

# SAFEGUARDING POLICY

Last update: July 2018

## Introduction

This policy has been drawn up with an aim to follow the relevant and updated legislation and guidance relating to Safeguarding. Documents consulted include but are not limited to:

GDPR Data Protection Act 2018  
The Children and Families Act 2014  
Safeguarding Vulnerable Groups Act 2006  
The SEN Code of Practice 2015  
The Equality Act 2010  
Working Together to Safeguard Children 2015  
Keeping Children safe in Education (2018 in effect in September)  
The Sexual Offences Act 2003  
The Care Act 2014  
Education Act 2011  
The Prevent Duty 2015  
The Disability Discrimination Act 1995

## Safeguarding

Having a Safeguarding Policy in place means building relationships of trust, reducing risks, promoting safeguarding awareness within the school and having clear procedures in place in case something goes wrong.

Our duty of care means that all staff and group leaders have a responsibility to protect under-18s and vulnerable adults from emotional abuse, physical abuse or any other physical harm, sexual abuse and neglect. All staff have the responsibility to safeguard under-18s and vulnerable adults, be vigilant and report concerns, including small ones, or allegations. All staff must know who to contact both within and outside of Link School of English.

## Policy Availability

The Safeguarding Policy is available in the Link School of English office and on Link School website ([www.linkschool.co.uk](http://www.linkschool.co.uk)). Link School staff are required to sign a declaration that they have read, understood and will adhere to the policy.

## Code of Practice

Link School of English is committed to creating a safe environment in which everyone, including Link School students, staff and visitors, can feel comfortable and secure while participating in any of the Link School of English activities within or outside the school premises. All Link School staff must at all times show respect and understanding for the individual's rights, safety and welfare, and conduct themselves appropriately. Students are expected to look after each other and treat everyone respectfully. Students are encouraged to feel comfortable with raising any concerns with their teachers. All Link School staff must report any abusive behaviour. Not reporting abusive behaviour will be treated as equal to the abuse itself.

All Link School students should be dressed appropriately for classes and other activities and should not wear any clothes that would offend anyone, e.g. clothes that are too revealing or T-shirts with offensive slogans or images. If you see anyone who is dressed inappropriately or is wearing something which may cause offence, please speak to them, or ask a member of staff of the same gender as the student to speak to them.

Bullying is against the Link School rules. Link School staff should be particularly sensitive to the possibility of under-18s and vulnerable adults being bullied. Ensure that all students treat others with respect and do not allow students to talk to one another in an inappropriate way even if they say it's just a joke or they do not really mean it. Any bullying behaviour must be immediately reported to a member of the management team.

### Student Population

Link School of English caters to a variety of [students from different countries](#). As this is an international environment it is important staff are aware of the safeguarding issues, procedures and policies that are in place. This policy encompasses all students who enrol in the school; however attention needs to be drawn to the more vulnerable members of the student population who are protected uniquely by law.

The majority of students attending [courses](#) at Link School of English are 18 and over, but we do also accept students from the age of 16. We have a duty of care towards all our students, especially those under the age of 18 and any vulnerable adults.

### Under-18s

We accept students on group courses from the age of 16. Individual students can take [1-2-1 lessons](#) from the age of 12. In such cases their parent or legal guardian must remain in the room at all times.

Link School of English will ask parents sending a student of 16 -17 to study with us to sign an agreement noting that their child will be in a primarily adult environment. All students under 18 must submit a completed Parental Consent Form before they start their course.

All students under the age of 18 must present a letter from their parents/guardians giving permission to travel and the name of the person they are staying within accommodation.

The identity of parents of students under-18s must be verified.

## **Vulnerable Students**

Link School of English accepts applications from students with learning difficulties and disabilities where it is practicable and reasonable. In order to create a suitable programme 'reasonable adjustments' will be made in line with expectations set out in the SEN Code of Practice (2015) and relevant training provided to staff.

