

MLA

Safeguarding Policy



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Language
Ahead



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1. Our Safeguarding aims & policy

1.1 Context

MLA Move Language Ahead, runs short courses throughout the year and in a number of centres in the summer 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 Accustomed English or Work Skills 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 and adults at risk 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 and adults at risk 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 fully committed to the welfare and safeguarding of all children, young people and adults at risk across all our centres in England, Scotland and Ireland. Our practices follow the statutory guidance, national frameworks and legal duties relevant to each jurisdiction.

In England, MLA operates in line with *Working Together to Safeguard Children (December 2023)*, *Keeping Children Safe in Education (2024)* and the *Online Safety Act (2023)*.

In Scotland, our safeguarding responsibilities are guided by the *Children and Young People (Scotland) Act 2014*, the *National Guidance for Child Protection in Scotland (2021)*, the *Getting It Right For Every Child (GIRFEC)* framework, and the oversight of local Child Protection Committees.

In Ireland, we comply with the *Children First Act 2015*, *Children First: National Guidance for the Protection and Welfare of Children (2017)*, and the requirements set by Tusla – the Child and Family Agency.

Across all nations, MLA ensures that every student feels safe, supported and protected in all areas of our seasonal programme. The best interests of the child are the primary consideration in every action we take. MLA takes all reasonable and proportionate steps to protect children from harm, abuse, neglect, discrimination, online risks and degrading treatment. This includes meeting the digital and information-sharing duties outlined in the *Online Safety Act (2023)* in England and adhering to parallel online-safety and data-protection standards in Scotland and Ireland. We recognise our legal and moral duty to act on concerns immediately, to share information appropriately with safeguarding partners—including Local Authorities, Police Scotland, An Garda Síochána, Health Boards, Social Services and Tusla—and to uphold the rights, voice and welfare of every child at all times.

In line with the *Children Act 1989* (England), the *Children and Young People (Scotland) Act 2014* and the *Children First Act 2015* (Ireland), a child is defined as any person under the age of 18. MLA processes and retains safeguarding information in accordance with the *UK GDPR*, the *Data Protection Act 2018* and, where applicable, *Irish Data Protection legislation*, ensuring that all personal data is handled lawfully, securely and only for the purpose of protecting a child's safety and wellbeing. All retention periods comply with relevant statutory requirements for each jurisdiction. This policy should be read alongside our Staff Code of Conduct, Prevent Policy, GDPR Policy, and Sexual Harassment Prevention and Action Policy. Across all MLA centres, we recognise that children's voices, lived experiences and rights must shape our safeguarding culture and underpin all aspects of our practice.

1.3 Safeguarding Terminology

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

Contextual Safeguarding	<p>Considering the wider environmental and social contexts in which harm occurs where young people may be at risk outside the home, such as in peer groups, online spaces, public areas, accommodation settings or during off-site activities. For residential language schools, this includes risks during:</p> <ul style="list-style-type: none"> • excursions and free time • shared accommodation • peer group dynamics • online behaviour • interactions with the public <p>It emphasises creating safe cultures and environments around young people, not just focusing on family-based risks.</p>
Position of Trust	<p>A role where an adult has authority, responsibility or influence over a young person, creating an unequal power dynamic that could be exploited. Examples include teachers, activity leaders, group leaders, residential staff, coaches, or anyone supervising, caring for or instructing children/adults at risk.</p>
Abuse	Refers to any actions or situations which harm a person physically or emotionally.
Regulated Activity	Determines when an adult requires an enhanced DBS check with barred-list information in England, a PVG Scheme membership in Scotland, or Garda Vetting in Ireland—specifically for roles involving regulated work or day-to-day responsibility for the care and welfare of children.
DBS	Disclosure and Barring Service. Governmental body responsible for carrying out checks on the criminal record and barring lists of people in the UK.
PVG	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/adults at risk and protected adults cannot do regulated work with these vulnerable groups.
Disclosure	When a student (or staff member) informs a staff member of an incident or situation related to safeguarding that requires action.
DSL	<p>A role where an adult has authority, responsibility or influence over a young person, creating an unequal power dynamic that could be exploited. Examples include teachers, activity leaders, group leaders, residential staff, coaches, or anyone supervising, caring for or instructing children/adults at risk.</p>
DSO	Designated safeguarding officer at centre level. Acts as deputy to DSL trained at Advanced Safeguarding (Level 2) or Specialist Safeguarding (Level 3).
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 specific part of the UK. For Scotland and ROI this role is fulfilled by multiple agencies and allegations are handled via: Scotland: HSCP (Health and Social Care Partnership (HSCP) Children's Services) / Chief Social Work Officer / Police Scotland. Republic of Ireland: Tusla (Child and Family Agency) / Designated Liaison Person (DLP) / An Garda Síochána (Irish National Police Service).
LSCP	Local Safeguarding Children's Partnership: responsible for co-ordinating all work to safeguard and promote the welfare of children in the local area.
Prevent	UK government strategy to combat radicalisation from terrorism and other forms of extremism in various sectors, including education.
Low-level concerns	A concern about a staff member's behaviour—past or present—that does not meet the threshold for a formal allegation but may indicate a breach of the staff code of conduct or create a sense of unease. Low-level concerns must be reported, recorded and reviewed to help identify patterns and prevent harm.

