

# English Path Berlin Safeguarding Policy

English Path is committed to safeguarding and promoting the welfare of young people and vulnerable adults. We expect all staff and volunteers to share this commitment. We are fully committed to ensuring that consistent effective safeguarding procedures are in place to support everyone at the school.

<b>Document title: English Path Berlin Safeguarding Policy</b>	<b>No. of pages: 29</b>
<b>Version Number: 1</b>	<b>Date first published: 22.04.2025</b>
<b>Approved by: Managing Director</b>	<b>Last review date: N/A</b>
<b>Date approved: 22.04.2025</b>	<b>New Policy or Substantive Policy Review: New Policy</b>

## Periodic Policy Review / Change History

<b>Version Change</b>	<b>Date of Review / Revision</b>	<b>Description of change</b>	<b>Reviewed By</b>	<b>Approved By</b>

©2025 English Path

# Contents

Context .....	4
Declaration .....	5
Scope: .....	5
English Path Safeguarding Team: .....	5
Terminology .....	6
Child / Young Learners .....	6
Designated Safeguarding Lead .....	6
Designated Safeguarding Officer .....	6
Private Fostering .....	6
Safeguarding .....	6
Vulnerable adult .....	7
Welfare .....	7
Commitments .....	8
Best practice .....	9
Preventing Radicalisation .....	<b>Error! Bookmark not defined.</b>
Safer recruitment .....	9
DBS Staff Checks .....	<b>Error! Bookmark not defined.</b>
Staff Induction .....	9
Students' induction .....	10
External Suppliers and contractors .....	10
Covid-19 .....	<b>Error! Bookmark not defined.</b>
Accommodation .....	11
Residential accommodation .....	11
Arrival/departure transfers .....	11
Overnight travelling .....	11
Curfews .....	11
Attendance .....	12
Supervision .....	12
Risk assessments .....	13
Welfare of students online .....	13
Social Programme .....	13
Data Protection .....	14
Student protection – information for staff .....	15
Allegations .....	21
Allegations against members of staff or any adults working or volunteering with children .....	21
Allegations against students .....	21
Suspecting or hearing a complaint of any form of abuse .....	22
Reporting and recording .....	22
Monitoring and Review process .....	24
Legal framework .....	24
Appendix. ....	25

Appendix 1 - Example Role Description: Designated Safeguarding Lead .....	25
Appendix 2 - Contacts .....	26
Appendix 3 - Allegation/Concern Report Sample Form.....	27
Appendix 4 – Contractor & Supplier Safeguarding’s Statement .....	28

## Context

English Path's main office is located at 891 Greenford Road, Greenford, London, UB6 0HE, United Kingdom. We offer a range of Language Programmes in our schools across the UK, Ireland, Malta, Canada, Dubai, France, Germany and Australia.

Historically EP offers Under 18s courses at English Path London Greenford and London Stratford, Leeds and Birmingham. Other Young Learner courses will be offered at our seasonal camps in Paris, Canterbury, Essex, Leeds and London Stratford. English Path does not accept students under the age of 18 on our campuses in Manchester and Canary Wharf London.

The Head Office of English Path GmbH is in Berlin. The campus is in a shared space with ICN (ICN Business School ARTEM - Ecole de Management). English Path and ICN are owned by the GEDU group out of the UK but are registered as individual companies in Germany and German law applies.

English Path is committed to providing a safe and secure environment for students, staff and visitors and promoting a climate where children and adults will feel confident about sharing any concerns which they may have about their own safety or the well-being of others. We aim to safeguard and promote the welfare of students by protecting them from maltreatment; preventing impairment of students' mental and physical health or development; ensuring they grow in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

English Path recognises that there is a legal framework within which we need to work to safeguard students who have care and support needs and for protecting those who are unable to take action to protect themselves and will act in accordance with the relevant legalities. We are committed to safeguarding students in line with French legislation and relevant national and local guidelines.

At English Path we are committed to creating a culture of zero-tolerance of harm to students which includes: the recognition of students who may be at risk and the circumstances which may increase risk; knowing how abuse, exploitation or neglect manifests itself; and being willing to report safeguarding concerns.

This extends to recognising and reporting harm experienced anywhere, including on our activities programme, within other organised or voluntary activities, in the community, in the person's own home and in any other setting.

English Path is committed to best safeguarding practice and to uphold the rights of all students to live a life free from harm from abuse, exploitation and neglect.

## **Declaration**

English Path believes everyone has the right to live free from abuse or neglect regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status. Our purpose is to care for our students, this is one of our core values, and our commitment is to provide and promote the welfare of all students (young learners and adults) regardless of age, gender, ethnicity, beliefs, nationality, or ability. Staff, suppliers and volunteers are expected to agree to and share this commitment.

English Path acknowledges that safeguarding is everybody's responsibility and is committed to preventing abuse and neglect through safeguarding the welfare of all students who study with us.

