

Key Contacts for Safeguarding at the School

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Deputy Designated Safeguarding Lead – George Delmonte 07902951802, Bircan Ay 07388608122,

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**Safeguarding and Welfare Officers – Aki Manabe, Zak Benboubetra, Meriem Jouti, Nozomi Ide,
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Key Contacts in the City of Westminster

- **Local Authority Designated Office – Aqualma Daniel**
 - **07870 481 712**
- **Emailing the named LADO at Aqualma.Daniel@rbkc.gov.uk**
 - **020 7641 7668**
 - **lado@westminster.gov.uk**

In an urgent situation, such as if a child is in immediate danger, you can call 03000 41 11

11. If the call is urgent and outside of office hours, you can call 03000 41 91 91.

Multi Agency Safeguarding Hub (MASH)

- **email: acesstochildreancesservices@westminster.gov.uk**
 - **phone: 0207 641 4000**

Key Contacts in the London Borough of Barnet

Local Authority Designated Office – Rob Wratten 0208 359 4528

(MASH) 0208 359 4066 or out of hours 0208 3592000

Email: MASH@barnet.gov.uk

The aims of the school and the context for this policy

GG Colleges is committed to the teaching of English to speakers of other languages including adults and young learners. Young learners between the ages of 16 and 17 are included in our general English classes, which also comprise adult learners. There may be closed groups comprising of 9–17-year-olds learning English mainly in afternoon classes or off-site in summer. The school also arranges social events and trips in London. The well-being of all our learners is of the utmost importance to us and this policy is designed to ensure that all staff members are clear about their responsibilities regarding safeguarding and protection. All staff undergo Basic Awareness training (Level 1) as a minimum and therefore can recognise and report any safeguarding issues. Safeguarding and Welfare Officers have a minimum of Advanced Safeguarding training.

The school also has a risk assessment policy that considers the welfare and safety of all its students and staff at school and on school outings.

What is safeguarding?

Safeguarding and promoting the welfare of children is defined as (KCSIE 2024, p.4):

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Safeguarding Young Learners

- All staff must work together to create a safe learning environment for Young Learners.
- GG Colleges encourages all Young Learners to be healthy, stay safe, enjoy and achieve, make a positive contribution and achieve economic well-being.
- The school operates safer recruitment policies. All teachers and reception staff are DBS (enhanced) checked. DBS documentation is applied for permanent staff.
- In order for GG Colleges to fulfil its Prevent duty; it is essential that staff are able to identify learners who may be vulnerable to radicalisation and know what to do when they are identified. All staff are also required to complete the basic Prevent awareness training provided by the UK government.

Important legislation

The Children Act 1989

This provides the legislative framework for child protection, outlining the key principles in relation to safeguarding the welfare of children effectively. The Children Act was amended in 2004 to encourage partnerships and increased communication between agencies as well as to create more accountability

The Education Act (2011)

This act states that all schools have a duty to safeguard children and promote their welfare. Schools must also ensure that all members of staff act to safeguard children from abuse and neglect.

Every Child Matters (2004)

This is a guidance note whose key principles remain at the centre of all safeguarding policies and procedures. It originally introduced 5 key outcomes that the government views as being essential for each child or young person to fulfil his/her potential. These outcomes are being healthy, safe, enjoying and achieving and making positive contribution and achieving economic well-being.

Working Together to Safeguard Children (2018)

This is a guide to promote the welfare of children and sets out the roles, responsibilities and expectations of services as well as highlighting the different types of abuse and definitions of safeguarding.

Keeping Children Safe in Education (2021)

This is an updated piece of legislation that looks at safeguarding procedures and practices in education to strengthen efforts in safeguarding, safer recruitment and the handling of allegations against staff.

Code of Conduct

The aims of this code of conduct are to both support and protect staff and students. It is written to set clear boundaries, standards and guidelines on what is expected of our staff at all times in order to ensure a safe, warm and welcoming environment. This code of conduct applies to all staff employed or contracted by GG Colleges School of English.

As a general rule, we expect all staff to treat students, especially those under 18, the same way they would expect their own family members to be treated if in a foreign environment, in which they are likely to be more vulnerable and lacking in local language and cultural norms. All staff must be committed to:

- professional conduct at all times
- treating everyone but particularly U18s and adults at risk with respect and dignity
- always taking time to listen to what a student is saying
- recognising and valuing the unique contribution each individual can make
- encouraging and praising students

Position of trust

All permanent and freelance staff are in a Position of Trust. **Any sexual activity between an adult who has a position of care or responsibility, and any student under 18 (U18) is illegal even though the legal age of consent is 16 (Sexual offences Act 2003).**

Leading by Example

U18 students are likely to look to the staff for an example of appropriate behaviour so all staff need to be mindful of setting a good example. It is not possible to write an exhaustive list as staff are expected to apply their common sense, but some examples would be:

- provide an example that you would wish others to follow
- use appropriate language with U18s and challenge inappropriate language you hear U18s using. Please remember that English is not their 1st language, and they may be unaware of the impact of inappropriate language
- use neutral language in interactions to limit misunderstandings of intent or possible accusations of misconduct
- do not make light of smoking, drug taking or alcohol consumption
- dress appropriately at all times during working hours or when in the company of students
- respect a young person's right to privacy
- arrive punctually for all lessons and activities

Prohibited actions

The following prohibited actions refer to interactions with U18s unless the age is explicitly mentioned. Staff should:

- not condone the breaking of the law, particularly in regard to drinking alcohol, taking drugs, smoking, vaping, sexual activity or extremist views/behaviours;
- not drink alcohol in front of students;
- not drink or be under the influence of any alcohol if responsible for U18s on a social programme or school visit;
- avoid being alone with an U18 wherever possible unless it is an individual one-to-one lesson. Make sure that they can be easily viewed by passersby outside of the room if that is the case not initiate any form of physical contact with an U18. Inappropriate physical contact can be hard to define in a multicultural environment. Staff are therefore prohibited from initiating any form of physical contact with students in order to avoid misunderstandings or accusations of inappropriate conduct. This is especially important in a situation where the staff member is in a one-to-one situation with an U18.
- not meet a student under the age of 18 outside school on a one-to-one basis unless the meeting is work-related and has been approved by a member of the safeguarding team (e.g. to accompany an U18 to a medical visit);

- be aware of any action that could be construed as favouritism towards a particular student; do not have any contact on social media platforms with students or provide or exchange details which could lead to staff and students identifying each other on social media.

