



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

CELt

Safeguarding

Children

&

Adults at Risk Policy

Contents

Section A POLICY STATEMENT	6
A1 Context	6
A2 Context: Multi-centre Organisation	6
A3 Terminology	7
A4 Statement.....	9
A5 Under 18’s Entitlement & A6 Adult’s Responsibilities	9
A7 Structure, Roles and Responsibilities	10
A8 Designated Team Way of Working	11
A9 Local Authority Contacts And Standards	12
A10 Documents / Legal Framework.....	13
A11 Associated Policies	13
A12 Under 18’s Involvement.....	13
A13 Policy Review.....	14
A14 Policy Availability & Formats	15
Section B CODE OF CONDUCT	16
B1 Overview & Principles	16
B2 Position Of Trust	17
B3 Setting Standards.....	17
B4 Adult – U18 Interaction.....	18
B5 Appropriate Appearance / Dress Code.....	20
B6 Alcohol, Drugs & Smoking Plus Piercings	20
B7 IT & Social Networks	20
B8 Accommodation	21
B9 Transport.....	22
B10 Favouritism & Gifts.....	22
B11 Whistleblowing	23
Related Policies and Documents	23
Section C CHILD PROTECTION	24
C1 Overview & Structure	24
C2 Nominated/Designated Persons.....	25
C3 Situations When Adults Need To Respond	27
C4 Identifying Main Forms of Abuse & Recognising Symptoms	28
C5 A Child Telling An Adult (Disclosure).....	29
C6 Confidentiality.....	31

C7 Knowing & Recognising Secondary Forms of Abuse	31
C8 Difference Between Concern & Serious Issue.....	36
C9 Identifying Vulnerable Students & Early Help	37
C10 Keeping Records	37
C11 If An Adult Is Accused	39
C12 If the DSP/Senior Manager Is Accused.....	41
C13 If A Child Is Accused or If Another Student Over 18 Is Accused.....	41
Related Policies and Procedures.....	41
Section D TRAINING	42
D1 Responsibility.....	42
D2 Different Levels of Training	42
D3 How Training Is Delivered and How Often.....	42
D4 Content	43
D5 Ensuring Understanding.....	45
D6 Recording Training.....	45
Other Related Training	45
Related Polices and Documents.....	45
Section E SAFER RECRUITMENT	46
E1 Overview	46
E2 Recruitment Materials	46
E3 Recruitment Stages For All	46
E4 Information For Applicants	47
E5 DBS Applications and Renewals	47
E6 Recruitment Of Homestays	48
E7 Applicants awaiting DBS	48
E8 Applicants With A Criminal Record.....	48
E9 Applicants Where A Criminal Check Is Not Possible	49
E10 Single Central Record	49
E11 Prohibited List Checks.....	50
E12 s128 Check for Managers	50
E13 Childcare Act Disclosure	50
E14 Disqualification List Check	50
Other Related Policies and Procedures	50
Section F WELFARE / IMPLEMENTING SAFEGUARDING.....	51
F1 Use of Risk Assessments	51

F2 (i) Supervision Ratios	51
F2 (ii) Levels Of Supervision including Safety During Unsupervised Time	51
F3 Welfare Provision	54
F4 Dealing With A Concern	57
F5 Missing Students	59
F6 Emergency Contact Details	60
F7 Accommodation.....	60
F8 First Aid & Medical	60
F9 Under 18 Behaviour & Discipline	62
F10 Fire Safety	63
F11 Airport Transfers.....	63
F12 E-safety	64
F13 Radicalisation & Extremism PREVENT	64
F14 Parental Consent.....	65
F15 Private Fostering	65
F16 Corporal Punishment For EYFS	66
F17 GDPR & Safeguarding	66
F18 Contextual Safeguarding	66
Other Related Policies.....	66

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 +44(0) 29 2033 9290

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

neil@celt.co.uk +44(0) 29 2033 9290

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

grace@celt.co.uk +44(0) 29 2033 9290

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

greg@celt.co.uk +44(0) 29 2033 9290

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

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 +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 & North Road Trained To Safeguarding Specialist (Level 3)</p>	
<p>Senior Manager with overall responsibility for Safeguarding & 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 & Teacher +44(0) 29 2033 9290 Salisbury Road & 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 of 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

Cardiff Education Safeguarding Team

Tel: 029 2233 0879

Email: slssafeguardingteaminformation@cardiff.gov.uk

Cardiff and Vale of Glamorgan Regional Safeguarding Board

Tel: 029 2233 0880 / 029 2233 0883

Email: cardiffandvalersb@cardiff.gov.uk

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

Email for Prevent referrals: 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.

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.

Section C CHILD PROTECTION

C1 Overview & Structure

Child protection is the responsibility of all adults associated with Under 18s. CELT meets its child protection responsibilities by:

- making all staff and homestay providers aware of their responsibilities.
- having a CELT Safeguarding Team whose members and roles are known to all staff and homestay providers
- making sure that a member of the Safeguarding Team can always be contacted 24/7.
- ensuring the Safeguarding Team are themselves appropriately and fully trained.
- training all staff and homestay providers and making them aware of different child protection scenarios and training them to recognise symptoms of abuse
- making sure all staff and homestay providers know how to respond when they suspect abuse or when a child tells them about abuse.

C2 Nominated/Designated Persons

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 & North Road Trained To Safeguarding Specialist (Level 3)</p>	
<p>Senior Manager with overall responsibility for Safeguarding & Designated Safeguarding Person</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 & Teacher +44(0) 29 2033 9290 Salisbury Road & North Road Trained to Safeguarding Advanced Safeguarding (Level 2)</p>	

Other people involved with Safeguarding at CELT:

<p>Lynda Gallagher Local Authority Designated Officer – LADO For child protection concerns re under 18s with an adult in a position of trust, i.e. our staff and homestay providers Tel: 029 2233 0889 Email: lgallagher@cardiff.gov.uk</p>
<p>Cardiff Children’s Services For child protection concerns with external parties and other students 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: 02920 788570</p>
<p>Cardiff Education Safeguarding Team For advice with policy and procedures Tel: 029 2233 0879 Email: slssafeguardingteaminformation@cardiff.gov.uk http://cardiff.sla-portals.co.uk/Services/4730</p>

- CELT has a Safeguarding Team of 6 members of staff. There are always a minimum of 3 CELT Safeguarding Team members available at any time of the year, with at least 1 member of the Safeguarding Team who is trained as Specialist Safeguarding (Level 3) in both the adult and junior centres when both centres are in operation.
- A member of the team can always be contacted 24 hours a day, 7 days a week by first calling the school’s emergency phone number +44 7486 888641 or the school’s landline (voicemail messages left out of hours are automatically converted to MP3 as an attachment and sent in real time to the Principal).
- Members of CELT’s Safeguarding Team contact the Local Authority Designated Officer (LADO) if there are ever any child protection issues or concerns with an adult in a position of trust, i.e. our own staff or homestay providers
- If the child protection concern is with people not involved directly with the school, or is regarding another student, the Safeguarding Team contact the MASH Team in Cardiff Children’s Services.
- For advice and assistance with CELT’s safeguarding policy and procedures, CELT can also contact team members in Cardiff’s Education Safeguarding Team, which is line managed by Lynda Gallagher, the LADO.
- CELT is also in discussion with a Safeguarding Consultant with ELT specialism to provide ongoing assistance with CELT’s Safeguarding provision.

C3 Situations When Adults Need To Respond

“Saying nothing is not an option”

There are three main scenarios in which an adult must respond:

- If noting something themselves
- If being told something by another person (adult or under 18)
- If being told something as a disclosure by an under 18 (following the specific procedure outlined in Section C5 below)

All adults must respond, because of our legal duty of care to students aged under 18, whether it is a teacher, an admin team member, a homestay provider, an outside contractor or even another student. Anyone who knows or suspects that any student at CELT (and specifically any student under 18) is being or has been harmed or is at risk of significant harm, **must respond**. It is not that person’s role to investigate or assess whether abuse has occurred: rather, they have a responsibility to pass on their concerns to those who can investigate them, so that action to protect the child can be taken if necessary.

If there is a concern, it must be reported immediately to a member of the Safeguarding Team and / or to the police if it is believed that a crime has been committed.

Depending on the nature of the concern, the Safeguarding Team will handle the matter internally. Concerns requiring external intervention are dealt with in the following way:

- If the concern is a serious incident or if it is an allegation of abuse or a disclosure, the Safeguarding Team must immediately report it to the LADO
- If it concerns an adult in a position of trust, i.e. a member of staff or an accommodation provider, it must also be reported to the LADO
- If it concerns others not connected to the school or concerns another student it should be reported to the MASH Team at Cardiff Children’s Services.
- If a crime has or may have been committed it must be reported to the police.

Staff, and accommodation providers in particular, need to be able to recognise the symptoms of abuse: these are detailed in Section C4.

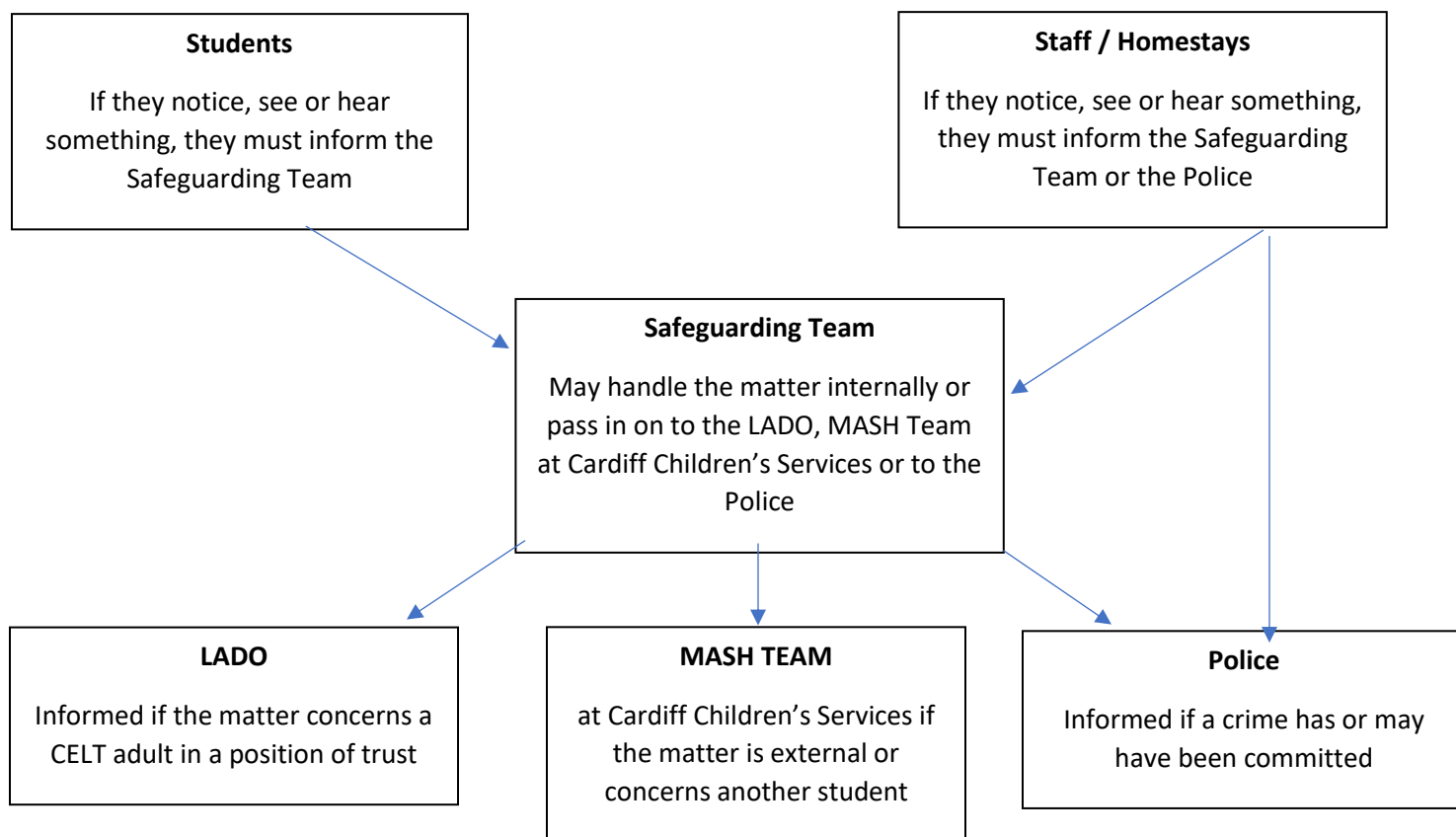
The safety and welfare of the child must be the primary consideration in deciding whether or not to share information. This always overrides confidentiality.