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 in the last year) 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-hour Safeguarding protection in the form of Welfare Managers, Centre Directors, at Level 2 or Level 3 Safeguarding levels.

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 adults at risk 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 which is displayed in various areas throughout our centres can be found in part 9 of this Policy document 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 a collective responsibility for the safeguarding and wellbeing of all young people and adults at risk studying with us. All staff must be aware of and abide by this Safeguarding Policy, have read and confirmed their understanding of the full staff Code of Conduct and successfully completed basic awareness Level 1 Safeguarding training before commencing employment. All staff are made aware of their duties and responsibilities when it comes to Safeguarding children/adults at risk during the seasonal course and they must ensure that:

- The welfare of children/young people/adults at risk is of primary concern
- All children/young people/adults at risk, 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 school's 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 Lead and Cover Designated Safeguarding Lead 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 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, if appropriate/necessary, initially with the relevant 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 child/adult at risk 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 provides 24-hour Safeguarding support with centre level Safeguarding policies, procedures and trained managers. MLA also has several Head Office staff including trained Safeguarding Leads who are ready to support with any queries and can provide guidance on external support such as Government bodies and child support help lines.




MLA UK Head Office Staff

	<p>Specialist (formerly Level 3) Safeguarding trained DSL: Academic Manager – Ruth Marin (r.marin@mlaworld.com), +44 7448 509226 Cover DSL: Academic Coordinator – Josh William (j.william@mlaworld.com), +44 7466 477015 DSO: Operations Coordinators DSO: Academic Coordinators DSO: Assistant Academic Manager</p>
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MLA UK Centre Level Staff

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

UK Safeguarding

	<p>LADO's; Local Authority Designated Officer of Allegations Management Provides advice and management of allegations in the local council.</p>
	<p>In an emergency If you think a child is in immediate danger you should call 999.</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>

1.8 Managing Allegations Against Staff, Volunteers and Group Leaders

MLA is committed to ensuring that all adults working with children maintain the highest standards of professional behaviour. Any allegation or concern that a member of staff, volunteer or group leader has behaved in a way that may pose a risk to children will be taken seriously and managed in line with Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2024).

This procedure applies where it is alleged that an adult working for or on behalf of MLA has:

Harmed, or may have harmed, a child

- Committed a criminal offence against or related to a child
- Behaved in a way that indicates they may pose a risk of harm
- Behaved inappropriately towards children, including online behaviour
- Breached professional boundaries or the MLA Code of Conduct

Immediate Response & Actions

Any staff member or group leader receiving an allegation must take it seriously, make a factual written record, ensure the child is safe and report it immediately to the Designated Safeguarding Lead (DSL) or Centre Director. Staff must not investigate the allegation themselves. If a child is at immediate risk, emergency services must be contacted without delay.

The DSL will assess the information and if deemed necessary, within 24 hours, contact the Local Authority Designated Lead (LADO) for advice and direction. MLA will follow all LADO and police instructions.

If the allegation concerns the Centre Director, the Head Office DSL or Cover DSL must be informed.

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	
NSPCC Website states	<p>The UK's four nations – England, Northern Ireland, Scotland and Wales – each have their own child protection system. The main differences are as follows:</p> <p>England</p> <ul style="list-style-type: none"> Guided by Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2024). Local multi-agency safeguarding arrangements led by Local Authorities, Police, and Integrated Care Boards (ICBs). LADO (Local Authority Designated Officer) manages allegations against adults working with children. <p>Scotland</p> <ul style="list-style-type: none"> Governed by the National Guidance for Child Protection in Scotland (2021). Local safeguarding overseen by Child Protection Committees (CPCs). No LADO equivalent—allegations about adults are handled by Health and Social Care Partnerships (HSCP), Chief Social Work Officers, and Police Scotland. Uses the national wellbeing model GIRFEC (Getting It Right For Every Child) as the foundation for children's services. <p>Republic of Ireland</p> <ul style="list-style-type: none"> Operates under the Children First Act 2015 and Children First: National Guidance (2017). National child protection authority is Tusla – the Child and Family Agency. Organisations must have a Designated Liaison Person (DLP) who reports concerns to Tusla and liaises with An Garda Síochána (national police). Mandatory reporting applies to certain professionals ("mandated persons") under the Children First Act.
	<ul style="list-style-type: none"> 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
The Department for Education (DfE)	<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.
Education Scotland	<ul style="list-style-type: none"> Education Scotland will promote safe practice to protect children, young people and adults from harm, abuse and exploitation
Legislation and guidance	<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 service.

