

## 2023 CHILD PROTECTION AND SAFEGUARDING POLICY

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## MALVERN HOUSE SAFEGUARDING & CHILD PROTECTION POLICY

### 1. INTRODUCTION

#### 1.1 STATEMENT OF INTENT

A person under 18 years old is designated a child by English law. It is the legal responsibility of the school to protect under 18 students from abuse and to report any suspicions or allegations of abuse.

This safeguarding legislation is set out in [The Children Act \(1989\) and \(2004\)](#), and [Safeguarding Vulnerable Groups Act 2006](#). The DfE guidance '[Keeping Children Safe in Education](#)' (re-issued in September 2022) and the [Counter-Terrorism and Security Act \(2015\)](#) also inform this policy.

Malvern House is committed to ensuring that all students, and in particular those under 18, are able to study in a safe and secure environment.

Safeguarding is the school's general duty of care towards all under 18 students, acting 'as a caring parent would'. This extends to all members of staff and adults in contact with under 18s through their role with the organisation, including group leaders and interns, all of whom are issued with this policy and asked to familiarise themselves with it.

All staff receive regular training to an appropriate level and are made aware of the roles of the Designated Safeguarding Lead (DSL) and Deputy Designated Safeguarding Lead (DDSL), and also who holds these roles within the organisation.

Child protection involves protection from abuse, which includes neglect, physical, emotional and sexual abuse.

Malvern House does not normally accept students under the age of 16 into adult classes.

16 and 17 year olds enrolled in the adult school study in classes and use common areas of the school with adult students of all ages, unless under-18s have been enrolled in closed group classes.

The large majority of our students are adults, though the percentage of under-18s varies with the time of year and increases in the summer and during school holidays, when there are more under-18 group and individual bookings.

Malvern House will accept closed groups of students under the age of 16 (minimum age 12).

They will be separated as far as possible from adult students and will have different break times.

## 1.2 AIMS

- To provide clear policies and procedures for all aspects of the student's stay with Malvern House, including accommodation and all off-site activities.
- To ensure that all staff and adults who come into contact with our students are familiar with our Safeguarding and Child Protection Policy, which includes our Code of Conduct and reporting procedures.
- To ensure that all students under 18 and their parents are aware of our policies and the various support services available to them.
- To ensure that all staff who come into regular unsupervised contact with students under 18, including administrative support staff, are checked for their suitability through the DBS (Disclosure and Barring Service) and receive an appropriate level of safeguarding training.
- To have clear procedures for monitoring the welfare of under-18 students, as well as for acting upon any problems which arise, involving such students.
- To set boundaries and expectations to protect staff and all adults who come into contact with our students from any behaviour or actions which might be misconstrued.
- To have clear administrative procedures with secure confidential record-keeping and to review and update this policy regularly and at least once a year.
- This policy sets out the entitlement to protection for all under 18 students, regardless of colour, race, nationality, ethnic or national origin, gender, marital status, religion, sexual orientation, disability or other difference.
- Though this policy is specifically designed for the needs of under 18 students, some of the content will be relevant to over-18 students, who may be classed as vulnerable adults if their level of English is low.
- See also Malvern House Prevent Policy for details of policies and procedures to safeguard students of all ages against radicalisation and extremism.

## 1.3 CODE OF CONDUCT

All adults who have contact through our organisation with students under the age of 18 are expected to:

- Treat all under18s with dignity and respect, regardless of ethnicity, race, religion, gender, sexual orientation or other difference.
- Be aware that an under-18 student is a child by UK law and that the adult who has contact with them is in a position of trust.
- Behave as a 'caring parent' would towards the student. Under18s vary in maturity and emotional development and may be vulnerable to abuse.