If a child needs medical attention this must be dealt with as an absolute priority.

What is an allegation?

An allegation is information which indicates an adult or another under 18 may have:

- Behaved in a way that has/may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child in such a way that indicates s/he would pose a risk of harm towards children.



C4 Identifying Main Forms of Abuse & Recognising Symptoms

There are four main types of abuse, as explained below, and frequently related signs to look out for. Sometimes multiple signs are present; however, some caution should be exercised because if someone is showing signs, it does not always necessarily follow that they are being abused. Bullying is sometimes included as a fifth form of abuse or can be included as a secondary form (see Section C7 Knowing & Recognising Secondary Forms of Abuse)

<https://www.nspcc.org.uk/preventing-abuse/signs-symptoms-effects/>

PHYSICAL ABUSE:

- Physical Signs: Injuries not adequately explained including: fractures, bruises, burns, bite marks, slap marks and implement marks (e.g. belt mark) grip marks, symmetrical bruising or bruising in unusual places.
- Behavioural Signs: Appears scared of others, avoids communication with authority. Mood swings, can be both passive and aggressive, frozen watchfulness, equally could appear overly “happy” and “eager to please”. Anti-social and even criminal behaviour.

SEXUAL ABUSE:

- Physical Signs: Over-familiarity, explicit sexual drawings, pain, soreness or itching in the genital or anal areas or mouth, recurrent genital or urinary infections, pregnancy.
- Behavioural Signs: Sleep problems, anorexia, bulimia, self-harm or excessive 'comfort' eating, fear of a specific person, use of alcohol or drugs, unexplained gifts, money, having 'secrets' particularly around internet use or overtly sexual display.

NEGLECT:

- Physical Signs: Looks excessively thin or ill, unexplained weight loss, complains of hunger; lack of energy, untreated conditions/injuries, repeated accidents, especially burns, repeatedly unwashed, smelly or dressed inappropriately for the weather.
- Behavioural Signs: Poor level of concentration, constantly hungry, not keeping Doctor or Hospital appointments, frequently not at school or persistent lateness.

EMOTIONAL ABUSE:

- Physical Signs: Speech disorders, depression, eating disorders, evidence of self-harm and voicing suicidal thoughts.
- Behavioural Signs: Over-reaction to mistakes, continual self-deprecation, excessive fear of new situations, excessive behaviours, e.g. rocking, head banging, pulling own hair out, self-harm and/or eating disorders, stealing, excessively sad, depressed, withdrawn, low self-esteem, unable to form friendships with other students.

C5 A Child Telling An Adult (Disclosure)

It is important to recognize that a child may choose any adult to talk to: it is therefore important that ALL staff at CELT know the correct way to respond.

Receive:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said without judgement. Take it seriously. Be calm.

Reassure,

- Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep e.g. "I'll stay with you" or "Everything will be all right now"
- Don't promise confidentiality – you have a duty to report your concerns.
- Tell the child that you will need to tell some people, but only those whose job it is to protect children.
- Acknowledge how difficult it must have been to talk.
- Never agree to keep secrets – be honest
- Reassure the child that he or she is right to talk

React:

- Listen quietly, carefully and patiently
- Do not investigate, interrogate or decide if the child is telling the truth
- Don't ask leading questions, e.g. "What did he do next?" (This assumes he did).
- Ask open questions like "Is there anything else that you want to tell me?"
- Do not ask the child to repeat what they have told you to another person
- Explain what you have to do next and whom you have to talk to.

Record:

- Make brief notes at the time and write them up in detail as soon as possible on the CELT Safeguarding Report Form.
- Do not destroy your original notes in case they are required by the courts.
- Record the date, time, place, words used by the child and how the child appeared to you.
- Record statements and observable things.
- Do not assume anything – don't speculate or jump to conclusions

Remember:

- If a child discloses abuse to you, take it seriously
- Seek advice from the designated members of the Safeguarding Team at CELT

Don't

- Refuse to listen, tell them you will see them later
- Over-react
- Be on your own in a room with the student with the door closed
- Show worry or concern
- Put words in their mouth
- Make comments
- Ask leading questions
- Promise confidentiality
- Leave the student alone after they have disclosed – if you need to leave the office, call another member of staff and ask them to sit with them and not ask questions, but act as a reassuring presence.
- Tell any colleagues other than members of the CELT Safeguarding Team
- Correct the language (grammar and vocabulary) of a disclosure: this should be recorded verbatim

C6 Confidentiality

It is essential that any adult who becomes aware of child protection information must only share it with CELT's Safeguarding Team and not with anyone else, including friends or members of their own family. Confidentiality about both the victim and the accused must be maintained at all times. Within the context of GDPR and changes to data protection in 2018, it is important to understand that data protection does not undermine safeguarding.

C7 Knowing & Recognising Secondary Forms of Abuse

Besides the four main types of abuse explained in Section C4 above (physical, sexual, emotional and neglect), CELT recognizes the following as further forms of abuse:

- Child Sexual Exploitation (CSE)
- Female Genital Mutilation (FGM)
- Peer-on-Peer Abuse
 - Bullying and Cyber-bullying,
 - Sexual Violence and Sexual Harassment
- Honour Based Violence (HBV) and Forced Marriage
- Teenage Relationship Abuse

Both CSE and FGM are illegal in the UK and must be reported to the Police as well as to the Safeguarding Team for appropriate action. It should be noted that any kind of sexual activity, even grooming, done by a person in a 'position of trust' to an under 18 is a crime and therefore must be reported to the Safeguarding Team and to the Police for appropriate action.

Child Sexual Exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (Department for Education, 2017)

In all cases, those exploiting an under 18 have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Some of the following signs may be indicators of child sexual exploitation:

- Appearing with unexplained gifts or new possessions
- Going missing for periods of time or regularly coming home late
- Having older boyfriends or girlfriends

CELT staff and accommodation providers must be aware of Child Sexual Exploitation and recognise it is a form of abuse and if this is disclosed to them by an under 18, or if they believe that this may be happening, they must immediately inform a member of the CELT Safeguarding Team and the Police. Child Sexual Exploitation is illegal in the UK.

Female Genital Mutilation (FGM)

Staff should be aware that FGM is the non-medical, partial or total removal of external female genital organs, typically done to young girls from African countries. It is enough to know from disclosure, not from examination, that FGM has happened. FGM is illegal if done in the UK and is also illegal if a UK resident is taken to another country to have it done. If a member of staff or an accommodation provider becomes aware that this has happened or suspects it may happen to a student under 18, it is their duty to make a direct report to the CELT Safeguarding Team and the Police.

Peer-on-Peer Abuse

All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. Abuse therefore is not only done by adults against children but can also involve under 18s, notably teens, abusing their peers. This is most likely to include, but may not be limited to, gang violence, bullying in all its forms including cyberbullying, gender-based violence, particularly against girls, hate and revenge crimes, sexual assaults and sexting.

Examples of safeguarding issues involving peer-on-peer abuse could include:

- Physical abuse
- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol
- Emotional abuse
- Blackmail or extortion
- Threats and intimidation
- Sexual abuse
- Indecent exposure, indecent touching, or serious sexual assaults
- Forcing others to watch pornography or take part in sexting
- Sexual exploitation
- Encouraging other under 18s to attend inappropriate parties
- Photographing or videoing other children performing indecent acts

CELT staff therefore receive training to help them to understand peer-on-peer abuse, how it can manifest itself plus signs to notice and look for. If peer-on-peer abuse is suspected, it must be reported to a member of the Safeguarding Team, who will then escalate it as necessary to the MASH Team at Cardiff Children's Services, the LADO for further advice and, if necessary, to the Police. If an instance of peer-on-peer abuse involving under 18s is disclosed to a staff member, the procedures outlined in Section C13 will come into place: the school has a duty of care to both the children involved. The procedures are the same as in Section C11 (If An Adult Is

Accused) with the key difference that CELT will also appoint a second member of the Safeguarding Team to support the accused on a personal level. Once this second person has been appointed, the procedure is then the same as with any case of suspected abuse by an adult. As always it is essential that total confidentiality is maintained.

Bullying and Cyber-Bullying

In its simplest form, bullying can be identified as ‘the act of making somebody else unhappy, done deliberately and repeatedly’. Naturally, if the action is done just once or unintentionally, the action still needs to be addressed so that it is not repeated and thus becomes bullying. Bullying is not readily translated into many languages and as such the phenomenon may not be readily understood by all cultures: it is therefore important that the concept is clear to all. At CELT, we proactively encourage all students, including under 18s, to be kind, thoughtful and respectful to everyone: on the rare occasions where this is not the case, the student(s) involved are spoken to and if necessary the issue is escalated to a member of the Safeguarding Team for further investigation.

Bullying can take many forms, including some or all of the four main forms of abuse. It is on occasions explained as ‘having fun’, ‘part of growing up’ or a ‘cultural difference’. These explanations must be robustly rejected as in every situation: bullying is a form of abuse.

No single sign will indicate for certain that a under 18 is being bullied, but watch out for:

- belongings getting ‘lost’ or damaged
- physical injuries, such as unexplained bruises
- being afraid to go to school, being mysteriously ‘ill’ each morning, or skipping school
- asking for, or stealing, money (to give to whoever’s bullying them)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.

Cyber-bullying, that is instances of bullying which take place via digital media (typically on the Internet on devices such as laptops, PC and mobile phones or tablets), is particularly insidious as such instances can happen at any time of day or night, remotely and anonymously. Besides the possible of bullying listed above, signs of cyber-bullying may include:

- spending a lot, much more or much less time online, texting, gaming or using social media
- being withdrawn, upset or outraged after using the Internet or texting
- being secretive about who they’re talking to and what they’re doing online or on their mobile phone
- having lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet.