Actions taken by English Path will be consistent with safeguarding principles ensuring that any action taken is prompt, proportionate and that it includes and respects the voice of the student concerned.

## **Scope:**

English Path is devoted and committed to providing a safe environment and to care for the welfare of all its students (children and young adults included), regardless of age, gender, ethnicity, beliefs, nationality or ability. English Path expects all its staff, students, suppliers, and volunteers to adhere to and share this commitment. We understand that the students' needs are paramount, and we believe that every student has the right to feel safe. Therefore, we are committed to providing a safe environment, as far as is reasonably practicable, to protect them from physical or psychological harm.

## **English Path Safeguarding Team:**

### **Who to contact:**

Designated Safeguarding Lead – Head of EP Germany: Tobias Kliem – located at the Berlin Campus – Telephone: +493054854558 / +491732464590

Designated Safeguarding Lead - Head of Young Learners Programme: Romina Borderas – Located at the Greenford Campus – Telephone: +44 20 8132 8631

Designated Safeguarding Lead / Head of Operations UK: Sian Matos – Located at the Canary Wharf Campus – Telephone: +44 20 4551 3657 / +44 749 400 2444

## **Terminology**

### **Child / Young Learners**

A person/people under the age of 18

### **Concern**

When someone is worried or concerned that a child is at risk of harm or not being looked after in the appropriate manner.

### **Designated Safeguarding Lead**

The designated safeguarding lead is the person appointed to take lead responsibility for students' protection issues in school. The person fulfilling this role must be a senior member of the school's leadership team or have experience in this role within another organisation.

### **Designated Safeguarding Officer**

Safeguarding officer is the designated person within the school with primary responsibility for managing and reporting concerns about children and for putting into place procedures to safeguard children in the school.

### **Disclosures / Allegations**

When there is information which shows that an adult may have behaved in a way that is harmful towards a child.

### **Private Fostering**

*Private fostering*: is when a child under the age of 16 (or under 18 if disabled) is cared for by someone who is not their parent or a close relative. This is a private arrangement made between a parent and a carer, expected to last 28 days or more.

### **Safeguarding**

Taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse and harassment from occurring; to protect people, especially vulnerable adult at risk and children, from that harm; and to respond appropriately when harm does occur. Safeguarding applies consistently and without exception across our programmes, partners, students, volunteers and staff. It requires proactively identifying, preventing and guarding against all risks of harm, exploitation and abuse and having mature, accountable and transparent systems for response, reporting and learning when risks materialise. Those systems must be survivor-centred and protect those accused until proven guilty.

## **Vulnerable adult**

An adult at risk is any person aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age or illness; and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

## **Welfare**

Protecting and having systems in place to protect students from maltreatment and harm, ensuring they study with the provision of safe and care.

## Commitments

- To foster a safe environment and to ensure we safeguard any child, young learner, or vulnerable adult (for the purpose of this policy referred to as students) while studying with English Path at any of our campuses.
- To identify the names of responsible persons in the school and explain the purpose of their role.
- To involve students in decision-making which affects them (taking the age and developmental stage of children into account.)
- To encourage positive and safe behaviour among students.
- To protect students from abuse or neglect and to reduce the risks of abuse or neglect.
- To prevent harm to students' health.
- To provide clear guidance to all teaching and non-teaching staff within the campus and the wider organisation on how to keep students safe and what to do in case of harm. To provide training sessions to staff members and to raise awareness of their responsibilities in identifying and reporting possible causes of abuse/harm/risk.
- To ensure that those responsible for recruitment are aware of how to apply safeguarding principles when employing staff.
- To implement and maintain good communication among the English Path community, as well as developing good and effective working relationship with other agencies where required (child protection/safeguarding partners).
- To create a good monitoring system of students thought to be at risk of harm and to ensure we provide support to those in need.
- To create a structured system that all staff have access to and can follow in case of harm/abuse.
- To ensure that all staff members working at each campus who have contact with students have been checked as to their suitability, including verification of their identity, qualifications, and an Erweitertes Führungszeugnis, and to ensure that this information is stored securely and kept up to date.
- To ensure staff members are positive role models to both students and other staff members and to never engage in rough, physical, or sexually provocative games.
- To ensure that if any deficiency or weakness is identified, it is addressed promptly.
- To ensure confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored in line with our Data Protection Policy.
- To commit to an annual Safeguarding review and report.



## **Best practice**

Best practice refers to the actions of staff whilst working with or near to students. It also refers to the way staff communicate with students and the information that they share with them.

The behaviour of staff must not be open to criticism. Staff should protect themselves against liability or allegations which could cause conflict between them, the student and the parent(s)/guardian(s). Staff must ensure that they do not put themselves in a position that may inadvertently threaten or upset a student in their charge and use best practice in all they do.