U18s in the classroom

All students are expected to attend classes and arrive on time every day. Students between 16 and 17 are required to sign in at Reception before going to their classes. Attendance is taken separately in closed group classes. Where any under 18s has not signed in or had their attendance marked by the time classes are to begin, a Welfare Officer must be informed and appropriate action taken.

As part of our safeguarding ethos, teachers need to ensure U18s are comfortable and integrating well. Part of this will rely on the material and subjects chosen by the teacher for class delivery. It is the teacher's responsibility to make sure that material chosen – especially authentic material – is appropriate for all the ages and nationalities in the class.

One-to-one contact with U18s

All staff members should avoid a situation where they are left alone in an enclosed space with an U18. If a confidential meeting is necessary, it should be conducted in a room with an open door, close to other staff members. If appropriate, another staff member should be brought into the meeting.

If an U18 is scheduled for individual tuition or a tutorial, the teacher must teach in a classroom, preferably close to other occupied rooms, e.g., not in a room on an empty floor, so that they are clearly visible to anyone passing the room, and the door must be left ajar.

If an U18 student needs to be given first aid treatment in an enclosed space, there should be two staff members present. The staff member must explain what they are going to do to administer first aid and ask permission first.

Safeguarding LGBTQ+ Children and Young People

U18s General Welfare

We are interested in the general welfare of all our students, but there are some areas where we need to pay closer attention to U18s for safeguarding considerations. These include the following:

- **Appropriate dress:** All students should be dressed appropriately for class and when on a school social programme or class visit and should not wear clothes that could offend anyone. Examples include clothing that is too revealing or clothes with offensive slogans or images. If a staff member sees anyone dressed inappropriately, they should talk to them or ask another member of staff to do so and explain what is appropriate.
- **Bullying and discrimination:** While bullying is clearly prohibited throughout the school, we need to be extra vigilant with U18s. Staff must ensure that students are treated with respect by both staff and their peers. Any behaviour that contradicts this must be challenged and cannot be ignored, even if it is claimed to be a joke or unintentional. Particular care must be taken to safeguard LGBTQ+ students from discrimination, harassment, or exclusion, ensuring they feel safe and supported at all times.
- **Inclusivity and respect for identity:** Staff should ensure that LGBTQ+ students are treated with the same respect and inclusivity as all students. This includes using their preferred names and pronouns where applicable and addressing any issues of misgendering, exclusion, or discriminatory behaviour.
- **Monitoring social interactions:** Staff should remain aware of whom U18s are socialising with. Are they spending a lot of time with one particular person? Do they appear to be uncomfortable or overly friendly with anyone? Any concerns should be raised appropriately to ensure student welfare.

Social Media and Technology

While technology and phones provide many benefits, they also present risks such as cyberbullying, exposure to radical/extremist views, grooming by sexual predators, and the downloading of illegal or copyrighted material. The College has established the following guidelines:

- Staff should not give out their personal phone number, email address, or social media contacts to U18s.
- If a staff member is supervising a social programme involving U18s, they must take a school phone with them and ensure U18s have that number stored in their phones. The staff member should also have a list of students' phone numbers as part of the risk assessment.
- Reporting inappropriate content: Any inappropriate website access should be reported to the DSL. Inappropriate content includes pornographic sites, excessively violent video games, websites promoting extremist views, and certain age-inappropriate social networks and forums. Staff should also be aware of online harassment, particularly any LGBTQ+-related abuse, and ensure any incidents are reported and addressed promptly.
- Photography and consent: Staff should never use their own devices, including mobile phones, to take pictures of U18s. If they plan to film or take photos of any U18s on school equipment, they must first check that the student is comfortable with it and that parental consent has been given. Any images taken should be deleted immediately after use.
- Cyberbullying awareness: Staff should be particularly vigilant in identifying and reporting cyberbullying, including targeted harassment of LGBTQ+ students. All concerns should be reported to a member of the safeguarding team.

Harassment and Bullying

To maintain a safe and comfortable environment for staff and students, GG Colleges and School of English is committed to ensuring that everyone can work and participate in school life without fear of harassment, bullying, or intimidation.

- Everyone at the school has a responsibility to ensure their own behaviour, whether intentional or unintentional, does not constitute bullying or harassment.
- Zero tolerance for discrimination: Any form of harassment, including homophobic, biphobic, or transphobic bullying, is strictly prohibited. Staff must take immediate action if they witness or suspect discrimination or harassment.

- Any concerns regarding harassment or bullying should be reported to the safeguarding team for further investigation and support.

U18s Social Programme and External Visits

On excursions and activities organised by the school, due regard should be given to the risk assessment document and any special measures adopted for U18s on that trip. The following considerations apply:

- U18s should always be in a group of at least three people.
- The member of staff leading the trip must know the whereabouts of U18s at all times and have their contact details, as outlined in the risk assessment policy for offsite activities.
- Other students, even those over 18, cannot take responsibility for an U18 student; that responsibility remains with the school staff.
- Staff should be mindful of LGBTQ+ students' safety in external environments and be aware of potential risks, such as discrimination or unsafe situations in unfamiliar locations.

Low-Level Concerns Relating to Staff

A low-level concern is any concern – no matter how small, and even if it causes only a sense of unease or a “nagging doubt” – that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct.

- The term ‘low-level’ does not mean insignificant; it simply means that the behaviour does not meet the threshold of harm.
- Staff are informed about what constitutes appropriate behaviour and should be able to distinguish between acceptable and concerning behaviour, both in themselves and others.
- LGBTQ+ inclusion in safeguarding: Staff must also be aware of behaviours that may create an unwelcoming or exclusionary environment for LGBTQ+ students. This includes inappropriate jokes, dismissive attitudes, or failure to challenge discriminatory language.

Reporting Procedures:

Any concerns should be reported to the DSL with the aim of:

- Addressing unprofessional behaviour and supporting staff in correcting it at an early stage.