- Be receptive and open to what students may relate and deal with any concerns promptly, following Malvern House procedures.
- Provide an excellent role model of behaviour to students at all times and be mindful of the impact of your behaviour on under-18s, who may be easily influenced.
- Language used should be appropriate and clothing should be modest. Avoid smoking in front of under -18s and do not encourage the use of non-prescription drugs and drinking alcohol.
- Avoid at all times any inappropriate physical contact or touching and flirtatious behaviour, which could be misconstrued.
- Be friendly and supportive, but maintain an appropriate 'distance' – do not seek or encourage friendship with an under-18 student.
- It is a criminal offence under the [Sexual Offences Act 2003](#) for any adult in a position of trust to engage in any sexual activity with an under 18 student.
- Limit your use of mobile phones, social networking and other forms of digital/electronic contact to class or social programme use. Staff members should not give out personal numbers or contact details. Personal friendships on Facebook and other social networks between adults and under-18s are not appropriate.
- Avoid being alone with an under-18 student, especially in an enclosed space. If possible, have another adult or member of staff present, but if unavoidable, let other adults know about any meetings and leave the door open.
- The privacy of children should be respected at all times. This requires particular care in residential accommodation, where adults should not enter the sleeping, bathroom, shower or toilet areas when children are undressing or using the facilities.
- Do not encourage extremist views or behaviour and report any that are observed to a senior member of staff.
- Report any concerns about any under-18 student to DSL or DDSL, who will look into it and deal with the matter according to our procedures.
- In cases of suspected child abuse, this must be reported to the DSL, who will investigate the allegation and contact the appropriate authorities if applicable.

## **2. ADMINISTRATIVE PROCEDURES**

### **2.1 DESIGNATED PERSONS AND STAFF TRAINING**

- There is a minimum of two Safeguarding Leads, a Designated Safeguarding Lead (DSL) and a Deputy Designated Safeguarding Lead (DDSL) to cover for absence, whose names are displayed prominently in the Centre and on relevant documentation.
- The Centre Manager/Principal is the Designated Safeguarding Lead (DSL) and has

overall responsibility for the implementation of the Safeguarding and Child Protection Policy. They are supported by the Deputy Designated Safeguarding Lead (DDSL) who also fulfil the role in their absence.

- All Malvern International staff who have any contact with students receive Level 1 safeguarding training at a minimum as part of the induction process, in order to ensure an understanding of our policies and procedures. They are asked to complete the [online safeguarding training](#) available on the British Council website.
- Level 1 'Refresher' training for all staff must be carried out at least annually, with regular updates as required. Training should ideally be face-to-face, to allow for questions and clarification, but can take other forms.
- The DSL and DDSL should receive at least Level 3 training. There are other Safeguarding Officers in the centres with Level 2 training or above that can assist in their absence.
- Homestay hosts, group leaders, airport transfer drivers and any other adults coming into contact with our under-18 students will also receive a copy of our Safeguarding and Child Protection Policy, with particular reference to the code of conduct.
- 'Refresher' training at Level 2 for all Safeguarding Officers and Level 3 for DSL and DDSL should be carried out at least every two years.
- The DSL and DDSL should keep abreast of current knowledge on safeguarding with regular updates of information from websites (eg [www.safenet-work.org](http://www.safenet-work.org)) and other sources.
- All training must now include: Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), Whistle-blowing - legal obligation on staff to report, preventing radicalisation Peer-on-peer abuse (especially bullying/gender issues), so called 'Honour based' violence, individual to report FGM to police direct (as well as to DSL), increased vulnerability of pupils with SEND (Special Educational Needs and Disability).

### 2.1.1 DESIGNATED PERSONS IN YOUR CENTRE

The Designated Persons at Communicate School of English are:

- Designated Safeguarding Lead (DSL): Giulia Mella, Centre Manager
  - Email address: [giulia.mella@malvernplc.com](mailto:giulia.mella@malvernplc.com)
- Deputy Designated Safeguarding lead (DDSL): Chris Tabor, Director of Studies.
  - Email address: [chris.tabor@malvernplc.com](mailto:chris.tabor@malvernplc.com)

If the DSL or DDSL are not available and it is a matter of urgency, please contact:

- Niki Clear, Senior Teacher: [niki.clear@malvernplc.com](mailto:niki.clear@malvernplc.com)
- Gabrielle Woolner, Senior Student Support Officer:  
[gabrielle.woolner@malvernplc.com](mailto:gabrielle.woolner@malvernplc.com)

Both Niki and Gabrielle have the required Safeguarding Training (Level 3) to act as Safeguarding Leads and can help if Giulia or Chris are not available.

## **2.2 RECRUITMENT / HR & DBS CHECKS**

### **2.2.1 RECRUITMENT PROCESS**

- Staff recruitment advertisements must include reference to Malvern House's commitment to safeguarding. They must also inform candidates that:
  - suitability checks will be required
  - they will be asked to explain any gaps in their CVs during the interview
  - referees will be asked specifically if they have any concerns with regard to the applicant working with under 18s
  - proof of identity will also be required
- In the invitation to interview, candidates will be informed that they will be required to sign a criminal declaration form and to complete an application for a DBS check. They will also be asked to provide the name, contact telephone number and email address of two referees.
- Upon successful interview, two references should be obtained using the Malvern House Reference Request form, which includes a question regarding suitability to work with under- 18s.
- Employment offers must state that they are subject to receipt of satisfactory references and a satisfactory DBS check.