Staff are expected to understand the responsibilities which are part of their employment role and be aware that appropriate sanctions which will be applied where these are breached, always act and be seen to act in the students' best interest, take responsibility for their own actions and behaviour, be open to advice and feedback from colleagues and pass on any concerns regarding the conduct of colleagues where necessary.

Staff are also expected to avoid using their position to gain access to information for their own advantage and/or a students' detriment, including the power to intimidate, threaten, coerce, or undermine students, or to form or promote relationships with students which are of a sexual nature, or which might become so.

When there is no guidance or staff are worried on how to proceed, they are advised to discuss the circumstances with the Safeguarding Officer.

## **Deradikalisierung - Deradicalization**

There is a duty on educators in the exercise of their functions, to the best of their abilities, prevent people from being drawn into terrorism. Young people can be exposed to extremist influences or prejudiced views, often via the internet and social media platforms. Schools can help to protect students from extremist and violent views in the same ways that they help to safeguard students from drugs, gang violence or alcohol.

Staff will receive training in preventing radicalisations. In the event of escalation staff will be encouraged to contact the Beratungsstelle Radikalisierung (Federal Office for Migration and Refugees - BAMF): This is a federal advisory center where professionals can seek guidance. Contact: [radikalisierung@bamf.bund.de](mailto:radikalisierung@bamf.bund.de) or +49 911 943 43 43.

## **Safer Recruitment**

A recent (up to 1 month old) Erweitertes Führungszeugnis (Extended Certificate of Conduct) will be requested and checked for all staff members.

## **Staff Induction**

All new members of staff receive an induction at the commencement of employment. Induction includes an overview of their role in the organisation together with identifying and reporting abuse, and confidentiality issues.

All staff receive training on Safeguarding Awareness to help them fulfil their responsibilities in respect of child protection.

All staff members are expected to join any in house CPD Safeguarding sessions. These trainings are organised by the Designated Safeguarding Lead and will be renewed frequently.

### **Students' induction**

As part of orientation process students receive an induction, this induction has a welfare section where they receive important details regarding their own security; school rules, who to speak to in case they need support with classes, health care, who's responsible for safeguarding at the school, laws of the country in which they are studying (alcohol/drugs) and a school/city tour. This is delivered by Safeguarding Officers.

As part of the induction and safeguarding procedures, students aged 16 & 17 years old will be giving a different coloured lanyard (green).

At school or on activities students will be reminded that they must always wear their lanyard.

### **External Suppliers and contractors**

All our external suppliers will sign a form confirming they are aware of the need to safeguard young and vulnerable adults within our school and community and will share this commitment. With this form they confirm all their employees have been advised, informed and vetted to work with children. Appendix 4 – sample form.

### **Pandemic**

The safety and welfare of our students during the exceptional circumstances of a pandemic and periods of school closure is covered separately in EP's COVID-19 additional outbreak contingency policy.

EP also runs a very successful online English Training program called EP Online that could be used to supplement learning should there be any need for non-face to face studies. Additionally, EP sits under the GEDU holding company that owns and operates Higher Education and Vocational studies in more than 10 markets globally. This existence in different markets and sectors globally allows for risk to be dispersed and managed by the executives of the business.

## **Accommodation**

Students aged 18 or younger are not permitted to book a course without accommodation or to stay in their own accommodation, unless they are staying with their parents or legal guardian, and this has been arranged in advance with the appropriate documents signed. We reserve the right to inspect any accommodation which is not provided by English Path to ensure it is suitable for young students or vulnerable adults. Students aged 13 to 17 on an English Course or Study Tour must book half board homestay accommodation, and students on Young Learner Programme have mandatory full board accommodation options.

At EP Berlin, our host families are provided by Famworld. All the host families who host juniors, must have recent Criminal Record Check (casier judiciaire) for all adults at the address.

## **Residential accommodation**

All students using EP Residential Accommodation are over the age of 18 years old. EP has various options for different budgets all providing excellent value for money.

## **Arrival/departure transfers**

All students arriving in Germany are given our school emergency telephone number.

We request that any student under the age of 18 is met by a friend or family member at the airport. We require their full contact details and travel information in advance of arrival.

Students enrolled on Young Learner programmes must book a transfer unless parents/guardian have made arrangements to drop their child off at school or EP provided accommodation, and parental consent has been signed in advance.

## **Overnight travelling**

Wherever possible, students should stay in their English Path provided accommodation. If students under the age of 18 wish to spend a night outside of their accommodation in a different location, a parental consent form must be signed for each occasion providing details of where the student is staying, with whom and their return times. Students must be supervised by an authorised adult, ideally this person should be known to the parents. These trips are not authorised during weekdays unless for exceptional reasons.

## **Curfews**

Students aged 13 to 17 enrolled on a Young Learner Programme or Study Tour are allowed to have unsupervised free time while on the offered leisure programme, they must return to the provided accommodation by 19.00.