- placing a duty on local authorities and their partners to co-operate in safeguarding and promoting the wellbeing of children and young people

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.

Safeguarding of Children and Adults at risk: All children/young people/adults at risk 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).

Legal Information

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).

The DSL, Centre Director and Head Office team will consider LADO guidance and may implement protective measures such as increased supervision, temporary redeployment or suspension where necessary to protect children or the integrity of the investigation.

Depending on the nature of allegation, MLA will not carry out an internal investigation until authorised by the LADO/police. Internal investigations will follow MLA disciplinary procedures.

MLA will support the child and their family and ensure the accused adult is treated fairly and informed at an appropriate stage. They will be signposted to welfare support and reminded not to discuss the allegation.

Where an allegation is substantiated and results in dismissal or resignation, MLA has a legal duty to refer the case to the Disclosure and Barring Service (DBS) and inform the police if a criminal offence may have been committed.

MLA will keep clear, secure records of all allegations and decisions in accordance with UK GDPR and the Data Protection Act 2018. Records will be retained in line with statutory requirements and kept separate from personnel files.

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/adult at risk, 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/adults at risk 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;

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

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.

<p>2.</p> <p>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.</p> <p>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>The physical signs of emotional abuse may include:</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,</p> <p>Sudden speech disorders, Persistent tiredness, Development delay, either in terms of physical or emotional progress.</p> <p>Changes in behaviour which can also indicate emotional abuse include:</p> <p>Obsessions or phobias,</p> <p>Sudden under-achievement or lack of concentration,</p> <p>Inappropriate relationships with peers and/or adults,</p> <p>Being unable to play,</p> <p>Attention seeking behaviour, Fear of making mistakes,</p> <p>Self-harm,</p> <p>Fear of parent being approached regarding their behaviour.</p>
<p>3.</p> <p>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:</p> <p>Sudden or unexplained changes in behaviour e.g. becoming withdrawn or aggressive,</p> <p>Fear of being left with a specific person or group of people, Having nightmares,</p> <p>Running away from home,</p> <p>Sexual knowledge which is beyond their age or developmental level, Sexual drawings or language,</p> <p>Bedwetting,</p> <p>Eating problems such as over-eating or anorexia,</p> <p>Self-harm or mutilation, sometimes leading to suicide attempts, Saying they have secrets they cannot tell anyone about, Substance or drug abuse,</p> <p>Suddenly having unexplained sources of money,</p> <p>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:</p> <p>Pain or itching in the genital/anal area, Bruising or bleeding near genital/anal areas, Sexually transmitted disease,</p> <p>Stomach pains,</p> <p>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>Physical signs Physical of 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>
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(Reference: *Working Together to Safeguard Children 2023 Appendix A*).

Child-on-Child Abuse / Peer-on-Peer Abuse

MLA recognises that children can abuse other children and that this behaviour can occur in any setting, including residential and activity environments. Child-on-child abuse can take many forms, including but not limited to:

- physical abuse (hitting, kicking, shaking, etc.)
- bullying, including online and prejudice-based bullying
- sexual harassment and sexualised language
- upskirting
- harmful sexual behaviour (HSB)
- consensual and non-consensual sharing of nude or semi-nude images
- initiation/hazing behaviours
- emotional abuse, coercion or intimidation

MLA operates a zero-tolerance approach to child-on-child abuse. All concerns must be reported immediately to the DSL, who will assess the level of risk and take proportionate action. Children who display abusive behaviour may also require support as victims in their own right.

Where an incident involves sexual harassment, sexual violence or harmful sexual behaviour, the DSL will follow statutory guidance and, where necessary, make referrals to children's social care, the police, or both. Both the victim and the alleged perpetrator will be supported, with safety plans implemented as needed.

Harmful Sexual Behaviour (HSB)

(Including sexual harassment & sexual violence)

Harmful Sexual Behaviour refers to any sexual behaviour that is developmentally inappropriate, coercive, abusive, or harmful to oneself or others.

This includes:

- unwanted touching
- sexual jokes/comments
- sexualised bullying or harassment
- pressure to engage in sexual activity
- non-consensual image sharing (nudes/semi-nudes)

- online sexual coercion or exploitation
- any behaviour that may constitute a criminal offence

Immediate Response Procedure

When an incident involving sexual harassment, sexual touching, or sexual violence is reported:

- Take the report seriously, listen calmly, and avoid judgement.
- Reassure the child and avoid questioning beyond establishing basic facts.
- Record the disclosure verbatim and pass immediately to the DSL.
- Do not promise confidentiality.