### **2.2.2 DBS CHECKS**

- Before starting work, new employees must be given an application form to complete for an enhanced DBS check for children. The completed form must be returned and the online application made within one week.
- If the new employee is registered with the online update service, they should be asked for their ID and for written permission to access this. The line manager should then complete the check and the results should be recorded in the central register. If their status has changed, a new check must be carried out.
- Existing DBS checks can be accepted while waiting for the results of a new check to come through BUT only if: a) it is an enhanced check b) it is not more than 3 years old c) there are no other causes for concern. This also applies to existing staff members who have a break of 3 months or more.



- All staff should be encouraged to register for the update service. This must be done either when the application is made, or within 19 days of issue of the certificate.
- Agency teachers (and other agency staff) must have satisfactory enhanced DBS checks. Managers must stipulate this at the time of booking and request that they bring photo ID, which they should check when the teacher arrives in the school, take a signed copy and store for our records.
- A register of staff DBS checks is kept on file and it is updated by the HR manager and/or the Centre Manager. Line managers must see original certificates.
- The results of the check will be forwarded to the line manager, who will review any negative results with the HR manager and/or Centre Manager. If the results give any cause for concern whatsoever, the contract will be terminated.
- New staff will only commence employment before receipt of a clear DBS check in exceptional circumstances, which must be risk assessed, authorised by a senior manager and recorded in the Single Central Record. While awaiting the results of the DBS check, staff will not be given unsupervised access to under 18s. In the case of interns/ volunteers without a DBS check, they should be supervised at all times by a member of staff, who must be made aware of their responsibilities by the intern's line manager.
- Further DBS checks should be carried out on existing staff at least every three years or whenever there is a cause for concern, using the online updating service if possible.
- If the returned disclosure shows that a prospective or existing member of staff has a criminal record, the procedure outlined in the [British Council Care of Under 18s: Guidance for ELT providers](#) must be followed.

### **2.2.3 GENERAL HR**

All staff must be informed about the school's Safeguarding & Child Protection Policy by their line managers during their induction.

- The Safeguarding & Child Protection Policy is displayed in the staffroom(s) and is also accessible to all staff via the computer shared drives and the school website.
- Any member of staff who has concerns or suspicions with regards to a colleague's behaviour towards underage students is obliged to inform a senior member of staff. All such incidents will be investigated.

### **2.3 STUDENT ENROLMENT:**

- Malvern House does not accept students under the age of 16 to join adult classes for over 16s.
- Malvern House accepts closed groups which include under-16 students (minimum age normally 12), who are accompanied by a group leader (or leaders) and are taught separately from over 16 students.
- Enrolments staff must ensure that all prospective students under 18 have filled in the enrolment form completely (with special attention to complete emergency contact details and parents' contact details).
- Parents or guardians of all under-18 students are also required to submit the 'Parental Consent Form', confirming the parent/legal guardian's agreement for the student to enroll on the course and to live in and travel to the UK independently. Enrolment staff should request the agent or student to complete and sign this before issuing a confirmation of enrolment (CoE) for the student.
- This completed and signed form will also be required for the purpose of visa applications and must also be shown by the student at immigration control upon request on every occasion when entering the UK.
- A copy of this consent form must be saved on the student's profile on the database for ready access by school staff and must be double-checked as part of the first day student induction process.
- The 'Parental Consent Form' also contains information for parents, which agents are encouraged to go through with the students (and parents where possible) prior to their departure from their home country.

### **2.4 GROUP ENROLMENTS:**

- DBS checks are not appropriate for group leaders of under 18s who are foreign nationals and have not been a UK resident. However, as they have unsupervised access to under 18s, Malvern House must have an agreement with the agent to ensure that suitability

checks have been carried out by the police or other official authorities in their country of residence for all staff accompanying the group. The agreement is sent out to agents for completion prior to booking, who should return it with proof of suitability checks for group leaders.