## Attendance

All 16–17-year-old students on an adult course:

All students aged 16 or 17 on an adult course will have their attendance monitored throughout the day. Additionally, all students aged 16 or 17 are highlighted on our registers to make the teacher aware of their age.

The student or their host family on their behalf, must call in or email before 08.45 if they are not coming to school that day.

If we have not heard from the student and they are not in class, the teacher will tell the Academic Management team by 9:30am and we will call the student immediately. If the student does not answer and the host family are unavailable (or guardian if private accommodation) we will call their agent (if applicable) and keep trying. We will also try to contact the student through other media, including e-mail, WhatsApp and Facebook. If we are unsuccessful at contacting the student, agent, host family or guardian and still have no news from them by 5pm, their parents will be contacted along with the emergency authorities.

Students on a Young Learner programme:

Students on a young learner course are required to attend 100% of their lessons and activities daily. Attendance is checked for every lesson or block of activities within the first 15 minutes of the class/activity starting.

The student, or their host family on their behalf, must call or email in before 08.45 if they are not coming to school that day. If a student on a Young Learner programme is taken ill and their host is not home, the student must come to school where they will be supervised, accompanied to a doctor if necessary and they will be allowed to rest in a quiet supervised space until their host parent returns home.

If we have not heard from the student and they are not in class, the teacher will tell the Academic Management Team by 9:15 am and we will call the student/host family immediately. If the student doesn't answer and the host family are unavailable (or guardian if private accommodation) a member staff will visit the student's accommodation and another member of staff will continue to try to make contact.

*Absence of any minor or vulnerable adult will be immediately followed up with notification to the emergency authorities if necessary. In this case, the parent and/or agent will be contacted immediately to notify them.*

*For more details about how EP manages attendance and safeguards the wider school community please refer to our attendance policy.*

## Supervision

Extracurricular activities for under 18s are supervised with one adult for every 20 students.

## **Risk assessments**

All our activities are risk assessed and include consideration for under 18s and vulnerable students. Additional risk assessments are in place for unsupervised free time, which includes travelling from school/accommodation, sharing premises with ICN students and staff (such as bathrooms, lifts, canteen) where not everyone will have had a Criminal Record Check - Erweitertes Führungszeugnis (Extended Certificate of Conduct).

## **Welfare of students online**

In case of the need to transfer our teaching online (pandemic, emergency etc), as with face-to-face teaching, safeguarding and child protection is vital when teaching remotely. We have the following important processes in place to help us safeguard our students online.

- Students are strongly encouraged to keep their cameras on throughout the lessons.
- We have a set of helpful classroom rules for our classes which the teacher reminds the students of at the start of each lesson
- All staff members will take appropriate steps to ensure their devices remain secure. This includes, but is not limited to:
  - Using strong password protection, with passwords that are at least 8 characters, with a combination of upper- and lower-case letters, numbers and special characters
  - Ensuring the hard drive is encrypted, so that if the device is lost or stolen the files on the hard drive cannot be accessed by attaching it to a new device
  - Making sure the device locks automatically if left inactive for a short period of time
  - Not allowing family or friends to use the device
  - Storing the device securely to avoid theft
  - Ensuring that anti-virus and anti-spyware software is up to date
  - Installing updates to ensure that the operating system remains up to date
  - Staff should ensure that all safeguarding concerns are reported immediately to the Head of EP Germany – Tobias Kliem.

Staff must ensure all communication with parents and students is conducted through the school following normal guidance and ensure this remains professional.

## **Social Programme**

Students on a Young Learner Programme (13 to 17 as individuals < 12 if groups).

The activity programme is an integral and compulsory part of the Young Learner Programmes offered by English Path. All activities are risk assessed.

16 & 17 students on an adult course:

Our weekly Social Programme is offered to ALL students on adult courses. Some activities are not suitable for this age group, and they will be informed about this during their induction. These activities are not compulsory and those aged Under 18 can choose to attend or not attend. Sign-up sheets are located at the Student Services desk. Students Under 18 will be listed on the Sign-up sheet so staff can be sure they do not sign up for events not suitable for their age group. All Social Activities have a risk assessment completed to ensure the whole group attending are safeguarded during the excursion. These are reviewed by the teacher/activity leader prior to the excursion and the students informed of the risks and provisions put in place (see Excursion Policy).

## **Data Protection**

English Path and its staff will ensure that all data about students is handled in accordance with the requirements of the law, and any national and local guidance. We ensure the [Bundesdatenschutzgesetz \(BDSG - Federal Data Protection Act\)](#) and the EU's [General Data Protection Regulation](#) are followed in our procedures.

If a safeguarding concern involves sharing information, the staff member will speak to the designated safeguarding lead or deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of students. A record is kept where concerns/disclosures are recorded and stored securely by the Designated Safeguarding Lead or Deputy.

