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English Path Malta Safeguarding Policy

Version History

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Introduction

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. This Safeguarding Policy outlines the safeguarding policy specific to English Path Malta and is aligned with Maltese legal requirement and local safeguarding procedures.



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1. Context

English Path's head office is located at 891 Greenford Road, Greenford, London, UB6 0HE. We offer a range of language programmes across our international campuses, including London (Canary Wharf, Greenford and London Stratford), Birmingham, Leeds, Manchester, Berlin, Brisbane, Dubai, Dublin, Malta, Paris and Toronto. Each location has its own Safeguarding Policy in line with the requirements of each country.

This is the Safeguarding Policy for our school in St Julian's, Malta. It has been developed in accordance with the Child Protection (Alternative Care) Act (Chapter 602) and the relevant Maltese safeguarding laws, and reflects international best practices.

In St Julian's we are located at Marguerite Mangion Street West Block Level 4-6, Malta. We offer students aged 16 and 17 courses on adult programmes at English Path, Malta as well as closed mini stay programmes. Other Young Learner courses are offered at our seasonal camp.

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 wellbeing 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 Maltese laws & International best practices.

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.

2. Purpose of the Policy

The purpose of this safeguarding policy is to:

- Protect children, young people, and vulnerable adults from any form of abuse, exploitation, or harm.



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- Provide a clear framework for staff, interns, and students on how to act responsibly and how to report any concerns.
- Ensure that all employees, contractors, and interns understand their responsibility in safeguarding and are properly trained.

Legal Framework

This policy is in line with the following Maltese laws and international conventions:

- The Protection of Minors (Registration) Act (Chapter 518).
- The Convention on the Rights of the Child (UN).
- Malta's Child Protection (Alternative Care) Act (Chapter 602).
- General Data Protection Regulation (GDPR) for the handling of sensitive information.

3. 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. Caring for our students is one of our core values. Our commitment is to protect 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.

4. Scope

English Path is committed to providing a safe environment and safeguarding 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.

This policy applies to:

- All staff, including administrative, teaching, and non-teaching staff.
- Interns, contractors, host families, and third parties involved with the school.
- All students, particularly those under the age of 18 and vulnerable adults.



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5. Definitions

Abuse: When someone hurts a child or vulnerable adult, or does not protect them from being hurt. This can include physical harm, emotional cruelty, sexual contact, or not giving them the care they need.

Child: Any person 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.

Safeguarding: Actions taken to protect the well-being, health, and human rights of individuals, especially children and vulnerable adults, to live free from abuse, harm, and neglect.

Vulnerable Adult: Any person over the age of 18 who is unable to protect themselves against significant harm or exploitation due to disability, illness, or mental health issues.

Welfare: Protecting and having systems in place to protect students from maltreatment and harm, ensuring they study in a safe, caring and supportive environment.

6. Roles and Responsibility

Designated Safeguarding Lead (DSL):

The primary point of contact for any safeguarding concerns. The DSL is responsible for the overall implementation of this policy and ensuring all staff are aware of their safeguarding responsibilities.

Designated Safeguarding Officer:

The staff member in the school who is mainly responsible for dealing with concerns about children's safety and making sure that proper steps are followed to keep them safe.

All Staff and Interns:

Must report any concerns immediately to the DSL or Safeguarding Officer



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Follow the procedures outlined in this policy

- Complete mandatory safeguarding training
- Maintain appropriate professional boundaries with students

Host Families:

- Must follow safeguarding guidance provided by English Path
- Provide a safe and supportive environment for students
- Report any concern or unusual behaviour to the Safeguarding Officer or DSL

Contractors and Activity Leaders:

- Must comply with all safeguarding expectations and instructions
- Supervise students responsibly during all activities
- Report any incidents or concerns without delay

Volunteers and Temporary Workers:

- Must be appropriately vetted and trained before working with students
- Should never be left alone with under-18s unless authorised
- Must follow the same safeguarding standards as full-time staff

Students:

- Are encouraged to speak up if they feel unsafe or worried
- Must treat others with respect and follow school rules
- Will be supported and protected when raising any safeguarding concerns

7. Policy and Procedure

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.



