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CELT

**Safeguarding
Children
&
Adults at Risk Policy

B Code of Conduct**

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Section B CODE OF CONDUCT

B1 Overview & Principles

Courses at CELT have previously been offered to adults aged 18 and above at the adult centre in Salisbury Road and to under 18s at the junior centre in North Road. From January 2019, the school also welcomes students aged 17 onto adult courses in the adult centre, subject to receipt of the necessary consent forms.

CELT has a diverse student population with learners representing a wide range of ages, cultures, religions and backgrounds. CELT's objective is to give its students the best teaching, learning and cultural experience possible and we are committed to providing students with excellent courses in a warm, friendly and professional environment and to caring for every aspect of their stay. Our staff and homestay providers have a key role in creating such a professional environment and we are committed to their care, training and support. CELT also recognises that it has a responsibility to provide a safe and healthy environment for all students and staff built on mutual trust: this is particularly critical for students under the age of 18 and for vulnerable adults. The need for and benefits of this Code of Conduct are explained during both the staff and student induction process.

The aims of this Code of Conduct are:

- to both support and protect students and staff within the context of a safe school culture
- to set boundaries, standards and give clear guidelines on what is expected of CELT staff in order to help create the warm, friendly and professional environment we aspire to, both in general and with specific reference to under 18s and vulnerable adults
- to provide guidance for adults involved with CELT's operations (staff, homestays, group leaders) and for under 18s to behave correctly with each other and with adults and to understand what is considered appropriate and professionally acceptable behaviour in the UK.

This Code of Conduct applies to all staff who are employed by CELT including occasional volunteers and work experience staff. All staff have a key role to play in defining how we are seen as an institution and how we are perceived by our colleagues, students, clients and all other stakeholders. In addition to our academic and welfare commitments to students and staff, we aim:

- to actively promote intercultural understanding
- to encourage appreciation of the different ways we all live, think and learn
- to treat everyone with respect and dignity

It is therefore CELT's goal to be sensitive to different cultural backgrounds and behaviours while maintaining the school's identity and values and complying with our statutory and legal obligations. An exhaustive list of rules prescribing staff behaviour in all situations would be impossible to write: we therefore make use of safer recruitment procedures, staff training and the trust we place in our staff to enable them to make professional and common-sense decisions. Nevertheless, we have provided clear guidance on certain issues in response to our duty of care and safeguarding responsibilities. As a general guideline, we expect students to be treated in the way that we would wish our own friends, colleagues and family members to be treated in a foreign environment in which they are likely to be more vulnerable and lacking in awareness of the that environment, its language and cultural norms. If any questions or doubts about points in this Code of Conduct arise, or matters are not covered here, please speak to a line manager or senior member of the safeguarding team for guidance.

Under 18s (and vulnerable adults)

Child Protection Policies and Procedures have been developed and are available on our website, from line managers, and are provided as part of staff induction and training (see Section C Child Protection). However, in considering adults at risk, age is not necessarily the only determining factor; anyone of any age with a limited level of English and cultural awareness of UK norms in the UK for the first time is potentially at risk so some of the following may equally be relevant to CELT's adult students.

This section of the Code of Conduct is written to give clear and formalised guidance to school staff on creating a safe school culture for under 18s and vulnerable adults. This includes protecting both students under 18 and adults from behaviours or actions that might be misconstrued and to ensure that staff do everything reasonable in their power to ensure the safety and wellbeing of under 18s and vulnerable adults studying at the school.

B2 Position Of Trust

We have a legal and moral duty to protect our students from the risk of sexual, physical and emotional abuse, and neglect. Any sexual activity between an adult who has a position of trust and responsibility in the school (including temporary summer staff) and an **under 18** is **illegal** even though the legal age of consent is 16 (Sexual Offences Act 2003). This also includes non-contact activities such as causing students to watch sexual activity. Such behaviour will also be considered to be gross misconduct.