The DSL will assess risk, implement safety measures, and consult statutory services as required.

The DSL will follow KCSIE 2024 ([GIRFEC](#) in Scotland and Children First in Ireland) guidance on:

- sexual harassment response
- immediate safety planning
- decision-making about police or children's social care involvement
- appropriate supervision or separation arrangements
- supporting both the victim and the alleged perpetrator

If the behaviour meets the threshold for a child protection response, the DSL will liaise with social care and police. Staff must never assume that "banter," "exploring sexuality," or "part of growing up" excuses or minimises harmful behaviour.

Child Sexual Exploitation (CSE) & Child Criminal Exploitation (CCE)

Child exploitation involves manipulation, coercion or control of a child to engage in sexual or criminal activity, often in exchange for something they need or want (e.g., affection, gifts, status, substances). Exploitation can occur online, in the community or during free time and excursions.

Indicators may include:

- unexplained gifts, money or new possessions
- secretive behaviour or sudden changes in peer groups
- going missing from activities or campus
- increased use of mobile phones or secrecy around online behaviour
- signs of physical injury or distress
- older individuals persuading students to go off-site

Any suspicion of CSE or CCE must be immediately reported to the DSL who will take advice from social care and the police as appropriate. MLA will ensure students are supervised appropriately and understand the rules around free time and off-site activity.

County Lines & Off-Site/Excursion Risks

County Lines activity involves criminals exploiting children to transport, store or sell drugs, often using coercion, intimidation or grooming tactics. Although MLA students are generally in the UK for a short period, they may still be vulnerable to exploitation during free time, excursions, public spaces or travel routes.

Staff vigilance should include:

- monitoring students speaking with unknown adults
- watching for attempts to lure students away from the group
- preventing unsupervised leaving of excursion sites
- ensuring students remain in groups and follow curfew procedures
- challenging unauthorised absence immediately
- Any concerns that a student is being approached, groomed or coerced by adults or peers associated with County Lines must be reported to the DSL without delay.

Online Grooming & Digital Risks in the Residential Programme Setting

Online grooming occurs when an adult builds an emotional connection with a child to exploit or abuse them sexually or criminally. In residential and international programmes, students may spend significant time online during free time, increasing their exposure to risk.

Forms of online grooming may include:

- adults contacting students via social media, messaging apps or gaming platforms

- attempts to arrange meetings off-site
- flattery, gifts, offers of money or attention
- requests for images or secrecy
- sexualised language or coercion
- recruitment into criminal activity (CCE)

MLA response expectations:

- Staff must report any signs of online grooming immediately to the DSL.
- Students must not engage with unknown individuals online while on programme.
- Staff must reinforce online safety rules to students, including reporting unwanted contact.
- Staff must never contact students on personal accounts and must not share personal details.
- Where online grooming is suspected, the DSL will seek advice from statutory agencies and take immediate safeguarding action.

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"> • Treat any allegation extremely seriously and act at all times towards the child as though you believe what they are saying. • 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. • Tell the child that they are right to tell you • Reassure them that they are not to blame • Allow the young person to speak without interruptions • Reassure the child that they are not alone and tell them what will happen next • Write down everything that is said and done. Record and date any facts verbatim (in the child's own words). • 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 • 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.

2.4 Record-Keeping & Logbook

Accurate record-keeping is essential to safeguarding at MLA. All concerns must be recorded promptly and factually and shared with the DSL, Centre Director and Welfare Manager. Records enable early identification of patterns, support decision-making, and ensure compliance with statutory guidance and UK GDPR.

MLA uses a comprehensive Incident Reporting procedure and keeps a log of all incidents. Staff must ensure entries are made as soon as practicable and full detail where the incident pertains to any of the following incident types:

a) Safeguarding

For recording:

- disclosures or allegations
- physical or sexual abuse concerns
- harmful sexual behaviour / child-on-child abuse
- concerns requiring LADO, police or social care involvement

Safeguarding entries must be factual, signed, dated and passed to the DSL immediately.

b) Welfare

For recording:

- homesickness, emotional distress
- minor medical or pastoral concerns
- wellbeing issues requiring monitoring

c) Behaviour

For recording:

- rule breaches and sanctions
- low-level behavioural concerns
- incidents that may escalate into safeguarding issues

Retention & Secure Storage

Safeguarding records: kept until the child is 25 or for 10 years after the final entry (whichever is longer).

Welfare and behaviour records: kept for 3 years, unless linked to safeguarding concerns.

All records must be securely stored in Digital logs: encrypted, password-protected and access-controlled.