As an education provider we need to state clearly the extent of the support we can provide before the student joins the course. However, we reserve the right to refuse applications when we feel that the necessary support is beyond our means. In cases where a student's disability and medical/psychological condition has not been declared or has been significantly underestimated and is impeding their performance or that of their class, Link School of English may reassess the student's ability to continue on the course. This will normally occur in exceptional circumstances and only after investigation and an official meeting has been held, as stated in the SEN Code of Practice (2015). If the school is unable to make the necessary adjustments or provide an equitable or safe service as per the Equality Act (2015) students will be provided with the names of alternative education providers who might better meet their needs.

## **Safeguarding Team**

The following people are members of the school's Designated Safeguarding Team or as will be referred to later as the DST. These are the members of our organisation who are responsible for safeguarding, welfare and well-being in the school. Under no circumstances should staff or external contractors deal with issues in this area alone without first consulting the team.

### **Designated Safeguarding Lead**

Responsibilities:

- To ensure all staff, subcontractors and representatives receive the relevant training.
- To work with the school's Designated Safeguarding Officer.
- To investigate and deal with any major safeguarding incidents brought to their attention by the Designated Safeguarding Officer.
- To make students aware of their rights and responsibilities relating to safeguarding.
- To report to and liaise with the local Safeguarding Children Board and Prevent Engagement Team when required.
- To ensure the Prevent Duty is adhered to and that all cases involving vulnerable adults and under-18s are dealt with appropriately.

## Designated Safeguarding Officer

### Responsibilities:

- To receive, record and investigate safeguarding incidents reported by staff, sub-contractors and representatives.
- To cater to the welfare of students by offering support and advice.
- To liaise with the Designated Safeguarding Lead on matters relating to safeguarding and welfare.
- To ensure that accommodation provided to under-18s and vulnerable adults adheres to best practice in regards to legislation relating to welfare and safeguarding.
- To ensure all students and staff behave appropriately.

## Teachers

### Responsibilities:

- To be alert to any signs or instances of concern and to report these to the Designated Safeguarding Officer.
- To ensure they keep up to date on training relating to safeguarding.

## Safer Recruitment

Link School of English is committed to a safer [recruitment](#) process. The management team must make decisions on staff suitability based on facts, including qualifications, DBS checks, identity checks, reference checks, the person's right to work in the UK and interview information.

The management team need to be aware of people who should not have substantial access to under-18s or vulnerable adults and who often actively seek roles in which they would be in a position of trust. Reference requests will ask applicants for any reasons as to why they should not be engaged in situations where they are responsible for, or have substantial access to under-18s.

For roles with significant access to under-18s an enhanced DBS check is required. Any gaps in the CV must be explained satisfactorily. We also request employees to declare any criminal convictions. New staff who start work before their DBS check has arrived will be allowed to take up their role; however, they will be barred from being left alone with any under-18s until a clear DBS check can be verified.

Criminal records from overseas can not be obtained by the DBS, therefore any UK resident who has lived outside the UK in the last five years for six months or more will be required to undergo a police check from their previous country of residence.

Anyone who has a previous criminal conviction or who may have Prohibited Orders placed on them warranting their appearance on the DBS Barred List or being identified as individuals sanctioned in EEA member states will automatically be excluded from working

with under-18s. This disqualification from service is based on the Protection of Children Act 1999.

Link School service providers such as taxi companies or tour providers must provide written evidence that their staff have undergone satisfactory DBS disclosure within the last 3 years.

In addition, all adult members of any homestay who wish to host under-18s must also undergo a DBS check before they are able to start hosting them.

## **Safeguarding Training**

Staff training must be done within the first three months of employment. The school provides training in the following areas: safeguarding, bullying, prevent.

1) Safeguarding in schools

<http://www.prosperoteaching.com/free-accredited-online-safeguarding/>

2) Bullying and SEND

<https://www.anti-bullyingalliance.org.uk/tools-information/schools-and-teachers/free-cpd-online-training>

3) Prevent Duty: Radicalisation and e-safety

<https://www.foundationonline.org.uk/course/index.php?categoryid=14>

Staff can access these websites for free completing the modules mentioned above. Once training has been completed, staff are asked to e-mail their certificates to the Designated Safeguarding Lead.