Under no circumstances is an intimate relationship between an adult member of staff and a student, co-worker or volunteer in the school under the age of 18 appropriate. If there is evidence that one has developed, this will be seen as a serious breach of the school's policy in this area and will lead to immediate dismissal and a report about the individual adult being made to the DBS.

Any sexual activity between an adult who has a position of care and responsibility in the school (including temporary summer staff) and an under 18-year-old is illegal even though the legal age of consent is 16 (Sexual Offences Act 2003). It is also illegal to cause students to watch sexual activity.

B3 Setting Standards

In all we do, the yardstick we will use is that of

- adopting behaviours that we would expect of a professional with a duty of care and therefore acting as a role model to under 18s
- treating students under the age of 18 with due respect and in accordance with professional standards
- requiring under 18s to treat each other and adults with the same respect

These behaviours pertain to the context of a foreign environment in which any under 18 is likely to be more vulnerable and lacking in awareness of the surrounding environment, language and cultural norms.

Under 18s look up to staff and look to them for clues about how to behave in a new environment: it is therefore important that staff consider this in their behaviour and provide a suitable role model for them. This might include how they talk to others, which subjects are appropriate to talk (or joke) about, and how they dress and the way this might be read by younger students.

B4 Adult – U18 Interaction

The school expects staff to behave with common sense to ensure the safety and wellbeing of young people under the age of 18. To ensure ease of identification, students under 18 are required to wear a CELT wristband: 17-year olds will also be clearly identified on class lists if they enrolled on a course in the adult centre or participating in out-of-school activities.

For the purposes of this code of conduct, these are a few particular areas to consider:

1. Staff should avoid situations where they are left alone in an enclosed space with a student who is under 18. If a confidential meeting is necessary, it should be undertaken with a door open, close to other staff or adults: if appropriate a line manager should be informed (or if unavailable a colleague) that a 1:1 meeting with an under 18 is taking place.

2. Staff should take extra care with the language that they use around under 18s, making sure that it is always appropriate to their role. This is true in the classroom and while engaged in social activities, where staff may be less mindful of language grading and suitability.

3. In all instances staff should avoid favouritism (see Section B10 Favouritism and Gifts) and be as positive and even-handed with under 18s as possible, using praise where appropriate and ensuring that all students are treated equally and fairly.

4. Staff should as far as possible avoid any physical contact with students under the age of 18, particularly contact which might be misconstrued by the under 18 or by someone else witnessing it. Corporal punishment is illegal and any incidence of a member of staff using physical chastisement will result in dismissal and the police being informed. If it is necessary to touch a student, for example in a first aid situation, explain what you're going to do and why and ask permission first.

5. Staff should be especially careful in any dealings with under 18s they might have in a social setting outside of the school. These might easily be misconstrued by the under 18(s) or by others. If you do meet students outside school, make sure that it's as part of a group and never with an individual under 18.

6. Staff should neither explicitly nor implicitly condone the breaking of the law, particularly in regard to drinking alcohol, taking drugs, smoking, sexual activity or extremist views/behaviour. Any concerns in this area should be reported immediately to the DSP or in his absence a senior member of the Safeguarding Team.

7. On excursions and activities organised by the school, due regard should be given to the risk assessment document and in particular to any special measures adopted for under 18s on that trip. In general, it should always be ensured that under 18s are with at least 2 other people at all times, and, if necessary, with the member of staff leading the trip.

8. Students may ask why some of these limits exist and, in some circumstances, may question them. In these circumstances listen to the student in order that they feel validated rather than dismissed out of hand but be clear that the limits are not negotiable, that they exist for all and that they protect students and staff. Frame wherever possible your response in positive terms.

Personal Relationships

We understand that personal relationships may develop at work, with colleagues, clients, students or people that you may meet whilst on CELT business. Such relationships need to be handled

sensitively. Particular issues can arise when the two parties are of different seniority levels or working within the same area. Resentments can arise if it is felt that an individual is being treated differently, and if a relationship should end it can be difficult for the two parties to continue working with each other.