- Providing a responsive, sensitive, and proportionate handling of such concerns when they are raised.
- Identifying any weaknesses in the safeguarding system.

Examples of Low-Level Concerns:

- Being overly friendly with U18s.
- Having favourites.
- Taking photographs of U18s on personal mobile devices.
- Engaging with an U18 on a one-to-one basis in a secluded area or behind a closed door.
- Ignoring or failing to address bullying or discrimination, including LGBTQ+-related issues.

All staff must report any concerns about a colleague's conduct or any safeguarding concerns relating to U18s. Reports can be made in confidence, and staff can be assured they will not face repercussions for reporting concerns.

The school has a Whistleblowing Policy, which can be found in the Employee Handbook.

The NSPCC Whistleblowing helpline number is 0800 028 0285.

Procedure for reporting allegations or suspicions of abuse

All adults need to respond to a suspicion or allegation of abuse without delay. It should be noted that all adults include any adult working in the school including volunteers, visiting speakers and freelance staff. It is not for staff to decide whether a suspicion or allegation is true. All suspicions or allegations must be taken seriously and reported to a member of the safeguarding team immediately so that appropriate action can be taken to protect the child if necessary. We have a legal duty of care to our U18s that must be taken extremely seriously by everyone. This includes information which indicates an adult or another U18 may have:

- behaved in a way that has/may have harmed a U18;
- possibly committed a criminal offence against or related to a U18;
- behaved towards an U18 in such a way that indicates s/he would pose a risk of harm towards children.
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Depending on the nature of the concern, the safeguarding team will handle the matter internally. If

the concern is a serious incident or if it is an allegation of abuse or disclosure, the safeguarding team

must immediately report it to the LADO and follow their advice for the next step. If a crime has, or may have, been committed they may report it to the police.

The safety and welfare of the child must be the primary consideration in deciding whether to share information and this always overrides confidentiality.

Vulnerable students

Vulnerable students are any U18s and adults at risk. An adult at risk is defined as a 'person aged 18 or over who may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation'.

Although it is extremely rare that we would have a student who can be officially defined as 'an adult at risk', we apply an extra duty of care to those whose personal circumstances may make them more vulnerable than others. This includes a physical disability, special educational needs, low level of English, and unfamiliarity with the local area or customs. It cannot be assumed that someone who is not considered at risk on-site would not become at risk off-site.

Vulnerable students are more susceptible to grooming and abuse, so everyone needs to be more alert once a vulnerable student has been identified. Where possible, the school will identify any students with SEN and/or disabilities and ensure that there are appropriate support measures in place. This may be indicated at the time of booking or is most likely to be when the student arrives or is referred to the school's safeguarding team. There must be an awareness that behaviour, mood and injury may relate to possible abuse and not necessarily because of the specific SEN or disability that has been identified. It should also be noted that these students are of a higher risk of peer group isolation and may have additional challenges with communication.

Any staff with concerns regarding a student whom they believe fall into this category must contact the DSL who will consider what, if any, additional pastoral care should be put in place.

The difference between a Concern and an allegation/serious incident

We take the safety of our students very seriously and it is important that staff understand the difference between a Concern and an Allegation or Serious Incident.

A Concern is a low-level safeguarding or welfare thing which staff notice and need to report, however small they seem, to safeguarding/welfare staff to allow them to address the concern. A staff observation may be part of a larger picture which safeguarding team need to know. Concerns will be recorded, investigated and some information may be shared with staff.

An Allegation / serious incident is anything which could be connected to child protection, i.e. abuse. All these, even if only suspicions, must also be reported and remain confidential. Response from safeguarding team will follow set procedure, may involve outside agencies and information will usually not be shared as it is confidential.

Definitions

Type of Abuse	Physical Signs	Behavioural Signs
Physical	<ul style="list-style-type: none"> ● Unexplained bruising ● Multiple bruises in clusters ● Cigarette burns ● Human bite marks ● Broken bones ● Scalds, with upward splash marks 	<ul style="list-style-type: none"> ● Fear of parents being approached for an explanation ● Aggressive behaviour ● Flinching when approached ● Depression ● Withdrawn behaviour
Emotional		<ul style="list-style-type: none"> ● Neurotic behaviour e.g. rocking ● Fear of making mistakes ● Sudden speech disorders ● Self-harm ● Fear of parents being approached regarding behaviour

Sexual	<ul style="list-style-type: none"> ● Pain or itching in the genital area ● Discomfort when walking or sitting down ● Bruising 	<ul style="list-style-type: none"> ● Sudden unexplained changes in behaviour ● Fear of being left alone with a specific person ● Having nightmares ● Self-harm ● Sexual knowledge beyond age or developmental level
Neglect	<ul style="list-style-type: none"> ● Constant hunger ● Poor hygiene ● Loss of weight or underweight ● Inappropriate clothing for conditions 	<ul style="list-style-type: none"> ● Complaining of being tired all the time ● Having few friends ● Mentioning being left alone or unsupervised

Source- www.nspcc.org.uk

Sharing of nudes and semi-nudes or sexting is where learners share nude or semi-nude images, videos or live streams.

Honour-Based Abuse (HBA)

This is coercion or violence used against a person in the belief that family or tribal honour requires action. A person can be seriously injured or even killed in extreme cases. Signs to look out for include:

- the student being withdrawn, anxious or frightened
- a decline in behaviour or performance
- a family member keeping a close eye on the student

Female genital Mutilation (FGM)

One aspect of HBA is FGM. This is a practice that can cause severe and long-lasting damage to physical and mental health. It is carried out for religious, social or cultural reasons, however, there are no medical reasons for carrying it out. It is a criminal offence if done in the UK. Staff should be aware that a person who has suffered FGM may ask for help without being explicit about the problem due to embarrassment or fear. Any causes for concern are to be reported to the DSL. Any suspected case of FGM must be reported to the police.

Child sexual exploitation (CSE)

This is a form of sexual abuse where under 18s (U18s) are exploited to engage in sexual activity in return for money, gifts, drugs, affection or status. CSE does not always involve physical contact as it can happen online or involve pressure from peers or cyberbullying.

