

Safeguarding Policy

Introduction

Celtic English Academy accepts 16 and 17 year olds on its adult courses and accepts younger age groups (12+) as part of closed groups.

We recognise our duties in caring for the welfare of all students – inclusive of those under 18 and vulnerable adults - regardless of race, gender, or religious beliefs. We believe all children are entitled to protection from harm and recognise the role we play in this.

“We” pertains to all adults with regulated activity/substantial access to under-18s, including teachers, administrative/reception staff, homestay providers, additional service providers (e.g. taxi drivers), junior activity leaders and visiting group leaders.

As well as our child protection duties (protecting children from direct harmful behaviour), we also recognise our wider responsibility for the safeguarding of under 18 year old students, that is, looking after their overall welfare (including health, safety, and pastoral care) and ensuring that sufficient measures are in place to prevent any harm.

The designated safeguarding lead (DSL) at Celtic English Academy is **Nadia Vecchio-Donovan** (Operations Manager). The secondary designated safeguarding lead is **Chelsea Trythall-Barbery** (Student Support Officer). **Marta Abellan Divins** (Assistant Operations Manager) is also available should the aforementioned members of staff not be present or should they be implicated in any disclosure. **Shoko Doherty**, as Chief Executive Officer, has overall responsibility of this policy area.

There are also several Designated Safeguarding Staff (DSS) trained to Level 3 safeguarding: **Ceri Thomas, April Pugh and Ewan Turner** (Academic); **Steven Kenward and Alan Bates** (Finance/Marketing); and **Cara Douglas-Jones** (Staff Development). The role of these staff is to support the work of the DSLs within each department.

This policy is subject to annual review by the DSLs named above and subject to approval by the Chief Executive Officer. However, all related adults (listed above) are welcome to comment and make suggestions for the policy at any time.

Glossary

<i>DSL</i>	<i>Designated Safeguarding Lead</i>
<i>DSS</i>	<i>Designated Safeguarding Staff</i>
<i>LSCB</i>	<i>Local Safeguarding Children Board</i>
<i>DBS</i>	<i>Disclosure and Barring Service</i>

Sources

Government Legislation

- The Children Act 1989
- The Children Act 2004
- Working Together to Safeguard Children 2013

Industry specific/best practice guidance

- Accreditation UK Handbook 2018-19 (specifically criteria S1 – S8)
- Accreditation UK “Care of Under 18s: Guidance for ELT Providers” (January 2018)
- The Independent School Inspectorate’s framework (2015)

What we do

In recruiting and inducting our staff

- Recruitment materials for roles will include reference to the organisation's commitment to safeguarding, and inform applicants that:
 - References will be followed up
 - All gaps in CVs must be explained satisfactorily
 - Proof of identity and (where applicable) qualifications will be required
 - Reference requests will ask specifically whether there is any reason that they should not be engaged in situations where they have responsibility for, or substantial access to, persons under 18
 - Appropriate suitability checks will be required prior to confirmation of appointment
- At interview stage, for appropriate roles (e.g. summer activity leaders), questions on dealing with problems specific to children are asked.
- Upon recruitment, references will be followed up and an application made for an enhanced DBS check.
- Upon induction, staff members are:
 - Made aware of the safeguarding policy and the DSSs
 - Requested to undertake Level 1 online training or attend an in-house training session
 - Required to fill in a self-declaration form, if still awaiting the result of a DBS check
 - Made aware of their responsibilities in reporting missed contacts (teachers only)
- In the case that a DBS check is returned with disclosed information, the **DBS Failure Policy** should be followed.
- In the case of the recruitment of homestay providers, all providers who wish to host under 18s are: are asked to sign a declaration at application stage and at the initial inspection to confirm that there is no reason why they should not be permitted to host under 18s. The main household occupier must have an up-to-date enhanced DBS certificate which is checked or applied for by the Accommodation Officers. Two references for the main household occupier are followed up by the Accommodation Officers.

At booking stage (for parents and children)

- Parents or guardians are requested to fill in a consent form covering arrival details, medical details, advice on curfews, and their contact details.
- Parents or guardians are provided with a phone number that can be used outside of office hours if they have concerns about the welfare of their child. This number is also given to the student in case of problems with their arrival.
- If an airport transfer has not been arranged through the academy, the details of the arrangements are requested.
- Parents and students are made aware that the academy does not accept responsibility for the supervision of under 18s outside of schedule class time and activities (with the exception of students on the junior programme who have 24 hour supervision). However, we do recognise our duty of care in helping under 18s to be safe outside of school (see 'At school' section below).