Given the cyber-bullying does not necessarily respect geographical boundaries, it is possible that the abuser may be physically remote: CELT may therefore be unable to address and deal

directly with the issue fully. In such circumstances, CELT will involve the group leader if there is one and the emergency contact to make them aware of the situation.

Sexual Violence and Harassment

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Sexual harassment is usually carried out by a male aggressor to a female victim but is not restricted to this male-female dynamic. It is important to note that all forms of sexual violence and harassment are unacceptable: 'low-level' incidents such as skirt raising, up-skirting and the touching of breasts are never 'a bit of teenage fun' but are unacceptable.

Sexual violence

It is important that staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Sexual harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to:

violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - non-consensual sharing of sexual images and videos;
 - sexualised online bullying;
 - unwanted sexual comments and messages, including, on social media; and
 - sexual exploitation; coercion and threats

Honour Based Violence (HBV) and Forced Marriage

Honour based violence is a violent crime or incident which may / may have been committed to protect or defend the honour of the family or community.

It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional within a particular culture

Women and girls are the most common victims of honour based violence; however it can also affect men and boys. Crimes of ‘honour’ do not always include violence. Crimes committed in the name of ‘honour’ might include:

- Domestic abuse
- Threats of violence
- Sexual or psychological abuse including FGM
- Forced marriage
- Being held against your will or taken somewhere you don’t want to go
- Assault

A forced marriage is one that is carried out without the consent of both people. This is very different to an arranged marriage, which both people will have agreed to. There is no religion that says it is right to force you into a marriage and you are not betraying your faith by refusing such a marriage.

Signs of honour based violence might be:

- Persistent absence from school

- A decline in engagement / behaviour / performance and lower than expected test scores as a result
- Depression
- Other family members or friends keeping a close eye on the student(s)

Regardless of the motivation for such crimes, honour based violence is recognized as a form of abuse in the UK and as such must be reported. While often associated with adults, it can involve students aged under 18: if honour based crime is suspected, it must be reported to a member of the CELT Safeguarding Team who will escalate it as appropriate to the MASH Team or to the LADO and/or the Police.

Teenage Relationship Abuse

This form of abuse typically starts with two teens in a consensual close relationship in which one is very needy and the other starts to dominate and manipulate their needy partner: it is at this point that the relationship becomes abusive.

Signs of teenage relationship abuse may include:

- Repeated insults / put downs
- Stopping the partner from seeing friends/family
- Checking the partner all the time (including using texts and social media)
- Forced sexual activity
- Humiliation by the dominant partner to harm or ‘punish’ the other

As in the case of peer-on-peer abuse, CELT staff receive training to help them to understand teenage relationship abuse, how it can manifest itself plus signs to notice and look for. If teenage relationship abuse is suspected, it must be reported to a member of the Safeguarding Team, who will then escalate it as necessary to the MASH Team at Cardiff Children’s Services, the LADO for further advice and if necessary to the Police. If an instance of teenage relationship abuse involving under 18s is disclosed to a staff member, the procedures outlined in Section C13 will come into place: the school has a duty of care to both the under 18s involved. The procedures are the same as in Section C11 (If An Adult Is Accused) with the key difference that CELT will also appoint a second member of the Safeguarding Team to support the accused on a personal level. Once this second person has been appointed, the procedure is then the same as with any case of suspected abuse by an adult. As always, it is essential that total confidentiality is maintained.

C8 Difference Between Concern & Serious Issue

It is important that all staff are aware of the following distinction in meaning between these two terms:

Term	Definition
Concern	Something which seems to be not right but which presents no immediate danger to an under 18
Serious issue	An under 18 could be in danger of harm or abuse and a quick or urgent response is required.

In the case of a concern, it is part of our duty of care to respond in a timely manner (ideally the same day) in order to prevent a potential situation becoming more serious. If a CELT member of staff has a concern, it should be discussed as soon as possible with a member of the Safeguarding Team who will decide if the issue can be dealt with internally or if it requires external intervention.

If there is the possibility that an under 18 could be in danger of harm or abuse, it is essential that there is a quick and / or urgent response. As a minimum, a member of the CELT Safeguarding Team should be consulted without delay in order to meet our shared duty of care to our students who are under 18.

C9 Identifying Vulnerable Students & Early Help

CELT takes its duty of care to all its students and staff seriously and therefore does whatever possible to identify before a student arrives in the school any factors which may make him/her vulnerable and any early help support mechanisms required to support him/her during his/her stay in the school. However, even in the case of under 18 students, information relating to this is not always forthcoming and all staff are therefore required to attend to any signs which may help us to identify these factors after arrival.

As noted previously, all students and visitors under the age of 18 are entitled to be protected under this policy regardless of their race, nationality, age, gender, sexual orientation or religious belief. This duty of care applies to all members of staff, and whether or not students 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.

Besides language and cultural issues such as 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) and lack of cultural awareness (unfamiliar with local and national customs and behavior), other reasons which may cause an under 18 to be vulnerable include:

- physical disability (e.g. sight/hearing impairment, mobility impairment)
- SEND, Special Educational Needs and Disability (e.g. learning difficulties, dyslexia)

CELT staff share responsibility as part of their duty of care to report any issues which may cause an under 18 to be identified as being vulnerable to their Line Manager and/or a member of the Safeguarding Team.

Quick reporting to the Safeguarding Team of any signs of vulnerability, any cause of concern and any symptoms of abuse is essential as this allows for early help which improves the chances of a concern becoming more serious.

C10 Keeping Records

Accurate record keeping is essential in safeguarding. If accurate records are not kept, perpetrators can escape justice and will be free to go on offending.

If someone discloses to you, you must:

- Make some brief notes at the time someone makes a disclosure to you
- Write your notes up in detail as soon as possible preferably on a CELT Safeguarding Report form: blank forms are kept on the school server and paper copies are available in the Director of Studies' office.
- Do not destroy your original notes in case they are required by a court.
- Record the date, time, place, words used by the child and how the child appeared to you
- Record statements and observable things – do not add opinions
- Do not assume anything – don't speculate or jump to conclusions.

Completed Safeguarding Report forms must be given to a member of CELT's Safeguarding Team and kept by the DSP/CPO together with all sensitive safeguarding documents in a locked cupboard in the Director of Studies' office. The only members of staff with access to these documents are members of CELT's Safeguarding Team and Cardiff and Vale Regional Safeguarding Children Board (RSCB) on request.

Confidentiality must be maintained throughout the process. Witnesses must be advised not to talk to anyone about the incident. Gossip or leaks to the media can be very damaging to the person accused when it has not yet been proven that they are guilty. The victim's and accused's identity must also be kept secret and he/she should be advised not to talk to anyone. Never leave sensitive records lying around. Never leave a computer on with sensitive documents displayed.

Electronic Records

CELT has a secure system on the school server where it keeps its Welfare and Safeguarding records. On the system, there is an area for:

- Staff training (both initial and refresher)
- All Safeguarding contact details including the RSCB and the LADO

There are separate areas on the school server which are password protected:

- Safeguarding concerns
- Allegations.
- Safeguarding reports

Annual Safeguarding Report

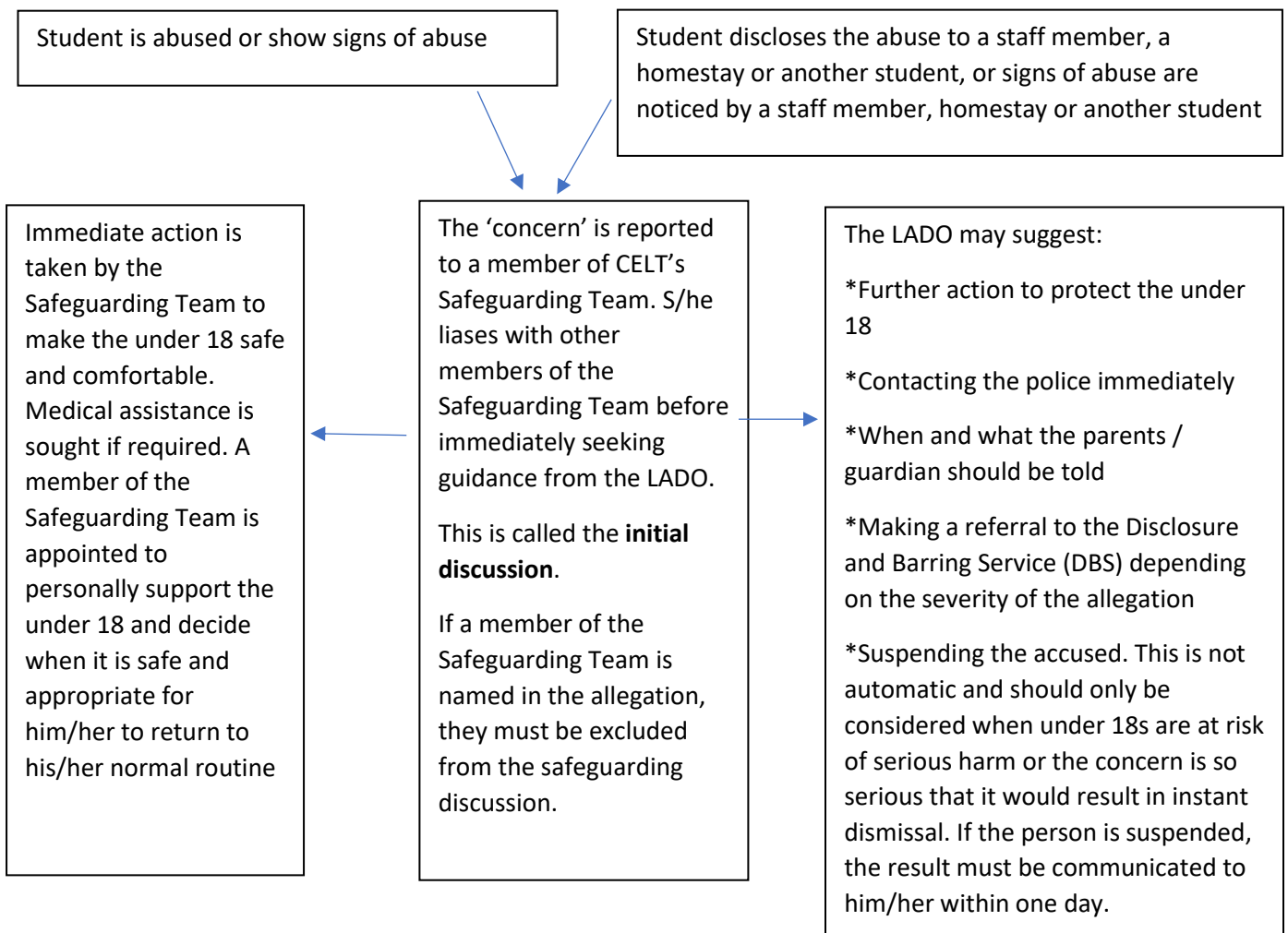
In December CELT prepares an annual Safeguarding Report which is not a report on any individual cases but an overview of what has happened in Safeguarding during the previous 12 months. The report notes

- Number of concerns raised and dealt with (statistics)
- If any patterns have emerged
- How effective safeguarding strategies have been
- If any major safeguarding issues have arisen

- Record of training done and any changes made to training procedures
- Any changes in Safeguarding staff
- Any feedback from staff / students regarding Safeguarding awareness
- Any areas of weakness noted.
- If any new initiatives should be considered /implemented over the coming year.