## **Safeguarding Young People and Vulnerable Adults**

### **Staff responsibilities On the Premises**

[Link School of English](#) guidelines for ensuring a safe and secure environment within the school premises:

#### **Avoiding accidents**

- Ensure that all school infrastructure and furniture is secure, e.g. if you notice that any of the chairs or desks are in need of repair or replacement, put them out of use immediately and inform a member of the management team
- Electrical cables need to be covered and positioned in such a way that they would not cause anyone to trip over them

- If students pose a risk to themselves, other students or anyone else, they should be asked politely to stop immediately
- Nobody is allowed on the roof!
- If any student is seen to have an object that could be potentially harmful to the student or to anyone else (e.g. a knife) you should politely ask the student to hand it to you and report the incident to a member of the management team. They will decide what further action to take.
- A weekly list of under-18s in school is created and distributed to all relevant staff
- All Link School staff should be aware of which members of staff are trained in First Aid and where they can be found in the event of an accident

### **Alcohol, tobacco and illegal drugs**

- Students are informed about the law regarding alcohol and tobacco during their induction on day one (please refer to the start-of-the-course information list)
- Students under the age of 18 should not smoke or use alcohol while under the care of the school. If a student is known to be under the age of 18 and is seen smoking or using alcohol they should be asked to stop.
- Adult students attending courses or social activities together with under-18s must not supply alcohol to the under-18s
- Social activities involving alcohol are for students aged over 18 only. Activity leaders need to take appropriate care to ensure that younger students do not attend.
- Link School of English has a zero tolerance policy on drugs. If any student is found to be taking drugs, they will be sent home immediately, they may be denied a place on the course without a refund and the Police may be informed.

### **Fire safety and evacuation**

- Students are informed of the fire exits and evacuation procedure during their first day at the school. Please check periodically that students understand what to do in the event that the school needs to be evacuated.
- Ensure that nothing is blocking the fire escapes and passageways. Should you see anything, such as a desk or a wrongly parked car blocking an escape route remove it if you can, or report it to a member of the management team.
- All Link School staff are responsible for ensuring students evacuate the building safely in the event of a fire alarm. All teachers must take their student registers and check that all students are present.
- Anyone with mobility issues may be regarded as being vulnerable in the context of having to evacuate the school premises. Such person may require a Personal Emergency Evacuation Plan (PEEP).

### **Staff Responsibilities in the classroom**

- All students are expected to attend [classes](#) and be on time every day. This is particularly important for under-18s and vulnerable adults. Link School staff need to

know where the under-18s and vulnerable adults are during school hours. For this reason, if an under 18 or vulnerable adult is absent, please report this fact to the school office within 30 minutes from the start of the lesson so that the student or student's home can be called. If you are a leader of a social activity taking place outside of the school premises and lose a student, please call the school from your mobile phone to inform us that an under 18 is absent.

- Link School teachers must check that the materials they use in the classroom will not be harmful in any way to under-18s.
- Under the Education Act (2011) educators are permitted to search students and confiscate harmful objects such as weaponry or delete unlawful data from students' phones, e.g. older students taking photographs of under-18s or vulnerable adults without their and their guardian's knowledge or consent. Several protections are recorded in Safeguarding Vulnerable Groups Act (2006). However, it is advised that staff consult the DST first.
- Confiscated items should be taken to the DST and recorded. Deleted items should also be recorded.
- The new GDPR Data Protection Act (2018) allows schools to store visual and audio records of students but with restrictions. Please consult the DST before conducting a lesson that requires you to film a student or record their voice.
- If students ask to have a photograph taken as a class or individually with you included, please consult the DST first especially if the photograph is on the school premise, it shows the school brand and is going to be placed on social media.

## **Safeguarding Young People and Vulnerable Adults during the Social Programme Activities**

Events on the [social programme](#) may include: art classes and other types of classes, visits to museums, theatres and other tourist attractions in London or day excursions to other towns. The social programme activities may take place during the day, evenings or weekends.