Signs to look for in U18s include:

- having a much older boyfriend or girlfriend
- appearing with unexplained gifts or new possessions
- associating with others involved with exploitation
- misusing drugs or alcohol
- being absent from school
- going missing or regularly coming back late to accommodation

Child Criminal Exploitation (CCE) and County Lines

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity. Violence, coercion and intimidation is common.

Signs might include: students missing education, unexplained gifts, misuse of drugs and alcohol, changes in emotional well-being.

County Lines

Exploitation is an integral part of the county lines offending model with children and adults at risk exploited to move (and store) drugs and money.

Child-on-Child abuse

It should be remembered that abuse does not only come from adults but can come from other U18s. Child-on-child abuse can include bullying (including cyberbullying), harmful sexual behaviours HSB including sexual violence and sexual harassment.

Bullying

Bullying between students can be in many forms. This can include face-to-face and/or online.

Cyberbullying or online bullying takes place over digital devices such as mobile phones, computers and tablets. It can occur through texts, apps, social media, forums or gaming where people can view, participate in or share content. Cyberbullying includes sending, posting or sharing negative, harmful, false or mean content about someone else causing embarrassment or humiliation. Some cyberbullying crosses the line into unlawful or criminal behaviour. The most common places where cyberbully occurs are:

- social media, such as TikTok, Instagram, Snapchat, and Twitter/ X
- SMS (Short Message Service) also known as Text Message sent through devices
- Instant Message (via devices, email provider services, apps, and social media messaging features)
- email

Signs to look out for in under-18s include:

- appearing nervous when receiving a text, instant message or email
- unwillingness to share information about online activity
- unexplained anger or depression, especially after going online
- abruptly shutting off or walking away from a computer or mobile device mid-use

Harmful Sexual Behaviours (HSB) including sexual violence and sexual harassment

Harmful Sexual Behaviours (HSB) is an umbrella term for many types of behaviours. It includes:

- contact and non-contact behaviours
- online and off-line behaviours
- group/gang and peer influenced behaviours

Examples include:

- sexual/sexist name calling
- rumours about students' sexual activity
- sharing naked imagery
- sexual harassment

Some people might try to excuse mild transgressions as a “joke” or “teenage fun”. However, all forms of sexual violence are unacceptable. It should also be noted that both perpetrators and victims can be either male or female.

Upskirting

Upskirting typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks. This has been illegal in the UK since 2019.

Vulnerable students are any learners under 18 and **Adults at Risk**. An adult at risk is defined as a 'person aged 18 or over who may be in need of community care services by reason of mental health issues, learning or physical disability, sensory impairment, age or illness and who is or may be unable to take care of him/herself or unable to protect him/herself against significant harm or serious exploitation'. Although it is extremely rare that we would have a student who can be officially defined as 'an adult at risk', we apply an extra duty of care to those whose personal circumstances may make them more vulnerable than others. This includes a physical disability, special educational needs, low level of English, unfamiliarity with the local area or customs. It cannot be assumed that someone who is not considered at risk on-site would not become at risk off-site.

Vulnerable students are more susceptible to grooming and abuse, so everyone needs to be more alert once a vulnerable student has been identified. Where possible, the school will identify any students with SEN and/or disabilities and ensure that there are appropriate support measures in place. This may be indicated at the time of booking or is most likely to be when the student arrives or is referred to the school's safeguarding team. There must be an awareness that behaviour, mood and injury may relate to possible abuse and not necessarily be as a result of the specific SEN or disability that has been identified. It should also be noted that these students are of a higher risk of peer group isolation and may have additional challenges with communication.

Any staff with concerns regarding a student whom they believe fall into this category must contact the DSL who will consider what, if any, additional pastoral care should be put in place.

Young learners include everyone under the age of 18.

These definitions and indicators are not meant to be definitive. Their purpose is to serve as a guide. There may be other reasons for changes in behaviour such as a death or the birth of a new baby in the family or other reasonable explanation.

Disclosure from an U18 – what you should do

All staff must be prepared to listen to a disclosure from an U18 as they are likely to choose the person they feel most comfortable with and this will not necessarily be part of the safeguarding team. If an U18 chooses to disclose an allegation of abuse to you, you must follow these key steps.

GG Colleges Safeguarding Policy

Receive	<ul style="list-style-type: none">● Listen calmly to what is being said without displaying shock or disbelief. Accept what is being said without judgement.● Allow the child to speak without interruption.● Take it seriously.● Be calm.
Reassure	<ul style="list-style-type: none">● Reassure but only so far as is honest and reliable. Don't make promises that you can't be sure you can keep e.g. 'everything will be alright now'.● Don't promise confidentiality, you have a duty to report your concerns. Tell the child that you will need to tell some people but only the ones whose job it is to protect children.● Acknowledge how difficult it must have been to talk.● Never agree to keep secrets – be honest.● Reassure the child that he/she is right to tell.● Alleviate feelings of guilt and isolation while passing no judgement
React	<ul style="list-style-type: none">● Listen quietly, carefully & patiently.● Do not investigate, interrogate or decide if the child is telling the truth.● Do not ask leading questions.● Ask open questions like 'is there anything else you want to tell me?'● Do not ask the child to repeat what they have told you to another person.● Explain what you have to do next and who you need to talk to
Record	<ul style="list-style-type: none">● Make brief notes at the time and write them up in detail as soon as possible. Record the date, time, place, words used by the child and how the child appeared to you.● Do not destroy your original notes in case they are required for a police investigation.

	<ul style="list-style-type: none">● Record statements and observable things● Do not assume anything. Don't speculate or jump to conclusions
Remember	<ul style="list-style-type: none">● If an U18 discloses abuse to you, take it seriously.● Seek advice from the dedicated members of staff

Dealing with a disclosure can be stressful but there are some DON'Ts that you must remember:

Don't:

- refuse to listen or say that you will talk to them later;
- over-react;
- be in a room on your own with the student with the door shut;
- show worry or concern;
- put words in their mouths;
- make comments;
- ask leading questions;
- promise confidentiality;
- leave the student alone after they have disclosed. If you need to leave the office, ask another member of staff to sit with them as a reassuring presence.
- tell any of your colleagues other than members of the safeguarding team.