- Prior to arrival in the school, group leaders are given a copy of the Safeguarding and Child Protection Policy, with particular attention to the code of conduct. In addition, group leaders should be supervised closely by the Centre Manager/DoS and/or site Co-ordinator and other staff who have close contact with them. The Centre Manager should go through the risk assessments for the group social activities with the Group Leaders to ensure that they minimise these risks. They should also be reminded of the curfew times for students staying with homestay hosts (see 2.5 Accommodation section).

## **2.5 ACCOMMODATION:**

- Malvern House London requires that under-18 students who are not part of a group must book homestay accommodation with half or full board. The student must also agree to adhere to the rules on the parental consent form.
- Where appropriate, Malvern House must have written assurances from its professional accommodation agency partners that they have clear policies for students under 18 and are responsible for screening their hosts in this regard, including DBS checks as appropriate. Malvern House now only works with homestay organisations that are on the British Council Approved list.
- Under-18 students must only be placed in homestays by agencies which are registered with the British Council or with direct homestay hosts that have a DBS check.
- Malvern House will ensure that under-16s in homestay or residential accommodation will not be lodged with students of 18 years or older.
- Homestays should also be informed directly or via agencies of Malvern House rules for curfew. Homestays should contact the school, or should contact the agency who will contact the school Accommodation Officer, if the student arrives home late. Curfew time is 11 pm Friday and Saturday and 10.30 pm all other days of the week. Under 16s must remain at their homestay once they have returned for dinner in the evening, unless accompanied by a group leader. This information is included on the parental consent form.
- Hosts should ensure that any adult visitors to the home should not be left alone with under 18 homestay students at any time.
- Under 18 students booking as groups with an authorised leader may be booked into homestays or student residences, which are externally provided. If student residences are used, they must have the appropriate licence for students under 18 or under 16. Their

Group Leader will have to stay in the same accommodation and provide supervision at all times.

- For the daily return journey between homestay accommodation and school, under 16 students must be accompanied by the host to a meeting point, from where the group leader will then accompany the group for the remainder of the journey to school, with the reverse process after classes. This option is also available upon request for students aged 16 and 17 who have booked as part of a group. Individual students aged 16 and 17 years old who have enrolled on adult courses are expected to travel independently between the school and homestay, as stipulated on the Parental Consent Form.
- For all visa national students, homestay accommodation for students under 18 must be pre-booked and confirmation sent to the student for submission with their visa application.

## **2.6 AIRPORT TRANSFERS:**

- Students under 18 who book accommodation through Malvern House are strongly recommended to use Malvern House's airport transfer service, and those who do not book accommodation through us will be strongly encouraged to do so (particularly if they are arriving after 5 pm).
- Malvern House must have proof from its airport transfer partners that their drivers are DBS checked.
- Students under 18 will be flagged on the airport transfer booking form so that drivers are aware of their age. The driver will wait for the student for 2 hours. If the under 18 student does not come through, the driver will check with the Immigration Authorities to see whether they are being held. If that is the case, the driver will call the school to seek advice on what to do next.
- If the driver has to stay for longer than 2 hours, the student will bear the additional cost (as stated in the Terms and Conditions).

## **3. SAFETY MEASURES/DEALING WITH STUDENTS/CONTACT WITH STUDENTS**

### **3.1 GENERAL MONITORING AND WELFARE:**

- The DSL and DDSL are responsible for enforcing this policy in the centre. They are also the first point of contact for any concerns relating to students under 18.
- Students under 18 will be highlighted on the arrivals list and given additional information during their first day informing them about the school's Safeguarding and Child Protection Policy and school rules for Under 18s. Student Services staff carrying out the induction should stress the importance of maintaining up-to-date contact information.

- Under 18s will be offered a one-to-one welfare meeting on request with the Centre Manager (DSL) during their first week in the school. This meeting is to ensure that they are settling in well and to 'nip in the bud' any problems that they may be experiencing. During quiet periods, where possible, students will receive an email invitation and in peak periods, they will be offered a bookable appointment, available on request. (Please note this applies to individual, not group bookings).
- Student Services staff must make every effort to ensure that the contact information of the student is completed and is up to date, including full contact details of their accommodation while in the UK, their agent (where applicable) and parents/guardians.
- Teachers, who are usually the first line of contact with students, should be aware of any students in their class under 18 and be vigilant for any problems or issues which may be affecting them and report them promptly. Under 18s student will be highlighted on the class registers for teachers to identify them and teachers should be informed of this at induction.
- A risk analysis for all aspects of the student experience has been conducted for under 18s. This is available to staff on the shared drives and is highlighted during staff inductions and training.
- Special provisions are made for closed groups which include under 16s and these classes should take place in a separate part of the school, where possible. Classes are scheduled to avoid overlap with over 16s. See risk analysis for further details.
- All staff should be vigilant at all times and report any concerns about students or other members of staff to a Child Protection Officer.

