



English Path Australia

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Brisbane QLD 4000
Australia

› +61 7 3012 9812
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English Path Brisbane Safeguarding Policy

Version History

Version	Author	Reviewed by	Pages	Approved by	Date published
3	Sian Matos	-	27	Mark Bailey (HoO Australia)	15.08.2025
2	Sian Matos	Juliette Synnott-Lee	29	Mark Bailey (HoO Australia)	14.01.2025
1	Sian Matos	Mark Bailey	33	Mark Bailey (HoO Australia)	11.10.2021

Introduction

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

Translations available. Please ask Student Services.

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Contents

1. Context 4

2. Declaration 4

3. Scope:..... 5

4. English Path Safeguarding Team: 5

 Who to Contact 5

5. Terminology 7

6. Commitments 7

7. Best practice 8

 Preventing Radicalisation..... 9

 Safer Recruitment..... 9

 Staff Screening – Adult Student Safety 10

 Pre-employment screening includes:..... 10

 Ongoing compliance: 10

 What Happens if Screening is Delayed? 11

 Staff Induction 11

 Students’ induction..... 12

 External Suppliers and contractors 12

 COVID -19 12

 Accommodation 13

 Accommodation & Transfers 13

 Attendance..... 14

 Supervision and Risk assessments 15

 Welfare of students online 15

 Social Programme 16

 Data Protection..... 16

8. Student protection – information for staff 17

9. Allegations 19

10. Related Legislation..... 22

Appendix 1 – Example Role Description: Designated Safeguarding Lead 23



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Appendix 2 – Contacts Australia24

Appendix 3 – Allegation/Concern Report Sample Form.....25

Appendix 4 – Contractor & Supplier Safeguarding’s Statement.....26

Appendix 5 – English Path Staff Safeguarding27



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1. Context

English Path is committed to providing a safe and secure environment for all students, staff, and visitors, and to promoting a climate where everyone feels confident about sharing any concerns regarding their own safety or wellbeing. Our safeguarding approach focuses on the welfare of adult students, including those who may be considered vulnerable adults, and aligns with Australian legislation, the Standards for RTOs 2015, and the ELICOS Standards 2018.

The Brisbane campus is centrally located in the heart of the city is owned by the GEDU group headquartered in the UK.

We aim to safeguard and promote the welfare of students by:

- Protecting them from maltreatment, abuse, exploitation, and neglect.
- Preventing impairment of students' mental and physical health or development.
- Ensuring they are supported in circumstances consistent with the provision of safe and effective care.
- Taking prompt action to enable all students to have the best outcomes in their studies and personal wellbeing.

English Path recognises the legal framework within which we operate to safeguard students who may have care and support needs, and to protect those who may be unable to take action to protect themselves. We act in accordance with relevant national and local requirements, including applicable Australian legislation.

We are committed to creating a culture of zero tolerance of harm to students, which includes: recognising students who may be at risk and the circumstances that may increase risk; knowing how abuse, exploitation or neglect may manifest; and taking appropriate action to report and address safeguarding concerns.

This commitment extends to recognising and responding to harm experienced anywhere, including during our activities programme, in other organised or voluntary activities, in the community, or in a student's own accommodation. English Path upholds the right of all students to live and study free from harm, abuse, exploitation, and neglect.

2. Declaration

English Path believes that every student has the right to live and study free from abuse, neglect, exploitation, or harassment, regardless of age, ability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status, or nationality. One of our core values is care for our students, and our commitment is to provide and promote the welfare of all adult learners, including those who may be considered vulnerable adults.



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We acknowledge that safeguarding is everyone's responsibility. All staff, contractors, and volunteers are expected to share this commitment and to take prompt action if they have concerns about the safety or wellbeing of a student.

Actions taken by English Path will be consistent with safeguarding principles, ensuring that:

- Any action is prompt, proportionate, and appropriate to the circumstances.
- The student's voice is heard and respected.
- The student's dignity, safety, and rights are upheld at all times.

We will take all reasonable steps to prevent harm from occurring, respond effectively when concerns arise, and work in partnership with relevant agencies when necessary to ensure the safety and wellbeing of our students.