Parents/guardians of fewer than 18s need to give permission relating to any off-site or extra-curricular activities.

Guidelines for activity leaders:

- Some social activities are only for students who are 18 or over and ID may be required. If an under 18 goes missing, Link School staff should ring the school or emergency phone holder immediately.
- Social activities leaders should be aware of the potential risks for the activity they are leading. Activity leaders must read the related risk assessment and instructions related to the Social Programme activity they are about to lead and sign the related document to declare they have read and understood them.
- The Social Programme Organiser ensures that the following staff to student ratios are met: afternoon and evening excursions 1:20; full-day excursions 1 staff member per coach, with no more than 20 under-18s per coach.



- For all social programmes, activities leaders must have a list of names of all students in their group. Where possible they should also have mobile phone numbers of students under 18. Activity leaders must be issued with a school mobile phone for activities taking place outside of the school premises.
- During social programme activities in which students have free time to themselves, those under 18 should not be left on their own. Under-18s should be told to stay in groups of at least 3, should have a written copy of the group leader's mobile phone number to call in case of any problems. They should also have a written copy of the school emergency number if they are unable to contact the group leader. Ensure that all students know where and at what time to meet the group after their free time.
- While using public transport the group leader should ensure all students stay together. For larger groups there should be two group leaders - one should take the lead while the other stays at the rear to ensure no students are left behind. Group leaders need to do a head count at every change of transport to ensure no-one is missing. Where possible, inform students which station or platform the group will be using in case they lose the group.
- In case of a terrorist attack follow the RUN, HIDE, TELL advice
- It is the responsibility of the activity leader to be aware any potential danger in the environment that they are taking students into.
- Group leaders are encouraged to take photographs of school excursions. All students need to give their consent to their image being used for publicity. It is recommended to avoid taking photographs of under-18s as photos of under-18s can only be used if their parents have given their consent.
- It is the responsibility of the activity leader to ensure that all under 18s return safely to Link School of English or Ealing Broadway/North Ealing stations. No under-18s may leave the group.

## Safeguarding Young People and Vulnerable Adults in Accommodation

General rules for placing students in [accommodation](#):

- All students under the age of 18 are placed in homestays. All adult members of hosting families are required to have an up-to-date DBS check.
- Students under 18 are not placed in a homestay with other students who are over the age of 18
- Parents of under-18s need to complete parental consent forms. Curfew times are 10 pm Sunday to Thursday and 11 pm Friday and Saturday. Parents may stipulate they wish their child to have an earlier curfew time, but not a later one.
- Under-18s are never placed in accommodation with single hosts of the opposite gender.
- The age of any children in the homestay family is taken into consideration. For example, a sixteen year old girl will not be placed in a homestay where there are boys of a similar age.
- Homestay families are given guidance on hosting under-18s and are aware of procedures in case of problems.
- Homestay families and under-18s have each others' mobile phones and the emergency number of the school.



# Recognising Safeguarding Issues in a Diverse Environment

Multiple high risk issues can occur in a diverse environment. It is the school's and staff's responsibility to remain vigilant in identifying these issues and reporting their concerns in line with the school's Safeguarding procedures.

While abuse of under-18s or vulnerable adults at Link School of English is unlikely, we should not assume that it may never happen. Our duty of care includes watching out for signs of potential abuse. **The four main types of abuse are:**

- **Physical**
- **Sexual**
- **Emotional**
- **Neglect**

This list is not exhaustive and other forms of abuse that **may** occur in this setting.

## Definitions of abuse

### Physical Abuse

Physical abuse may include: hitting, kicking, slapping, pushing, undue restraint, misuse of medication or inappropriate sanctions.

Signs of potential physical abuse:

- Bruising, burns or other injuries not consistent with the explanation given
- Flinching when approached or touched
- Withdrawn behaviour
- Wearing clothes to cover injuries, e.g. long sleeves even in hot weather

### Sexual abuse

Sexual abuse may include: inappropriate physical contact, taking images of a sexual nature of under-18s or vulnerable adults or sexual acts to which they did not or could not consent.

