



**celt**

**CENTRE FOR ENGLISH  
LANGUAGE TEACHING**

6 Salisbury Road  
Cardiff CF24 4AD  
United Kingdom

**Tel: +44 (0)29 2033 9290**

**Fax: +44 (0)29 2033 9515**

Website: <http://www.celt.co.uk>

E-mail: [english@celt.co.uk](mailto:english@celt.co.uk)

**CELt**

**Safeguarding  
Children  
&  
Adults at Risk Policy  
  
A Policy Statement**

## Contents

Section A POLICY STATEMENT .....	4
A1 Context.....	4
A2 Context: Multi-centre Organisation.....	4
A3 Terminology .....	5
A4 Statement .....	7
A5 Under 18’s Entitlement & A6 Adult’s Responsibilities.....	7
A7 Structure, Roles and Responsibilities .....	8
A8 Designated Team Way of Working .....	9
A9 Local Authority Contacts And Standards .....	10
A10 Documents / Legal Framework.....	11
A11 Associated Policies.....	11
A12 Under 18’s Involvement .....	11
A13 Policy Review .....	12
A14 Policy Availability & Formats .....	13

## Document Revision

Date	Staff Involved
Policy written by:	Neil Harris
Policy reviewed by:	Grace Durighello, Greg Nelson, Mike Burden, (Designated Safeguarding Staff)
Policy approved by:	Grace Durighello
Policy publication date:	December 2018
Policy amended:	
Next policy review date:	December 2019

### SENIOR DESIGNATED SAFEGUARDING STAFF

#### Mike Burden (Director of Studies), Designated Safeguarding Person

[mike@celt.co.uk](mailto:mike@celt.co.uk) +44(0) 29 2033 9290

#### Neil Harris (Academic Projects Development Manager), Assistant Designated Safeguarding Person

[neil@celt.co.uk](mailto:neil@celt.co.uk) +44(0) 29 2033 9290

#### Grace Durighello (Academic Director), Senior Manager with overall responsibility for Safeguarding

[grace@celt.co.uk](mailto:grace@celt.co.uk) +44(0) 29 2033 9290

#### Greg Nelson (Principal), Designated Staff (Trained to Specialist Level 3)

[greg@celt.co.uk](mailto:greg@celt.co.uk) +44(0) 29 2033 9290

#### Alyssia Jones (Accommodation Officer), Designated Staff (Trained to Advanced Level 2)

[alyssia@celt.co.uk](mailto:alyssia@celt.co.uk) +44(0) 29 2033 9290

#### Chen Hodges (Admin Assistant), Designated Staff (Trained to Advanced Level 2)

[chen.hodges@celt.co.uk](mailto:chen.hodges@celt.co.uk) +44(0) 29 2033 9290

This policy was last updated in December 2018. The next update is due in December 2019 and will also be updated in event of staff changes, changes to legislation, changes to Accreditation UK criteria requirements and after a safeguarding concern.

## Section A POLICY STATEMENT

### A1 Context

Founded in 1989, CELT has offered courses for adults aged 18+ at its adult centre in Salisbury Road, Cardiff since 2000 and courses for under 18s (aged 13-17) in its dedicated junior centre in North Road, Cardiff since 2009. Since January 2019, the school has also accepted 17-year-old learners on its adult courses in Salisbury Road, subject to receipt of the necessary parental consent forms. Adult courses run year-round; junior courses run year-round for closed groups and with continuous enrolment in open classes in July and August on the under 18 Holiday Language Course.

Accommodation is provided with local homestays or in one of CELT Student Residences (adults only, aged 21 and over). Some students choose to source their own accommodation privately. The vast majority of under 18s stay with school homestays unless the school has agreed for them to stay with a family member or an authorised adult aged 25+ ; approximately 50% of adult students stay in homestay; the remainder arrange private accommodation and a maximum of 9 adult students are accommodated in the residences at any one time.