3. Scope:

English Path is committed to providing a safe and respectful environment for all adult students, regardless of gender, ethnicity, beliefs, nationality, or ability. We expect all staff, contractors, and volunteers to adhere to and uphold this commitment.

We recognise that the safety, dignity, and wellbeing of our students are paramount. Every student has the right to feel safe, supported, and treated with respect throughout their studies.

Our safeguarding responsibilities include, as far as is reasonably practicable:

- Protecting students from physical, psychological, and emotional harm.
- Responding appropriately to concerns about abuse, neglect, harassment, or exploitation.
- Providing clear and accessible information about welfare and support services.
- Promoting positive wellbeing and ensuring students are aware of their rights and responsibilities.

This policy applies to all English Path Australia staff, students, contractors, and visitors, and covers all on-campus and off-campus activities organised by or on behalf of the school.

4. English Path Safeguarding Team:

Who to Contact

Designated Safeguarding Lead – Head of Operations (Australia):

Mark Bailey – Located at the Brisbane Campus
Telephone: +61 7 3229 6929 / +61 461 331 754



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Deputy wellbeing officer:

Philippa Meek – Director of Studies. Email pmeek@englishpath.com

Richard Williams – Student Services Officer. Email rwilliams@englishpath.com

Designated Safeguarding Lead – Head of Operations (UK):

Sian Matos – Located at the Canary Wharf Campus

Telephone: +44 20 4551 3657 / +44 749 400 2444

Role of the Safeguarding Team

The Safeguarding Team is responsible for:

- Acting as the first point of contact for any concerns relating to student welfare or safety.
- Providing advice, guidance, and support to staff, students, and visitors on safeguarding matters.
- Ensuring that safeguarding concerns are handled promptly, sensitively, and in accordance with this policy and relevant legislation.
- Coordinating referrals to external agencies when appropriate.

All members of the Safeguarding Team are trained in identifying and responding to safeguarding issues involving adult learners, including those who may be considered vulnerable adults.





5. Terminology

Concern: When someone is worried or concerned that a student is at risk of harm or not being supported 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 and for putting into place procedures to safeguard all students 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 student.

Safeguarding: Taking all reasonable steps to prevent harm—such as abuse, exploitation, harassment, and neglect—from occurring; protecting students, especially those who may be considered vulnerable adults, from such harm; and responding appropriately when concerns arise. Safeguarding applies consistently and without exception across all programmes, staff, students, contractors, and visitors. It includes identifying, preventing, and managing risks and ensuring a safe and respectful learning environment.

Vulnerable Adult:

Any person aged 18 or over who may be unable to protect themselves from harm, abuse, or exploitation due to factors such as mental or physical disability, illness, age, cultural isolation, or social disadvantage.

Welfare:

The systems, policies, and practices in place to protect students from harm and to promote their physical, mental, and emotional wellbeing.

6. Commitments

English Path is committed to:

- Fostering a safe and respectful environment for all adult students, including those who may be considered vulnerable adults.
- Identifying the names and contact details of responsible persons in the school and explaining the purpose of their role.
- Encouraging positive, respectful, and safe behaviour among students.
- Protecting students from abuse, exploitation, harassment, or neglect, and reducing risks to their safety and wellbeing.



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- Promoting and supporting students' physical, mental, and emotional health.
- Providing clear guidance to all staff on how to maintain student safety and what to do if concerns arise.
- Ensuring staff receive safeguarding awareness training appropriate to their role and responsibilities.
- Applying safeguarding principles during recruitment to ensure suitability of staff and contractors.
- Maintaining effective communication across the English Path community and, where necessary, developing positive working relationships with external agencies and support services.
- Establishing monitoring systems for students identified as being at risk of harm and providing appropriate support to those in need.
- Creating and maintaining a structured safeguarding process that all staff can follow in the event of a concern.
- Ensuring all staff have undergone appropriate background checks, identity verification, and qualification verification in accordance with Australian requirements, and that this information is stored securely and kept up to date.
- Ensuring staff act as positive role models and maintain professional boundaries at all times.
- Addressing any identified weaknesses in safeguarding practice promptly.
- Maintaining secure, accurate, and confidential records of all safeguarding concerns in line with data protection requirements.
- Conducting an annual safeguarding review and report.