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- 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 who have contact with students have been checked as to their suitability, including verification of their identity, qualifications, and police conduct certificate, 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. In English Path's definition of 'best practice', we refer to staff having a warm professional relationship with students that makes them feel welcome and supported during their time at school, while still maintaining rigid professional boundaries.

The professional boundaries described include but are not limited to: staff not accepting friend or follower requests on social media from students; not spending time with students outside of school and school-arranged activities; not giving out personal phone numbers and other contact information to students; and not forming relationships with students which go beyond the scope of respectful professional relationships between employees and customers.

Staff must behave in a way that upholds English Path's values of caring for each other, cherishing diversity and operating ethically and professionally. They should not cause deliberate offence to other staff members, students, partners and service providers. Staff should protect themselves against liability or allegations which could cause conflict between them, the student and the parent(s)/guardian(s) by being mindful of their posture, language and tone.

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.



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When there is no guidance or staff are worried on how to proceed, they are advised to discuss the circumstances with the Designated Safeguarding Staff on campus, or Group Safeguarding Leads.

Staff are expected to understand the responsibilities which are part of their employment role and be aware that appropriate sanctions will be applied where these are breached. They should 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 should always work in open environments, avoid one-to-one situations unless necessary and ensure transparency.

Curfews

Students aged 8 to 12 will not have unsupervised free time and their activities must have finished by 21.00 by when they must be back in their provided accommodation. Students aged 13 to 17 enrolled on a Young Learner Programme are allowed to have unsupervised free time while on the offered leisure programme; they must return to the provided accommodation by 22.00.

Students aged 16 and 17 on adult courses are allowed unsupervised free time. They must return to the provided accommodation by 22.00 Sunday to Thursday and by 23.00 Friday and Saturday.

Attendance for students aged 16 & 17 students on adult courses: All students aged 16 or 17 on an adult course must sign in at the front desk on a daily basis before class.

All students aged 16 or 17 are highlighted on our registers to make the teacher aware of their age. If we have not heard from them 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 doesn't answer (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, or guardian and still have no news from them by 5pm, their parents will be contacted.

Supervision

Extracurricular activities for under 18s are supervised with one adult for every 20 students. For students aged 8 to 12 is ratio is one adult for every 15 students

Students on a Young Learner programme:

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



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They 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, 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 the medical room. If we have not heard from them and they are not in class, the teacher will tell the Academic Management Team by 9:15 am and we will call the student immediately.

If the student doesn't answer (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 and if necessary, the situation will be reported to the police and / or Aġenzija Appoġġ (Malta's child protection services)."

In this case, the parent and/or agent will be contacted immediately to notify them.

Welfare of students online

In case of the need to transfer our teaching online, 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 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 are accepted as individuals from the age of 13 to 17.



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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 optional 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 that 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.

Use of WhatsApp Groups

WhatsApp groups should only be used for official communication related to academic purposes or relevant extracurricular activities. The group should be created solely for students currently enrolled and studying with us and dissolved upon completion of the course or activity. WhatsApp groups should not be used for informal or personal discussions between students and staff.

Group administration

Only designated staff members or teachers should be administrators of student WhatsApp groups. A Minimum of two staff members must be included in each group to ensure oversight and accountability. Students should not be assigned admin roles in the group.

Consent and Participation

Written consent must be obtained from students (or their guardians, in the case of minors) prior to adding them to any WhatsApp group.

Participation in a WhatsApp group should be voluntary. No student should be penalized for choosing not to join.