Access Controls & GDPR Compliance

Access is strictly on a need-to-know basis in line with the Data Protection Act 2018.

logs: access limited to the DSL, Centre Director, Centre Welfare Manager and authorised Head Office staff.

Log information must not be copied, screenshot, emailed or shared outside authorised systems.

Information is shared externally only when necessary to protect a child or when required by law.

An example of one of our Logbooks:

Issue Tracking Template

MLA

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										
7										
8										
9										
10										
11										
12										
13										
14										
15										
16										
17										

2.5 Online Safety

MLA is committed to promoting safe and responsible use of digital technologies. Online safety is a core part of safeguarding, particularly in residential settings where students may spend significant time online. MLA follows KCSIE 2024, the Online Safety Act 2023 and Working Together 2023.

Key Online Risks

Students may be exposed to:

- Contact risks: grooming, unwanted contact, criminal exploitation.
- Conduct risks: bullying, harmful sexual behaviour, pressure to share images.
- Content risks: extremist, pornographic or inappropriate material.
- Commercial risks: scams, data harvesting, online fraud.

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.

Staff and GL Responsibilities

All staff must:

- Model safe online behaviour.
- Users bringing mobile phones into school should ensure that there is no inappropriate or illegal content on the device.
- Use only MLA-approved devices for photos or communication.
- Never store or share student images on personal devices.
- Never contact students via personal social media, messaging apps or gaming platforms.
- Intervene and report unsafe online behaviour immediately.
- Ensure students understand and follow online safety rules.

Online Grooming & Digital Exploitation

Staff must be alert to signs of grooming, including secrecy around device use, messages from unknown adults, pressure to meet off-site or requests for images.

Any concerns must be reported immediately to the DSL who will involve statutory agencies where appropriate.

Harmful Sexual Behaviour Online

HSB online includes sexualised comments, coercive messaging, sharing or requesting nude/semi-nude images, or sexual bullying.

All HSB concerns must be recorded and passed to the DSL, who will follow KCSIE procedures.

Online Expectations for Students

Students are briefed on induction to:

- Avoid sharing personal information online.
- Not add or contact staff or on any platform.
- Report unwanted contact, bullying or inappropriate content to staff.
- Use devices safely and responsibly in line with centre rules e.g. students must not secretly take photos or videos of any person on site and are made aware of possible sanctions for doing so.

Use of Devices

MLA may restrict or supervise device use in classrooms, bedrooms or during activities.

No filming or photography is permitted in accommodation areas or bathrooms.

Filtering, Monitoring & Wi-Fi

Where possible, MLA collaborates with venue providers to ensure appropriate filtering and monitoring systems are in place.

Staff Use of Personal Devices

- Personal devices must not be used for leisure/personal purposes while supervising students. Mobile devices should only be used for necessary communications or other uses which may be required to ensure successful delivery of MLA programmes and activities.
- 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.
- Staff may not allow students to use their personal devices.
- Safeguarding information must never be stored on personal devices.
- Personal cameras should not be used in any MLA school to take images of any students. 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.
- 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.

Reporting Online Concerns

- Any online concern—grooming, bullying, harmful content, sexual behaviour, extremist material—must be reported to the DSL and recorded in the safeguarding log.
- Data Protection
- MLA processes all digital information in line with UK GDPR and the Data Protection Act 2018, ensuring secure storage, limited access and lawful processing.

Education & Awareness

- MLA provides online safety guidance at inductions for both staff and students to promote a safe digital culture across all centres.

2.6 Bullying, Peer-on-Peer Abuse and Harmful Behaviours

MLA is committed to providing a safe, respectful and inclusive environment. Bullying of any form—whether physical, verbal, emotional, sexual, or online—will not be tolerated. This includes all forms of child-on-child abuse, as required under KCSIE 2024, and applies to behaviour that occurs on-site, off-site, online, or in residential settings.

Bullying behaviour may be individual or group-based, repeated or one-off, and can be carried out in person or digitally. All concerns must be taken seriously and reported immediately to the DSL.

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

MLA operates a zero-tolerance stance on all bullying and harmful peer behaviour. Our response prioritises:

- immediate safeguarding for the child who has experienced harm
- fair, proportionate management of the child who has caused harm
- transparent, factual recording in the correct logbook
- communication with parents/carers where appropriate
- involvement of statutory agencies when required

We recognise that children who cause harm may also be vulnerable or experiencing their own difficulties. Support will be provided to all parties.

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 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.