7. Best practice

Best practice refers to the conduct of staff while working with, supporting, or being in proximity to students. It also applies to the way staff communicate with students and the type of information they share.

The behaviour of staff must not be open to misinterpretation or criticism. Staff should protect themselves against allegations or situations that could cause conflict between them, the student, and other parties. Staff must ensure they do not put themselves in a position that may inadvertently threaten or upset a student, and should use best practice in all interactions.

Staff are expected to:

- Understand their responsibilities under this policy and related procedures.
- Always act, and be seen to act, in the student's best interest.
- Take responsibility for their own actions and behaviour.
- Remain open to feedback and guidance from colleagues.
- Report any concerns regarding the conduct of colleagues to the Designated Safeguarding Lead (DSL) or Deputy DSL.
- Avoid using their position to gain access to personal information for their own advantage or to the detriment of a student.
- Never engage in intimidation, coercion, harassment, or inappropriate relationships with students.

When uncertain about how to proceed in any situation, staff should consult the DSL for advice and guidance.



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Preventing Radicalisation

English Path Australia supports the principles of the Australian Government's *Living Safe Together* program, which aims to prevent individuals from becoming involved in violent extremism. Radicalisation" refers to the process by which a person comes to support terrorism and extremist ideologies, which can lead to criminal or harmful activity.

All staff have a responsibility to be alert to signs of radicalisation and to take action if they have concerns about a student's behaviour, wellbeing, or exposure to extremist influences. These influences may come from a variety of sources, including online platforms, social media, or personal networks.

We help to protect our students from extremist or violent views in the same way we safeguard them from other harms such as harassment, discrimination, substance abuse, or exploitation.

Staff will receive awareness training on recognising and responding to indicators of radicalisation. If concerns arise, escalation may involve:

- Contacting the Designated Safeguarding Lead (DSL) for guidance.
- Seeking advice from relevant national security or law enforcement agencies.
- Contacting the **National Security Hotline** on 1800 1234 000.
- In emergencies, calling **000**.
- Referring students to appropriate mental health or community support services such as **Lifeline** on 13 11 14.

Our approach is preventative, respectful of human rights, and in line with Australian laws and values.

Safer Recruitment

English Path is committed to recruiting staff and contractors who are suitable to work in an adult education environment and who uphold our safeguarding principles.

All recruitment processes include:

- Verification of identity.
- Verification of qualifications and professional registrations where applicable.
- Employment history checks, including investigation of any gaps.
- At least two reference checks from previous employers or relevant professional contacts.

Where roles involve direct student interaction, particularly with students who may be considered vulnerable adults, additional checks (such as police history checks) may be conducted in accordance with Australian legislation and best practice.



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Staff must not commence work until the required checks are complete and clearance has been granted by management.

A Single Central Register of recruitment and vetting checks for all staff working at English Path is maintained to ensure compliance with legislative and organisational safeguarding requirements.

Our recruitment approach supports a culture of professionalism, transparency, and accountability, and helps ensure the ongoing safety and wellbeing of all students.

Staff Screening – Adult Student Safety

English Path Australia does not enrol students under the age of 18.

However, we remain committed to ensuring that all staff, contractors, and volunteers are suitable to work in an adult education environment and to engage appropriately with students, including those who may be considered vulnerable adults.

Pre-employment screening includes:

- **Identity verification** – confirmation of legal right to work in Australia.
- **Qualification and professional credential checks** – verification that any claimed qualifications or licences are valid.
- **Employment history and reference checks** – confirmation of prior experience and suitability for the role, including exploration of any employment gaps.
- **Nationally Coordinated Criminal History Check** – undertaken where the role involves direct contact with students, especially those who may be considered vulnerable adults.

Ongoing compliance:

- Staff must notify management immediately if there are any changes to their criminal history or other circumstances that could affect their suitability for the role.
- Screening checks are renewed or updated in line with legislative requirements and organisational policy.

All screening records are maintained securely and confidentially in accordance with privacy legislation and our data protection policy.



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What Happens if Screening is Delayed?

