

## Safeguarding Vulnerable Adults and Child Protection Policy

### For the purposes of this policy:

“Academy” and “CEA” refer to Celtic English Academy in Cardiff.

“Children” refers to any students, staff (including apprentices), visitors or volunteers under the age of 18 for whom the Academy has primary responsibility.

This policy was written using guidance written by Accreditation UK and with reference to key government publications on Safeguarding Children in education: handling allegations of abuse against teachers and other staff (Welsh Government circular no: 009/2014. April 2014), Working Together to Safeguard People in Wales 2018, and Keeping Children Safe in Education 2018.

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**Reviewed by:** Shoko Doherty, Marta Abellan, Louise Ellis, Ceri Thomas

The following policies and procedures contain sections which are directly relevant to safeguarding in the Academy:

- Staff Handbook
  - o Whistleblowing Policy
  - o Disciplinary Policy
- Staff Recruitment Policy
- Staff Professional Development Policy & Procedure
- Data Protection Policy
- Attendance and Lateness Policy
- Student Disciplinary Policy & Procedure
- Health and Safety Policy
- Student Data Protection Notice

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## PART A: SAFEGUARDING VULNERABLE ADULTS AND YOUNG PERSONS POLICY

### 1. Introduction

- Celtic English Academy has a responsibility to provide a safe & healthy learning environment for all students and staff but especially for students under the age of 18 and vulnerable adults.
- CEA will help keep children and vulnerable adults safe by:
  - o Providing a safe environment for children and vulnerable adults to learn
  - o Identifying children and vulnerable adults who are suffering or likely to suffer significant harm and take appropriate action with the aim of making sure they are kept safe.
- CEA is committed to ensuring and promoting the safeguarding of learners who are involved in courses or activities which come under the responsibility of the Academy.
- This Safeguarding Vulnerable Adult and Child Protection Policy deals with the welfare and protection of children, which the Children Act 1989 defines as a person under 18 years of age.
- Our policy applies to all staff working in the school setting, and to all people who have unsupervised access to children in the home setting. CEA aims to ensure that all students aged under 18 & vulnerable adults are protected from potential abuse or harm from hosts, staff, other suppliers or fellow students and that they are safe in all aspects of their interactions with the Academy.
- This policy will be made known to all adults in contact with under 18s through their role with CEA (including employees, homestays, group leaders and sub-contracted workers such as drivers doing airport transfers and excursions). It is expected that all these adults will understand and apply this policy as appropriate to their area of activity, and in particular will report any child protection or safeguarding concerns immediately to a member of the Academy's designated safeguarding team as set out in the procedures below.

### 2. Context

This policy applies to the main Celtic English Academy (CEA) in Cardiff. Separate safeguarding policies are in place for the CEA Junior Summer Programme held at Bangor University, Bangor.

Most of the students who enrol at the Academy are over the age of 18. However, we do accept 16 and 17-year olds on our adult courses and younger age groups (12+) as part of closed groups with a group leader supervising at a maximum ratio of 1:15. Exceptionally, 15-year old students who come as part of a group may join our adult courses provided a group leader can take responsibility for the student (More information is included in our Policy on Under 16 students).

The Academy is situated in three self-contained Victorian properties on a quiet street in central Cardiff. Extra classrooms are occasionally made use of in Lumis Student Living residence accommodation in the summer which is a 20-minute walk from the Academy. The Academy is close to public transport links including Cathays and Queen Street railway stations (5-minute walk) and bus stops (3-minute walk).

The Academy places students in a range of accommodation, primarily homestay and university student residence. It also makes use of Youth Hostels such as the Urdd in Cardiff Bay. Only students over the age of 18 are offered the option of self-catering residence. Our residence offers students the option of staying in a shared kitchen flat or studio flat and all residence bedrooms have en-suite bathroom.

At CEA, tuition is usually face to face, at the Academy, in classrooms with a teacher. On occasion courses are delivered online for specific courses and one to one zoom lessons especially during Covid-19 pandemic. All aspects of the safeguarding policy and code of conduct apply to staff and students involved in online tuition.

### 3. Terminology

For the purposes of clarity and accessibility, common terms used in this policy and their acronyms are outlined below.

**Safeguarding** - Safeguarding is an umbrella term; it can apply to children (aged under 18) or vulnerable adults. Safeguarding is the action that is taken to promote the welfare of children and vulnerable adults and protect them from harm.

**Child protection** – A part of safeguarding, this is the need to protect under 18s from direct harmful behaviour, i.e. abuse.

**Under 18s:** Any students who have not yet reached their 18th birthday, irrespective of the age of majority in their home country or the location of the ELT provision. They are deemed to be a minor by law.

**Duty of care** – Duty of care is the moral and legal obligation to ensure the safety and wellbeing of others. This is particularly adults working with under 18s to look after them and to 'protect them from that which is not in their best interests.'