At school

- Under 18s are clearly identified on the class list and registers as well as with their orange lanyard. They are also highlighted on the new starters list for the next week which is sent to all support staff.
- A DSS identifies themselves to the under 18 year old on their first day at the academy and is given an emergency phone number (for use outside of office hours).
- A DSS checks that we have the correct next-of-kin details for the student.
- A DSS follows up with the student after one week at the academy to identify any problems in accommodation, class, or elsewhere.
- In the case of missed contacts, it is the teacher's responsibility to notify a DSL/DSS who will then contact the student and/or homestay provider, followed by the parents/guardians if necessary.
- A 'Safeguarding Awareness' poster is displayed in each of the three buildings to communicate to all students who the DSSs and who the primary and secondary DSL are and what to do if faced with a concern, allegation or disclosure.

Prevent

- Celtic is committed to safeguarding all students, including those under the age of 18, from extremist materials and radicalisation. The measures taken to do this are outlined in the academy's Prevent policy.
- Under 18 year olds are given extra welfare support in order for us to identify when they are or if they become particularly vulnerable. They are also given e-safety advice.

In accommodation

- Independent 16 and 17 year olds are permitted to book homestay accommodation, but not residential accommodation.
- Under 16s are never accommodated for longer than 28 days in homestay accommodation. If this becomes necessary in future, we will comply with legal requirements.
- Under 18 groups with designated group leaders are permitted to stay in residence accommodation, as long as the supervision ratio is satisfactory.
- Homestay providers are given specific guidelines on how to deal with under 18s, covering issues such as curfews, alcohol, internet restrictions and so on (available from the Accommodation Officers).
- The main household member must have an up-to-date enhanced DBS certificate which must be checked by the Accommodation Officers.
- Under 18 and under 16 students are placed in homestay according to the following age-related guidelines:
 - 15 years old or younger: can stay with 16 and 17 years old
 - 15 years old or younger: cannot stay with 18+ years old
 - 16 or 17 years old: can stay with 18-25 year olds of the same gender or with someone older, if they are a family member

During social activities

- The staff-student ratio on social activities where 16 and 17 year olds may be present is 1:18. For under 16 students in closed group the ratio is 1:10.
- If group leaders from organised groups are present, they may be included as supervisors, but must be fully briefed on safety and transport arrangements and are only responsible for their own group.
- Risk assessments given to activity staff cover issues that may arise from having under 18s on the activity (available from the Student Support Officer).

Organised groups with accompanying group leaders

- Group leaders are briefed prior to the commencement of the course on the academy's safeguarding policy and given the contact details of the DSL and our code of conduct.
- Group leaders responsible for under 18s should provide a police certificate of good conduct from their country and be asked to sign the self-declaration form.

Staff training and awareness

- The DSL is responsible for training of other staff. The Chief Executive Officer is responsible for ensuring that the training needs of the DSL and secondary DSL are met.
- All staff who have substantial access to under 18s are required to undertake Level 1 training (online course or in house training).
- There is a central database of enhanced DBS checks and their issue dates for all staff, including information on any level 1, 2 or 3 training completed.
- The DSL, secondary DSL and the Chief Executive Officer are trained to level 3 safeguarding.
- The DSL is responsible for ensuring that safeguarding training is refreshed every year as a minimum.
- A 'Safeguarding Awareness' poster is displayed in each of the three buildings to communicate to all staff who the DSSs and who the primary and secondary DSL are what to do if faced with a concern, allegation or disclosure.

Visitor awareness

- There is a notice at the entrance to the academy notifying visitors that there are under-18s in the academy and that all adults should conduct themselves accordingly. This notice is also provided to visitors in the form of a hand-out in the reception area.

Concerns, Allegations and Disclosures - Procedures and Record-keeping

- Once a **concern** is raised, it is the DSL's responsibility to respond. The person reporting the concern must fill in the Concern, Disclosure and Allegation Form with help from the DSL if necessary.
- The response to a concern will depend on its nature. The DSL will do one of the following:-
 - monitor the situation on a regular basis
 - investigate further (confidentially and with sensitivity) to gather more information
 - discuss the matter with a group leader, parent, agent, host, secondary DSL or Chief Executive Officer where appropriate prior to any action