Any student under the age of 18 is a minor, and as such CELT has a special “Duty of Care” towards both the under 18s and any adults at risk who attend the school. 'An “adult at risk” is an adult who: (a) is experiencing or is at risk of abuse or neglect; (b) has needs for care and support (whether or not the authority is meeting any of those needs); and (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.’ This definition of an “adult at risk” applies in relation to the statutory powers and duties included in Part 7 of the Act and, for those purposes, replaces the definition of a “vulnerable adult” included within In Safe Hands (Welsh Assembly Government 2000)

<https://gov.wales/docs/phhs/publications/160404part7guidevol1en.pdf>

CELT also includes in this category adults with a disability (both physical and mental), and one whose level of English and cultural familiarity makes them vulnerable. Each student’s level of vulnerability may depend on the context and it cannot be assumed that someone who is not thought of as a vulnerable adult within the school premises doesn’t become vulnerable off-site.

All students and visitors who fall into the category of adult at risk and all under 18s are entitled to be protected under this policy regardless of their race, nationality, age, sex, gender identity, religion or belief.

This duty of care applies to ALL members of staff towards CELT students whether or not they are on the premises, are on their way to or from the school, on an excursion or doing a sports or social activity organised by the school and in accommodation organised by the school.

### A2 Context: Multi-centre Organisation

CELT is not a multi-centre organisation and therefore the need to show how things differ in each centre is not pertinent to CELT. CELT is however mindful that it runs across two sets of buildings and safeguarding procedures take this into account. Please see Section A8 Structure, Roles and Responsibilities for further details.

### A3 Terminology

The following terminology is used throughout this policy and other school policies. It is important that all members of staff are familiar with the terms used, and where a term refers to a named person, they know who that person is and how they can be contacted. Group leaders and homestays are made aware of this policy, a copy of which is available on the school's [website](#). A condensed version of the policy is made available to all staff, homestays and Group Leaders which contains a link to this full version of the policy.

Duty of Care – this is a responsibility of all staff and group leaders to protect under 18s and vulnerable adults from direct harmful behaviour, for example, emotional abuse, physical abuse or any other physical harm, sexual abuse and neglect.

Safeguarding – this is an umbrella term which refers to the way in which CELT looks after all of its students, and with particular regard to vulnerable adults and under 18s, and protects them from “that which is not in their best interests”. It covers health and safety, child protection (see Section C Child Protection) and welfare/pastoral care (see Section F Welfare / Implementing Safeguarding) and a duty to promote wellbeing. All adults who work with under 18s have a legal duty of care to look after them correctly.

Child Protection – this aspect of safeguarding relates specifically to the protection of under 18s from direct harmful behavior either from an adult or from another under 18. This includes child protection procedures which explain how to respond to concerns about a child.

Under 18s – this term, used by the British Council and CELT in place of ‘junior’ or ‘child’, refers to any student or visitor who is under the age of 18. Under 18s are deemed to be under the age of full legal responsibility by law. All students studying in CELT’s adult centre who are under the age of 18 have their age highlighted in a different colour on their student card; their name is also highlighted on the register. Likewise, under 18 students in the adult centre and under 18s in the junior centre are required to wear a wristband with the school’s emergency number printed on it. Any use of the term junior in this document refers to a student aged under 18; the school’s junior centre is a separate building for the dedicated use of under 18 students.

Adult at risk – this term is defined as “a person aged 18 or over who may be in need of community care services by reason of mental or other disability, age or illness and who is or may be unable to take care of himself or herself, or unable to protect him or herself against significant harm or exploitation”. It replaces the previous term of vulnerable adult. 'An “adult at risk” is an adult who: (a) is experiencing or is at risk of abuse or neglect; (b) has needs for care and support (whether or not the authority is meeting any of those needs); and (c) as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.” This definition of an “adult at risk” applies in relation to the statutory powers and duties included in Part 7 of the Act and, for those purposes, replaces the definition of a “vulnerable adult” included within In Safe Hands (Welsh Assembly Government 2000)

<https://gov.wales/docs/phhs/publications/160404part7guidevol1en.pdf>

CELT also includes in this category adults with a disability (both physical and mental), and one whose level of English and cultural familiarity places them at risk. Each student’s level of risk may depend on the context and it cannot be assumed that someone who is not thought of as an adult at risk within the school premises doesn’t become at risk off-site.