Signs of potential sexual abuse:

- Promiscuous behaviour
- Becoming withdrawn
- Nightmares, sleeping problems
- Attention-seeking behaviour
- Changes in eating habits
- Fear of particular places or people

## Psychological abuse

Emotional abuse may include: threats of harm, isolation or abandonment; humiliation either blatant or subtle; isolation; denial of affection or contact, abandonment, intimidation, verbal abuse or bullying; irrational or unreasonable withdrawal of social network.

Signs of potential emotional abuse:

- Withdrawal or aggression
- Sudden speech disorders
- Fear of making mistakes
- Neurotic behaviour (rocking, hair twisting)
- Self-harm
- Insomnia or tiredness
- Change in appetite
- Easily coerced, personal space is easily invaded and unaware of individual rights
- Distressed when left in closed spaces
- Excessive fear of loud sounds or particular noises and paranoia
- Inappropriate clothing
- Tearfulness

## Neglect or self-neglect

Neglect and acts of omission may include: negligence through risk-taking, failure to access medical care or services, failure to give prescribed medication, poor nutrition or lack of heating.

Signs of potential neglect:

- Poor personal hygiene
- Abuse alcohol or drugs
- Inability to recognise boundaries of acceptable behaviour
- Begging or stealing food
- Aggressive or anti-social behaviour
- Living in unsanitary conditions leading to infections or diseases as a result
- Insufficient funds to support basic needs or living
- Malnutrition
- Lack of medical aids e.g. braces or glasses

## Radicalisation and Extremism

Link School of English is a multicultural study and work environment which aims to facilitate international and intercultural exchange. We believe in acceptance and tolerance of a range of views students may encounter in such an environment. While we encourage our students to share their own views and beliefs, they should always respect the core British values of

democracy, the rule of law, individual liberty, mutual respect and tolerance of those of different backgrounds and beliefs.

In some instances it may occur that students have been exposed to extremist views or are vulnerable to being radicalised. Any discrimination, extremist views, derogatory language, displayed by students or staff will always be challenged and dealt with in line with the school policies.

The Prevent Duty (2015) encourages staff to create an open space for students to debate controversial issues. However, it does also state that they assist students in developing resilience to extremist views.

Although there is no specific way to identify whether students have been radicalised Link School staff should be alert and have a duty to report to the DST any of the following:

- Disclosures by students of their exposure to the extremist actions, views or materials in their homes or community groups
- Display of any content promoting extremism or terrorism
- Use of extremist or “hate” language, calls to exclude others or promoting violence
- Students accessing extremist content online
- Changes in behaviour or friendship
- Students expressing opinions drawn from extremist ideologies or narratives
- Intolerance of difference of any kind - secular or religious, nationality, gender, sexuality, race, colour, disability or culture
- Anti-Western or Anti-British views
- Students expressing concern that they are being bullied into joining an extremist group
- Students who have been ostracised by their peers because they will not share extremist views
- Students being befriended or coerced by students known to have extremist views

Examples of terrorist material:

- articles, images, websites, social media posts, speeches, music, films or videos promoting terrorism
- content encouraging people to commit acts of terrorism
- videos of terrorist attacks
- content promoting hatred against any religious or ethnic group
- bomb-making instructions

### **Female Genital Mutilation**

This involves removing the external genitalia of females either partial or completely for religious or cultural purposes. Ages of the girls can range from as young as 5 years old to

15 years old. It is important to note that some of our students come from countries where it is practised.

Signs of potential FGM:

- Hesitation towards returning to their country for a holiday or wanting to discuss a holiday
- Unusual behaviour after a holiday
- Difficulty or pain during movement
- Reluctant to seek medical attention
- Spending long periods in the toilet possibly as a result of chronic reproductive tract infection
- Depression, anxiety, PTSD
- Hepatitis B or C

### **Honour based violence**

This is violence committed in an assumed attempt to protect a family or community from shame or disgrace. Students most susceptible are those who do not prescribe to some if not all of the core British values. These cultures may not approve of the following:

- LGBTQ+ members and their partners
- Interracial or interfaith relationships
- Relationships partners in similar or different tribal or totemistic groups
- Disabled, mentally or terminally ill members
- Members with albinism
- Wearing particular clothes or taking part in activities (e.g. foreign education) that are not viewed as being culturally appropriate or relevant.
- Leaving a forced or arranged marriage

Signs of potential honour based violence

- Withdrawal or socially isolated from peers or community
- Treatment for depression
- Substance abuse or eating disorders
- Self-harm
- Students inform staff of abuse and emotional or psychological blackmail

### **Modern Slavery**

Although slavery is assumed not to exist at this present time there are countries and cultures that still do have it in law and practise it as a part of their normal social structures. According to Anti-Slavery International (2018), there are estimated to be tens of thousands of **known** slaves in the UK. International students of any gender, race, nationality, culture, social class, age etc. can fall victim especially if they are wanted for a particular market

where their skills or knowledge will be exploited with or without their consent, knowledge or pay. Slavery in the UK is commonly discovered in the following industries or professions:

- Prostitution or human trafficking
- Agriculture, restaurants, factories
- Domestic service
- Sweatshops
- Hand car washes
- Nail and beauty studios

Signs of potential Modern Slavery

- Withdrawal or isolation
- New or healing injuries
- Malnourishment or poor hygiene
- Fearful of authority or authority figures
- Growing unhealthy dependence, on a school mate (even in trivial decisions) who may be grooming them for slavery or trafficking

### **Discriminatory Abuse**

This is abuse or harassment for some of the following reasons:

- social class
- gender or gender identity
- race
- religion
- sexual orientation
- tribe, clan or totem

Signs of potential discriminatory abuse

- Withdrawal and isolation
- Frustration or rage
- Low self esteem
- Being excluded from activities or getting access to services
- Interest in radical or extremist ideology

### **Financial or material abuse**

This is where an individual is denied access to money or possessions. Abuse may occur in the following ways:

- Theft
- Fraud
- Internet scamming
- Coercion: individuals are forced to part with their inheritance, alter their wills, apply for and alter life-insurance
- Misuse of funds or benefits

## Signs of potential financial abuse

- Personal property or possessions suddenly disappear
- Unable to purchase goods most people can normally afford e.g. stationery
- Carer/guardian is only interested or has an unhealthy interest in the individual's finances
- The carer/guardian is dishonest about the financial situation or transactions
- The individual is disinterested or reluctant to receive care from specific individuals

## Guidelines for all Link School Staff and all Adults

Link School staff, clients and third party suppliers must be committed to:

- Being familiar with the Safeguarding Policy and Health and Safety Policies
- Acting professionally at all times
- Providing an example, which we would wish others to follow
- Valuing each vulnerable adult and young person
- Treating vulnerable adults and young people with respect and dignity
- Always listening to what a vulnerable adult or young person is saying
- One to one lessons with under-18s must take place in a classroom with the door open
- Not discriminating against race, gender, age, nationality, sexuality, religious beliefs, disability, gender identity, social class
- Motivating and praising each vulnerable adult or young person
- Using neutral and clear language at all times in order to prevent any misunderstanding of intent or possible accusations of misconduct
- Appropriate dress code at all times when on school premises or carrying out any work duties
- Reporting any concerns at the earliest possible stage

### Prohibited Actions

Link School staff, clients and third party suppliers may not engage in any of the following activities:

- Initiating or engaging in any inappropriate physical contact
- Use of inappropriate language
- Threatening, shouting or being aggressive
- Allow any student under the age of 18 to consume alcohol or tobacco products either on or off the premises, inside or outside of working hours
- Drugs must never be taken or sold on school premises
- Be alone with an under 18 where they cannot be observed
- Be in a relationship with any student under the age of 21. Any member of staff entering a relationship with any students aged 21 or over MUST inform their line manager immediately.