Content and Communication Guidelines

Communication should remain professional, respectful, and relevant to the group's academic purpose. Staff members are to avoid engaging in one-on-one personal conversations with students through WhatsApp, unless there is an educational or welfare-related reason, and a second staff member should be included in the conversation for transparency. Sharing of inappropriate content, including but not limited to explicit material, harassment, or hate speech, is strictly prohibited.



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Privacy and Data Protection

Staff should not share personal or sensitive information of any student in the WhatsApp group.

Students' phone numbers must be handled in compliance with the Data Protection Act and General Data Protection Regulation (GDPR) and relevant Maltese data protection laws. Students should be informed of who has access to their contact details. Administrators should enable settings that require approval before allowing users to add new members to the group, ensuring that only relevant individuals are included.

Monitoring and Reporting Concerns

Staff members responsible for the WhatsApp groups should monitor communications for any safeguarding concerns, including signs of bullying, harassment, or distress. Any safeguarding concerns raised within the group must be reported immediately to the Designated Safeguarding Lead (DSL) following the organization's safeguarding reporting procedures. In cases of inappropriate behaviour, the offending party may be removed from the group and appropriate disciplinary action will be taken.

Time Boundaries for Communication

Communication within WhatsApp groups should only take place during appropriate hours, ideally within working hours (e.g., 8:00 AM – 6:00 PM). Staff should refrain from contacting students outside of these hours unless it is an emergency or relates to urgent welfare concerns.

Leaving the Group

Students should be allowed to leave the WhatsApp group at any time without being pressured to explain their reasons. Administrators must ensure that leaving the group does not result in any form of discrimination or disadvantage for the student. Student Services team will conduct a weekly audit of the group members to make sure that the groups only include current students.

Review of Use

Regular reviews of the WhatsApp groups should be conducted by staff to ensure adherence to these guidelines and to monitor the appropriateness of the content being shared. The use of WhatsApp groups must be periodically reviewed in line with overall safeguarding policy evaluations to ensure that all safeguarding measures are up to date and effective.



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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 Safeguarding Officer.

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.



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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 and DDSLs will be considering whether children are at risk of abuse or exploitation in situations outside their families.

Possible signs of abuse:

All the staff needs 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.

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



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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 13 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. 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 or authority in relation to the young person.

Nonconsensual 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)

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal. Sharing nudes and semi-nudes covers the incidents where:

a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18

a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18

- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.



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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 referring to appropriate agencies following the referral procedures.

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.

Criminal Exploitation and Drug Trafficking

Children and vulnerable adults may be exploited by individuals or organised groups to carry out criminal activity such as transporting, storing or distributing drugs or stolen goods. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Students can be targeted and recruited into criminal behaviour from a number of locations including schools or online using social media.

Some specific indicators that may be present where a student is criminally exploited are when individuals

- 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.



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All staff should 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, sexual violence & harassment between children, initiation/hazing, teenage relationship abuse, sexting (when someone sends or receives a sexually explicit text, image or video – this includes sending 'nude pictures' or 'rude pictures' or 'nude selfies'). Many people are not aware that under Maltese law, it is a criminal offence to possess, create, or share indecent images of anyone under the age of 18, even if the images are shared voluntarily or between peers. This includes images sent through messaging apps or social media and applies regardless of the age of consent. If an incident involving sexting occurs in our schools, we will follow the guidance Agenczija Appogg.

Domestic abuse

Domestic violence and abuse are 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.

Safeguarding Training

All staff, interns, and host families will receive mandatory safeguarding training at least once a year. New employees must undergo safeguarding induction training within the first month of employment. Safeguarding training may be delivered in person or online and will be tailored to the role of the participants.



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Recruitment Procedures

To ensure safe recruitment:

- All potential employees and interns will undergo a thorough vetting process, including background checks and police conduct certificates.
- Reference checks will be required from previous employers, particularly those where the applicant worked with children or vulnerable adults.