## Student protection – information for staff

### Types of child abuse and neglect, information for staff

The welfare and well-being of our students is incredibly important. Any concerns regarding the safety or welfare of a student must be brought to the attention of the Designated Safeguarding Lead (DSL).

Recognising abuse;

**Abuse:** a form of maltreatment of a person. Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. Students may be abused by an adult or adults or a child or children.

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter including exclusion from home or abandonment; protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or

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

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the DSL will be considering whether children are at risk of abuse or exploitation in situations outside their families.

### **Possible signs of abuse**

All staff need to be alert to signs and symptoms that may indicate that a young person has suffered or is suffering abuse. Many of the signs and symptoms may have an alternative explanation but all are a concern, particularly if several of these occur are persistent (unexplained bruises or injuries; particularly if these seem to be inconsistent with the explanation, untreated injuries, reluctance to go home, fear of parents being contacted, eating disorders, poor personal hygiene, withdrawal from physical contact, asking to move class, attention seeking or over compliance, attempted suicide/self-harm, violent outbursts / aggression to others, poor peer relationship, drugs or alcohol abuse, inappropriate sexual remarks, pregnancy)

**In addition to these types of abuse and neglect, members of staff will also need to be alert to the following specific safeguarding issues:**

### **Mental Health**

We are aware that mental health problems can, in some cases, be an indicator that a child/student has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our staff members, however, 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, this will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

For advice and non-emergency concerns, can be passed onto:

Dr Tobias Kliem – Head of EP Germany – EP Berlin, certified Mental Health First Aider  
[Tkliem@englishpath.com](mailto:Tkliem@englishpath.com)

Patra Mwaniki – Student Services & Accommodation Manager – EP Berlin  
[Pwmwaniki@englishpath.com](mailto:Pwmwaniki@englishpath.com)

Mary-Ellen Wright – Head of Academics (EP London) – First Aid Mental Health Level 2

[mwright@englishpath.com](mailto:mwright@englishpath.com)



## **Child Criminal Exploitation (CCE)**

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 in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people. Some of the indicators of CCE are: children who appear with unexplained gifts or new possessions; children who associate with other young people involved in exploitation; children who suffer from changes in emotional well-being; children who misuse drugs and alcohol; children who go missing for periods of time or regularly come home late; and children who regularly miss school or education or do not take part in education. Any possible CCE case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

## **Child Sexual Exploitation (CSE)**

CSE is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some indicators of children being sexually exploited are: going missing for periods of time or regularly coming home late; regularly missing school or education or not taking part in education; appearing with unexplained gifts or new possessions; associating with other young people involved in exploitation; having older boyfriends or girlfriends; suffering from sexually transmitted infections; mood swings or changes in emotional wellbeing; drug and alcohol misuse and displaying inappropriate sexualised behaviour. A child under the age of 14 is not legally capable of consenting to sex (it is statutory rape) or any other type of sexual touching. Sexual activity with a child under 16 is also an offence if it involves exploitation (e.g., coercion, payment, or a significant power imbalance). It is an offence for a person to have a sexual relationship with a 16- or 17-year-old if that person holds a position of trust, authority, or responsibility in relation to the young person, such as a teacher or caregiver.

This aligns with Germany's Strafgesetzbuch (StGB – Criminal Code), [Sections 174, 176, and 182](#) on sexual offences against minors.

Non consensual sex is rape whatever the age of the victim. If the victim is incapacitated through drink or drugs, or the victim or his or her family has been subject to violence or the threat of it, they cannot be considered to have given true consent and therefore offences may have been committed. Child sexual exploitation is therefore potentially a child protection issue for all children under the age of 18.

## **Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)**

Distributing nude and semi-nude images and videos of under-18s (including those created and shared with consent) is illegal. While sharing privately created pictures and videos of oneself consensually with another person is not illegal in Germany, it nonetheless creates a big risk due to the nature of digital media.

When such an incident involving nudes and semi-nudes comes to a member of staff's attention, this will be shared with the designated safeguarding lead with a view to either referring to appropriate agencies following the referral procedures or to lead a serious discussion with the student about the potential consequences.

## **Serious violence**

All staff will be made aware of indicators, which may signal that students are at risk from, or are involved with serious crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. We are aware that there is a range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. We are also aware that fear and a need for self-protection is a key motivation for children to carry a weapon – it affords a child a feeling of power. Neighbourhoods with high levels of deprivation and social exclusion generally have the highest rates of gun and knife crime. Children are more likely to carry knives and other weapons than guns. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL.

## **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across Germany – no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Students can be targeted and recruited into county lines in a number of locations including schools, also targeted and recruited online using social media. Some specific indicators that may be present where a student is criminally exploited through involvement in county lines are individual who: go missing and are subsequently found in areas away from their home; have been the victim or perpetrator of serious violence (e.g. knife crime); are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs; are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection; are found in

accommodation that they have no connection with, often called a 'traphouse or cuckooing' or hotel room where there is drug activity; owe a 'debt bond' to their exploiters; have their bank accounts used to facilitate drug dealing. All staff will be aware of the associated risks and will share any concerns about or knowledge of such children immediately with the DSL.