### **3.2 TEACHING:**

- At induction, teachers are requested to read the Safeguarding & Child Protection Policy, which is posted in the staff room. If a teacher suspects that there is a problem, they should inform the Director of Studies or ADOS immediately, who will then report it to the DSL or DDSL.
- Teachers should be mindful that they may need to adapt some of their teaching material if it is inappropriate for students under 18 and should endeavour to set a good example to their students (see Code of Conduct above).
- Where possible, tutorials with individual students under 18 should take place in a public area or, if in a room, with the door open.
- Private meetings between staff and students under 18 outside the normal teaching environment are strongly discouraged. Where such meetings cannot be avoided,

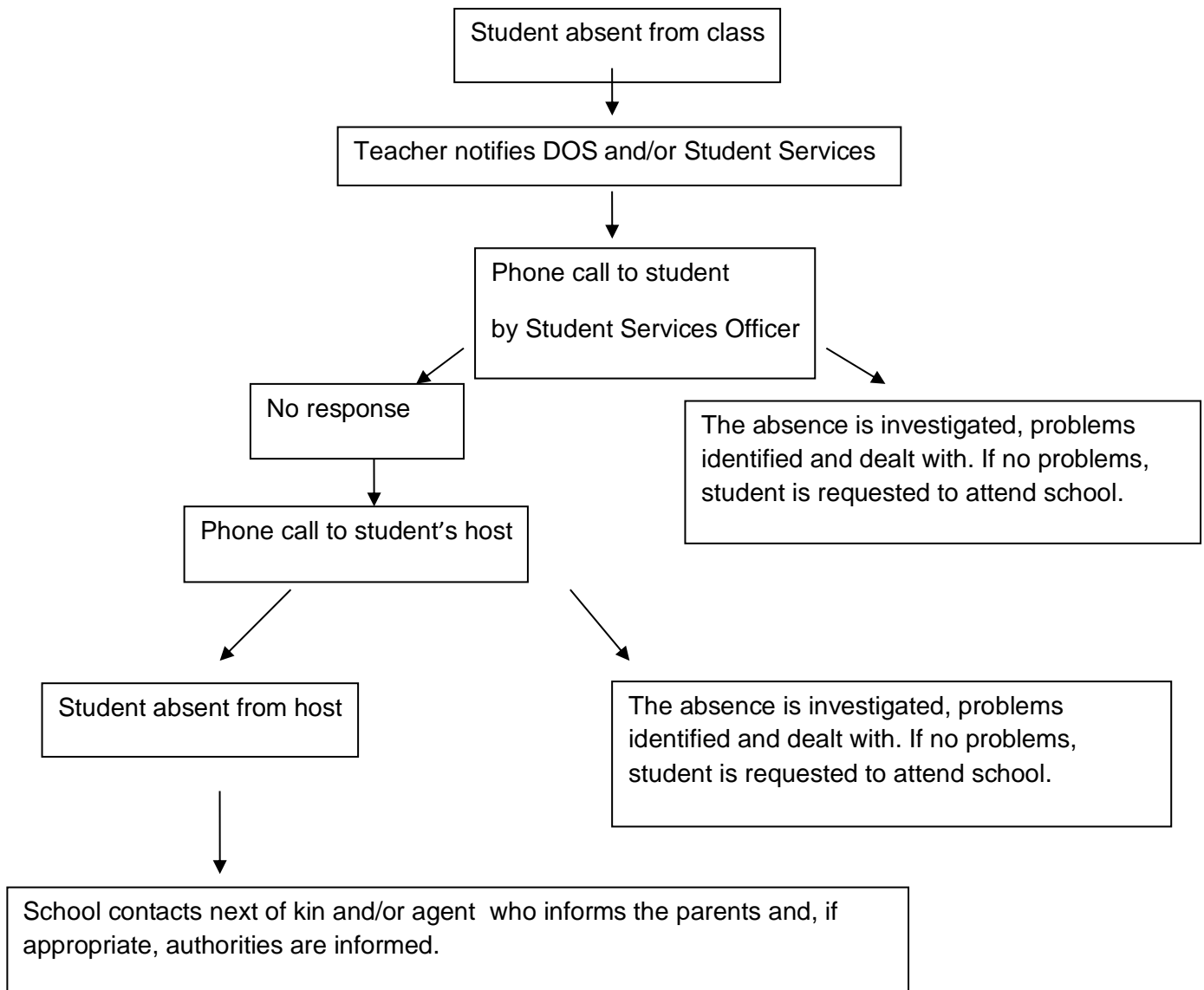
teachers should inform another staff member that they are taking place.