C11 If An Adult Is Accused

If an adult is accused of inappropriate behaviour or abuse, CELT responds in the following way:



Possible outcomes from the initial discussion	What to tell / do with the accused person: This must always be agreed with the LADO
Strategy Meeting – usually held within 3 days	Tell the accused person about the accusation, using minimum detail. Inform him/her of the possible / likely courses of action. CELT will appoint a named person to support the accused and will advise the accused to get professional advice.
Referrals to the Police or Social Care for investigation	As above
No further action	School decides what internal action to take, possibly disciplinary action and certainly an investigation by a Senior Manager

Terminology for possible outcomes to investigation

Term	Definition
Substantiated	There is sufficient identifiable evidence to prove the allegation
False	There is sufficient evidence to disprove the allegation
Malicious	There is clear evidence to prove that there was a deliberate act to deceive and the allegation is false
Unfounded	There is no evidence which supports the allegation. It could be that the person making the allegation misinterpreted the incident or did not know the circumstances
Unsubstantiated	There is insufficient evidence to prove or disprove the allegation (this is not the same as 'False'). Accused could be innocent or guilty.

Resolution of allegation	Action by school
Allegation substantiated, leading to prosecution or dismissal	Inform DBS; record kept on file until the accused reaches retirement age or 10 years, whichever is the longer.
Allegation substantiated, leading to disciplinary action or dismissal	May need to inform DBS; record kept on file
Allegation unsubstantiated	Summary record kept in staff file for future clarification and reduce the need for reinvestigation; copy given to the accused
Allegation unfounded or malicious	Report removed from file. Disciplinary action required against the perpetrators of malicious story.

CELT has a duty of care to its employees and will provide support for anyone facing an allegation. The school must maintain confidentiality regarding the accused. Until any investigation, either internal or external, has been completed, the identity of the accused must not be released. If the allegation is unsubstantiated, unfounded or malicious, CELT will support the member of staff on their return to work, especially if they have been suspended. As part of its insurance cover, in the event of a proven accusation against a member of staff, CELT as a business is covered as part of its public liability for resultant court costs or charges brought against the company in terms of compensation.

C12 If the DSP/Senior Manager Is Accused

If the DSP and / or Senior Manager is accused, the following steps are to be taken:

- Ensure the under 18 is safe, supported and reassured.
- Inform the ADSP/a senior member of staff immediately.
- Ensure that another staff member is aware of the private meeting with the student.
- Ensure a clear written record has been made on the standard form, which should be signed and dated by the person making the allegation, or the person who heard the allegation from a child.
- The ADSP/senior member of staff must contact the relevant local authorities.

C13 If A Child Is Accused or If Another Student Over 18 Is Accused

It may happen that the person being accused of abusing a child is also a child. In such circumstances the school has a duty of care to both the children involved. The procedures are the same as in Section C11 (If An Adult Is Accused) with the key difference that CELT will also appoint a second member of the Safeguarding Team to support the accused on a personal level. Once this second person has been appointed, the procedure is then the same as with any case of suspected abuse by an adult. As always, it is essential that total confidentiality is maintained.

If the person accused of abusing a child is a CELT student over 18, the procedure is the same as when dealing with an allegation of abuse made against any adult. However, the school again has a duty of care to both parties. In all cases, the school's absolute priority must be to ensure that the alleged victim is kept safe. The DSP/CPO or in his absence the ADSP and / or Senior Manager will contact the MASH Team at Cardiff Children's Services immediately. No decisions will be made on further action without referring to the RSCB.

The MASH Team may suggest additional measures to further protect the victim and the alleged perpetrator may be excluded from the school or asked to change class or homestay in order to avoid a further contact with the alleged victim.

Related Policies and Procedures

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

Section D TRAINING

D1 Responsibility

The DSP has overall responsibility for ensuring that all adults have training to the appropriate level. The DSP will be assisted in this task by the ADSP and Senior Manager. Training must take place before any staff or contractors come into contact with children.

D2 Different Levels of Training

At CELT the expected level of training is:

Status	Level of Training
DSP	Specialist (Level 3) Safeguarding Has followed English UK Safer Recruitment & Safeguarding Webinar
ADSP	Specialist (Level 3) Safeguarding Has followed English UK Safer Recruitment & Safeguarding Webinar
Senior Manager with Responsibility for Safeguarding (DSS)	Specialist (Level 3) Safeguarding Has followed English UK Safer Recruitment & Safeguarding Webinar
Principal (DSS)	Specialist (Level 3) Safeguarding
DSS x2	Advanced (Level 2) Safeguarding
All teachers	Basic (Level 1) Awareness Training – online followed by face to face training with DSP or ADSP
All admin staff	Basic (Level 1) Awareness Training – online followed by face to face training with DSP or ADSP
All homestay providers	Basic (Level 1) Awareness Training online
Cleaner & Handyman	Basic (Level 1) Awareness Training online
Visitors	Unaccompanied visitors are given safeguarding leaflets which they are expected to read before being allowed into the school. They are also required to wear a visitor lanyard which also has a safeguarding reminder in it

D3 How Training Is Delivered and How Often

Basic Awareness

The Basic Awareness (Level One) online training is now done online using the free British Council safeguarding training at <https://accreditation-uk.english.britishcouncil.org/>. Previously training was offered using the Gallery Teachers safeguarding training at <https://galleryteachers.com/service/safeguarding-basic-awareness-course/> with follow up face-to-face training done in-house by members of the Safeguarding Team who are Specialist Safeguarding (Level 3) trained.

Focused Level 1 training is a requirement of all new staff as part of their induction; ongoing in-house training takes place whenever there is a significant update and is also covered in staff

meetings and in dedicated safeguarding training. The school receives the Gallery Teachers Safeguarding newsletter and this is shared with the teaching and admin staff.

Advanced and Specialist

All members of CELT's Safeguarding Team receive Advanced (Level 2) or Specialist (Level 3) training from either via English UK or direct from Blueberry Safeguarding and Compliance.

Focused Advanced (Level 2) and Specialist (Level 3) training is arranged for new staff appointed to roles which require higher level Safeguarding training. Ongoing in-house training takes place whenever there is a significant update and is also covered in staff meetings. The school receives the Gallery Teachers Safeguarding newsletter and this is shared with the teaching and admin staff.

Refresher training (All levels)

As serious safeguarding issues are unlikely to happen frequently, CELT believes it is important that refresher training is an essential aspect of our commitment to safeguarding.

Basic Awareness refresher training (Level 1) happens at least annually and/or if there are any changes to policy or legislation and/or if a serious incident occurs.

Advanced & Specialist refresher training for the DSP, ADSP and DSSs occurs at least every 2 years and is then filtered down to other CELT staff (teaching and admin) at the earliest available opportunity.

In addition, there are:

- Updates on policy, brief reminders, questions and feedback in staff meetings once every main term.
- Formal refresher training sessions for admin and for teachers
- As part of the annual Safeguarding Review, the Safeguarding Team verifies the training that has taken place in the year, making sure that it is current and up to date.

Visitors

Visitors are given a flyer on arrival, explaining that there are under 18s in school and listing key expectations of the visitor's behaviour whilst around those students. Visitors are also required to wear a lanyard which identifies them as visitors and which has inside it a reminder of their duty of care to report any concerns to the school.

D4 Content

Basic Awareness (Level 1) training includes:

- raising awareness that everyone is involved (staff & other adults) and that everyone has a legal Duty of Care to safeguard

- making sure everyone knows who CELT's Designated Safeguarding Staff are and how to contact them (there are posters with photos in every classroom) knowing the systems for reporting concerns
- information on how to recognise signs of abuse
- information on how to respond if an allegation is made
- receive copy of condensed safeguarding policy and know where to find full policy
- Code of Conduct; expectations of behaviour from all adults working with under 18s
- awareness that all staff have a duty to look out for each other's behaviour and report anything inappropriate (whistleblowing), and will be supported and that confidentiality is assured
- Prevent training

Advanced (Level 2) training, which provides trained staff with an understanding of how to respond to situations and how to contact local authorities, includes:

- Role, Responsibilities and Duty of Care
- Legislation, Guidance and Policy
- Raising Awareness
- Implementing Safeguarding and Child Protection
- Primary and Secondary Forms of Abuse
- Recognising Signs of Abuse and Early Help
- Managing Concerns, Allegations and Disclosures
- Bullying
- Implementing Safeguarding
- Online Safety
- Training
- Code of Conduct
- Prevent

Specialist (Level 3) training, which enables trained staff to take full responsibility and lead over any safeguarding incident and to understand how CELT's local authority works and to have good awareness of ELT-related safeguarding, includes:

- Role, Responsibilities and Duty of Care of DSL
- Legislation and Guidance
- Raising Awareness
- Working with LSCBs
- Thresholds for Referring: EHA, CIN, Child at Risk of Significant Harm
- Managing Concerns and Allegations/Incidents
- Record Keeping & Confidentiality
- Safeguarding Policy
- Training and Raising Awareness for Stakeholders
- Internet Safety
- Code of Conduct
- Application of Safeguarding to Current Situation
- Prevent

D5 Ensuring Understanding

It is important that mechanisms are in place to ensure that participants have understood the Level 1 Basic Awareness level training. This is achieved for admin staff and teachers in workshops and staff meetings by peer discussion, verbal and written testing.

D6 Recording Training

Safeguarding training is evidenced by the collection of certificates at initial and refresher stages. This is recorded on the single central record showing the date of training, the name of the person completing the training, the content of the training (wherever possible) and evidence that it was completed and understood. In-house training is recorded as is all internal written testing.

Other Related Training

First Aid training (4 staff, 2 men and 2 women + one of maternity leave)

Fire Marshall Training (4 staff)

Prevent Training (2 staff)

Related Policies and Documents

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

Section E SAFER RECRUITMENT

E1 Overview

CELT is committed to safer recruitment practices for all staff who may have unsupervised contact with under 18s. This includes school staff, the main carer in a homestay plus other adults in the household, group leaders and other agents such as transport companies. It is delivered at every point of the recruitment process – from the stage of advertising a job vacancy, in the invitation to interview letter, during the interview itself and throughout our suitability checks.

E2 Recruitment Materials

Safeguarding is referred to in our recruitment materials both as a statement of CELT's commitment to safeguarding as well as the expectation that all adults related to the school are expected to share the school's ethos and actively engage in looking after under 18s safely.

E3 Recruitment Stages For All

All teaching and administrative staff and homestay providers with unsupervised access to under 18s are subject to the school's DBS check procedure. As far as service providers (taxi and coach companies, for example) are concerned, we require a guarantee in writing from each company that all staff used by CELT students are DBS checked.

The school recognises that DBS and police checks are not the only safeguarding measure that organisations should apply at the point of selecting an individual to work closely with children. Therefore, for staff roles, the school always takes up at least two references and checks an individual's employment history and will check any gaps in an applicant's CV. A Prohibited List check will also be carried out for anyone who has been in teaching work or worked in the regulated education sector, e.g. as Teaching Assistants.

Returning summer teachers will also be asked to provide another reference from their most recent employer. References for any person who may have contact with under 18 year olds will include a question about their suitability to work with young people under the age of 18 and whether they have been subject to any disciplinary action.