### **Peer on peer/child on child abuse**

We recognise that peer on peer abuse can have a devastating effect on children and vulnerable adults, including becoming a barrier to their learning and can have serious consequences for their mental health. Effectively preventing and tackling abuse can help to create a safe, disciplined environment where students are able to learn and fulfil their potential. If the evidence suggests that there was an intention to cause harm to the victim, an incident should be regarded as abusive whether or not severe harm was actually caused.

This is behaviour by an individual or group of individuals which can be a one-off incident or repeated over time, intentionally intended to hurt another individual or group either physically or emotionally.

*Types of peer-on-peer abuse;*

Bullying, cyberbullying, physical and sexual violence, and harassment between children, initiation/hazing, teenage relationship abuse, and sexting (when someone sends or receives a sexually explicit text, image, or video – including 'nude pictures' or 'nude selfies') are serious concerns. Possessing, creating, or distributing indecent images of a person under 18 is a criminal offence under [§ 184b](#) and [§ 184c](#) of the German Criminal Code (Strafgesetzbuch – StGB), classified as child pornography. If such content is shared without consent, it may also be prosecuted under [§ 201a](#) StGB (violation of intimate privacy by taking or sharing images) and, in cases of coercion, under [§ 240](#) StGB (coercion) or [§ 177](#) StGB (sexual assault, coercion, and rape)

### **Domestic abuse**

Domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to psychological, physical, sexual, financial and emotional. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. If members of staff have a concern about or knowledge of any domestic abuse incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

### **Violence Against Women and Girls (VAWG)**

VAWG is defined as any act of gender-based violence that results in, or is likely to result in physical, sexual or psychological harm or suffering to women including threats of such acts, coercion or arbitrary deprivation of liberty, whether occurring in public or private life. VAWG is the umbrella term which brings together multiple forms

of serious violence such as crimes committed in the name of “honour”; domestic abuse; female genital mutilation (FGM); forced marriage; sexual violence, abuse, exploitation and rape; stalking; harassment; trafficking for sexual exploitation; prostitution. If members of staff have a concern about or knowledge of any VAWG incidents, they will share it immediately with the DSL with a view to referring to appropriate agencies.

### **So-called ‘honour-based’ abuse (HBA) (including Female Genital Mutilation and Forced Marriage)**

HBA includes incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. If members of staff have a concern about or knowledge of a student that might be at risk of HBA or who has suffered from HBA, they will share it immediately with the DSL with a view to referring to appropriate agencies.

### **Female Genital Mutilation (FGM)**

FGM is a procedure where a part of the external female genitalia is removed and there is no medical reason for this. Whilst religious, social or cultural reasons are sometimes given for FGM, In Germany, female genital mutilation (FGM) is recognized as a severe violation of human rights and a form of gender-based violence. It is considered a way of controlling female sexuality and can cause severe and long-lasting damage to physical and emotional health. It is frequently a traumatic and violent act for the victim and can result in serious harm. FGM is a criminal offence under [§ 226a](#) of the German Criminal Code (Strafgesetzbuch – StGB), punishable by imprisonment.

School staff and professionals working with children are encouraged to report any concerns about FGM to Jugendamt (Youth Welfare Office) or the police, as protecting a child from harm is a key safeguarding responsibility. In cases of imminent danger, authorities can take preventive measures, including temporary child protection orders.

### **Forced marriage**

Forcing a person into a marriage is a crime in Germany. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent. Any possible forced marriage case will be shared with the DSL with a view to referring to appropriate agencies following the referral procedures.

# Allegations

## Allegations against members of staff or any adults working or volunteering with children

If an allegation is made against a member of staff, homestay provider or volunteer we will follow the procedure below:

- The allegation should be reported immediately to the Designated Safeguarding Lead or Safeguarding Officer. Should the allegation be made against the Designated Safeguarding Lead, the matter should be reported immediately to the deputy DSL or in case of their absence a safeguarding officer and a member of the Senior Management Team.
- Where appropriate, EP will consult with the appropriate German authorities for advice and guidance.
- A full investigation will be carried out by the appropriate professionals to determine how this will be handled.
- English Path will follow all instructions from them and ask all members of staff to do the same and co-operate when required. This may include;
  - o immediate action to protect the student
  - o when and what the parents should be told
  - o what should be said to the adult facing the allegation and should s/he be suspended
- Suspension – This is not an automatic response. It is considered when the child is at risk of serious harm, or the concern is so serious it would result in immediate dismissal due to gross misconduct.
- Suspension would be communicated to the staff member within 24 hours.
- If the allegation against the staff member is substantiated, and if the DSL and HR representative agree that the person is unsuitable to work with children then the DSL will refer the individual to the police to protect students aged 17 or under in the future.
- EP recognises the importance to provide a duty of care to the staff member against whom the allegation has been made. The Head of School will be their key contact at the school during the time of the investigation.
- If as an individual, you feel this will not be taken seriously or are worried about the allegation getting back to the person in question then it is your duty to inform the German authorities directly.