In exceptional circumstances, where the completion of required pre-employment screening (e.g., criminal history check, qualification verification, or reference checks) is delayed due to administrative or external factors, English Path will implement additional risk management measures before the staff member can commence duties involving student contact.

These measures may include, but are not limited to:

- Limiting the staff member's duties to non-student-facing tasks until clearance is obtained.
- Increased supervision of the staff member by a senior manager.
- Restricting access to certain areas or information.
- Keeping workspaces open and visible to other staff.

Under no circumstances will an individual be permitted to undertake unsupervised work involving direct student engagement until all mandatory checks have been completed and clearance has been granted by management.

All temporary control measures will be documented, and screening will be prioritised for completion at the earliest opportunity.

Staff Induction

All new members of staff at English Path receive an induction at the commencement of their employment. The induction covers:

- An overview of the organisation, including our mission, values, and culture.
- Clear explanation of roles, responsibilities, and reporting lines.
- Introduction to the Safeguarding Policy, including how to identify and respond to concerns about student safety or wellbeing.
- Confidentiality requirements and professional boundaries.
- Health, safety, and emergency procedures.

Safeguarding Awareness training is provided to all staff to help them recognise, respond to, and report welfare or safety concerns involving adult students, including those who may be considered vulnerable adults.

Staff are expected to participate in ongoing professional development, including internal Continuing Professional Development (CPD) sessions relevant to safeguarding and student wellbeing. Training is coordinated by the Designated Safeguarding Lead (DSL) and updated regularly to reflect legislative changes, regulatory requirements, and best practice.



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Students' induction

As part of the orientation process, all new students at English Path Australia receive an induction designed to help them settle into their studies and life in Brisbane. This induction includes:

- An introduction to the school, its facilities, and key staff contacts, including the Designated Safeguarding Lead (DSL) and support staff.
- Information on student welfare services and how to seek assistance.
- Overview of school rules, policies, and codes of conduct.
- Guidance on personal safety and wellbeing, both on campus and in the wider community.
- Guidance and contact details for legal aid in case of necessity.
- Health and safety briefing, including emergency procedures and reporting incidents.
- A guided school and local area tour to familiarise students with the environment.

The induction ensures students are aware of their rights, responsibilities, and available support networks, enabling them to make the most of their learning experience in a safe and respectful environment.

External Suppliers and contractors

External suppliers and contractors engaged by English Path Australia must be aware of and comply with our Safeguarding Policy and our commitment to providing a safe and respectful environment for all adult students, including those who may be considered vulnerable adults.

Prior to commencing work, all suppliers and contractors must:

- Sign a declaration confirming their awareness of and commitment to our safeguarding principles.
- Ensure their employees and subcontractors are aware of these requirements.
- Comply with all applicable workplace health and safety and anti-discrimination laws.

If a contractor's work involves regular or direct contact with students, they may be required to undergo additional screening checks (such as a Nationally Coordinated Criminal History Check) before commencing work.

Any concerns about the behaviour or conduct of a supplier, contractor, or their staff towards students will be addressed promptly in accordance with our safeguarding and grievance procedures.

COVID -19

English Path Australia follows Australian Government and Queensland Health advice regarding COVID-19 and other communicable diseases. While the specific guidance issued during the COVID-19 pandemic has been withdrawn, we remain committed to ensuring the health, safety, and wellbeing of all students, staff, and visitors.



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Our approach includes:

- Monitoring official updates from health authorities and responding promptly to any public health directions.
- Implementing hygiene, cleaning, and ventilation measures in line with current recommendations.
- Providing clear communication to students and staff about any temporary changes to operations.
- Maintaining contingency plans for a transition to online learning (via EP Online) if in-person classes are disrupted.
- Supporting students who may be affected by illness or isolation requirements to continue their studies where possible.

English Path benefits from being part of the GEDU global network, which allows for the sharing of resources, expertise, and operational strategies to maintain continuity of education in exceptional circumstances.

Accommodation

English Path offers accommodation options through approved providers to ensure students have safe, comfortable, and well-managed housing during their studies.

Accommodation arranged by English Path is inspected for quality, safety, and suitability, and providers are required to comply with all applicable Australian laws and industry standards.