Interviews also include questions that ask about a candidate's attitude to and expectations of working with under 18s and what safeguarding involves.

The school will also require any agents/schools or group leaders accompanying groups with students under the age of 18 to provide confirmation or evidence that the group leaders have current police good conduct certificates or similar from their country of origin.

Overseas police checks

Any teachers who have spent a period of one year or more based abroad in the last 3 years (including returning teachers) will also be required to produce a current police good conduct certificate from the country where they have been working. If the certificate is delayed or unavailable (this is checked using <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>), we will take additional care with the other checks and request a third reference. It is also our policy to check that teachers from the EEA do not have restrictions imposed in their own country. Wherever possible, we carry out Prohibited List checks on teachers who have worked in the state sector, which also covers any teachers who has worked in the state system within the EEA.

E4 Information For Applicants

Applicants are informed prior to interview that for staff roles, the school always takes up references and checks an individual's employment history and will check any gaps in an applicant's CV. The school's application documentation also states that we are committed to safeguarding and that suitability checks including DBS checks will be carried out for all staff before appointment. All applicants will also be asked to read a summary of the school's safeguarding policy and Code of Conduct at the pre-interview stage.

E5 DBS Applications and Renewals

All teaching and administrative staff and homestay providers with unsupervised access to under 18s are subject to the school's DBS check procedure: this requires each person (including all adults over 18 in homestays) to provide an Enhanced DBS check.

In the case of UK residents, CELT undertakes Enhanced DBS checks for all its teaching and admin staff and for all adults over the age of 18 in our homestays if they are to have unsupervised access to under 18s.

If an application is received from someone who is resident overseas, CELT requires a current police good conduct certificate from the country where they have been living and or working. This is also true for any teachers who have spent a period of one year or more based abroad in the last 3 years (including returning teachers). If the certificate is delayed or unavailable (this is checked using <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>), we will take additional care with the other checks and request a third reference. It is also our policy to check that teachers from the EEA do not have restrictions imposed in their own country. Wherever possible, we carry out Prohibited List checks on teachers who have worked in the state sector, which also covers any teachers who has worked in the state system within the EEA.

In the case of non-UK nationals and residents, our first step is to request an Enhanced DBS check. If this is not possible our next step is to request a current police good conduct certificate from the country where they have been living and or working. In this case, additional care with the other checks is taken and a third reference is requested. It is also our policy to check that

teachers from the EEA do not have restrictions imposed in their own country. Wherever possible, we carry out Prohibited List checks on teachers who have worked in the state sector, which also covers any teachers who has worked in the state system within the EEA.

If an applicant for a teaching job has an existing Enhanced DBS for a similar role, this is only accepted if the date is within three months of appointment. If the DBS is older than three months, CELT routinely requests a new DBS.

Renewals of Enhanced DBS are required as follows:

- For teachers in continuous employment at CELT, checks are renewed every three years unless they are covered by the Update Service, in which case CELT requests an update
- For returning teachers: if a teacher with an Enhanced DBS has been abroad during the year and returns in subsequent years for summer work, we require a reference from the employer for the intervening period

E6 Recruitment Of Homestays

In homestays accommodating under 18s, as advised by Accreditation UK, the main carer is required to have a satisfactory DBS check undertaken before under 18s are placed with them and every 3 years thereafter and to tick the 'Working at home address' box (equivalent to box 66 on the DBS's own application form) to ensure that suitable checks are carried out on all adults at that address.

In the case of homestays, we accept existing Enhanced DBS certificates if they are no older than 3 months and are for a similar role. In this case, for a homestay with no other adults in the house and where the homestay has opted into the updating service, we request an update. If the homestay is not part of the Updating Service, we request a Barred List check. If the homestay lives with other adults, a new Enhanced DBS is requested even if the existing certificate is within three months. In all other circumstances, a new Enhanced DBS is required.

Checks are renewed every three years.

E7 Applicants awaiting DBS

Where a new member of staff, is not able to provide a satisfactory check because it delayed has not arrived in time and it is deemed unavoidable by the DSP that they start work without clearance, the school will ensure a Barred list check is done beforehand and a risk assessment is carried out, that a self-declaration is signed and that the unchecked person is not allowed to work with under 18s unsupervised. For this reason, homestay hosts cannot accommodate under 18s until a check has been received.

E8 Applicants With A Criminal Record

If an applicant's disclosure shows that the applicant has a criminal record, CELT will judge that applicant's suitability to work at CELT and to work with under 18s on a case by case basis and in light of the results of the pre-appointment checks carried out on him/her. The fact that an applicant has a criminal record does not automatically make him/her unsuitable for work at CELT: a decision will be taken by the DSP and another member of the Safeguarding Team taking into account only those offences which may be relevant to the particular job or situation in

question. The following points will be taken into consideration when deciding the relevance of the conviction:

- Seriousness and nature of the offence
- Nature of the appointment
- Age of offence(s)
- Frequency of the offence (s)

The disclosure will be discussed with the applicant in order to establish if the information in the disclosure does in fact relate to the person concerned and to gather further details. Any decision will be made by a team of at least two people, the DSP and another senior member of the Safeguarding Team directly involved in the recruitment process. Once a decision has been reached, a clear record of the decision will be made, bearing the judgment and the signature of the recruiting manager. This record will not contain details of the offence(s).

E9 Applicants Where A Criminal Check Is Not Possible

In the case of a British national returning to the UK after working overseas where the authorities have refused to provide a record check because the applicant is a British national, an Enhanced DBS will be requested for their UK records and additional care taken with the other recruitment checks such as ID, qualifications, information on CVs and references. In such cases we will ask for a third reference and wherever possible make sure at least one reference is checked verbally, preferably from somebody who has seen the applicant working with under 18s.

For overseas nationals, we document what action has been taken to obtain a check and why it has not been possible, taking additional care with other checks such as ID, qualifications, employment history and references. Based upon these findings, a judgement is then made with regard to suitability for the role and the level of supervision.

E10 Single Central Record

To ensure that all necessary pre-appointment checks have been done for all staff, homestays and group leaders we have two grids – one for homestays and one for school staff and group leaders. These registers can only be accessed by Senior Management and the Senior Members of the Safeguarding Team. This central records act as a record/checklist of the following information:

- 1) Identity – name, address, DOB
- 2) Start date
- 3) Role in organization
- 4) Qualifications
- 5) DBS certificate (Disclosure number, date issued, type, evidence of check and date)
- 6) Barred list check

- 7) Overseas Police check – check required (Y/N), received (Y/N)
- 8) Right to work in the UK
- 9) Prohibited list check (for teachers)
- 10) Restriction check for teachers who have worked in the EEA
- 11) S128 Prohibition Check for Management Positions in Independent Schools
- 12) Minimum of 2 references (+ extra one for returners or those with delayed DBS checks)

NB Disqualification by association checks are not required by CELT as we have no homestays hosting under 8s.

[E11 Prohibited List Checks](#)

The Prohibited List Check is an additional check on teachers who have been deemed unsuitable to work in the state sector as teachers and can be made across the EEA (European Economic Area) as well as the UK. This list therefore covers staff who may not have broken the law or done anything to appear on the DBS barred list but are nevertheless deemed inappropriate to work with children. CELT will carry out Prohibited List checks for anyone who has been in teaching work or worked in in the regulated education sector, e.g. as Teaching Assistants.

[E12 s128 Check for Managers](#)

If an individual joins CELT as a senior manager (or potentially as an owner or director), an s128 check for managers will be carried out to establish if that person has not been deemed suitable to manage in an educational setting. This check refers to staff who have held a management position (owner, senior manager, director, governor, trustee, department head) in the regulated education sector.

[E13 Childcare Act Disclosure](#)

As CELT does not work with juniors aged under 8, the need to obtain evidence that an applicant has not been in a situation, in the UK or overseas, that would not appear on police (DBS) or Prohibited List checks, relating to a child being placed under a Care Order or had a Childcare Registration cancelled, is not pertinent.

[E14 Disqualification List Check](#)

As CELT does not work with juniors aged under 8, the need to check for disqualification by association for staff who may live at the same address as somebody who is disqualified from working with children is not pertinent.

[Other Related Policies and Procedures](#)

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

Section F WELFARE / IMPLEMENTING SAFEGUARDING

F1 Use of Risk Assessments

Risk Assessments

Risk assessments are a fundamental aspect of CELT's operation. Risk assessments relating to the business (e.g. health and safety, premises) are the responsibility of the school's Owner Principal (Greg Nelson) and Owner Academic Director (Grace Durighello).

CELT's Director of Studies, Mike Burden, is the school's DSP and therefore a senior member of the Safeguarding Team and has specific responsibility for risk assessments as they relate to activities linked to teaching and social activities. Mike works closely with the teaching team to ensure that all risk assessments are updated and signed off by teachers prior to excursions/activities taking place.

Risk Assessments underpin every aspect of our Safeguarding Policy. We look at every situation our students, and in particular, those under 18, can find themselves in. We analyse those situations and we look for risks. If we identify a risk, we determine ways we can ideally eliminate or realistically minimise those risks and we adopt procedures accordingly.

Specific areas for analysis of risks include

- Getting to and from Cardiff and to their accommodation
- Getting to and from school from their accommodation
- In the school buildings and grounds
- In school-owned accommodation (for adults aged 21 and over)
- Educational activities
- Social activities
- During free time – risks considered include: Abuse, Stranger Danger, Getting lost, Road Safety, Alcohol, Drugs, Shoplifting, Accidents, Sickness, Losing mobile phones, Fights, Terrorism, Breaking school rules such as travelling without consent, breaking the curfew, Breaking the law (shoplifting etc)

See Risk Assessment Policy <https://www.celt.co.uk/policies-and-procedures/> other related policies

F2 (i) Supervision Ratios

Supervision ratios (the number of adults to how many students) are decided based on risk assessments and includes awareness of location and the specific situation and the age of the students involved. As the minimum of age accepted for study at CELT is 13, the ratio supervision ratio for under 18s is 1:15, in line with the 1998 DfEE publication Health and Safety of Pupils on Educational Visits.

F2 (ii) Levels Of Supervision including Safety During Unsupervised Time

CELT believes that rules for what students may do outside the scheduled lesson or activity times and without supervision should be age appropriate and based on the school's risk assessments of the location(s) involved.

Our rules in this regard are made known to all staff and students and are given in writing in order to identify and mitigate against potential risks. These are available on our website on the Care of Students Under 18s page <https://www.celt.co.uk/careofstudentsunder18/> and in the documents which can be downloaded from that page/

17-year olds who are registered on adult courses in the adult centre are less closely supervised than they would be on junior courses in the North Road centre but still receive rules and safety guidance regarding matters such as alcohol consumption, drugs and curfew times, as well as guidance on areas to avoid such as parks at night and how to keep safe. This takes place during induction and is included in the written Guidelines For Students (Adult Courses). Our supervision levels for 17-year-olds on adult courses is clearly explained in writing to the person making the booking at the time, and a completed booking will be taken as consent: we also require receipt of parental consent forms in order to accept bookings of this type.

Levels of supervision for CELT students who are under 18 are as follows:

Journey from homestay to school: As stated in our publicity material (printed and online) and in our parental consent forms, journeys between the homestay and school are unsupervised. However, under 18s studying in the junior centre are typically accommodated in homestays in pairs. These students are wherever possible housed in areas where there are a number of other students and under 18s are encouraged to travel together to and from school. As a further safeguarding step, before the students' first lesson, the homestay provider is required to show the students the route to and from school.