## Allegations against students

If an allegation is made against a student, we will follow the procedure below:

- If an allegation of abuse is made towards a student, they may be suspended from school and/or removed from their accommodation during the investigation and in this instance, DSL should be informed.
- The organisation will take advice from the local Safeguarding Partners on the investigation of such allegations and will take all appropriate action to ensure

the safety and welfare of all students involved, including the student or students accused of abuse. If it is necessary for a student to be interviewed by the police in relation to allegations of abuse, we will ensure that, subject to the advice of the local Safeguarding Partners, the parents are informed as soon as possible, and that the student is supported during the interview by an appropriate adult.

### **Allegations against students aged U18**

- Procedure if a child protection allegation is made against another under 18 English Path student. English Path will appoint a suitable DSL to support the person who has been accused.
- The under 18s parents, (also group leader & agent if appropriate) will be informed of the allegation and kept informed at every stage of the developing situation
- DSL will follow guidance provided by local child protection authorities
- If other agencies become involved, e.g., police, the under 18 will be accompanied throughout the process by their DSL support
- If other agencies are not involved and EP needs to carry out an internal investigation, the under 18 accused will be supported by their DSL and accompanied by them to any interviews.

### **Suspecting or hearing a complaint of any form of abuse**

Any staff who are informed of, hear about, or suspect any abuse must record what they have been told or they have seen, and they must share their concerns immediately with the DSL or Safeguarding Officer.

If a student confides in a member of staff the staff member should be accessible and receptive and take the student to a quieter space but leave the door open. If the teaching is taking place online the breakout room should be used for the student and the DS or DSL should be contacted immediately. The staff member should always stay visible, listen carefully and not criticise, reassuring the student that is ok to tell them and they are there to support. The staff member must explain that the information might have to be shared in order to help, using accessible language, and ensure the student understand this. Make a record of what was said, as for the basis of what happened you don't need to ask for the whole story, just enough to take the next step, tell the person what you intend to do, safeguard the alleged victim and the alleged perpetrator (peer on peer abuse), follow up with DSL.

What you must not do; investigate, suggest or probe for information, ask leading questions, speculate or accuse anybody, offer opinion, forget to record what has been said, fail to pass the information to the Safeguarding Officer, comment with your colleagues, make promises about confidentiality, assume that someone else will take the necessary action and neither jump to conclusions, be dismissive or react with shock.

### **Reporting and recording**

At English Path, we are committed to ensure that professional behaviour applies to relationships among students and staff, there are clear and professional boundaries,

and everyone is aware of what is an appropriate behaviour. Staff are required to work in a professional manner, and everyone should avoid conduct which can lead to questions about motivation and/or intent.

Personnel is required to report to the DSL or Safeguarding Officer any concerns or allegations about behaviour of colleagues that could put students at any risk. There are no retributions or disciplinary action taken against a member of staff who makes such report if it is done in good faith. It is an offence to not disclose information relating to possible child abuse.

Only the DSLs have access to the relevant forms. All information is recorded, and all records are signed and dated. They are kept confidentially and chronologically.

Records show:

- what the concerns were
- whether any follow-up action was taken
- how and why decisions were made

All incidents, disclosures or signs of abuse are fully recorded with dates, times, locations, and actions taken.

### **Confidentiality and information sharing:**

The DSL(s) will only share information with professionals or agencies with the student's consent. Only relevant information will be disclosed to those that need to know. Information is confidential. If the staff member reporting the concern or DSL(s) has any queries regarding confidentiality, they will seek advice from the German authorities.

Staff should make a record of the concern, allegation using the appropriate form, see appendix 3.

## **Monitoring and Review process**

Our policies and procedures are regularly reviewed and updated as required, at least on an annual basis. EP will review this policy when appropriate, i.e., a change to the legislation, a change of personnel or as a result of a safeguarding incident occurring.

Yearly Report: At the end of each year the DSL(s) will create an annual report on the concerns and allegations. This is a record of the year and reviews the actions taken and enables us to make any necessary changes to our policies and procedures, and to review and update our training programmes.

## **Legal framework**

This policy is consistent with all other central policies adopted by English Path and should in particular be read in conjunction with the following policies relevant to the safety and welfare of children.

- Anti-Harassment and Anti-bullying
- Attendance Policy
- Covid-19
- Equality and Diversity
- E-safety
- Health and Safety
- Mental Health and Wellbeing
- Modern Slavery
- Prevent
- Student Code of Conduct



## **Appendix.**

### **Appendix 1 - Example Role Description: Designated Safeguarding Lead**

The designated person within the organisation has primary responsibility for putting into place procedures to safeguard students at risk, where relevant and for managing concerns about students at risk.