CELT is vigilant in identifying adult students who fall into this category, and it is very rare for such adults to visit or enrol as students at the school. However, CELT considers all of its students as being potentially at risk not only for reasons such as physical disability and or special needs but also because of their level of English (lower students may not fully understand instructions or be able to effectively express a concern), lack of local knowledge (unfamiliar with the local vicinity or customs), lack of cultural awareness (unfamiliar with local and national customs and behavior), lack of confidence and difficulty integrating and making friends.

Abuse – this can be emotional, sexual, physical or neglect. It is defined as inflicting harm or failing to prevent harm.

Child Protection Officer (CPO) – A named member of staff responsible specifically for child protection. The Child Protection Officer is Mike Burden, the Director of Studies and the school's Designated Safeguarding Lead.

Designated Safeguarding Person (DSP) – A named member of staff, trained to Specialist Safeguarding Level (Level 3), who has full overall responsibility for the implementation of CELT's safeguarding policy. CELT's Designated Safeguarding Person is Mike Burden, the Director of Studies. The identity of the DSP is advertised around the school on posters and he meets all new students on their first morning. When the DSP is working in the junior centre, the Assistant Designated Safeguarding Person (ADSP) and the Academic Director deputize for him as DSP in the adult centre. Please note that DSP is the Welsh equivalent of DSL (Designated Safeguarding Lead).

Designated Safeguarding Staff (DSS) – Named members of staff trained to a minimum of Specialist Safeguarding Level (Level 2). CELT's DSSs are Chen Hodges and Alyssia Jones. Greg Nelson is also a DSS although as the school Principal and co-owner, he is trained to Specialist (Level 3) level.

CELT's DSSs are involved in the day-to-day implementation of safeguarding, as well as maintaining records.

Regional Safeguarding Children's Board (RSCB) – A key statutory mechanism for agreeing how the relevant agencies in each local area will co-operate to safeguard and promote the welfare of children in that locality, and for ensuring the effectiveness of what they do. The Children Act 2004 requires each local Children's Board authority to establish a Safeguarding Board. CELT falls within the catchment area of the Cardiff and Vale of Glamorgan Regional Safeguarding Board.

Local Authority Designated Officer (LADO) – The officer or team of officers involved in the management and oversight of allegations against people that work with children. CELT will contact its LADO regarding child protection concerns relating to an under 18 and an adult in a position of trust (such as a member of CELT staff or a homestay provider).

Prevent – A government initiative to try to reduce the likelihood of people supporting terrorism or becoming terrorists. Prevent is one of the four elements of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism. In Wales, PREVENT is managed by WECTU, Welsh Extremism and Counter Terrorism Unit. PREVENT is one of the four P's on which CONTEST is established:

- Pursue terrorists wherever they are and stop terrorist attacks
- Prevent people from becoming terrorists or supporting violent extremism
- Protect the UK by strengthening our defences against terrorism
- Prepare to respond to an attack to lessen its impact

Welfare - Welfare means the general care and support of staff or students at CELT. The line between welfare and safeguarding is very fine and what may appear to be a welfare issue could easily develop into or be the signs of a safeguarding issue. For example, homesickness is primarily a welfare issue but if it leads to isolation of the student or bullying, it becomes a safeguarding concern.

#### A4 Statement

Safeguarding is **every adult's** responsibility at CELT – not only every member of staff and accommodation provider but everyone else involved with the school from the taxi drivers used by the school to the cleaning staff. We must all endeavour to protect all of our students 'from that which is not in their best interests', always acting in the best interests of our students who are under 18. As such, we actively promote a culture of vigilance, recognising that safeguarding is a priority in all areas of the school's operation.