Outcomes and Sanctions

MLA staff will follow procedures of centre rules set out at induction and in staff handbooks, these may include but are not limited to:

- 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

2.9 Appropriate Contact & Use of Reasonable Force

Guidelines for Appropriate Contact

As a general principle, staff must not make gratuitous physical contact with students of any age. However, this does not constitute a 'No Contact' policy, because a complete ban on contact could stop staff from fulfilling their duty of care or from taking necessary action to prevent a student from being harmed. For example, contact may be required when staff need to provide medical attention, assist a student in distress or give help to students with disabilities. In general:

- Staff should avoid being alone with a student under the age of 18 (e.g. in a room with a closed door or in a car) – where possible leave the door open or ask another member of staff to be present
- Staff must avoid sharing personal contact details, private information or opinions with students

Some students may form an attachment to one teacher or other member of staff and seek their attention, approval or other form of contact in excess of normal school duties. Staff may feel they should provide extra attention to a needy or disadvantaged student, or feel obliged to keep a student's confidence and protect their privacy. However, all staff must report any unusual behaviour, concerns or incidents immediately to the Welfare Manager, Centre Director or Designated Safeguarding Lead.

The Designated Safeguarding Lead will follow defined procedures for identifying the risks and establishing the student's level of need and be able to provide assistance through existing pastoral and academic support structures, counselling, and/or liaison with the student's family as required, to ensure the student's welfare.

Students with disabilities who require physical assistance should either be accompanied by a designated carer or, where MLA has agreed to provide physical assistance to the student during school activities, the degree and type of assistance will be predefined in the risk assessment. This may include staff receiving specific training in correct lifting and handling techniques and will be with the full agreement of the staff and student involved as part of the assessment process.

Guidelines for Physical Restraint

There may be times when staff have to intervene physically in order to restrain students and prevent them from coming to harm. Such intervention will always be the minimum necessary to resolve the situation. MLA follows the guidance given in the Department of Education's 'Use of reasonable force Advice for head teachers, staff and governing bodies.' All members of school staff have a legal power to use reasonable force to prevent students from hurting themselves or others, from damaging property, or from causing disorder.

MLA has a legal duty to make reasonable adjustments for disabled students and those with special educational needs where the use of reasonable force may be foreseeable.

Any incident involving the use of force or leading to staff restraining a student (or other staff / public) must be reported immediately to the Centre Director and DSL and recorded on the Safeguarding Incident Log.

2.10 Searching, screening and confiscation

Searches without a student's consent

Authorised centre staff (the centre management team) may search a student's bags, belongings, or school-provided accommodation without consent where there are reasonable grounds for suspecting that the student is in possession

of a prohibited item as defined in the Education Act 1996. Prohibited items include:

- weapons, e.g. knives
- alcohol
- illegal drugs
- stolen goods
- pornographic images (of any kind, eg tabloid topless pictures and 'lads' mags' as well as extreme adult material)
- fireworks
- anything that has been, or is likely to be, used to cause injury or commit an offence
- anything banned in the school rules

These items can be confiscated.

Complaints about a search

If a student is unhappy with a search, they can speak to the Centre Manager. If they're not satisfied, they can find the Complaints Procedure in the Student Handbook.

3. Centre Rules

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 & Vaping

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. Whilst it is not illegal to use e-cigarettes or vapes indoors in the UK, it is an offence to sell these items to anyone under the age of 18. MLA students who are under 18 MUST not attempt to purchase or keep vapes in their rooms and/or use them in any areas of the centre during the programme.

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).

4. Welfare Provision

4.1 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. We take the welfare and care of everyone involved with MLA seriously.

We have clearly stated rules and procedures in place to support everyone:

Welfare Manager & MLA Staff	<ul style="list-style-type: none"> • 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. • This friendly, helpful, supportive Welfare Manager is based in the centre office and is always pleased to help students. • 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 have received official background checks to confirm their suitability in working with children
Group Leader	<ul style="list-style-type: none"> • 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. • 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. • Logistical support and accompaniment: Ensure that students follow schedules and programmes. • Communication with parents: Keep parents updated on their children's conditions and well-being, addressing any questions. • Coordination with local staff: Collaborate with the summer camp staff to ensure that activities run smoothly.

	<ul style="list-style-type: none"> • Emotional and disciplinary support: Provide emotional support to students, intervening in case of conflicts or inappropriate behaviour. • Monitoring of health and well-being: Ensure that students follow medical instructions and that any allergies or health issues are adequately managed. • Documents and permissions: Ensure that all documents, such as passports, medical authorisations, and travel permissions, are in order and easily accessible.
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- adult ratios are met and any potential risks are prevented. • Students must wear their MLA ID lanyard, 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 • Students under the age of 16 are not placed in classes with students of 18 years or older
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.
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. In some cases a prepaid card may be given in place of a packed meal. • Night patrol staff supervise the centre site and accommodation during the night • Students under 16 will be housed in separate accommodation from students ages 18.
Fire Safety	<ul style="list-style-type: none"> • Fire safety training is provided to all individuals in MLA centres. • 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	<ul style="list-style-type: none"> • All incidents, missing students, welfare or safeguarding concerns should be logged. • Each case should be recorded, as well as follow up actions to be taken and who has followed up on the point recorded.