- Meet any student under the age of 21 outside of the work premises unless this meeting is work related, e.g. meeting a group of students for a Link School activity
- Have contact with any student via the internet or any type of media including email, social networking sites or any other type of social media, unless this contact is part of normal work duties and uses Link School networking systems, e.g. school email or phone
- Smoke, consume alcohol or be intoxicated in the presence of under-18s
- Accept gifts of a high value from students at any time. Small gifts from students are acceptable when a student, teacher or other staff members leave.

Link School Staff are in a position of trust and any sexual contact with a student under the age of 18, even if the student is over 16, is a criminal offence.

### **Inappropriate physical contact**

Link School staff are prohibited from initiating any physical contact with a student. If alone with a student, Link School staff are prohibited from engaging in physical contact if initiated by the student.

Students may wish to have a photograph taken with a member of staff. In such situation it is natural for the student to place their arm around the member of staff. This is considered acceptable provided that the staff member is not alone with the student and the staff member refrains from reciprocating.

Where appropriate Link School staff may need to tactfully explain to students that they cannot engage in physical contact with them.

### **One-To-One contact with students**

Link School staff should avoid spending excessive amounts of time alone with any student away from others. In a situation where privacy is needed, ensure that other staff are informed of the meeting and its place. Link School staff are strongly advised against meeting any student, especially of the opposite sex or with alternative sexual orientations, alone in a closed space.

### **Communication with students**

Link School staff may join the company Facebook page and group or other company social media and message the students collectively. Private messaging between staff and students is NOT allowed before, during or following a course. This includes, but is not limited to, instant messaging, emailing, messaging through social media, blogs, videos and telephone calls. Staff are not allowed to exchange any personal information with students.

Students are informed during the induction and in the student booklet that Link School staff are not allowed to befriend them on social media.



Staff must request permission from the management for any electronic contact with a student which is of a non-work-related nature before, during or after a course.

For the purpose of social programme activities outside of the school premises staff, it is necessary to request students' mobile phone numbers. However only school mobile phones can be used to contact students. Staff are not allowed to give out their personal phone numbers to students.

If friendship with adult students develop, staff must inform their line manager immediately and obtain a written permission to contact the student privately.

## Dealing with Incidents

### General guidance:

- Challenge any abusive behaviour you see between students and report it.
- If a fight erupts between students, staff members in schools and those without the correct Physical Restraint Training are NOT allowed to break it up. Call a member of the DST immediately.
- Reassure those who experienced or witnessed abuse that Link School policy doesn't tolerate any abuse and that the matter will be dealt with
- Stay alert when suspicions are raised that a student may be suicidal. Record any absences, late arrivals or early departures.
- If the student has revealed anything sensitive that causes you as a teacher to feel distressed it is important for your well-being that you report this to the DST in order to receive the proper support.

### **If a student under 18 or a vulnerable adult wishes to discuss something in private, please use the following procedure:**

- Take them somewhere private and listen to what they want to say
- Allow them to speak without interruption
- Ask questions only for clarification
- Accept what they say – it is not your role to investigate or question
- Inform them what you will do next and with whom the information will be shared
- Reassure the student that they have done the right thing by telling you
- If in a hurry or can't talk, schedule an appointment with the student at the time you can give them your full attention
- Write down what you heard as soon as possible using the person's own words, the date and time of incident/report, any names mentioned, what was said or done and by whom, name of person reporting the concern, to whom the information was given and ensure that the record is signed and dated. Report to the DST.

### Do's:

- Treat all vulnerable adults and under-18s with respect
- Exercise caution when discussing sensitive or distressing issues, asking open ended not closed or leading questions. For example 'Could you tell me what happened?' 'What happened after that?'

### Don't-s:

- Don't close the door. Leave it slightly ajar or sit somewhere away from people but in a view.
- Do not overreact
- If a student comes to you with a problem do not promise you will keep the information confidential or solve the problem. Do not reassure them that 'everything will be OK.'
- Do not ask for more information. Do not ask questions suggesting a specific answer or questions such as: Why? Who? When? Where? Why didn't you tell me earlier? Are you sure this is true? Are you angry?
- Include your assessment of the situation in the report, simply record what the student said
- Don't refer the person to someone else - you need to contact a member of Designated Staff.
- Don't discuss suspicions with anyone else other than a member of Designated Staff.
- Do not give the student preferential treatment even after they have made a report. Maintain normalcy in the class.