- Intimate or sexual relationships between staff and students under 18 are an abuse of trust which may constitute a criminal offence and will lead to dismissal.

### 3.3 CLASS ABSENCE:

In case of an underage student being absent from class, the following procedure will be adhered to:

(NB. If the student is part of a group, please contact the group leader directly, rather than the student)



### 3.4 SOCIAL ACTIVITIES, ALCOHOL, AND TOBACCO:

- Staff involved in the organisation of social activities (particularly the Social Programme Co-ordinator) or participating in social activities should check to see if participating students are under 18. Under 18 students will be highlighted on the activity register so teacher can identify them easily.

- Staff accompanying social activities should not give out their personal phone numbers, but should use a MH mobile phone.
- Supervision ratios of staff to students should follow as a minimum DfE guidelines of 1:15 for ages 11+. More staff should be provided if necessary, taking into consideration the level of risk as identified in the risk assessment of the activity, and students with any special needs. There should be enough supervisors to deal with an emergency.
- Under-18 students cannot participate in activities held on premises or public places (other than restaurants), where alcohol is sold or served, such as pubs, bars or clubs. The student's age can be deduced from their date of birth on the MH student card (or database), which must be checked when the student signs up for an activity.
- It is against the law for anyone under 18 to buy alcohol in a pub, off-licence, supermarket, or other outlet, or for anyone to buy alcohol for someone under 18 to consume in a pub or a public place.
- It is against the law to sell or give tobacco products to under 18s. In the UK it is illegal to smoke in any enclosed workplace, public building or on public transport. The school is a no-smoking zone for staff and students.
- All students are informed of the laws and school policies on alcohol and tobacco products during their first-day induction.
- Students under 18 must return to their homestays or accommodation by 10.30 pm from Sunday to Thursday and 11 pm on Friday and Saturday at the latest.
- The Social Programme should also include activities that are suitable for under 18s, which should be clearly marked as such.
- Risk analyses for all activities should include special consideration of under 18s.

### **3.5 E-SAFETY:**

The majority of students within the school are over 18 and will expect unrestricted access to the internet. However, the needs of under-18 students are paramount and therefore the following measures are put into place:

1. Filters installed on all computers in student break out area and study centre to protect children from viewing inappropriate material.
2. Careful monitoring to ensure there is no use of phones in class, in accordance with the class rules for all students, including under 18s.
3. Informal monitoring during break times when students are using tablets, phones and computers.



4. Raising students' awareness of e-safety issues, through posters and student handbook.
5. Encouraging teachers, especially those of closed group under 18 classes, to discuss e-safety issues in class.

### **3.6 EXTREMISM AND RADICALISATION:**

Malvern House forms a multicultural community which promotes the core British values of tolerance, understanding and respect between all students and staff, regardless of background. Staff receive training on this and there is a comprehensive anti-radicalisation and extremism (Prevent) policy. While any of our students may be vulnerable to exploitation by extremists of any nature, under-18s are particularly at risk due to their age and inexperience. All staff should be especially vigilant when overseeing under-18s in this respect and should report any concerns directly to the DSL or DDSL. (See also Prevent policy for further details).

## **4. CHILD ABUSE**

### **4.1 DEFINITION OF CHILD ABUSE**

Child abuse is any action which causes significant harm to a child and includes neglect, physical, emotional and sexual abuse. FGM (female genital mutilation) and CSE (child sexual exploitation) incorporate various forms of abuse. All forms of abuse may cause serious and long-lasting physical and emotional harm to a child, which affects their development and well-being. Staff receive training in what constitutes abuse and how to recognise it. While instances of abuse appear to be extremely rare in the school, staff should remain vigilant.

### **4.2 RECOGNISING CHILD ABUSE**

It is important to recognise signs of abuse, which may vary with age of the child. Not every child will exhibit every symptom. As well as signs, children may tell you of abuse, so adults should be receptive to this.