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:

Security on Site	<ul style="list-style-type: none"> • 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: <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.
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Fire and Fire Practices	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 carryout fire drills within approximately 24 hours of new students arriving on-site.
Emergency Procedures Activities & Excursions	
Missing Student	<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 onlinesystem. 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>
Risk Assessments	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.

4.2 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 and conduct regular headcounts and register checks of groups at key transitions. Students cannot leave the campus/centre without supervision. Also note the following:

Students: 11 – 17 years old

MLA Ratios on excursions and activities	1:15 on-site
Free Time ONLY on excursions	<p>Students aged 11-12 are NOT allowed unsupervised free time and must stay with their Group Leader or an Activity Leader.</p> <p>Students 13 or older may be given some free time on the excursions. It is important that they are always in a minimum group size of 4 and observe the rules explained at the beginning of their free-time period.</p>
Lessons	Oldest and youngest student can differ by a maximum of three years. Maximum class size 18 students
Activities	Students participating in the same sports should not differ in age by more than three years.
Accommodation	1:20 for students aged 12–17, and 1:15 for students under 12
Risk Assessments	Risk assessments for all parts of the programme.

The Centre Director, MLA Staff and Group Leaders are collectively responsible for the supervision of all students at all times. Everyone is responsible for safeguarding and promoting the welfare of children and must adhere to, and comply with this policy.

- All students are under supervision by centre staff who are easily accessible.
- Students cannot leave the campus/centre without supervision.

While on excursions, students may be allowed some unsupervised time:

- Students aged 11-12 are NOT allowed unsupervised free time.
- Students aged 13-17 years are allowed free time in groups of 4 provided they follow the rules and instructions to enjoy their free-time, please ensure your students pay attention when briefed:
- Groups of 4
- Respect check-in points and times
- Have your phone fully charged
- Wear the MLA lanyard and backpack

While on campus, students MUST be supervised at all times:

- MLA Staff are responsible for students during excursions, lessons, activities and meals.
- Group Leaders are responsible for their students at the accommodation building, on excursions and lesson breaks.
- MLA Staff will be available, easily identifiable and ready to assist on campus. Please liaise with the Centre Director to ensure student safety on campus.

What can Students do in their supervised Free- Time? What happens when students have some non-scheduled time, for example after an activity or an excursion, they have one hour before dinner. What can they do?

In their non-scheduled time on campus, students are under the supervision of their Group Leader. If accompanied by a Group Leader, students can:

- Go to rooms.
- Stay in Common Rooms.
- Sit outside on the grass or in a student area where they are visible to staff.
- However, even if not specifically assigned, MLA staff are always easily accessible and have duty of care while on campus.

Can students leave the campus?

- No. If they need to leave the campus for any reason, speak to the Centre Director.

5. Prevent Duty

MLA understands its responsibilities under the Counter-Terrorism and Security Act 2015 and is committed to reducing the likelihood of individuals of any age being radicalised or drawn into terrorism. MLA follows the Prevent Duty Guidance 2023, including updated terminology such as “extremist ideology” and “mixed, unstable, or unclear ideology.” Prevent is a safeguarding obligation, and all staff, subcontractors, and students play an active role in maintaining a safe environment.

Roles and Responsibilities

- MLA has an appointed Prevent Lead, trained to manage Prevent concerns and liaise with external agencies.
 - Prevent Lead: Academic Manager, Ruth Marin – r.marin@mlaworld.com | +44 7448 509226

Training & Awareness

MLA provides Prevent training to all staff through a combination of online modules and face-to-face briefings. Training ensures staff can:

- recognise indicators of vulnerability to radicalisation
- understand terms such as extremist ideology, terrorist ideology, and mixed/unclear/unstable ideology
- know how to record and report concerns

- identify students or staff who may be at risk

Subcontractors, contractors, and external activity providers must also be aware of MLA's Prevent expectations and demonstrate compliance with the Prevent Duty while working with or near MLA students.

Promoting British Values

MLA promotes the core British values of democracy, rule of law, individual liberty, mutual respect and tolerance through:

- arrival induction materials
- syllabus content including a British Values lesson
- classroom activities, excursions, and cultural sessions
- staff modelling inclusive and respectful behaviour

Reporting Prevent Concerns

Any concern that a student, staff member or contractor may be vulnerable to radicalisation, expressing extremist ideology, or showing signs of being drawn into terrorism must be reported immediately to:

- the Centre Director, and/or
- the Prevent Lead or Cover Prevent Lead

Recording Requirements

All Prevent concerns must be:

- documented in the Safeguarding Log,
- reported to the DSL,
- considered for referral to external safeguarding partners where appropriate.