Once a statement has been collected from a student, further questioning should be avoided apart from important clarification of factual detail.

The Principal and the DSL will meet as soon as possible to consider an appropriate course of action in response to the information disclosed by the student and will consider any other relevant information. The DSL will decide if it is appropriate to involve other staff members and also whether to inform the student's parents. There may be no need to take further action in which case, this should be recorded in writing.

Further action may include the immediate removal of any imminent threat of danger, seeking advice from the Local Authority Designated Officer and contacting the police.

Importance of Record keeping

Accurate record keeping is essential in safeguarding and child protection. If accurate records are not kept, then it can affect the police's chances of prosecuting a perpetrator.

If someone discloses to you, you must:

- make some brief notes at the time of the disclosure;
- write your notes up in detail as soon as possible;
- not destroy your original notes in case they are needed as part of a police investigation;
- record the time, date, place, words used by the child and how the child appeared to you;
- record statements and observable things – do not add opinions;
- not assume anything – don't speculate or jump to conclusions.

Completed Concerns & Disclosure notes must be given to a member of the safeguarding team and kept securely online with access only for the safeguarding leader(s).

Confidentiality

Confidentiality must be maintained throughout the process. You must not talk to anyone apart from the safeguarding team about the incident. Gossip or leaks can be extremely damaging to the accused who has not yet been proved guilty, and to any ongoing investigation.

Never leave sensitive documents lying around. Never leave your computer screen unlocked with sensitive documents displayed.

All safeguarding records are kept securely and only accessible to the safeguarding leader(s). There is an area for:

- safeguarding training
- all safeguarding contact details including the LSCP and the LADO
- safeguarding Concerns
- allegations
- safeguarding Reports
- safeguarding Audits

Annual Safeguarding review of policy

At the beginning of each year, the college conducts an overview of what has happened in safeguarding during the previous 12 months. It does not list individual names or identifying details.

The overview will take into account the following:

- the number of concerns raised and dealt with
- if any patterns have emerged
- how effective safeguarding strategies have been.
- if any major safeguarding issues have come up
- records of training carried out and any changes made to training procedures.
- any changes to the safeguarding team or structure
- any feedback from staff/students regarding safeguarding awareness
- any areas of weakness noted
- if any new initiatives should be considered or implemented over the coming year

A meeting is held with the safeguarding team and teachers to discuss ways to make improvements.

If an adult is accused

It is the duty of staff to disclose cases of abuse or allegations of abuse to the safeguarding team without delay. It is not for the staff to decide whether a suspicion or an allegation is true. All suspicions and allegations of abuse must be taken seriously.

It is important to ensure that the child is away from all possible harm. That may require changing the accused adult's work duties if they are a member of staff, even requiring them to leave the school while the investigation takes place. At all times the Principal will be kept informed of events and the DSL will decide whether it is appropriate to involve the LADO. At all times, confidentiality will be kept, and the ongoing investigation will not be discussed outside the safeguarding team.

If an accusation is made against a member of staff, the DSL will follow the same procedure, but keeping at least one other member of the Safeguarding Team informed.

If an accusation is made against the DSL, the principal and the Local Authority Designated Officer (LADO) must be informed and a referral form completed and sent to the MASH Team at Barnet Council:

<https://account.barnet.gov.uk/OnlineApplication/Introduction.aspx?form=MASHANDCAF&time=638412595946485590,1705662814363>

Process following a reported allegation or serious incident

Immediate action needs to be taken by the safeguarding team to ensure the safety of the child.

Medical assistance needs to be sought if required. A member of the safeguarding team is assigned to personally support the child and decide when it is safe and appropriate for the child to return to his/her normal routine.

Once a Concern is reported to a member of the safeguarding team, s/he will liaise with other members of the safeguarding team before immediately seeking guidance from the LADO. This is called **the initial discussion**. If a member of the safeguarding team is named in the allegation, they must be excluded from the safeguarding discussions.

If the DSL contacts the LADO, their advice may include the following:

- further action to protect the child
- contacting the police immediately
- when and what parents/guardians should be told
- what should be said to the person facing the allegation.
- making a referral to the DBS depending on the severity of the accusation
- suspending the accused. This is not automatic and should only be considered when children are at risk of serious harm, or the concern is so serious it could result in immediate dismissal. If the person is suspended, the reason must be communicated to him/her within 1 day.

Possible Outcomes from Initial discussion	What to tell/do with the accused person – this must always be agreed with the LADO
1. Strategy meeting – usually held within 3 days	Tell the accused person about the allegation using minimum detail. Inform him/her of the possible/likely courses of actions. The college will appoint a named person to support the accused and will advise the accused to get professional advice.
2. Referrals to the police or social care for investigation	As above.
3. No further action	School decides what internal action to take, possibly disciplinary action and certainly an investigation by a senior manager.

Terminology for possible outcomes to the investigation

Definition	Meaning
Substantiated	There is sufficient evidence to prove the allegation.
False	There is sufficient evidence to disprove the allegation.
Malicious	There is clear evidence to prove there was a deliberate act to deceive and the allegation is false.
Unfounded	There is no evidence which supports the allegation. It could be that the person making the allegation misinterpreted the incident or did not know all the circumstances.

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Unsubstantiated	There is insufficient evidence to prove or disprove the allegation (it is not the same as 'false'). Accused could be guilty or innocent.
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Resolution of allegation	Action by Golders Green College
Allegation substantiated, leading to prosecution and dismissal	Inform DBS, record kept on file.
Allegation substantiated, leading to disciplinary action or dismissal	May need to inform DBS, record kept on file.
Allegation unsubstantiated	Summary report kept in staff file for future clarification and reduce need for reinvestigation. Copy given to the accused.
Allegation unfounded or malicious	Report removed from file. Disciplinary action required against perpetrators of malicious story.

The college has a duty of care to its employees and will provide adequate support for anyone facing an allegation. The school must maintain confidentiality regarding the accused. Until any investigation, either internal or external, has been completed, the identity of the accused must not be released. If the allegation is unsubstantiated, unfounded or malicious, the college will support the member of staff on their return to work, especially if they have been suspended.

