



celt

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LANGUAGE TEACHING**

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CELt

Safeguarding

Children

&

Adults at Risk Policy

**F Welfare and Implementing
Safeguarding**

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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)

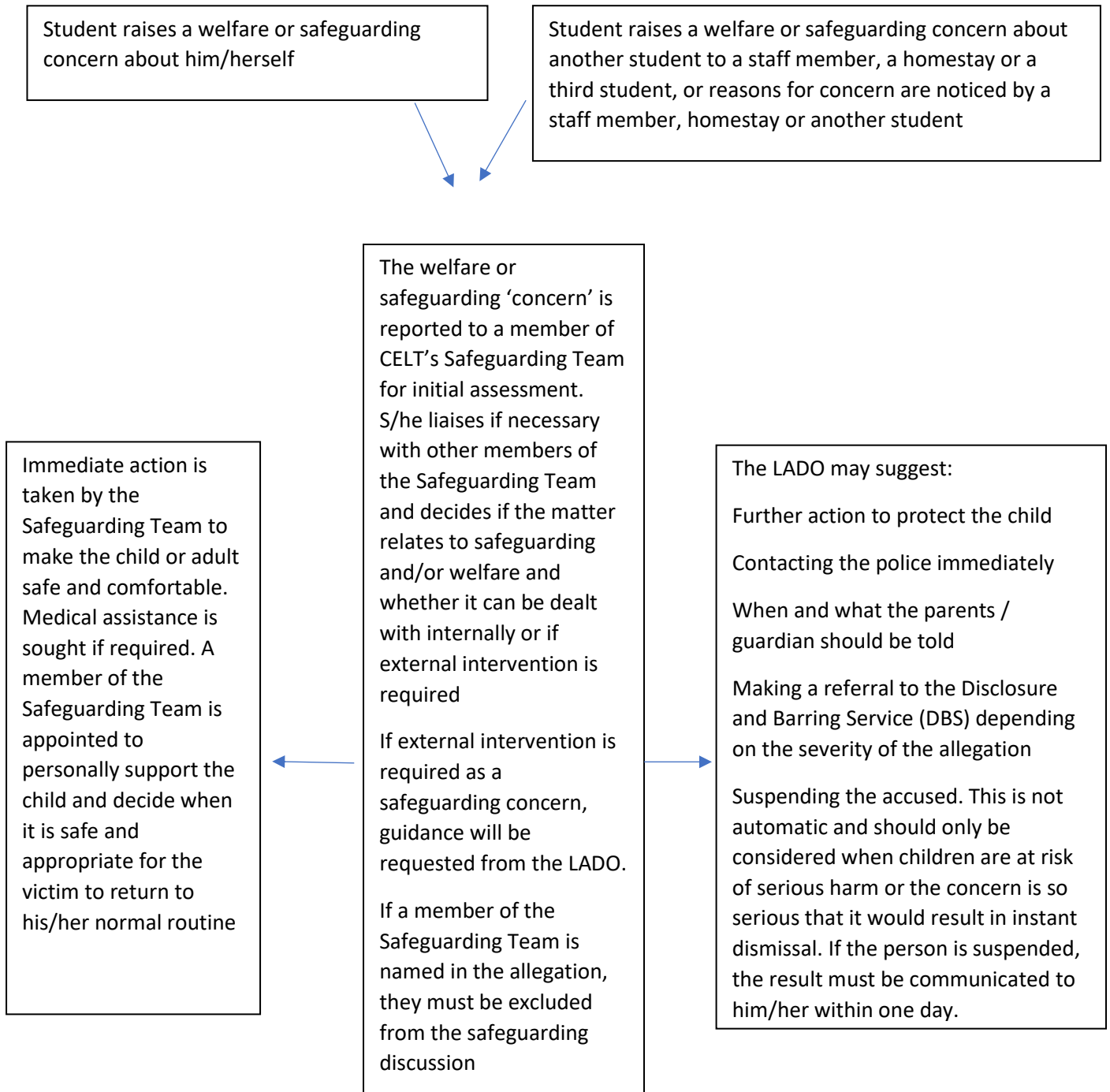
If there is a concern which relates to welfare which is considered to have a safeguarding element, it must be treated as a safeguarding issue and reported immediately to a member of the Safeguarding Team and or to the police if it is believed that a crime has been committed. If the issue relates to welfare 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 of 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/>