## Reporting Incidents

It is the duty of Link School of English staff to disclose cases of abuse, allegations or suspicions of abuse to a member of Designated Safeguarding Team immediately. It is not for staff to investigate or decide whether or not a suspicion or allegation is true but to receive, record and refer them correctly. This is in line with legislation namely Working Together to Safeguard Children (2015) which stresses the importance of having and following the correct procedures regarding safeguarding.

Any suspicions or allegations of abuse or bullying must be taken seriously. We encourage to report even small concerns. Reports of any of the aforementioned safeguarding issues need to be made to the Designated Safeguarding Team. In extreme cases the police may need to be notified.

### What to report

- Signs of potential abuse

- Reports of abuse or suspected abuse from students
- When you witnessed any form of abuse to a student, colleague or anyone else
- When you experienced any form of abuse
- When you have a suspicion of abuse

## Recording Incidents

All reports of abuse must be recorded and filed in the Safeguarding Book. All records and confidential information should be kept by the Designated Safeguarding Lead in separate files, locked or in secure electronic files.

## Investigation of incidents

What requires investigation:

- frequent late arrivals, early departures or absence
- student absent for 3 days in a row or more
- student subsequently not passing the tests
- student verbally or physically abusive
- students not contributing in their classes
- any, but not limited to, behaviour from the list of abusive behaviour of the Safeguarding Policy

All of the above must be recorded and reported to the Designated Safeguarding Team.

## Whistleblowing

As this is everyone's legal duty, Link School staff are required to report immediately to a member of the Designated Safeguarding Team any instances where they suspect a fellow member of staff to be engaging or to have engaged in any inappropriate or illegal activity. The staff member who raises such concerns will be given confidentiality.

## Allegations against a member of staff

Complaints against a member of staff will always be investigated by the school management. The police and other agencies will be informed at the discretion of Link School management or the school management may make a referral to the Independent Safeguarding Authority (ISA) depending on the severity of the allegation.

## Contact Details

### Designated Safeguarding Lead

Position: Managing Director

Name: Magdalena Oziminska

### Designated Safeguarding Person

Position: Centre Manager

Name: Iliyana Galeva

### 24-hour emergency number - for referrals out of school hours

+44 79 300 272 43

## Contacts outside of the school

### The Police

999 - in an emergency

101 - non-emergency

### Anti-Slavery International

Thomas Clarkson House

The Stableyard, Broomgrove Road

London, SW9 9TL

### NHS Services

<https://www.nhs.uk/Service-Search/GP/LocationSearch/4>

### FGM Charity FORWARD

Suite 4.7 Chandelier Building

8 Scrubs Lane

London, NW10 6RB

Telephone: +44 (0)20 8960 4000

E-mail: [forward@forwarduk.org.uk](mailto:forward@forwarduk.org.uk)

### Citizens Advice Bureau

<https://www.citizensadvice.org.uk>

### National Domestic Violence Helpline

<http://www.nationaldomesticviolencehelpline.org.uk/>

### Victims Support

<https://www.victimsupport.org.uk/more-us/contact-us>

### Ealing Council Child Protection Advisors

0208 8258000

**Disclosure and Barring Service**

DBS 0870 909 0811 /  
[www.crb.gov.uk](http://www.crb.gov.uk)

**ChildLine**

0800 1111

**Anti-Terrorist Hotline**

0800 789 321

**Samaritans**

08457 909090  
[www.samaritans.org.uk](http://www.samaritans.org.uk)

**East Riding: Safeguarding Adults Board**

[www.ersab.org.uk](http://www.ersab.org.uk)

We recommend all international students have a mobile which works in the UK during their stay at Link School of English

## Confirmation Statement

I confirm that I read and understood the Safeguarding Policy and will adhere to all the rules and regulations outlined within. I understand my responsibilities as an adult working within the school and will take special care when working with under-18s and vulnerable adults.

Print name

Signature

Position

Date