If an U18 or another student is accused

It must be recognised that abuse can come from children as well as adults and it is possible that a student under the age of 18 may be accused of abuse against another child. In such circumstances, it is important that the accused is recognised as being under 18 and must be given all the required support by a member of the Designated Safeguarding Team.

Training

The DSL has overall responsibility for ensuring that all adults in the organisation have training to the appropriate level. Training must take place before any U18 comes into the care of an adult. The level of training provided for our staff is as follows:

Role	Level of Training	Refreshed
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DSL and ADSL	Level 3 Specialist Safeguarding	Every 2 years externally
Welfare officers	Level 3 Specialist Safeguarding	Every 2 years externally
Social activity officers	Social programme and Safeguarding course provided by English UK	Every 2 years internally
All teachers	Level 1 Basic Awareness training provided by English UK. This is done through the British Council online and then in face-to-face teachers' meeting with a member of the safeguarding team trained to Level 3.	Annually on-line and face to face internally

The face-to-face training for Level 1 Basic Awareness ensures that all staff understand what safeguarding requirements and procedures are in place in the school and include:

- reiterating the duty of care that every adult has, regardless of their role or position in the school
- awareness that the duty of care includes being mindful of their own and other staff members' behaviour towards U18s and adults at risk and to report any concerns.
- making sure that everyone knows who the members of the safeguarding team are and how to contact them
- understanding the systems for reporting concerns and what the stages of the procedures are
- information on signs of abuse to be aware of
- information on how to respond if an allegation is made
- reminder of the Code of Conduct that everyone is expected to always follow.
- Prevent Training

During the online Basic Awareness training, understanding is tested throughout with multiple choice questions. In the Face-to-Face Basic Awareness training, understanding and learning is checked verbally during the session and a short-written quiz is taken by all participants.

Induction

As part of induction, the following will be undertaken:

- making known to all staff the policies and procedures in place that promote the safety and welfare of children and adults at risk.
- all staff will meet with the DSL/ADSL on their first day (where possible) for a safeguarding induction. This will include confirming understanding regarding the difference between a concern (something that seems not to be right but is of no immediate danger to the U18) and a serious issue (where the U18 could be in danger of harm/abuse and an urgent response is required)

All staff complete an Induction Checklist verifying that they have read and understood the Safeguarding Policy.

Safer Recruitment

Safer Recruitment Overview

The school is committed to safer recruitment for all staff positions, permanent and freelance for any staff that may have unsupervised contact with an U18. This includes school staff, social activity leaders and other providers such as transport companies. The Safer Recruitment guidelines are applied clearly and purposefully at every stage of the process:

- advertisement of the role
- application information pack
- job description
- invitation to interview email
- during the interview
- through all suitability checks

All staff that may have unsupervised contact with U18s are DBS checked by the school. This will also apply when U18s are placed in the care of subcontractors without direct supervision by college staff, for example in the case of airport transfers. Where there is no direct supervision by college staff, the subcontractor must confirm in writing on an annual basis that these staff members are DBS checked and that the check is up to date and clear. Should new staff be recruited in the year, the company's recruitment policy must require that all staff have the appropriate DBS check completed before they can be allocated to work involving U18 students.

In addition to DBS checks, all applicants for a role must provide 2 recent references and have a checkable employment history with no unexplained gaps. References for any person who may have contact with U18s must include a question about their suitability to work with U18s and whether they have been subject to any disciplinary action. A prohibited list check will be undertaken for anyone who has worked in a state school in the UK and for anyone who has worked in a state school outside the UK to confirm that they have not been sanctioned against working in education. This

could be confirmed by a letter of professional conduct from the local authority or other measures that the college can request, such as additional references.

Interviews for all posts include questions that ask about a candidate's attitude to and expectations of working with U18s and what safeguarding involves.

The school will also require that Group Leaders or anyone accompanying groups of U18 students provide confirmation or evidence that the Group Leaders have current police good conduct certificates or similar from their country of origin.

Overseas Police Checks

If an applicant has been working or living overseas, then a local police check from the country or countries they have been in for at least six months in the last three years is required. If the certificate is delayed, the school will apply additional scrutiny to the other checks and request a third reference from someone who has experience working with them, preferably in an U18 environment.

Applicants awaiting a DBS or where criminal checks are not possible

If an applicant has been working overseas before applying to the school and a police check cannot be obtained for whatever reason, the school will request an enhanced DBS check for their UK records and will take additional care with other recruitment checks including:

- identity
- qualifications
- work history
- references (minimum 3)
-

On occasion, new staff are taken on and need to start work before their DBS or police check is returned. If that is the case, then the DSL will ensure that:

- a Barred List check has been carried out;
- a self-declaration form has been signed, completed and filed;
- a detailed risk assessment by the DSL has been completed, signed and filed;
- other staff members are aware that the DBS or police check is outstanding, and that this person cannot be alone with U18s under any circumstances.

The staff member will be prohibited from being alone with an U18 until a cleared DBS or police check can be verified. In the case of teachers, they will not be scheduled for individual tuition with an U18 and all contact with U18s must be closely monitored. Steps to do this must be clearly set out in the risk assessment done prior to the role commencing.

Information for Applicants

Applicants are always informed of the following:

- the school always takes up references and checks an individual's employment history
- reference checks will include questions that are specifically related to suitability to work with U18s
- any gaps in an application form must be explained to our satisfaction
- the school is committed to safeguarding and is only interested in recruiting candidates with the same mindset and values
- enhanced DBS checks will be carried out for all staff before appointment including the Prohibited List
- applicants from overseas will be expected to provide a current police check from the relevant country
- on appointment, staff are required to undertake the online basic awareness safeguarding training and the face-to-face training to understand the policies and procedures of our context
- enhanced DBS checks will be carried out for all staff before appointment
- where relevant, Prohibited List checks will be done

Employment of ex-offenders is possible at the school provided that the seriousness, nature and frequency of the offence, as well as the age of the conviction, do not make the candidate unsuitable for the post they are applying for. Candidates will be signposted to a source of independent advice on what is required to be disclosed. At least two members of staff involved in the recruitment process will assess the candidate's suitability to work in the position they have applied for.