Where accommodation is arranged through a third-party provider, English Path ensures that:

- The provider follows relevant safety, privacy, and welfare practices.
- Accommodation meets agreed standards for cleanliness, maintenance, and security.
- Students have access to appropriate support from the provider if issues arise.

Students arranging their own accommodation are responsible for ensuring it meets their personal needs. English Path may provide guidance on suitable housing options but is not responsible for the condition or safety of privately arranged accommodation.

Any concerns about student accommodation arranged through English Path should be reported to Student Services so they can be addressed promptly.

Accommodation & Transfers

English Path offers approved accommodation options through reputable providers, ensuring a safe, comfortable, and supportive living environment for students. All accommodation arranged through the school is:

- Inspected to confirm it meets agreed quality, safety, and maintenance standards.
- Managed by providers who comply with all applicable Australian laws and regulations.



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- Supported by clear communication channels for addressing any issues.

Students arranging their own accommodation are responsible for ensuring it meets their needs. While English Path can provide general guidance, we are not responsible for the safety or condition of privately arranged housing.

Transfers:

Students may book arrival and/or departure transfers through approved service providers. These providers are selected for their professionalism, reliability, and compliance with relevant transport safety standards.

Students not using English Path-arranged transfers are responsible for making their own travel arrangements to and from the school or their accommodation.

Any concerns about accommodation or transfer services arranged through English Path should be reported to Student Services so they can be addressed promptly.

Attendance

English Path Australia monitors student attendance in accordance with the ELICOS Standards 2018, the Standards for RTOs 2015, and relevant visa requirements.

Students are expected to:

- Attend all scheduled classes and learning activities, with a minimum of 80% being a legal requirement for visa holders.
- Arrive on time and remain for the full duration of each session.
- Notify the school before the start of class if they are unable to attend, including the reason for their absence.

If a student is absent without notification:

1. The teacher will report the absence to the Academic Management Team.
2. Student Services will attempt to contact the student by phone, email, or messaging to confirm their welfare.
3. Continued absence without valid reason will trigger follow-up in line with our Attendance Policy and, where applicable, visa compliance requirements.

Persistent or unexplained absences may lead to intervention processes, academic counselling, and where relevant, reporting to the Department of Home Affairs in accordance with student visa conditions.

Our attendance monitoring ensures that students are supported to meet their study goals, maintain compliance with visa requirements, and engage fully with their learning.



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Supervision and Risk assessments

English Path ensures that all on-campus and off-campus activities are conducted in a safe and supportive environment.

Supervision

For all school-organised activities, appropriate staff or activity leader presence is maintained to ensure the smooth running of the event, provide assistance where needed, and respond to any incidents or emergencies. While adult students are responsible for their own safety and conduct, staff will remain available to provide guidance and support during organised activities.

Risk Assessments

Risk assessments are completed for all school-organised excursions, events, and activities. These assessments consider:

- Potential hazards and how they will be managed.
- Suitability of the activity for adult learners.
- Emergency response arrangements.
- Any additional support requirements for students with specific needs.

Risk assessments are reviewed regularly and updated when activities or circumstances change.

Welfare of students online

If teaching or other learning activities are delivered online (e.g., due to public health directives, emergencies, or blended learning arrangements), English Path applies the same commitment to safety, respect, and wellbeing as in face-to-face classes.

Our online welfare approach includes:

- Encouraging students to keep cameras on during lessons to support engagement and interaction.
- Providing clear online classroom guidelines at the start of each course and reminding students of these regularly.
- Ensuring all staff use secure devices and maintain data security, including:
 - Using strong passwords and device encryption.
 - Ensuring devices lock automatically when not in use.
 - Keeping devices physically secure when unattended.



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- Maintaining up-to-date antivirus and operating system updates.
- Not sharing work devices with others.
- Ensuring all communication with students is professional and conducted through approved school channels.
- Reporting any welfare or safety concerns identified during online classes to the Designated Safeguarding Lead (DSL) or Deputy DSL immediately.

This approach ensures that online learning remains a safe, respectful, and productive environment for all students.

Social Programme

English Path offers a regular social programme to help students connect with each other, experience local culture, and practise English in real-world contexts. Participation in social activities is optional but encouraged as part of a well-rounded learning experience.