It is essential that there is a harmonious and professional atmosphere amongst the staff at all times. You are expected to ensure that any personal relationships do not interfere with this. Personal relationships between members of staff are, in the end, a private matter; however, in order to avoid misunderstandings and potential problems, it would be a courtesy to inform your line manager and you are encouraged to do so.

In the same way, you are expected to behave positively and with professionalism in your dealings with colleagues even if you do not get on with them personally.

Personal relations with students and clients are a particularly sensitive area. Although many of CELT's students are adults, staff must at all times remember that they may not be regarded as having equal status even if that is their perception. This will apply with particular force if the staff member is a teacher and the individual concerned is in their class. While normal social friendliness is certainly encouraged, staff are expected to be professional and maintain clear boundaries while at work or taking part in the social programme. Intimate relationships are often inappropriate and if you perceive that one is developing you are urged to discuss this with your line manager or with another senior member of staff.

It is not uncommon for young students to develop a 'crush' on / infatuation with a member of staff. Staff should therefore make every effort to ensure that their own behaviour cannot be brought into question and does not appear to encourage it. Any member of staff that becomes aware that a young person has become or may be becoming infatuated with either themselves or a colleague should immediately report this to DSP or to a senior member of the Safeguarding Team. In this way appropriate early intervention can be taken which can prevent escalation and avoid hurt, embarrassment or distress for those concerned.

Harassment and bullying

In order to achieve a safe, warm, friendly and professional environment for students and members of staff, CELT is committed to ensuring that everyone is able to work and to participate in the life of the school without fear of harassment, bullying or intimidation. Everyone at CELT has a part to play by ensuring that their own behaviour, whether intentional or unintentional, does not constitute harassment. CELT will take action against inappropriate behaviour which shows lack of respect for others or which leads people to feel threatened (see CELT's Anti-bullying and Abuse Policy in our Statement for dealing with abusive behaviour) <https://www.celt.co.uk/policies-and-procedures/>

Socialising with students and clients outside work

It is part of the nature of ELT that staff may socialise with adult students and clients outside of the school setting. In some cases, this may be as part of an organised school activity. In other cases, it may be an informal gathering of a teacher and their main class, or lunch/dinner with a client as part of a marketing event. In all cases, these will be perceived as a CELT event and as such staff should represent CELT in a professional manner and neither explicitly nor implicitly condone the breaking of the law, particularly in regard to drinking alcohol, taking drugs, smoking, sexual activity or extremist views/behaviour. A maximum of a glass of wine / one pint of beer or equivalent is acceptable for official CELT events where the lead member of staff has responsibility for a group of adults aged 18 and above; in unofficial settings, staff will be expected to maintain

professional standards at all times. No alcohol is to be consumed on any social occasion where there is a student who is under 18.

B5 Appropriate Appearance / Dress Code

The way that staff dress can have an effect on many students, and some may find it difficult to respect staff or their role if they don't present themselves. Staff are therefore expected to be of clean appearance, and smartly dressed in a way that is suitable for the situation in which they are working and to present a professional image that reflects sensitivity to customer perceptions. Shorts and beach sandals/flip flops are not normally appropriate unless worn for example as part of the leisure programme. Jeans and trainers should be smart. Clothes should not be frayed, ripped or have holes in them. Thin strapped vest tops, off the shoulder and strapless tops are not appropriate nor is clothing with inappropriate wording or slogans. Particular care should be taken when summer staff are involved in evening activities such as discos with under 18s to ensure that they dress in a professional and appropriate way that could not be misconstrued as being suggestive.

B6 Alcohol, Drugs & Smoking Plus Piercings

It would be considered a disciplinary offence for staff or students to be on CELT premises and/or, in the case of staff, carrying out official duties when under the influence of alcohol or non-medically prescribed drugs.

Staff should neither explicitly nor implicitly condone the breaking of the law, particularly in regard to drinking alcohol, sexual activity or taking drugs. It is better to educate under 18s about addictive substances than to make light or joke about them. Any concerns in this area should be reported immediately to the school's DSP, or in the case of staff to the Principal and / or the Academic Director.