Duties and responsibilities include:

- Working with others within the organisation to create a positive inclusive environment at the campus.
- Play a lead role in developing and establishing the organisation's approach to safeguarding students and in maintaining and reviewing the organisation's implementation plan for safeguarding students in line with current legislation and best practice.
- Coordinate the distribution of the safeguarding student policy, procedures, and resources throughout the organisation.
- Contribute to ensuring other policies and procedures are consistent with the organisation's commitment to safeguarding students.
- Advise on the organisation's training needs and the development of its training strategy.
- Receive reports of and manage cases of poor practice and abuse reported to the organisation – including an appropriate recording system.
- Manage liaison with, and referrals to, external agencies for example social-care services and the police.
- Create a central point of contact for internal and external individuals and agencies concerned about the safety of students within the organisation.
- Provide advice and support to regional safeguarding/welfare officers and play a lead role in their recruitment, selection and training.
- Represent the organisation at external meetings related to safeguarding.

## **Appendix 2 - Contacts**

### **Germany**

English Path: Named personnel with designated responsibility for child protection:

Designated Safeguarding Lead

Name: Dr Tobias Kliem

Job Title: Head of EP Germany

Tel: + 493-54854558 / +491732464590

Designated Safeguarding Officer

Name: Patra Mwaniki

Job Title: Student Services & Accommodation Manager

Tel: + 493-54854558 / +4917663213599

### **United Kingdom**

English Path: Named personnel with designated responsibility for child protection:

Designated Safeguarding Lead

Name: Romina Borderas

Job Title: Head of Young Learners

Tel: + 44 7506 644638 / +44 7466 777425

Designated Safeguarding Lead

Name: Sian Matos

Job Title: Head of Operations UK

Tel: +44 7494 002444

### Appendix 3 - Allegation/Concern Report Sample Form

Please complete if you have any (safeguarding/prevent) concerns about a student or staff member. You must complete the boxes in bold. Other information can be filled in by the DSL later if you don't know.

<b>Date</b>	
<b>Student first name</b>	
<b>Student family name</b>	
<b>Gender</b>	
Date of Birth	
Nationality	
Group/Individual booking	
Student booking number	
<b>Name of person noting concern</b>	
<b>Role/connection with school</b>	
<b>Date and time concern noted</b>	
<b>Location</b>	
<b>Concern</b> (please provide as much detail as possible)  NB: If reporting a disclosure/allegation made by a student, please use this space to describe accurately (or as close as you can remember) the conversation (You can add extra paper if you need to give more details).	
<b>Signed</b>	

**Response to concern.** This section to be completed by the DSL.

Do parents, group leader, agent, homestay, other need to be informed? YES/NO

Does this need to be elevated to Senior Manager? YES/NO If yes please complete below:

Reported to: \_\_\_\_\_

Date : \_\_\_\_\_

<b>Response &amp; follow up</b>	<b>By whom</b> (full name)	<b>When</b> (date and time)

## Appendix 4 – Contractor & Supplier Safeguarding’s Statement

English Path is committed to provide a safe environment to its students and protect them from maltreatment and harm.

Contractors and suppliers visiting school are made aware of this commitment.

- Contractors and suppliers are made aware that at EP Berlin students under the age of 18 are present and that they should behave appropriately.
- Every visitor must sign in at the reception and wear a visitor badge.
- Contractors will only work in the required area and will not enter other areas of the Campus.
- Any contractor/s whose work may require to them being unaccompanied or unsupervised with under 18 years old will be subject to appropriate background checks including a Criminal Record Check Erweitertes Führungszeugnis (Extended Certificate of Conduct), character references from previous employers. This includes taxi drivers, coach drivers, cleaning staff, canteen staff, security staff or activity providers.
- The contractor/supplier will undertake responsibility for making these checks.
- Any concerns about inappropriate contact or conduct with English Path students will be followed up in collaboration with the school.
- If the contractor brings any subcontractor to school, contractor is responsible to make sure the subcontractor follows the same procedures.

---

I confirm, I have read and, I agree to the above statement. I agree to ensure all employees of my organisation are aware of your Safeguarding procedures. I confirm all employees who will provide service to English Path will have a Working with Children check or will not work with Under 18s.

Name \_\_\_\_\_ Signed \_\_\_\_\_

Company \_\_\_\_\_ Service Provider \_\_\_\_\_

Date \_\_\_\_\_

## **Appendix 5. English Path Staff Safeguarding**

I confirm, I have read and understand English Path's Safeguarding policies and procedures and my responsibilities within this framework.

Name \_\_\_\_\_ Signed \_\_\_\_\_

Date \_\_\_\_\_