All school-organised activities are:

- Planned to be inclusive and accessible to all adult students.
- Reviewed for suitability and safety before being offered.
- Accompanied by clear information on any costs, physical requirements, or special considerations.
- Conducted in line with our safeguarding principles and relevant health and safety requirements.

Risk assessments are completed for each activity, and students are briefed on key safety information before participation.

Students are expected to follow the school's Code of Conduct during all activities, whether on or off campus, and to behave in a way that upholds the safety and enjoyment of all participants

Data Protection

English Path Australia handles all student information in accordance with the **Privacy Act 1988 (Cth)**, the Australian Privacy Principles (APPs), and any other applicable national and state privacy laws.

We ensure that:

- Personal information is collected, stored, and used only for legitimate educational, administrative, and welfare purposes.
- Access to student information is restricted to authorised staff who require it to perform their duties.
- Information is kept accurate, up to date, and stored securely to prevent unauthorised access, loss, or misuse.



- Sensitive information is only shared with third parties where legally permitted or where the student has given explicit consent, except where disclosure is required to prevent serious harm or as otherwise required by law.

Records of safeguarding or welfare concerns are kept securely by the Designated Safeguarding Lead (DSL) and maintained in accordance with applicable privacy and record-keeping requirements.

Concerns about the handling of personal information can be raised directly with the DSL or by following the complaints process outlined in our Complaints and Appeals Policy.

8. Student protection – information for staff

Safeguarding is the responsibility of all staff, contractors, and volunteers at English Path Australia. While we do not enrol students under 18, we recognise that some adult learners may be considered *vulnerable adults* due to factors such as age, disability, illness, cultural isolation, or social disadvantage. All members of our community share responsibility for ensuring these students are supported and protected from harm.

Recognising Possible Signs of Abuse or Harm

Abuse of adults can take many forms, including physical, emotional, sexual, financial, or neglect. Signs may be physical, behavioural, or verbal, and may occur alone or in combination. Possible indicators include, but are not limited to:

- **Physical:** unexplained injuries, frequent minor injuries, reluctance to be touched, or signs of poor personal hygiene.
- **Emotional/Psychological:** withdrawal from social contact, loss of confidence, extreme mood changes, excessive fearfulness, or self-deprecating comments.
- **Sexual:** reluctance to be alone with certain individuals, sudden changes in dress or behaviour, unexplained physical discomfort, or disclosure of unwanted sexual contact.
- **Financial:** sudden loss of possessions or money, unexplained debt, or reluctance to discuss financial matters.
- **Neglect:** persistent fatigue, untreated medical conditions, poor living conditions, or lack of necessary support for daily needs.

Any one of these signs does not automatically mean abuse is occurring, but staff must take all concerns seriously and follow reporting procedures.

In addition to the above, staff should remain alert to the following specific safeguarding issues:



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- **Criminal exploitation of adults:** coercion/manipulation to carry out criminal activity (e.g., transporting/holding illicit goods, fraud, forced labour). Indicators include unexplained gifts, association with known offenders, sudden changes in lifestyle, or going missing for periods.
- **Sexual exploitation/sexual assault:** exploitation for sex or sexual favours in exchange for money, accommodation, status, or protection; grooming online or offline.
- **Image-based abuse (IBA):** non-consensual creation or sharing of intimate images/videos; threats to share ("sextortion").
- **Serious violence:** indicators include injuries, fear of certain individuals/groups, unexplained new possessions, changes in friend groups, or significant declines in wellbeing.
- **Domestic and family violence:** controlling, coercive, threatening behaviour, violence or abuse by a current/former intimate partner or family member (psychological, physical, sexual, financial, emotional).
- **Gender-based violence (including VAWG):** violence directed at a person because of their gender (e.g., sexual harassment, stalking, trafficking for sexual exploitation).
- **So-called "honour-based" abuse (including FGM and forced marriage):** abuse perpetrated to protect perceived family/community "honour". FGM and forced marriage are criminal offences in Australia; any concerns must be escalated to the DSL immediately and, where appropriate, to police/emergency services.