Concerns must be recorded factually, promptly and confidentially, in line with MLA's Safeguarding and Record-Keeping Policies.

For full procedures, staff should consult the MLA Prevent Policy available on the website or contact the Prevent Leads for guidance.

6. MLA Staff Recruitment and Induction Policy

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

6.2 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. Child Protection Record of Concern

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

STUDENT'S DETAILS	
Full Name:	Date of birth:
Gender:	Nationality:
Course Start and End date: From To	Student ID
Agent's details:	Group Leader details:
Preferred language of student:	Is there any type of language support needed to talk to the student? Yes <input type="checkbox"/> No <input type="checkbox"/>
<p>Does the student know the form is being completed?</p> <p><input type="checkbox"/> Yes What did they say?</p> <p><input type="checkbox"/> No Why not?</p>	
<p>Why are you concerned about this student? Please provide a description of any incidents/conversations and the dates when they occurred. You must clarify what the fact is and the hearsay. You must not ask leading questions and/or try to investigate the concern yourself.</p>	
<p>If an allegation of abuse has been made please provide about the alleged abuser:</p> <p>Full name: Position:</p>	
<p>Does the student have any visible injury, or have they told you they have been injured?</p> <p><input type="checkbox"/> No</p> <p><input type="checkbox"/> Yes Has medical advice been sought? <input type="checkbox"/> No <input type="checkbox"/> Yes</p>	
YOUR DETAILS	
Full name:	Name and position this record was handed to:
Position:	Date and time the person above received this record
Your signature:	Signature of the person receiving the record:

8. 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.

ABUSIVE BEHAVIOUR

FOR STUDENTS AND ADULTS

MLA



All members of the MLA centre have a right to expect that their school is a safe place in which to work and learn. We have a **zero tolerance approach to violence, threatening behaviour and disorderly conduct**, including abuse in all forms against school staff or pupils. The Public Order Act 1986 defines 'disorderly conduct' as: **verbal abuse, threatening, abusive or insulting words or behaviour, or any disorderly behaviour in which a person is caused alarm, harassment or distress**. 'Threatening behaviour' is when a person fears that violence or threat of violence is likely to be provoked.

Where any abusive behaviour does occur, **actions will be taken** to deal with the person/s concerned. Such measures could include:

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 a pupil's parents
- Sending the pupil home
- Banning the individual from any future dealings with MLA Move Language Ahead
- 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 Move Language Ahead
- Contacting the Police

9. 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, young people and adults at risk. All students should expect to feel safe within all areas of our 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:



SUPERVISION

- Students are welcome by MLA Staff at the airport
- Night patrol staff
- Supervision of classrooms and all areas accessible to students
- 24hr emergency contact number
- Students are not permitted to leave the centre unaccompanied
- Students must wear a lanyard for identification purposes
- Students must carry the MLA emergency card

WELLBEING

- Welfare Manager on campus responsible for the pastoral care of each student
- MLA Medical Staff based on site
- First aiders
- Venue Fire Marshalls and fire safety training

RECRUITMENT

- MLA Staff are trained to keep the children safe and have at least a level 1 Safeguarding certificate
- MLA Staff will have an enhanced DBS or PVC check to ensure their suitability to work with children
- MLA Staff have at least 2 satisfactory references verified
- MLA Staff are committed to promoting the welfare of students and adhere to, and comply with the MLA Safeguarding Policy

RISK ASSESSMENTS

- All areas of the programme are risk assessed, including excursions and free time
- Supervision 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:

- Always treat any allegation extremely seriously and act towards the child as though you believe what they are saying.
- Try not to be alone with the child but if there is no-one else around, please ensure the child is near an open door.
- Tell the child early on that you may have to share what they are telling them with someone.
- Be honest about your own position, who you must tell and why.
- Tell the child that they are right to tell you.
- Reassure them that they are not to blame.
- Allow the child to speak without interruptions.
- Reassure the child that they are not alone & tell them what happens next.
- Write down everything that is said and done: Record and date any facts.
- Inform the Welfare Manager or Designated Person immediately: 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 ASAP.
- Follow up with the Welfare Manager/Designated Person about what actions were taken and ensure that the issue was addressed.

DON'T:

- Make any promises you can't keep such as promising confidentiality.
- Interrogate the child/adult at risk. 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.

DESIGNATED SAFEGUARDING LEAD (DSL)

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COVER DSL

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10. 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

The Professionals Online Safety Helpline: saferinternet.org.uk/helpline/professionals-online-safety-helpline

The Revenge Porn Helpline: 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

Prevent:

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

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Date of Next revision: December 2026

THANK YOU!

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