Smoking is allowed in the adult centre in the garden area between No 6 & 8 but smokers must abide by UK laws. Smoking is illegal for anyone under the age of 18 and it is also illegal for an adult to buy tobacco or cigarettes for anyone who is under 18 or for an under 18 to buy tobacco or cigarettes for their own use or for a peer. This is covered in the student handbook and during induction. This legal position is also made clear to all under 18s studying in the junior centre during induction.

The consumption of alcohol during social activities involving adult students and staff is permitted; staff are required to remain professional and act as ambassadors for the school at all times. Any concerns regarding a member of staff's behaviour in this regard should be reported to a Line Manager for investigation. The consumption of alcohol during social activities involving under 18s is strictly forbidden at all times. Failure to respect this will result in an investigation and if necessary disciplinary action

It should be noted that it is illegal in Wales for an under 18 to get an intimate piercing (piercings to the tongue, breasts or genitalia); CELT ensures that this is made making clear to staff, homestay providers, group leaders and under18s by way of inductions and written guidelines.

B7 IT & Social Networks

While mobile phones and access to the Internet offer students convenient and rapid means of contact with their friends and family back home, and therefore have a valuable welfare, they also provide opportunities for abuse and inappropriate behaviour. In particular, there are risks to young

people through cyberbullying (possibly by their peers), exposure to radical/extremist views, grooming by adult sexual predators, and downloading and or sharing of illegal, inappropriate or copyrighted materials and possibly computer viruses. The school has therefore established the following guidelines:

1. Staff should not give out their personal mobile number, email address or social media contact details to students, especially those under 18. If a member of staff is carrying out CELT business – for example, taking a group of students out of school on a leisure programme activity and for safety concerns they need to give the students a contact number, they should use the CELT 'Social Programme' mobile number. Students will also have details of the school emergency number (+44 7486 888641), which, like the Social Programme numbers, is printed on their student card. Some group leaders create closed app groups for under 18s for welfare purposes: CELT teachers should not be added to a group of this type using their private mobile number: CELT recognises that the minimum age for WhatsApp is 16 and therefore encourages group leaders and ETOs to check their own data protection policies in regard to sharing personal data. CELT will encourage oversight of such WhatsApp groups to encourage transparency and use with legitimate cause to ensure safeguarding: it can be useful for a member of the welfare/admin team to be added using a school mobile number.
2. Inappropriate access to websites should be reported to a member of the Safeguarding Team. Most inappropriate websites including pornographic sites, excessively violent videos and games, websites promoting extremist/terrorist views and some age inappropriate social networks and chat rooms are blocked on the school network at source by the ISP, but may be accessed by students in a home setting or possibly by bypassing safeguards. Therefore, all staff and homestay providers are asked to be especially vigilant regarding use of the internet by under 18-year-olds, and if there are concerns about content, excessive use or possible grooming or abuse, they should be reported to the Safeguarding Team and/or action taken to remove access.
3. All students are made aware of the school's IT policies at induction and these are displayed in the computer rooms.
4. Both staff and other students should be on the lookout for signs of cyber-bullying as it can happen to anyone – it is particularly insidious as it is often anonymous and can happen 24/7. Signs to look out for include noticing if a student is especially quiet and withdrawn. See Section C7 for further details regarding cyber-bullying.

Publicity and digital content

In addition to our websites, brochures and promotional materials, digital media has considerable impact on how CELT is perceived and therefore can have a significant impact on how a potential client or current stakeholders (e.g. parents, sponsors) regard us. Although we actively encourage digital content (YouTube, Facebook, Twitter, Instagram), it is essential that these serve only to enhance the school's reputation with high standards of content and presentation. We therefore request that any such content that represents the school should be approved by a line manager and use official CELT channels. The school reserves the right to delete or detag any material which it deems to be inappropriate without warning.