Parental consent is required for 17-year-olds studying as adults in the adult centre to be able to travel independently and unsupervised. However, the homestay provider will still be required to show their student the route to and from school before their first lesson.

In class: Under 18s studying in the junior centre (or 17-year-olds studying in the adult centre) are expected to attend all their lessons. Class registers are completed at the beginning of the first lesson at 09.15 and attendance is checked by the DoS or a member of the admin team who does a walk around of the classes to check for absent students. If an under 18 is reported missing from class, every attempt is made to contact the student concerned immediately to check on their well-being, by contacting the homestay and the student direct by mobile. If an under 18 is late for class, s/he must report to reception first (access to the classrooms requires passing reception). Under 18s are not allowed to leave the lesson, unless they are ill or for a bathroom break. Under 18s cannot leave the building during lesson times unless involved in a supervised activity or unless authorized by a senior member of staff; the under 18 who would then need to be accompanied by a responsible adult (e.g. a DBS checked member of CELT's staff or the student's Group Leader).

In break time between class and at lunch: Under 18s studying in the junior centre are not allowed to leave the premises during break times between class. At lunch, these students are allowed to leave the premises unsupervised in groups of three or more: guidelines are provided in induction about the closest coffee shop and supermarket and the students and group leaders are made aware of the recommended road crossing points. This is covered by the relevant risk assessment.

17-year-old students studying in the adult centre are allowed to leave the building unsupervised, both in break time and at lunch and this is made clear in our publicity material (online in Care of

Students Under 18) and in our parental consent forms. In the case of 17-year-old students studying in the adult centre, attendance is checked after the break and if an under 18 is reported missing from class, every attempt is made to contact the student concerned immediately to check on their well-being, by contacting the homestay and the student direct by mobile.

On excursions: CELT usually provides one full-day and one half-day excursion per week, along with local visits and a sports afternoon for students studying in the junior centre. These excursions include some free time for shopping (see below). Staff and students are made aware of meeting times and points for the beginning of the excursion and for the journey home and for any interim meetings: this is provided on a copy of the social programme, an individual copy of which is given to each student at induction. Posters with this same information are provided in reception and there are daily reminders in class. Exact supervision arrangements will depend on the age, gender and needs of the students, the overall size of the group and the nature of the activity involved. All excursions include structured activity time during which there is full supervision of under 18s; the amount of less structured or unsupervised time is always less than the structured time. Group leaders and CELT staff are provided with a detailed info pack containing itinerary information, contact numbers (e.g. coach driver mobile numbers, homestay numbers and student mobiles), local maps and contact details of the nearest hospital and all students have the school's Emergency number and Excursion number printed on the student card. CELT employs a supervisor: student ratio of 1:15, in line with the 1998 DfEE publication Health and Safety of Pupils on Educational Visits. Group leaders may be included as supervisors but only for their own students.

17-year-old students studying in the adult centre attending activities with the adult school receive the same supervision as adult students. 17-year old students studying in the adult centre attending activities with the junior centre receive the same supervision as students in the junior centre.

Shopping time during excursions: Any unsupervised free time for younger students (under 16s) is more restricted and teachers and/or group leaders take into account the location and the type of students when deciding how long (or whether) to leave the students on their own. During unsupervised free time, under 18 students are required to remain in groups of three or more within a restricted area.

17-year-old students studying in the adult centre attending activities with the adult school are not supervised during shopping time. 17-year old students studying in the adult centre attending activities with the junior centre are required to respect the same rules set for unsupervised shopping time during excursions for under 18s studying in the junior centre.

Free time after lessons or activities finish and before needing to be at the homestay: As stated in our publicity material (online in Care of Students Under 18) and in our parental consent forms, free time after lessons or activities finish and before needing to be at the homestay is unsupervised. Under 18s are encouraged to remain in groups of three or more and to stay in areas in the city centre which are well-lit, busy, largely pedestrianized and close to bus stops for the journey home.

17-year-old students studying in the adult centre are not supervised after lessons, and this is made clear in our publicity material (printed and online) and in our parental consent form.

Curfew times: Under 16s must always be home in time for CELT's curfew time of 22.00 (weekdays and weekends). 16 and 17-year-olds have an extended curfew time of 22.30. If an under 18 returns home after the curfew times, the homestay provider will contact the school and appropriate action will be taken. Contact can be made out of hours using the emergency number.

Parents/guardians of under 18s have full knowledge of the levels of supervision before choosing a course as a result of signing a copy parental consent form. In the case of closed school and agent groups, CELT provides a copy of the parental consent form and makes them aware of the supervision information provided on our website <https://www.celt.co.uk/policies-and-procedures/> and <https://www.celt.co.uk/careo> fstudentsunder18/

F3 Welfare Provision

Welfare Provision is achieved at CELT in the following ways:

- CELT's approach to welfare is collegiate. Welfare in its widest sense relates not just to safeguarding but to the safety and security of students on the premises, the comprehensive plan to respond to any emergency and the care of students (including pastoral care relating to students' personal problems). As such it involves a wide range of CELT staff including the Principal (premises), the Emergency Plan (the ADSP, the DSP and the Academic Director) and care of students (all staff). In the adult school, pastoral care is dealt with formally as part of the tutorial system but is implemented more widely. We believe that good welfare provision involves all members of staff and that students should therefore be able to share their concerns with the member of staff with whom they have the greatest sense of trust. It is the role of all staff to listen to such concerns and to escalate it on a needs basis. For many students, their classroom teacher is often their first point of contact: CELT's teachers are therefore enabled by our welfare provision to listen to the student and actively notice any small changes in their behavior which may indicate a cause for concern. All members of staff are made aware of how to report these concerns upwards: teachers report any concerns to the Director of Studies and/ or the Academic Director for further action, if required. If admin staff become aware of a potential issue, they report the issue in the same way unless it relates to accommodation, in which case it will be dealt with by our accommodation staff, who also notify the Director of Studies and the Academic Director. Any notes relating to the way in which the issue is dealt with are recorded on the student database.
- As welfare and safeguarding are so closely related, once a welfare issue has been raised by any member of staff, it is escalated if required to members of the safeguarding team for action.
- In the case of under 18s who are studying in the adult school, the procedure is the same as for adults. However, in recognition of the potential greater vulnerability of under 18s studying in the adult centre, all under 18s meet with the DSP once they have completed their Early Bird questionnaire at the end of their first week to ensure that all is well. At this meeting, the DSP will ensure that the under 18s in question are aware of his open-door policy and that they should come back at any stage of their stay to discuss any concerns they may have.

- In the Junior Centre, where under 18s typically enrol on short courses, welfare is a prime concern. As in the adult school, our approach in the junior centre is collegiate and all members of staff are involved in ensuring student welfare. As such, it is the role of all staff to attend to welfare concerns and to escalate it on a needs basis. For many students, their classroom teacher is often their first point of contact: CELT's teachers are therefore enabled by our welfare provision to listen to the student and actively notice any small changes in their behavior which may indicate a cause for concern. All members of staff are made aware of how to report these concerns upwards: teachers report any concerns to the DSP (who is the Director of Studies), and who is based at the junior centre while junior courses are running. If admin staff become aware of a potential issue, they report the issue in the same way unless it relates to accommodation, in which case it will be dealt with by our accommodation staff, who also notify the Director of Studies and the Academic Director. Any notes relating to the way in which the issue is dealt with are recorded on the student database.
- Under 18s in the junior centre and who are studying at CELT as part of a closed group for a course lasting one week are monitored with the help of their group leaders; meetings between group leaders and junior centre managers take place on a daily basis and student welfare is an important aspect of these daily meetings. All under 18 students studying on a junior course lasting two weeks or longer receive an early bird questionnaire at the end of their first week: this complements the daily meetings with the students' group leaders if they are part of a group. Under 18s studying for two weeks or longer who are not part of a group meet with the DSP once they have completed their Early Bird questionnaire at the end of their first week to ensure that all is well. At this meeting, the DSP will ensure that the under 18s in question are aware of his open-door policy and that they should come back at any stage of their stay to discuss any concerns they may have.
- The wider CELT Safeguarding Team is made up of the DSP, the ADSP, the Academic Director, the Principal and the DSS's. CELT has a Safeguarding Team of 7 members of staff. There is always a minimum of 3 CELT Safeguarding Team members available at any time of the year, with at least 1 member of the Safeguarding Team who is trained as Specialist Safeguarding (Level 3) in both the adult and junior centres when both centres are in operation. Should it be necessary to use additional classrooms in July and August, CELT hires premises which are two doors down from the junior centre (28 North Road): when these premises are in use, safeguarding is the responsibility of the junior centre staff.
- The Director of Studies/ DSP's office is at the top of the stairs on the first floor facing the main front door in the adult centre in Salisbury Road and to the left of the main entrance in the junior centre in North Road; there is an open-door policy in both offices. He can therefore see when every student comes and goes in that building. He also endeavours to know the name and background of students in the school and to walk around classrooms and common rooms during break times.
- A member of the wider safeguarding team can always be contacted 24 hours a day, 7 days a week by first calling the school's emergency phone number +44 7486 888641 or the school's landline (voicemail messages left out of hours are converted to MP3 as an attachment and sent in real time to the Principal).

- All visitors have to sign in and wear a lanyard which identifies them as a visitor; they are given a flyer making them aware that there are under 18s in the school and reminding them of their welfare responsibilities.

Welfare systems in place at CELT include:

- As of January 2019, a link to our pre-arrival and Day One checklist is sent as part of our welcome email either to the student direct or to the agent / group leader.
- CELT is developing a series of short videos which will be part of our welcome email which cover the main information from the student guidelines.
- On Day 1, students in the adult centre attend a comprehensive induction and tour of the building
- On Day 1, students in the junior centre attend a comprehensive induction, a tour of the building and an orientation walk and Cardiff quiz
- For ease of identification, all under 18 are required to wear a wristband with the school's emergency number printed on it and receive a student card containing their homestay address and emergency numbers
- A safeguarding poster is displayed in classrooms, communal areas and the staff room making it clear that safeguarding is everyone's responsibility and who should be contacted if a student has a concern or if somebody has made a disclosure.
- Details of student issues and complaints are recorded in hardcopy in the student's file; there is provision in the new password protected student database for these issues to be recorded online. This database is only accessible to members of the wider safeguarding team.
- Under 18s studying in the adult centre are required to sign in and out whenever they enter or leave the building.
- All students (except those on a one-week course) complete an Early Bird questionnaire at the end of their first week and any issues arising are followed up. In the junior centre, student welfare and satisfaction for students enrolled on one-week courses are monitored with the help of group leaders.
- Although not formalized as an official meeting, the Director of Studies or the Academic Director meets with teachers each morning before class or if this is not possible in the first break
- A end of first week early bird questionnaire (course, accommodation and Cardiff) with space for students to raise other issues is completed by all students staying two weeks or longer
- Tutorials are arranged with long-term students (8 weeks or longer) during which any welfare issues can be discussed
- Each Monday, the first teacher of the day reminds students in a proactive way that student welfare and well-being is a school priority. This is embedded in a general conversation about the students' weekend and reinforces positively the school's and UK values and that the culture of a safer school.
- A physical copy of the leaving certificate, containing teachers' comments for each student in the adult centre is kept in his/her student file. These are kept for a minimum of three years.