Staff Records

All staff records are held by the Director of Studies.

Referrals to the Disclosure & Barring Service (DBS)

A referral must be made to the DBS if the school withdraws permission for an individual to engage in work with U18s or would have done so had the individual not resigned, retired, been made redundant or been transferred to a position which does not involve contact with U18s because they think that the individual has:

- engaged in *relevant conduct*, i.e., action or inaction that has caused: neglect, emotional/psychological, sexual or physical harm;
- satisfies one or more of the harm tests; to harm or cause harm, to put an U18 at risk, to attempt to harm or incite others to harm or to behave in a way that indicates they may not be suitable to work with children;
- received a caution or conviction for a *relevant offence*.

If these conditions have been met, the information must be referred to the DBS. The referral should be made to the DBS when the school has gathered sufficient evidence as part of their investigation to support their reasons for withdrawing permission to engage in work with U18s and, in following good practice, consulted with their LADO if appropriate.

Welfare for U18s

Risk Assessments

To ensure the safety of our staff and students, a comprehensive range of risk assessments are carried out. All risk assessments are reviewed annually and where relevant (e.g., social programme activities), they are reviewed before each event to make sure they are still relevant. Please see our risk Assessment Policy for further details.

Specific areas for analysis of risk include:

- travelling to and from the school
- travelling between their accommodation and school
- in the school building
- educational activities

- off-site activities
- the social programme
- free time
- unsupervised time

Before engaging in any activity with students, teachers and social programme leaders must read the relevant risk assessment, adapt it to any specific need for this particular group and then sign it to say they have read and understood it. The risk assessment must then be signed by a Welfare Officer and filed appropriately.

The fact that an activity has been risk assessed does not mean that there are no risks to students.

However, potential risks can be significantly reduced by following the safety provisions outlined in the risk assessment.

Unsupervised time

While every attempt is made to engage the U18s in school led activities, it is recognised that there may be time when the U18s will be unsupervised. The following provisions apply to 16-18 at the school and are in place to help keep them safe during unsupervised or free time:

- U18s must participate in all class trips that are during class time.
- If an U18 is late for class (at the beginning of the day or after a break), then the Registrar or Welfare Officer must immediately contact the host family to follow up.
- Host families must immediately contact the school's emergency number if an U18 misses their curfew.
- All students are issued with a card with the school's emergency number. On day one of an U18's course, they are asked to programme the number into the phone and call it to check the number is correct.

Missing Students

Procedures for what to do in the event of a missing student are outlined in:

- Procedure for dealing with missing students.
- Social programme – guidelines for group and activity leaders
- Airport arrivals procedures and policy
- The school Critical Incident Plan

The procedures cover what to do in the event of a missing student in any eventuality including airport arrival, accommodation, school and social activities.

All U18 students are required to give us their emergency contact details before they arrive in the UK for their course to start. They need to provide the following information:

- Name of emergency contact
- Telephone number and email address of emergency contact
- Relationship to the student
- Approximate level of English of the emergency contact
- Spoken language(s) of the emergency contact.

Welfare provision

Our Registrars are also our Welfare Officers and members of the Safeguarding Team who will meet all students enrolled at the college. There is always a member of the safeguarding team at the school. Our teams are made up of one man and two women so a student can choose the person they feel most comfortable talking to.

In order to prepare U18s for life in the school & London during their stay and to have the best experience possible, the following procedures are in place:

- a copy of the U18s Handbook is available on the website and is sent with the booking confirmation.
- a day one orientation for U18s is organised and led by a member of the safeguarding team. The orientation covers all aspects of their stay and the areas that are specific to U18s.
- U18s are highlighted in the school register so teachers who have U18s in their class can identify them easily
- a safeguarding poster is on the noticeboard in every classroom and in the staff areas to remind everyone of their responsibilities in Duty of Care
- all staff are aware of who the welfare and safeguarding team are and know to refer any concerns, however small, to them to take over. The welfare team member will then feedback to the person who brought up the worry so that everyone can be reassured that it is being dealt with

First aid provision

The school has a comprehensive First Aid Policy in place and ensures that at least 2 appropriately trained physical or medical first aiders are available. First aid training is updated regularly, and the

training schedule is kept up to date by the Senior Registrar. The names and photos of the trained first aiders are on the noticeboard in Reception which is pointed out as part of the induction.

Where required a member of staff will accompany all U18s to medical appointments and to the pharmacy to pick up medication.

The DSL is trained in Mental Health First Aid.

All staff should be aware that mental health problems can, in some cases be an indicator that a child has suffered or is a risk of suffering abuse, neglect or exploitation.

It is important to recognise whilst providing support that unless trained appropriately, staff are not mental health experts and should not be diagnosing conditions. The mental health first aid role is to provide information for staff and students to feel comfortable in asking for help or providing an environment where the suggestion of help may be made through a considered and guided approach such as with mental health first aiders.

Staff are well placed to observe students day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a student that is also a safeguarding concern, immediate action should be taken, following procedures and speaking to the DSL.

Code of Conduct for U18s

For everyone to be very clear on acceptable standards of behaviour a student code of conduct is included in the U18 Handbook and covered in the day 1 inductions. This includes information on alcohol and tobacco laws in the UK and makes it clear that:

- the legal age to buy alcohol and tobacco products in the UK is 18
- students under the age of 18 are not permitted to smoke or vape while under the care of the school.
- students under the age of 18 are not permitted to drink alcohol at any time.
- students under the age of 18 are not permitted to join a social activity which has not been deemed age appropriate. A student turning 18 whilst on the course will adhere to the rules as if they were still U18.

GDPR and U18s

U18s need particular protection when collecting and processing their personal data because they may be less aware of the risks involved. U18s have the same rights as adults over their personal data. These include the rights to access their personal data; request rectification; object to processing and have their personal data erased. An individual's right to erasure is particularly relevant if they gave their consent to processing when they were a child.

All our student data (adult and U18) is processed and stored under strict GDPR guidelines. In addition to the consent of the U18, parental consent is required.

Contextual Safeguarding

We have strict protocols in place to ensure the safety of our U18s on school premises and activities.