For advice and non-emergency concerns, please contact:

- Mark Bailey – Head of Operations – Australia (EP Brisbane) – Bachelor of Psychology
mbailey@englishpath.com
- Philippa Meek – Director of Studies (EP Brisbane)
pmeek@englishpath.com
- Mary-Ellen Wright – Global Head of Academics (EP London) – First Aid Mental Health Level 2
mwright@englishpath.com

Staff Responsibilities

- Be alert to possible signs of harm, even if the student has not disclosed a problem.
- Take all concerns seriously, regardless of perceived severity.
- Follow reporting procedures promptly by contacting the Designated Safeguarding Lead (DSL) or Deputy DSL.
- Maintain professional boundaries and avoid behaviour that could be misinterpreted.



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- Keep safeguarding information confidential, sharing only with authorised personnel or agencies when required.

Staff Must Not

- Investigate concerns themselves – this is the role of the DSL or relevant authorities.
- Promise absolute confidentiality to a student making a disclosure – instead, explain that information may need to be shared to ensure their safety.
- Delay reporting a concern.

Safeguarding at English Path Australia is proactive. We aim not only to respond to concerns but also to create a safe, respectful, and supportive environment where students feel able to raise issues early.

9. Allegations

English Path takes all allegations against staff, contractors, volunteers, or other students seriously. An allegation is any claim, suspicion, or concern that a person has:

- Behaved in a way that has harmed, or may have harmed, a student.
- Committed or is alleged to have committed a criminal offence against or related to a student.
- Behaved in a way that indicates they may pose a risk to students' safety or wellbeing.

Although we do not enrol students under 18, these procedures apply to all allegations involving adult learners, including those who may be considered vulnerable adults.

Allegations against members of staff or any adults working or volunteering with students

If an allegation is made against a member of staff, service provider (e.g., accommodation provider), or volunteer, we will follow the procedure below:

- The allegation should be reported immediately to the Designated Safeguarding Lead (DSL) or Safeguarding Officer. Should the allegation be made against the DSL, the matter should be reported immediately to the Deputy DSL or, in their absence, another Safeguarding Officer and a member of the Senior Management Team.
- Where appropriate, EP will consult with the relevant local or state authority (e.g., police or appropriate regulatory body) 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 the relevant authority and ask all members of staff to do the same and co-operate when required. This may include:
 - Immediate action to protect the student.
 - Deciding what information is shared and when.
 - Determining what should be said to the adult facing the allegation and whether they should be suspended.
- **Suspension** – This is not an automatic response. It is considered when there is a risk of serious harm to a student, 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 is substantiated and it is agreed that the person is unsuitable to work with students, the matter will be referred to the appropriate regulatory body or authority.
- EP recognises the importance of providing a duty of care to the staff member against whom the allegation has been made. The Head of School will be their key contact during the investigation.
- If an individual feels their concern will not be taken seriously or they are worried about the allegation getting back to the person in question, it is their duty to inform the relevant authority directly or use the Independent Whistleblower service – 1800 325 002.

Allegations against students

If an allegation of abuse is made towards a student, we will follow the procedure below:

- The student may be suspended from class and/or removed from their accommodation during the investigation; in such cases, the DSL must be informed.
- The organisation will take advice from the relevant external authority 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, the student will be supported during the interview by an appropriate staff member.
- If the allegation is substantiated, disciplinary action will be taken in accordance with the Student Code of Conduct and Discipline Policy, both of which can be found on our [website](#).

Suspecting or hearing a complaint of any form of abuse

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

If a student confides in a staff member, they should:

- Be accessible and receptive; move to a quieter space while keeping visibility (e.g., door open, visible location).
- If teaching online, use a breakout room and contact the DSL immediately.



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- Listen carefully without criticism; reassure the student that it is okay to speak up and that they will be supported.
- Explain that the information might have to be shared to ensure their safety, using accessible language.
- Make a factual record of what was said – just enough to take the next step.
- Inform the student of the next step.
- Safeguard both the alleged victim and the alleged perpetrator.
- Follow up promptly with the DSL.

What you must not do: investigate, ask leading questions, speculate, accuse, offer opinions, fail to record, fail to report, discuss with colleagues, promise absolute confidentiality, assume someone else will act, jump to conclusions, be dismissive, or react with shock.