B8 Accommodation

In addition to the above guidelines, homestay providers should be aware of the following and be particularly careful in the environments of the bedroom and bathroom:

- 1) Respect the privacy of the student in their room (including from other children and pets who may live in the household), and in particular always knock and attempt to gain permission to enter the room before entering a bedroom or bathroom. If you need access to a room, besides knocking, it may be helpful to announce that you will knock again and open the door in 10 seconds.
- 2) Do not allow adults to be alone in a bedroom or bathroom with a child unless the door is open and other adults are present in the house. Adults should meet under 18s in communal rooms whenever possible.
- 3) Be appropriately dressed around the house. In particular, be aware of the need to cover up appropriately when walking to/from the bathroom.

The two adult residences owned and managed by CELT also require staff and residents to be aware of appropriate behaviours within the context of the school's code of conduct. They should be aware of the following and be particularly careful in the environments of the bedroom and bathroom:

- 1) Respect the privacy of the student in their room and in particular always knock and attempt to gain permission to enter the room before entering a bedroom or bathroom. If you need access to a room, besides knocking, it may be helpful to announce that you will knock again and open the door in 10 seconds.
- 2) Do not allow adults to be alone in a bedroom or bathroom with another adult without full consent. Wherever possible, the door should be open and other adults are present in the house. Adults should meet in communal rooms whenever possible.
- 3) Be appropriately dressed around the residence. In particular, be aware of the need to cover up appropriately when walking to/from the bathroom.

B9 Transport

- 1) All contractors working for the school to transport children will provide annual written evidence that their staff have been properly DBS checked and that vehicles used have current roadworthiness certificates.
- 2) If for any reason a member of staff is required to transport a child in their car:
 - Ensure seatbelts are used.
 - If you are dropping off children after an event, try to keep a pair of students at the same address as your last drop off.
 - Avoid being alone in a car with a child as far as possible but if it is unavoidable, make sure that they sit in the back. In the case of transporting three students, two should sit in the back and one in the front if there is insufficient space/seat belts for three in the back.
 - Ensure you have appropriate insurance cover.

B10 Favouritism & Gifts

In order to provide a positive experience for all of CELT's students, it is important that all students are treated equally, regardless of a staff member's potential affinity with a particular student. For example, the understandable tendency to be drawn to students who come from a culture where a teacher may have formerly lived or who speak a language in common should be avoided. If staff have, or are perceived to have 'favourite' students, the other students will naturally feel left out, opening the staff member in question to accusations of favouritism. Staff are therefore encouraged to discuss with their line manager any situation where they feel they may be prone to privileging a student over others.

At times CELT teaching and / or admin staff may be given gifts by students as a token of gratitude for a job well done. In some cultures, the giving of gifts to teachers is common; in others it can be perceived as a form of bribery. It is therefore important that staff understand the impact of accepting a gift. Small gifts from students are acceptable when a student, teacher or other member of staff leaves but staff should not accept a gift of high value from a student/students at any time. Common sense should make it clear in most cases whether a gift is given for genuine reasons; if the gift is of high value or you think it may have been offered in order to gain an unfair advantage, the gift must be declared to your line manager immediately, especially if this occurs in the middle rather than at the end of the course. In order to avoid embarrassment, students as well as staff need to be aware of CELT's policy in this regard: our policy is made clear at staff and student induction.

[B11 Whistleblowing](#)

Staff are obliged **by law** to inform management of any concerns about colleagues not following this Code of Conduct in the knowledge that they will not be penalised as a result and that their report will remain confidential.

The NSPCC Whistleblowing helpline is 0800 028 0285. (This number is displayed in both reception areas and teachers' rooms. This number is for the The National Society for the Prevention of Cruelty to Children and exists as an outside contact for reporting any inappropriate activity involving an under 18.

It is important that students are aware of the different ways to report any inappropriate adult behaviour and that they will not get into trouble for doing so. Students must report any concerns they have to a member of the Safeguarding Team or alternatively they can contact the NSPCC Whistleblowing Helpline in 0800 028 0285 to report any inappropriate activity involving an under 18.

[Related Policies and Documents](#)

Please see Section A11 Associated Policies for a list of related policies and documents.