- If an **allegation** or **disclosure** is made (e.g. that an adult may have harmed a child or behaved towards a child in a way that may cause harm), it is the DSP's responsibility to respond. The person making the allegation must fill in the Concern, Disclosure and Allegation Form.
- The DSL must ensure that the child concerned is safe, supported, and reassured.
- The DSL must inform the Chief Executive Officer immediately (or the Chairman of the Board if the allegation is against the Chief Executive Officer) in the case of allegations and disclosures.
- The DSL or Chief Executive Officer must report the issue to the LSCB immediately, and no decisions (e.g. immediate action, how to deal with the adult who the allegation is against) taken without the LSCB's advice.
- All communication with the LSCB must be recorded in writing with the time/date.
- If an allegation is against a member of staff, Celtic will also ensure that they receive support as an employee.
- If an adult is suspended, transferred to another role or their employment terminated (whether they resign or are dismissed) due to their unsuitability to work with under 18s (following the outcome of an external investigation), the DSL or Chief Executive Officer will report it to the Disclosure and Barring Service.
- The DSP is responsible for maintaining accurate records of all child protection issues (concerns, allegations, disclosures and referrals).
- The DSL, secondary DSL, and Chief Executive Officer will meet annually to discuss the following:-
 - The number of concerns/allegations made over the past year
 - Staff training
 - Any major safeguarding issues
 - Feedback from staff
 - Any areas of weakness identified
 - Any new initiatives to be implemented over the next year
- Should a case arise where the DSL is the subject of an allegation, the secondary DSL and Chief Executive Officer will take responsibility for the situation.

LSCB's Contact Details:

Name: Children's Access Point

Tel: 02920 536490 (out of hours: 02920 788570)

NSPCC's Contact Details (if cannot contact LSCB or not satisfied with LSCB's advice):

Name: NSPCC - National Society for the Prevention of Cruelty to Children

Tel: 0808 800 5000

Disclosure and Barring Service's Contact Details:

Name: DBS barring helpline

Tel: 01325 953795

Forms and Guidance: <https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance>

Our Code of Conduct

Prevention

First and foremost, we seek to establish a safe and trusting environment for our students. This helps to ensure that students feel secure (and happy), and reduces the risk of actions by adults being misconstrued.

Expectations/Behaviour

We expect the best possible conduct of ourselves and colleagues, remembering that:

- We are role models for under 18s in our care
- We consider at all times how our actions will be construed by under 18s
- We dress appropriately for interacting with under 18s (i.e. clothing should not be too revealing or feature sexual or offensive slogans)
- We recognise under 18s as different to adults, even if they are mature
- We are aware, approachable, and understanding
- We report to a DSL/DSP anything we (or other members of staff) may have done accidentally which may have been misconstrued by a child or may turn into an allegation (e.g. if the child seems to become infatuated with a member of staff)

Rules

We abide by the following rules of best practice when dealing with under 18s:

- Do not use inappropriate language
- Do not encourage the use of drugs and alcohol
- Do not shout, threaten or be aggressive
- Do not connect with under 18s on social media or give them your personal phone number
- Do not make physical contact (*except in the case of administering first aid*)
- Do not contact or socialise with them alone outside of school
- Do not force an under 18 to do something they do not want to do

How to recognise abuse

We consider the following as signs of child abuse/neglect and worthy of reporting to a DSP or senior management as a cause for concern:

Emotional abuse

- Delayed physical or emotional development
- Shows extreme passivity or aggression
- Sudden speech disorders
- Overreaction to mistakes or continual self-deprecation
- Neurotic behaviour (rocking, hair-twisting, self-mutilation)
- Signs of radicalisation (see the academy's "Prevent policy" for further information)

Sexual abuse

- Acting in an inappropriate way with objects or peers
- Nightmares, sleeping problems
- Becoming withdrawn or clingy
- Personality changes, seeming insecure
- Unaccountable fear/dread of particular places or people
- Changes in eating habits
- Physical signs such as unexplained soreness around genitals
- Becoming secretive

Physical abuse

- Has unexplained bruises, burns, etc.
- Wearing clothes to cover injuries, even in hot weather
- Refusal to undress for sports or join swimming lessons
- Neglect
- Often hungry, may beg or steal food
- Badly dressed in clothes that need washing
- Poor appearance and personal hygiene; unwashed, hair not brushed
- Lacks needed medical or dental care
- Often tired
- Might abuse alcohol or other drugs

How we deal with disclosures

Aside from recognising the signs listed above, a child may tell directly inform a member of staff that they are experiencing abuse. If this happens, staff must do the following:

1. Record all of the details in writing, ensuring everything is dated and signed
2. Inform the DSL, secondary DSL, or Chief Executive Officer **within 24 hours**.

The DSL(s) and/or Chief Executive Officer will then refer the concern to the LSCB, recording all contacts/conversations in writing.

All written records will be kept in a locked area in the academy.

If an allegation is made against a staff member, the academy's disciplinary policy will be employed and appropriate support given to the accused (following consultation with the LSCB).

During a disclosure conversation with a child:

- Stay calm; do not overreact
- Tell another staff member where you are and that you are having a private conversation with a student
- Do not ask leading questions, instead say, "*is there anything else you want to tell me?*"
- Do not promise confidentiality
- Reassure the student that they are doing the right thing in telling you
- Do not inform any other staff members of the details of the conversation, other than the DSLs or the Chief Executive Officer