### **4.3 SEXUAL ABUSE**

Sexual abuse is forcing or enticing a young person to take part in sexual activities, which can happen in person and also over the internet, so the abuser might be in a different country to the victim. Even if a child is happy with the attention and willing, it is still sexual abuse if they are underage. There is a high incidence of teen abuse of other teens; befriending/loving a

needy friend, then turning on them.

Signs of abuse may include:

- Acting in an inappropriate sexual way with objects or peers
- Nightmares, sleeping problems
- Becoming withdrawn or clingy
- Personality changes, seeming insecure
- Unaccountable fear/dread of particular places or people
- Changes in eating habits
- Physical signs such as unexplained soreness around genitals, sexually transmitted diseases
- Becoming secretive

#### **4.4 EMOTIONAL ABUSE**

Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development.

Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. Children who are emotionally abused are usually suffering another type of abuse or neglect at the same time, but this isn't always the case.

It is often persistent, for example in bullying and can be compounded by abuser making children wary of authority/other adults trying to help them.

Signs may include:

- Delayed physical or emotional development
- Shows extremes of passivity or aggression, often switching erratically between them
- Sudden speech disorders
- Overreaction to mistakes, or continual self-depreciation
- Neurotic behaviour (rocking, hair twisting, self-mutilation)

#### **4.5 PHYSICAL ABUSE**

Physical abuse is deliberately causing physical harm to a child, through any means including punching, hitting, kicking, burning, shaking etc.

MSP (Munchhausen Syndrome by Proxy), the abuse of another person, typically a child, to

seek attention/sympathy for the abuser; creating symptoms for the victim to obtain repeated medical care.

Signs may include:

- Has unexplained bruises, burns, etc.
- Bruising - look for symmetry (2 black eyes/bruising on both shoulders) as a sign of abuse
- Burns or scalds that have a clear edge are usually caused deliberately not accidentally
- Finger marks need to be checked; does the story fit/sound plausible?
- Wearing clothes to cover injuries, even in hot weather.
- Refusal to undress for sports, or join swimming sessions.

#### **4.6 NEGLECT**

Neglect is the ongoing failure to meet a child's basic needs and is the most common form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. Neglect can happen in all levels of society (e.g. leaving children unattended is neglect).

Signs of neglect may include:

- Often hungry; may beg or steal food
- Badly dressed in clothes that need washing
- Poor appearance and personal hygiene; unwashed, hair not brushed
- Lacks needed medical or dental care
- Often tired
- Might abuse alcohol or other drugs

#### **4.7 CONTROLLING, COERCIVE, AND THREATENING BEHAVIOURS**

Often seen in teenage abusive relationships where one partner dominates the other in a range of ways, e.g. forced sexual activity, repeated insults and put downs, stopping partner from seeing friends/family, checking on partner all the time (texts/social media etc), using physical violence, taking money, forcing partner to work, controlling what partner wears.

The dominant partner makes the other feel subordinate and deprives them of ways to be independent. They may use threats, humiliation and intimidation to harm and punish their victim. These behaviours are often also evident in 'honour' based violence, female genital mutilation (FGM) and forced marriage.

#### **4.8 FGM (FEMALE GENITAL MUTILATION)**

FGM includes procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The procedure has no health benefits for girls and women and can cause severe and lasting physical and mental harm. It is illegal in the UK. FGM is a cultural procedure which affects predominantly communities of African origin. It is also practiced in some Middle Eastern and Asian communities. It is mainly carried out on girls between infancy and age 15.

Signs may include:

- difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- unusual behaviour after a lengthy absence
- reluctance to undergo normal medical examinations
- asking for help, but may not be explicit about the problem due to embarrassment or fear.

#### **4.9 CSE (CHILD SEXUAL EXPLOITATION)**

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection in return for engaging in sexual activities with the abuser(s).

Any young person may be at risk regardless of gender, ethnicity, sexuality, religion, or background. Likewise, the offenders do not fall into a particular pattern, but are more likely to be male than female – offenders may also form part of a gang that seeks to gain from the exploitation of children. Some children are "groomed" through "boyfriends" who then force the child or young person into having sex with friends or associates.

Signs may include:

- going missing for periods of time or regularly returning home late
- skipping school or being disruptive in class
- appearing with unexplained gifts or possessions that can't be accounted for
- experiencing health problems that may indicate a sexually transmitted infection
- having mood swings and changes in temperament
- using drugs and/or alcohol
- displaying inappropriate sexualised behaviour, such as over-familiarity with strangers, dressing in a sexualised manner or sending sexualised images by mobile phone ("sexting")
- they may also show signs of unexplained physical harm, such as bruising and cigarette burns

#### **4.10 BULLYING AND CYBERBULLYING**

Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home

or online. It's usually repeated over a long period of time and can hurt the recipient both physically and emotionally.

Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. The victim can feel that there's no escape because it can happen wherever they are, at any time of day or night.

#### 4.11 PEER ON PEER ABUSE

1. Sexual violence and sexual harassment can occur between two children of any age and gender. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Through application of our Safeguarding policy, procedures and related training, Malvern House seeks to making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. We do this by not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys".

These challenging behaviours are potentially criminal in nature and include (but are not limited to):

**Physical acts** such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts - interfering with someone's clothing, deliberately brushing against someone, displaying pictures, photos or drawings of a sexual nature and any unwanted conduct of a sexual nature (sexual harassment) that can occur online and offline.

**Online acts** such as non-consensual sharing of sexual images and videos. (UKCCIS sexting advice provides detailed advice for schools and colleges); sexualised online bullying; unwanted sexual comments and messages, including on social media; and sexual exploitation; coercion and threats.

## 5. REPORTING CONCERNS OR ALLEGATIONS

A concern refers to concern about an under-18 student's well-being.

An allegation is a claim or assertion that an adult may have:

- harmed a child
- possibly committed a criminal offence
- behaved in a way to suggest possible harm in the future

It is the duty of all staff and adults with contact through the school to under 18s not to ignore concerns and allegations. Adults who are not Malvern House staff members should contact the DSL or DDSL.

The procedure for staff is:

- I. Report the concern or allegation immediately to the DSL or DDSL.
- II. In the case of an allegation, DSL or DDSL will immediately inform the Local Designated Area Officer (LADO) at the Local Children Safeguarding Board (LCSB). Contact details for our local agencies are:
  - a. Malvern House London:

Camden Children Safeguarding Board  
Camden Multi-agency Safeguarding Hub (MASH)  
Tel. 020 7974 3317  
Email: [LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk)  
Website: <https://cscp.org.uk/>
  - b. Malvern House Brighton:

Brighton and Hove Safeguarding Children Partnership  
Tel. 01273 292379  
Email: [FrontDoorForFamilies@brighton-hove.gov.uk](mailto:FrontDoorForFamilies@brighton-hove.gov.uk)  
Website: <https://www.bhscp.org.uk/local-authority-designated-officer-lado/>
  - c. Communicate School Manchester:

Manchester Safeguarding Partnership  
Tel. 0161 234 3330  
Email: [manchestersafeguardingpartnership@manchester.gov.uk](mailto:manchestersafeguardingpartnership@manchester.gov.uk)  
Website: <https://www.manchestersafeguardingpartnership.co.uk/>
- III. If staff have concerns or allegations regarding senior management, they should contact the local LADO directly. They can also contact the NSPCC whistleblowing helpline for support and advice on 0800 028 0285.
- IV. Complete the Concerns and Allegations form available in each location.
- V. Further information on responding to concerns and allegations can be found in the shared drives.
- VI. Details to be documented by the DSL or DDSL by completing the Safeguarding Log. A note should also be left in the student's profile on the student database if compliant with GDPR regulations.
- VII. The DSL and DDSL will look into the concerns and allegations, follow through with any actions and with ongoing monitoring.

## **6.RECORD KEEPING & INFORMATION STORAGE**

### **6.1 LOCATION OF INFORMATION AND RECORDS**

- In the case of reports of concerns and allegations, these are kept in a confidential log, with protected access limited to the DSL and DDSL.
- This policy document is reviewed at least annually.

## 6.2 RELATED POLICIES

There are several policies related to the Safeguarding and Child protection:

- Prevent
- Recruitment
- Anti-bullying
- E-safety
- Health and Safety

All policies can be found in the Malvern House Staff Handbook and on the schools' websites:

- [Malvern House London: policies](#)
- [Malvern House Brighton: policies](#)
- [Communicate School Manchester: policies](#)

|                           |   |
|---------------------------|---|
| <b>Responsible staff:</b> | Principal/Centre Manager; Director of Studies; Enrolments Officer                     |
| <b>Last updated:</b>      | <b>April 2023</b> - Giulia Mella (General Manager for Communicate School Manchester). |
| <b>Next update due:</b>   | <b>April 2024</b>   |