Reporting and recording

EP requires all staff to work within clear professional boundaries. Staff must report to the DSL or Safeguarding Officer any concerns or allegations about the behaviour of colleagues that could put students at risk.

There will be no retribution or disciplinary action against a staff member who reports in good faith.

Only the DSLs have access to the relevant reporting forms. All records will:

- Be signed and dated.
- Include details of the concerns, actions taken, and reasons for decisions.
- Be stored securely and confidentially in accordance with the **Privacy Act 1988 (Cth)** and organisational policy.

Confidentiality and information sharing

The DSL(s) will only share information with professionals or agencies where it is legally permissible and necessary to protect student safety. Only relevant information will be shared with those who need to know.

Monitoring and review process

This policy and related procedures will be reviewed annually, or sooner if there are legislative changes, changes in personnel, or following a safeguarding incident. English Path works in partnership with local and national agencies and consults students and staff where appropriate.



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Yearly report

At the end of each year, the DSL(s) will prepare an annual report on safeguarding concerns and allegations. This will review actions taken, identify areas for improvement, and inform training and policy updates.

Legal framework

This policy has been developed in accordance with:

- Privacy Act 1988 (Cth)
- Australian Human Rights Commission Act 1986
- Anti-Discrimination Act 1991 (Qld)
- Relevant state and national legislation relating to abuse, assault, and harassment of adults.

It is consistent with all other central policies adopted by English Path and should be read alongside:

- Anti-Harassment and Anti-Bullying Policy
- Attendance Policy
- Equality and Diversity Policy
- Health and Safety Policy
- Mental Health and Wellbeing Policy
- Modern Slavery Policy
- Student Code of Conduct

10.Related Legislation

In upholding this Policy, the following legislation and frameworks must be considered:

- **Privacy Act 1988 (Cth)** – Protects personal information and governs information handling.
- **Criminal Code Act 1995 (Cth)** – Outlines Commonwealth offences including those relating to abuse, exploitation, trafficking, and cybercrime.
- **Anti-Discrimination Act 1991 (Qld)** – Prohibits discrimination and harassment in education and employment.
- **Work Health and Safety Act 2011 (Qld)** – Establishes the duty to ensure a safe environment for staff, students, and visitors.
- **Child Protection Act 1999 (Qld)** – Provides the legislative basis for the protection of children and young people; referenced for best practice safeguarding principles, although EP Australia does not enrol students under 18.



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 – Contacts Australia

English Path: Named personnel with designated responsibility for protection of vulnerable people:

Designated Safeguarding Lead / Head of Operations Name: Mark Bailey
Job Title: Head of Operations - Australia
Tel: +61 461 331754

United Kingdom

English Path: Named personnel with designated responsibility for protection of vulnerable people:

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 02 444

How to make a referral for Student Assistance Program

Referrals can be made by telephone on 1800 818 728.



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.

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 4 – Contractor & Supplier Safeguarding's Statement

English Path is committed to providing a safe environment for all students and protecting them from maltreatment and harm.

Contractors and suppliers visiting the campus are made aware of this commitment.

- Every visitor must sign in at reception and always wear a visitor badge while on campus.
- Contractors will only work in their designated area(s) and must not enter other areas of the campus without authorisation.
- If the nature of the work requires unaccompanied or unsupervised contact with students, contractors and their relevant employees must undergo suitable background checks as required under relevant Australian law.
- The contractor/supplier is responsible for ensuring all necessary checks are completed before their staff commence work on campus.
- Any concerns about inappropriate contact or conduct with English Path students will be addressed in consultation with the school and, if necessary, referred to the appropriate authority.
- If the contractor engages any subcontractor to work on site, the contractor must ensure the subcontractor follows these same procedures and requirements.

Acknowledgement

I confirm I have read and agree to the above statement. I will ensure that all employees of my organisation are aware of English Path Australia's safeguarding procedures. I confirm that all employees who will provide services to English Path have undergone the required background checks in accordance with applicable Australian legislation.

I confirm that 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 not work with Under 18s.

Name _____ Signed _____

Company _____ Service Provider _____

Date _____



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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 _____