#### A5 Under 18's Entitlement & A6 Adult's Responsibilities

Students under 18 and vulnerable adults have a legal right to be kept safe and protected, whatever their race, nationality, age, sex, gender identity, religion or belief. While we have a legal obligation to protect and care for under 18s and vulnerable adults, at CELT we understand we have a moral 'duty of care' to promote the welfare of all our students no matter what their age or background. CELT therefore has a proactive and fully trained Safeguarding Team with 6 members of staff including 4 senior members trained to Safeguarding Specialist Level (Level 3) and 2 other members trained to Advanced Level (Level 2) (see Section A8, Structure, Roles and Responsibilities). This number ensures there are always sufficient members of the team working in the school at any one time to ensure cover in all of our school buildings and whenever there are outside activities. There is also a member of the team who can be contacted by telephone 24 hours a day 7 days a week. To ensure there is a strong safeguarding ethos throughout the school, the DSP and the Academic Director ensure there is regular staff training which takes all relevant and the most recent legislation into account. Staff now receive training at least annually, with regular updates as required, and the DSP and other members of the Senior Safeguarding Team will have refresher training every 2 years. The training also includes FGM (female genital mutilation), CSE (child sexual exploitation), HBV (honour based violence) and peer to peer abuse (see Section C7 Knowing and Recognising Secondary Forms of Abuse) and whistleblowing. Safeguarding covers health and safety, pastoral care and child protection and everyone involved with the school must be familiar with procedures as set out in the school's safeguarding policy; they must be vigilant and aware of signs of abuse; they must know how to react and who they must report concerns and allegations to if they have heard, seen or been told something. CELT ensures that both staff and students are aware of the identity of the members of the Safeguarding Team and also who to contact outside of the school in the case of a safeguarding issue. The Academic Director and the Director of Studies have overall responsibility for ensuring the suitability of academic materials and are assisted in this by the teaching staff.

A7 Structure, Roles and Responsibilities

Staff highlighted in grey are senior members of the school's Safeguarding Team.

	<p>Designated Safeguarding Lead (DSP) and Child Protection Officer (CPO)</p> <p>MIKE BURDEN Director of Studies +44(0) 29 2033 9290 Salisbury Road &amp; North Road Trained To Safeguarding Specialist (Level 3)</p>	
<p>Senior Manager with overall responsibility for Safeguarding &amp; DSS</p> <p>GRACE DURIGHELLO Academic Director +44(0) 29 2033 9290 Salisbury Road Trained to Safeguarding Specialist (Level 3)</p>	<p>Assistant Designated Safeguarding Lead (ADSP)</p> <p>NEIL HARRIS Academic Projects Development Manager +44(0) 29 2033 9290 Salisbury Road Trained to Safeguarding Specialist (Level 3)</p>	<p>Designated Safeguarding Person (DSS)</p> <p>GREG NELSON Principal +44(0) 29 2033 9290 Salisbury Road Trained to Safeguarding Specialist (Level 3)</p>
<p>Designated Safeguarding Staff (DSS)</p> <p>CHEN HODGES Administrative Assistant +44(0) 29 2033 9290 Salisbury Road Trained to Safeguarding Advanced Safeguarding (Level 2)</p>	<p>Designated Safeguarding Staff (DSS)</p> <p>ALYSSIA JONES Accommodation Officer &amp; Teacher +44(0) 29 2033 9290 Salisbury Road &amp; North Road Trained to Safeguarding Advanced Safeguarding (Level 2)</p>	

Specialist Safeguarding (Level 3) Trained and senior members of the CELT safeguarding team

- Mike Burden – Director of Studies, DSP & CPO (Based at Salisbury Road and North Road) – Designated Safeguarding Lead and Child Protection Officer. Overall responsibility for the implementation of safeguarding and child protection in the adult and junior centres, policy and procedures, the social programme (excursions and activities in the adult and junior centres) and risk assessments.
- Grace Durighello – Academic Director & DSP (Based at Salisbury Road), Senior Manager with overall responsibility for Safeguarding. Deputises for the DSP in his absence
- Neil Harris – Academic Projects Development Manager & ADSP (Based at Salisbury Road) – Assistant Designated Safeguarding Lead
- Greg Nelson – Principal & DSS (Based at Salisbury Road)

Advanced Safeguarding (Level 2) Trained

- Chen Hodges - Administrative Assistant & DSS, responsible for enrolments, individual and group transfers
- Alyssia Jones - Homestay Officer & DSS, responsible for safeguarding under 18s in homestay accommodation (booking, homestay visits and related admin)

Given the size of the school and the need for operational flexibility, the three DSPs are able cover the office-based roles. Meets and greets are covered by the DSP, the Academic Director or the Principal if required

Outside Agencies

- Lynda Gallagher– LADO – the person to contact regarding child protection concerns re under 18s with an adult in a position of trust, i.e. our staff and homestay providers
- Cardiff Children’s Services MASH Team for emergency contact relating to child protection concerns with external parties
- Cardiff and Vale of Glamorgan Regional Safeguarding Board  
This regional board has separate boards for children and adults:
  - Cardiff and Vale Regional Safeguarding Children Board (RSCB)
  - Cardiff and Vale Regional Safeguarding Adults Board
- Cardiff Education Safeguarding Team – provides CELT with guidance on safeguarding within the school’s local and regional context.