Recognizing Signs of Abuse

All staff should be aware of the signs of abuse, including but not limited to:

- Physical Abuse: Unexplained injuries or signs of neglect.
- Emotional Abuse: Anxiety, withdrawal, or lack of confidence.
- Sexual Abuse: Inappropriate sexual behaviour or knowledge.
- Neglect: Poor hygiene, inadequate clothing, or untreated medical issues.

Responding to and Reporting Concerns

Any safeguarding concerns must be reported immediately to the DSL or, in their absence, the Designated Safeguarding Officer. Concerns about a child or vulnerable adult can also be reported anonymously. In cases where immediate danger is present, the authorities (e.g. Malta Police or Aġenzija Appoġġ) must be contacted without delay. All reports will be treated confidentially, and the school will work with relevant authorities for further investigation if required.

Confidentiality and Information Sharing

Any safeguarding reports and records will be handled with strict confidentiality in line with GDPR requirements.

Information will only be shared with relevant parties, such as social services or police, when there is a clear need to protect the individual.

Whistleblowing

Staff and Interns are encouraged to raise any concerns regarding safeguarding practices or breaches of this policy. The school will ensure that no person raising a concern in good faith will face retaliation or disadvantage.



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8. Review of Policy

This policy will be reviewed annually or sooner if there is a significant change in legislation or school procedures.

9. Contact Information

- Designated Safeguarding Lead (DSL): Mr. Allen Lofaro
- Safeguarding **Officer**: Mr. Giuseppe Abramo
- Local Child Protection Services (Aġenzija Appoġġ): +356 22959000
- Malta Police: 112

This safeguarding policy aims to ensure a safe and supportive environment for all students at English Path Malta. Compliance is expected from everyone involved with the school to uphold these safeguarding principles.

10. References and Related Policies

Related Policies

Please find the following [English Path Policies](#) on our webpage.

- Attendance Policy
- Code of Conduct
- Emergency Action Plan
- Mental Health and Wellbeing policy
- Modern Slavery Policy
- Privacy Policy



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References

Legislation and Legal Frameworks

- **The Protection of Minors (Registration) Act** – *Chapter 518, Laws of Malta*
Governs the registration and vetting of individuals working with minors.
- **Child Protection (Alternative Care) Act** – *Chapter 602, Laws of Malta*
Establishes procedures for protecting children and vulnerable persons, including mandatory reporting responsibilities.
- **Criminal Code of Malta** – *Chapter 9, Laws of Malta*
Includes offences related to child abuse, sexual offences, child pornography, and abuse of trust.
- **The Convention on the Rights of the Child (UN, 1989)**
International treaty outlining the civil, political, economic, social, and cultural rights of children, ratified by Malta.
- **General Data Protection Regulation (GDPR) (EU) 2016/679**
Governs the lawful collection, processing, and protection of personal and sensitive data, including that of minors.
- **Data Protection Act (Chapter 586, Laws of Malta)**
National legislation implementing GDPR requirements within Malta.

National Safeguarding and Support Bodies

- **Aġenzija Appoġġ** – Child and family protection agency under the Foundation for Social Welfare Services (FSWS). Website: <https://fsws.gov.mt>
- **Malta Police Force** – Cyber Crime Unit
Handles incidents involving online abuse, child exploitation, and illegal content. Website: <https://pulizija.gov.mt>
- **Office of the Data Protection Commissioner (Malta)**
Oversees enforcement of data protection laws, including GDPR. Website: <https://idpc.org.mt>
- **BeSmartOnline! Malta** – Safer Internet Centre offering online safety education and reporting tools. Website: <https://besmartonline.org.mt>



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11. Appendices.

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.



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Appendix 2 - 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.

Date	
Student first name	
Student family name	
Gender	
Date of Birth	
Nationality	
Group/Individual booking	
Student booking number	
Name of person noting concern	
Role/connection with school	
Date and time concern noted	
Location	
Concern (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)	
Signed	

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 :

Response & follow up	By whom (full name)	When (date and time)



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Appendix 3. 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 _____