- All visitors are required to sign in and out and are given a safeguarding leaflet which they are expected to read before being allowed into the school. They are also required to wear a visitor lanyard which also has a safeguarding reminder in it

F4 Dealing With A Concern

The process for dealing with a welfare concern is similar to the process used if an adult raises a safeguarding concern (See Section C3 Situations When Adults Need To Respond).

There are three main scenarios in which an adult needs to respond:

- If noting something themselves
- If being told something by another person (adult or Under 18)
- If being told something as a disclosure by an under 18 (following the specific procedure outlined in Section C5 below)

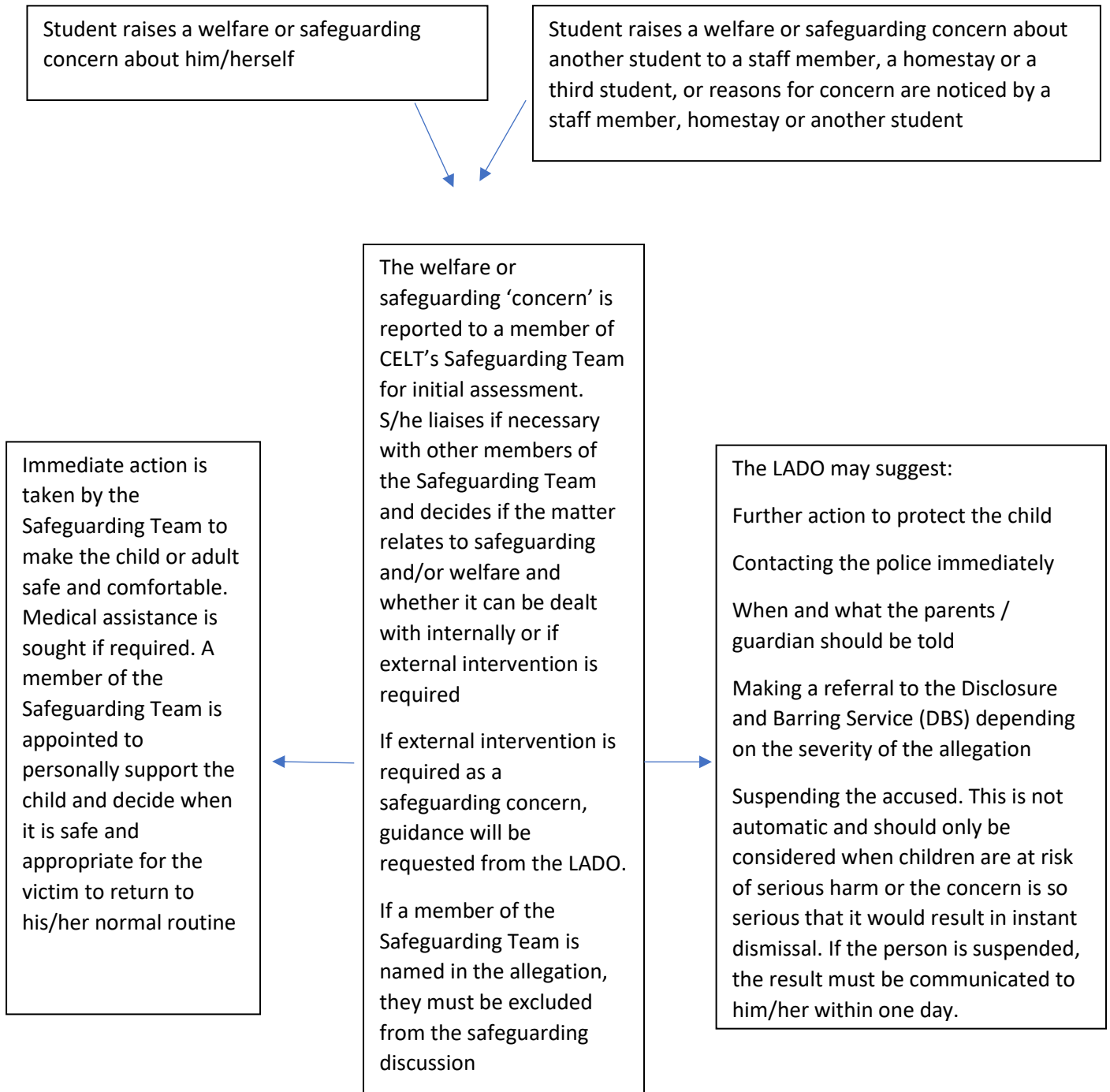
If there is a concern which relates to welfare which is considered to have a safeguarding element, it must be treated as a safeguarding issue and reported immediately to a member of the Safeguarding Team and or to the police if it is believed that a crime has been committed. If the issue relates to welfare only but does not have a safeguarding element, it should still be reported but it is more likely to be resolved internally. If in doubt, raise the issue as if it were a safeguarding problem: a senior member of the safeguarding team will then choose the appropriate course of action.

All adults need to respond, because of our legal duty of care to students aged under 18, whether it is a teacher, an admin team member, a homestay provider, an outside contractor or even another student.

The safety and welfare of under 18s and vulnerable adults must be the primary consideration in deciding whether or not to share information. This always overrides confidentiality.

If a child or adult needs medical attention this must be dealt with as an absolute priority.

Please see the flowchart on the next page for the processes involved in dealing with welfare and safeguarding issues.



Follow-up is important to ensure that the situation has been resolved correctly. In the case of welfare issues, those involved will be asked if the situation has been resolved to their satisfaction and further help will be offered as required. A record of any actions taken is made by adding to the notes field of the school's online database.

A decision is taken at an early stage whether anyone else needs to know and confidentiality is respected (See Section C6 Confidentiality); if the member of the Safeguarding Team needs to inform others in order to deal with the welfare situation correctly, this will be made clear.

F5 Missing Students

- On the first day, we ask every student aged under 18 if they have a working mobile phone (we provide a free UK sim if their home sim is not working) and remind them to keep their phones charged and switched on when they are not in school.
- The school makes a note of the mobile number for each under 18 student and stores this on its student database
- 17-year-old students studying in the adult school are required to sign in and out of the building at the beginning and the end of teaching: their attendance is also monitored at the beginning of the first lesson.
- Attendance of under 18s in the junior centre is checked at the beginning of the first lesson
- If any under 18 student is not in school (adult or junior centre) by 09.15:
 - The teacher reports his/her absence to reception
 - If there is a group leader, the group leader is asked if s/he has an update
 - If necessary, the homestay and the student him/herself are contacted by phone
- If CELT is unable to contact the student and the homestay, we ask the student's friends in school (in the first instance the other student in the same homestay accommodation).
- We ask when and where the student was last seen, who he/she was with and what he / she was wearing
- If no one has any information and we can't get through to the student, we go to the house.
- If we still can't make contact with the student, we call the parents/guardian/emergency services.

- If the student is late returning home after the curfew time and there has been no contact with the student, the homestay phones the school emergency number
- The school will endeavor to track the student down. (by phoning the student's friends and visiting places in town where he/she may be)
- The same procedure follows if the student is late home for dinner
- If an under 18 is scheduled to go on an excursion arranged by the school and they don't appear by the time the coach is due to leave, the excursion leader will call the student's mobile and if there is no answer will call the homestay and liaise with the group leader, if there is one. If at this stage contact has been unsuccessful, the DSP is contacted: if the DSP is the excursion leader, he will contact the Academic Director or the Principal or the ADSP in that order.
- In the unlikely case of an under 18 being missing during or after free time on excursions (under 18s are required to remain in groups of three during unsupervised time), the excursion leader will attempt to contact the student on his/her mobile phone and the group leader, if there is one, will be asked if s/he has an update. If CELT is unable to contact the student, we ask the student's friends if they have further information: if no one has any information and we can't get through to the student, we call the

parents/guardian/emergency services. The senior member on the trip will remain in situ and the coach will return to Cardiff under the supervision of the remaining school staff. For further details, please consult CELT's Emergency Plan and Crisis Management document,

F6 Emergency Contact Details

CELT ensures it is able to contact parents of under 18 students in event of an emergency by requesting two sets of contact details (Title, First and Family Name; Relationship to Child; First Language; Level of English; Home Address; Mobile Number; Telephone Number and Email Address) as part of the Parent Consent Form (For Students Aged Under 18 HLC Individual; For 17-Year-Old Students on Adult Courses; For Students Aged Under 18 Group Courses). In the event of a group not submitting complete information before departure, the contact details will be completed in full on the student's first day as a matter of urgency. CELT also requires Group Leaders for school groups to have copies of parent contact details and CELT asks that these are made available on arrival so that they are available to the holder of the emergency phone if any emergency occurs out of hours.

F7 Accommodation

Accommodation for under 18s is provided by CELT's homestay providers and we do not allow under 18s to stay alone or with other under 18s in independent accommodation such as hotels, independently sourced private accommodation or university accommodation. If an under 18 asks to stay with a family member, CELT requires parental consent and confirmation that the under 18 will be cared for by a responsible adult (ideally aged 25 or over) who will be responsible for the under 18 throughout the entire duration of his/her stay. Wherever possible, the school will meet the responsible adult and visit the accommodation in advance of the under 18's arrival to ensure that the school is comfortable with the arrangements. In the case where a parent/agent/guardian intends to arrange independent private accommodation for an under 18 student, CELT will recommend homestay accommodation as this protects the under 18 student's wellbeing, if it is not possible with them to stay with a suitable family member. If this cannot be agreed, CELT reserves the right to refuse or cancel the booking.

If an under 18 wishes to stay away from his/her organized accommodation overnight, specific parental consent is required in writing using the school's Parental Permission to Stay Overnight or Visit another City form.

F8 First Aid & Medical

CELT requires to be fully informed of any medical and / or behavioural conditions / disabilities of a prospective student in order to be able to provide appropriate care for the student. In the case of such information not being provided or of a false declaration of good health, CELT reserves the right to refuse acceptance of the student and/or request that the student is returned home at his/her own expense with no refund. Removal of a student on non-disclosed health grounds will only happen after a careful review of the student's needs, an attempt to meet these needs within the school's existing abilities and attempts to find the student an alternative provider if CELT is

unable to meet the needs itself (Please see our Disability and Special Education Needs Policy). In the case of under 18s, CELT also requires consent for emergency medical treatment signed by the parents (not agents or group leaders).