CELT’s structure enables clear leadership from the DSP, Mike Burden, who is based at Salisbury Road (or at North Road when the junior centre is open). Other senior safeguarding staff are present at the adult centre in Salisbury Road in Mike’s absence. North Road is covered by Grace Durighello if the DSP is absent. Further cover absence is provided by Greg Nelson and Neil Harris.

### A8 Designated Team Way of Working

From December 2018, the Senior Safeguarding Team will meet on a termly basis during the academic year (March/April, June, August and December) in order to review the implementation of CELT’s safeguarding provision. Further, on demand, meetings take place to respond to issues as they arise. Updates and changes are made following these meetings and the expertise and experience of staff is used to shape the policy. The team also meets annually in order to review and amend the policy documents. This review is the responsibility of the safeguarding team; editing and reviewing policy documentation lies with Neil Harris.

## A9 Local Authority Contacts And Standards

CELT works proactively within its local and regional context to ensure that it is following the standards and procedures set by its local authority in terms of child protection arrangements (see Section C Child Protection) and private fostering (see Section F Private Fostering) and wider safeguarding issues. The following local authorities are involved: the specific departments and their contact details are as follows:

### **Cardiff Children's Services**

Tel: 029 2053 6490, Option 3 for Emergency Referrals (MASH Team, Multi-Agency Safeguarding Hub) (Monday-Thursday 0830-1700, Friday 0830-1630)  
Out of Hours Emergency Duty Team: 029 2078 8570

### **The Local Authority Designated Officer, Children's Services, Cardiff: Lynda Gallagher**

Lynda Gallagher

Tel: 029 2233 0889

Email: [lgallagher@cardiff.gov.uk](mailto:lgallagher@cardiff.gov.uk)

### **Cardiff Education Safeguarding Team**

Tel: 029 2233 0879

Email: [slssafeguardingteaminformation@cardiff.gov.uk](mailto:slssafeguardingteaminformation@cardiff.gov.uk)

### **Cardiff and Vale of Glamorgan Regional Safeguarding Board**

Tel: 029 2233 0880 / 029 2233 0883

Email: [cardiffandvalersb@cardiff.gov.uk](mailto:cardiffandvalersb@cardiff.gov.uk)

[www.cardiffandvalesb.co.uk](http://www.cardiffandvalesb.co.uk)

This regional board has separate boards for children and adults:

- Cardiff and Vale Regional Safeguarding Children Board (RSCB)
- Cardiff and Vale Regional Safeguarding Adults Board

### **Cardiff Central Police Station**

King Edward VII Avenue, Cardiff CF10 3NN

Tel: 029 2022 2111

### **PREVENT**

Martyn Thomas (Partnerships)

E-Mail: [martyn.thomas@south-wales.pnn.police.uk](mailto:martyn.thomas@south-wales.pnn.police.uk)

Email for Prevent referrals: [prevent@south-wales.pnn.police.uk](mailto:prevent@south-wales.pnn.police.uk)

### **NSPCC Whistleblowing Helpline**

0800 028 0285

This service is available to staff who do not feel able to raise concerns regarding child protection failures internally. This helpline is available from 08.00 – 20.00 Monday to Friday

### **NSPCC**

Tel: 0808 800 5000

## A10 Documents / Legal Framework

CELT has a legal duty of care to all of the school's students. In the UK, the law states that people who work with children have to keep them safe. This safeguarding legislation is set out in The Children Act (1989) and (2004) and Safeguarding Vulnerable Groups Act 2006. It also features in the United Nations Convention on the Rights of the Child (to which the UK is a signatory) which sets out the rights of children to be free from abuse. The Government also provides guidance in the document Working Together to Safeguard People in Wales (July 2018), in which it is made clear that private organisations such as CELT "need to have appropriate arrangements in place to safeguard and protect children from harm" and Keeping Children Safe in Education (September 2018). In terms of GDPR and safeguarding, the government document Information Sharing (July 2018) has informed the writing of Section F17 GDPR & Safeguarding. In Wales, the Social Services and Well-being Act (Wales) 2014, Keeping Learners Safe, Roles schools have under the Education Act 2002 and Safeguarding children in education: handling allegations of abuse against teachers and staff: Welsh Government circular no 009/2014 (April 2014) have also informed the writing of this policy in its regional context. Copies of all these documents are saved on the school's shared data drive for shared access.