We also recognise that we have a duty of care to our students when they are unsupervised and ensure we have risk assessments conducted for, and advice for all U18s on areas such as:

- U18s keeping safe in unsupervised time
- travelling to and from school each day
- who to contact if you have an emergency
- keeping safe at events in central London

Safeguarding U18s and Adults at Risk on the social programme

Events on social programmes can take place during the afternoon, the evening or at weekends. To safeguard all our students but particularly those U18 or Adults at Risk, the following procedures and guidelines must be followed:

- A relevant risk assessment must be completed by the activity leader and signed off as complete by a Welfare Officer. Each activity will need a tailored risk assessment, so it is not appropriate to cut and paste from another document. However, many social programme activities fall into similar categories and so a template can be used as a starting point
- The social programme organiser needs to be sure that the ratio of staff to students is adhered to, especially if an U18 student is joining at any stage. The ratios are 1:15 as a minimum for social programme activities unless otherwise agreed with the DSL.
- For any on-site activities, make sure that the room is fit for purpose and any obstacles have been removed.

- For all social programme activities, the leader must have a complete list of all names and phone numbers for everyone joining the activity. A copy of this list must be left with the risk assessment in the school office and another copy must go with the activity leader.
- Activity leaders must be able to identify all U18s by sight and know all their names.
- The activity leader must take a school phone with them and make sure that every student has a note of the number in case they get separated from the group.
- On excursions where students have time to themselves, no U18 can be left alone. Students must always stay in groups of at least 3. The activity leader must ensure that the U18 student has their number and the school emergency number before leaving the school and that the student's phone has sufficient charge on it in case of emergencies.
- When using public transport, the activity leader must make sure that all students stay together and that no one is left behind. The activity leader must make it clear to students what procedure to follow in the event this happens.
- It is the responsibility of the activity leader to check the environment they are taking the group to as part of the risk assessment process. They should consider potential changes including heavy traffic, sporting events or public holidays etc.
- Ensure that all students know where the meeting point is and what time they are due to be there after their free time is over
- Activity leaders are encouraged to take photos on excursions. Particular attention needs to be taken to safeguarding if there are U18s on the trip. While all students need to give their consent to their image being taken and used for publicity, photos of U18s can only be used with their consent AND their parent/guardian's consent. The Activity leader should have this information as part of the risk assessment preparation

Safeguarding U18s and Adults at Risk during airport transfers

We strongly recommend that all U18s use our airport or Eurostar transfers in order to travel from their point of entry into the UK and their accommodation. If a parent wishes to organise their own travel arrangements, the school must conduct a risk assessment and inform the parent of their findings. The parent can then complete an informed parental consent form with clear information on who the U18 should contact if they get into any difficulties.

All drivers in the companies we use to transfer U18s are DBS checked and we have annual confirmation of this in writing on file. No company has permission to use a substitute driver for an U18 transfer. Additionally, at least one member of staff also attends the point of entry to meet U18 groups where there are at least ten U18s in the group.

Transfer documents that involve an U18 are clearly marked to say that the passenger is U18, and drivers are under strict instructions to never leave the airport/pick up point without their U18

passenger. In the event of a no-show, the driver must contact the emergency number of the school and receive confirmation that their passenger has not left their country of origin before leaving the pick-up point. When an U18 is delivered to the accommodation, the driver must ensure that the U18 passenger is met by an adult and has access to the accommodation before leaving.

Parental Consent

A Parental/Guardian agreement for students U18 to study with Golders Green College and School of English is emailed at the time of booking and must be completed before the course starts. This explains what the rules of the course are. No U18 can join a course without a signed parental consent form.

Parental consent forms will be stored on the U18s student account and information distributed to the safeguarding team as appropriate.

Prevent Duty

In light of recent global events the government has introduced its Prevent Strategy. Prevent is part of the government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

Government advice is as follows:

'Schools can build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. Schools are already expected to promote the spiritual, moral, social and cultural development of pupils and, within this, fundamental British valuesthere is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their

views. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

Source: DFE -The Prevent duty Departmental advice for schools and childcare providers, 2015

Radicalisation & Extremism

Golders Green College and School of English is a multicultural and international community in which we aim to foster an acceptance and tolerance of a range of views. We encourage our students to express their views as long as they respect the core British values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those of different faiths and beliefs in accordance with the Government's prevent strategy.

We are aware that some students may have been exposed to extremist influences or views before their arrival in the UK or may be exposed to them after coming here. At times, students themselves may reflect or display views that may be discriminatory, prejudiced or extremist, including using derogatory language. Any of these behaviours that are witnessed by staff must be challenged and reported to the DSL. These will then be dealt with in line with the relevant policies governing staff and student conduct.

Staff should be aware that U18s and Adults at Risk may be more susceptible to, or could be targeted by, extremists. Students who have not made friends, appear lonely or are excessively homesick may be particularly vulnerable. As part of a wider safeguarding responsibility, staff need to be alert and have a duty to report the following to the DSL:

- disclosures by students of their exposure to extremist views, actions or material both inside and outside of the school
- graffiti symbols, writing or artwork promoting extremist messages
- students accessing extremist material online
- any reports of changes in behaviour, friendships, actions or requests for assistance
- students voicing opinions drawn from extremist ideologies or narratives
- use of extremist or 'hate' terms to exclude others or incite violence
- intolerance of difference, whether secular or religious or, in line with our equalities policy, views based on but not exclusive to gender, gender identity, disability, sexuality, race, colour or culture
- attempts to impose extremist views or practices on others
- anti-western or Anti-British views.

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In order to help prevent such occurrences, the school is committed to raising staff and student awareness of radicalisation and extremism through training and incorporating these themes sensitively and appropriately into lessons. In a situation where concerns have been raised, the DSL will share them with local agencies as appropriate for guidance.

If you are concerned about any student, please inform the Prevent Lead: Mei Ling Delmonte. You can contact her by email: tesol@goldersgreencollege.com or call 020 8905 5467.

The school also has a separate and more comprehensive Prevent Policy.

I have read and understood the GG Colleges Child Protection Policy

Name:

Signature:

Date:

Person Responsible for the policy – DOS/ aDoS
Date – August 2024
Review date – March 2025