First Aid Procedures

- EEA Students are advised in the school's Terms and Conditions (website) and Student Application Form to obtain an EHIC (European Health Insurance Card) and non-EEA students are advised they should have private travel / health insurance before they come to the UK to cover all non-emergency treatment.
- Four members of staff have first aid training: these are the Academic Director, the DSP/ Director of Studies, the ADSP and the Admin Assistant. Posters showing who they are displayed in the communal areas of the junior and adult centres.
- The First Aid box is located in the reception area of the junior and adult centres.
- The First Aid box is checked annually and refreshed as needed or after an incident when the majority or all of the items have been used. This is done by the DSP.
- Access to GPs – students with homestay accommodation are advised to register with their homestay provider's GP to arrange a medical appointment (Monday to Friday). Adult students in independent accommodation are advised to source a GP via www.wales.nhs.uk : help with is available from reception. Adult students staying in the CELT residences able to register at Park Place Surgery, a five minute walk from the adult centre. This medical centre, which specializes in healthcare for students, including from overseas, can also register students who live within its catchment area.
- Call 0845 4647 for 24 hour medical support
- Emergency Unit (24/7) at the University Hospital of Wales, The Gateway, Cardiff CF14 4XW is open at all times in the case of emergency treatment being required
- Dental appointments can be made with local dentists and emergency treatment is available by contacting the Emergency Dental Helpline on +44 (0) 2920 444500 (out of hours service and for those not registered with a dental surgery)
- Under 18s are accompanied wherever possible by a member of staff / Group Leader / homestay provider if they have to visit the doctor, hospital or the dentist.
- Under 18s who are sick and have to stay at home are visited by a Group Leader or a member of staff if the homestay cannot stay home with them and if it is deemed by the member of the Safeguarding Team dealing with the case that the seriousness of their condition makes it necessary.

Procedure if a student feels unwell

- while they are in class – student informs teacher who tells the office staff and/or Director of Studies / Academic Director
- during break and lunch times – student informs office staff and/or Director of Studies/Academic Director
- during an activity/excursion arranged by the school – student informs the CELT teacher / Group Leader
- during the weekend – If an under 18 is sick at the weekend, they should ask their homestay provider for help and then either go to the pharmacy or call 0845 4647 to

Speak to a trained medical practitioner: full details are given in the Guidelines for Students (Junior Centre). If it is an emergency the student should go to the Emergency Unit of the University Hospital of Wales and remember to inform the school on the school emergency number. The student can also phone this number for assistance if they are not with or are able to contact their homestay provider.

The CELT member of staff who first responds to the report of an unwell student will assess the situation and decide what course of action to take:

Possible courses of action are as follows:

- Administer first aid (if trained or if a first-aider is available)
- Book a doctor's appointment (or a dentist's appointment)
- Take the student to the pharmacist
- Take the student to the hospital accident and emergency (or the Dental Hospital) or to the nearest hospital if the student is away from Cardiff on an excursion – the contact details of the local hospitals is noted in all the excursion risk assessments.
- Inform the student's homestay and/or parents/guardian
- Call 999

See: First Aid Policy contained within CELT's Health and Safety Policy and Manual

For full policy links see:

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

F9 Under 18 Behaviour & Discipline

CELT works hard to promote a happy and positive environment for its students and staff, including under 18s, and works towards the achievement of this outcome. We aim to provide a positive learning environment in which adult staff members lead by positive example. At times, however, it is necessary to have measures in place to deal with situations which put this environment at risk. CELT therefore has clear systems in place to deal with such eventualities.

CELT's Student Charter sets out not only what we expect of our students but what our students can expect from us and also includes the disciplinary and complaints procedures. A copy of this charter is given to all students on their first day during induction and is displayed in the student common rooms in both the adult and junior centres. The disciplinary procedures refer to the main sanctions available to the school if these rules are broken.

The induction process is an opportunity to introduce students to CELT's expectations as they relate to under 18 and discipline. We work on the assumption that students respond best when treated as young adults and therefore use a light touch when dealing with unacceptable behavior and school rules as given in the school rules. Bullying, cyber-bullying and law breaking are all covered and policies exist for all these areas: these policies are available on our website and are made available in full at the point when a student's behavior makes it necessary to speak to the student. If it is necessary to respond to a behavioural or disciplinary concern, this is dealt with wherever possible by the teacher(s) involved: the next step is to escalate this to the Director of Studies. If this fails to resolve the situation, the student is referred to the Academic Director and/or Principal for a final, third stage interview.

In the case of poor attendance, our policy is to begin by establishing if there are underlying welfare concerns. At any initial meeting with a student to discuss attendance concerns, a copy of the full attendance policy is given to the student at this stage and the next steps explained.

A staff board is clearly displayed in the reception area of both the adult and junior centres enabling students to identify who they need to go to if they feel unhappy or unsafe. The poster identifies members of the safeguarding team and their specific roles, first aiders and fire marshalls plus all other staff

If a disciplinary issue arises, then the usual school disciplinary procedures for students will be followed. However, special care and sensitivity will be taken to ensure that there are no underlying safeguarding issues or causes of concern.

It should be noted that it is illegal for an under 18 to get an intimate piercing (tongue, breasts and genitalia) in Wales. Staff, homestay providers, group leaders are under 18s are made aware of this through training/induction and it is made clear for students during induction.

F10 Fire Safety

Fire Safety is a legal requirement and is part of CELT's Health and Safety policy. Fire safety information is displayed on the back of each classroom door and throughout the adult and junior centres, and the fire drill is explained to all students, including under 18s, during their induction. Escape routes are clearly visible and students are shown where the fire drill meeting area is.

Fire drills are carried out termly with the help of members of the safeguarding team to make sure that all students and especially under 18 students know what to do in the case of a real fire. Teachers are responsible for accompanying all students, including under 18s, out of the building during a fire drill and a role call is completed at the meeting area. The school's fire alarm systems are tested on a weekly basis each Friday afternoon after classes end.

All homestay providers are required to complete a fire risk assessment and have a current gas safety certificate. These documents are checked by the accommodation team.

F11 Airport Transfers

Before travelling to the UK, individual students aged under 18 and their parents are contacted by a member of the administration team at CELT to inform them of our preference that a CELT airport transfer be arranged from the port of entry to the student's homestay accommodation; all licenced taxi and private hire drivers in Cardiff are DBS checked. The reverse procedure applies on departure. However, parents/ guardians can give their written permission for alternative arrangements, such as a family member meeting the student at the airport, if required. CELT will provide appropriate guidance and support if necessary.

Students and parents will also be advised to visit the following website to ensure that they meet the UKVI requirements for travelling to the UK if under 18 (with or without an adult):

<https://www.gov.uk/study-visit-visa/documents-you-must-provide>

Under 18 students studying at CELT as part of a group are transported from the port of arrival (typically a UK airport) to a central meeting point using a coach transfer arranged by the school.

All coach companies used by CELT have provided confirmation in writing that their drivers are Enhanced DBS checked and that their vehicles are roadworthy. The students are then collected by their homestay provider and taken to their home. The reverse procedure exists for the return journey.

The procedures adopted by the school in the case of a departure delayed as a result of an emergency are covered in the school's emergency plan.

F12 E-safety

It is increasingly important that all students, and especially those who are under 18, are aware of E-safety. To achieve this, CELT has produced an E-Safety policy and procedures

All students are given advice regarding the safe use of the Internet, and posters relating to E-safety guidelines are displayed in the school's computer rooms.

Homestay providers are also asked to monitor under 18s' use of the internet and digital technology at home and to report any concerns to a member of the Safeguarding Team.

F13 Radicalisation & Extremism PREVENT

Given its multicultural and multilingual environment, many aspects of CELT's activity directly and indirectly promote the development of intercultural awareness and understanding among our students, staff and homestay providers. We encourage an appreciation of diversity, tolerance and mutual understanding in terms of our different beliefs, values and ways of life. We therefore strive to develop acceptance of a range different values and beliefs as long as these are reasonable and do not extend to hurting or denigrating those with different beliefs. While it is unlikely to occur at CELT, if anyone in the school suspects that someone is expressing views that might hurt or denigrate those with different beliefs, this should be brought to the attention of the Director of Studies and/or the Academic Director so that appropriate action can be considered. This is particularly important if it appears that this person is attempting to radicalise other students with these views.

In order to help CELT to comply with its Prevent duties, staff are expected to:

- promote a safe and supportive international environment via clear expectations of accepted behaviours and an awareness that beliefs or actions which endanger this, such as radicalisation and extremism, will not be tolerated.
- exemplify core British values (democracy, the rule of law, individual liberty, respectful tolerance of different faiths or beliefs) in their management, teaching and through their general behaviour, including through opportunities in the curriculum. The school's approach is to educate our students and develop tolerance of UK beliefs and values even when these differ from the beliefs and values held in the student's country of origin.

CELT recognises its responsibilities under the Counter Terrorism and Security Act 2015 to prevent people of all ages, including under 18s, being radicalised or drawn into terrorism. Prevent is about safeguarding people and communities from the threat of terrorism. 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. The school promotes a multicultural

environment where respect for, and tolerance of, other people's beliefs is expected at all times, provided that these beliefs are reasonable and do not extend to denigrating or hurting those with different beliefs.

Radicalization can be difficult to spot: possible signs that a student is being radicalized or being drawn into terrorism may include:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around Internet use.

Under 18s who are at risk of radicalization may have low self-esteem or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family.

However, these signs don't necessarily mean a child is being radicalized – it may be normal teenage behaviour or a sign that something else is wrong. If a member of staff or a homestay provider believe that a student is being radicalized or being drawn into terrorism, they should contact a member of the school's Safeguarding Team immediately.

For more information about the CELT's policy and procedures, please refer to the school's Prevent Policy and Procedures.

F14 Parental Consent

Parental consent is required for many aspects of CELT's operations. In order to achieve the school's safeguarding procedures, parents or student representatives need to sign their agreement to the following

- Levels of supervision
- Rules and disciplinary procedures
- Spending time away from homestay
- Under 18s (in the case of CELT, 17 year-olds) studying as an adult in the adult school
- Medical consent

F15 Private Fostering

CELT currently rarely accepts students under the age of 16 on stays of 28 nights or longer and is aware that the local social or children's services must be informed at least six weeks in advance about all private fostering situations. Private fostering is defined as when "a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a **private** arrangement made between a parent and a carer, for 28 days or more".

In order to ensure compliance with its local authority and private fostering arrangements, CELT has contacted the Cardiff Education Safeguarding Team to ensure that the school is compliant

with what the local authority expects. We have been advised that we have two options should private fostering be required: to contact the Cardiff MASH Team of any potential private fostering in advance, where possible, or to move the students before the 28th night of their stay to a new homestay provider for the remainder of their stay (which would be no longer than a further 27 nights). Should this option be chosen, CELT will make the under 16's parents aware of these arrangements at the time of booking.

F16 Corporal Punishment For EYFS

As CELT does not accept children up to the age of 6, this section is not directly relevant: however, CELT confirms categorically that physical punishment is and never would be used or threatened in any circumstances.

F17 GDPR & Safeguarding

In order to meet our obligations under GDPR regarding the use of personal data in the context of safeguarding, CELT has appointed a Data Protection Officer (Neil Harris) who is taking responsibility for the full implementation of GDPR procedures to assure compliance with The General Data Protection (GDPR) and the Data Protection Act 2018. In terms of safeguarding, a full audit of documents which relate to the use of personal data in a safeguarding context (e.g. parental consent forms) has taken place and we recognize that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children as The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

F18 Contextual Safeguarding

CELT is required in response to the government publication *Keeping Children Safe in Education (September 2018)* to consider the safeguarding needs of its students beyond the school's adult and junior centres. This is covered as follows:

- The school has a comprehensive set of risk assessments for all trips and leisure programme activities.
- The school's Prevent and Radicalisation Policy includes a risk assessment covering the safeguarding of students and staff within the context of counter-terrorism and hate crime scenarios.
- The school's Emergency Plan and Crisis Management Policy covers the safeguarding of students and staff off-site (and on-site) in the event of an emergency.

Other Related Policies

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