While complying with the law, CELT also follows Accreditation UK's guidelines set out in Inspection criteria requirements and additional guidance 2018 – 2021 which reflect good practice and in certain circumstances goes beyond legal requirements.

Please see the Care of Students Under 18 page of the school website for further information <https://www.celt.co.uk/careofstudentsunder18/>

## A11 Associated Policies

- Abusive Behaviour Policy and Procedures
- Equality Policy
- E-safety & ICT Policy and Procedures
- Health and Safety Policy and Manual (containing First Aid Policy and Procedures, Fire Procedures, Accident Procedures)
- Policy on Admission and Management of Students with Disabilities and Special Educational Needs
- Prevent Policy and Radicalisation Policy
- Safeguarding Policy
- Safer Recruitment Policy
- Social Programme and Risk Assessment Policy
- Student Charter (containing disciplinary policy, complaints policy)
- Student Guidelines (containing school rules)

Full policy documents can be found on the school website <https://www.celt.co.uk/policies-and-procedures/>.

## A12 Under 18's Involvement

CELT is committed to achieving best practice in all aspects of its operations, including safeguarding. We recognize the value in involving under 18s in the production of our policy; this is, however, challenging in practice as CELT's under 18 students typically enrol on short courses and therefore are not in the school for a sufficiently long period to make this realistically

possible. To achieve clear understanding of the importance and application of safeguarding to these learners, safeguarding is included during induction and in the following documents:

- Under 18s handbook
- Pre-departure documentation
- Group Leader Guidelines
- Parental Consent Documentation

The importance of safeguarding is also made clear to group leaders, who are also made aware of their role in supporting the school's procedures by briefing from the DSP and/or the ADSP/Academic Director.

Under 18s themselves are taught their responsibilities during induction and through the Under 18 guidelines in order that they are aware of safeguarding, understanding when and how they might be at risk and how to raise concerns and get help when it is needed. They are also made aware that it is important that they look out for each other. The code of conduct clarifies what is considered appropriate behaviour when interacting with peers and adults within the context of UK norms. Early feedback from under 18s is important and this is achieved formally by the early-bird feedback questionnaire which is collected in class at the end of the students' first week and from discussion with group leaders. In the case of students who are enrolled on a course lasting just one week, early feedback is sought from the group leaders and ongoing direct contact with the students themselves.

### [A13 Policy Review](#)

The latest version of CELT's Safeguarding policy has been drawn up by the Assistant Designated Safeguarding Lead with help from senior members of CELT's Safeguarding Team. The format of the document follows guidelines established by Nigel Heritage as part of his Specialist (Level 3) Safeguarding Training for English UK Wales and the policy documentation has been audited by Kevin O'Donnell of Blueberry Safeguarding and Compliance. The policy is officially reviewed annually by the Senior Safeguarding Team. Interim updates are made whenever there are any official changes in legislation or best practice and following any incidents which cause the school to review its procedures.

From December 2018, the Senior Safeguarding Team will meet on a termly basis during the academic year (March/April, June, August and December) in order to review the implementation of CELT's safeguarding provision. Further on demand meetings take place to respond to issues as they arise. Updates and changes are made following these meetings and the expertise and experience of staff is used to shape the policy.

#### A14 Policy Availability & Formats

CELT's condensed and full safeguarding policies are available on the school website

<https://www.celt.co.uk/policies-and-procedures/>

- Hard copies are kept in the DSP's and the Academic Director/Principal's offices.
- A copy of the condensed policy and a link to the full version is also sent to prospective employees when inviting them for an interview.
- A condensed version is made available to all Homestay Providers, Group Leaders, Educational Tour Operators and parents/guardians of under 18s booking direct with their acceptance papers.