**Vulnerable adult** – A vulnerable adult is a student or visitor to the Academy over the age of 18 who is or may be for any reason unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Individuals may be considered to be more vulnerable if they have one or more of the following attributes:

- Physical conditions (e.g. sight or hearing impediment, mobility)
- Psychological conditions (e.g. emotional or mental health difficulties)
- Special needs (e.g. dyslexia, behavioural difficulties)
- Low level of English
- Unfamiliarity with local area and local customs

**Designated Safeguarding Lead (DSL)** – Has undertaken Specialist Safeguarding (Level 3) training and has overall responsibility for ensuring CEA meets the aims of this policy at a strategic level.

**Designated Safeguarding Person (DSP)** - Has also undertaken Specialist Safeguarding (Level 3) training and is responsible for managing referrals, training and raising awareness on a day-to-day basis.

**Designated Safeguarding Staff (DSS)** – Have undertaken Advanced Safeguarding (Level 2) for Designated Staff and are responsible for raising awareness on a day-to-day basis.

**Local Safeguarding Children's Board** - Responsible for ensuring effective safeguarding services within every local authority. LSCB website provides contact details, for e.g. Children's Social Care for concerns about children and the Local Area Designated Officer (LADO) for allegations about staff.

### 4. General Principles

- a. We believe that all our students, especially children and vulnerable adults, should be safe and protected in the Academy and that their welfare and well-being is of paramount importance. In delivering our duty of care, the Academy will endeavour to act in the best interests of the child or vulnerable adult.
- b. We aim to create an environment where students and staff feel safe and protected where they are listened to and their views respected.

- c. All staff at the Academy have a responsibility in relation to safeguarding and promoting the welfare of all students but especially children and vulnerable adults, and for ensuring that they are protected from harm and to follow the Academy's policies and procedures.
- d. We will respect the decisions made by our students about their own safety and well-being unless this is in conflict with our statutory duties.
- e. Our safeguarding policies will take into account the specific needs of international students in the United Kingdom and the local environments of Cardiff.

**There are three main elements to our policy:**

- establishing a safe environment in which all our students including young people and vulnerable adults can learn and develop
- ensuring we practise safe recruitment in checking the suitability of staff and homestay providers to work with young adults, vulnerable adults and children
- developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse and inappropriate behaviour.

## **5. Establishing a safe environment**

We recognise that because of the day-to-day contact with children, young persons and vulnerable adults, Academy staff are well placed to observe the outward signs of abuse.

The Academy will therefore:

- establish and maintain an environment where all students feel secure, are encouraged to talk, and are listened to.
- ensure students know that there are members of staff in the Academy who they can approach if they are worried
- ensure we have designated staff at the Academy who will have delegated responsibility for general issues to do with the welfare of students under the age of 18, young persons and vulnerable adults and a Designated Safeguarding Lead who is at senior level and will act as the point of contact and information for any child protection issue.
- ensure staff, and Designated Safeguarding Leads and Persons receive appropriate training and support for their roles.
- ensure every member of staff with significant contact with children, young persons and vulnerable adults (including temporary staff and volunteers) knows the name of the designated persons responsible for child protection and welfare and undergoes (Basic) Level 1 Child Protection training as part of induction procedures and then annual refresher training.
- ensure all staff and volunteers with significant contact with children understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the designated person responsible for child protection.
- Persons at risk (for example a student with special educational needs or a disability) will be identified to staff on a need to know basis when the information comes to the Academy's attention.
- ensure the premises are secure through secured and entry systems at the front to discourage access by people who should not be on the premises. These entry points and common areas will be monitored and recorded by CCTV.

## 6. Staff Well-being

CEA has a responsibility to provide a safe environment for staff also. In addition to ensuring the Academy environment is safe and secure, CEA has a responsibility to ensure staff are aware of measures to safeguard themselves when outside the Academy premises:

- All staff attending or leading excursions with students sign to confirm they have received, read and understood the risk assessment for the activity they are leading
- All staff visiting homestay hosts are requested to:
  - arrange visits in daylight where possible
  - leave a record of who they have arranged to meet, when and where inform the host that the appointment is in the academy's google calendar
  - carefully observe and assess the premises before entering and take a mobile phone
  - not to go upstairs or downstairs in front of the host
  - inform the host that they are expected to call their line-manager once the visit ends

***All staff are advised to seek immediate support from their line manager if they believe there is any risk to personal safety while performing Academy duties.***

## 7. Staff Responsibilities related to Safeguarding

All staff are responsible for safeguarding under 18s and vulnerable adults, and to aid them in this they are all trained in Basic Safeguarding Awareness. As part of the staff induction, all staff are made aware of the need to report any concerns or allegations and who the current designated safeguarding staff are within the Academy.

At least three staff within the Academy are trained to Specialist level (Level 3) at any one time to ensure there is always cover in the case of absence.

## 8. Training

CEA will make sure that staff and homestay providers receive the appropriate training for their posts.

- The Organisational Development and Communication Manager is responsible for organising external training.
- The Operations Manager is responsible for organising internal refresher training.
- The Accommodation Officer is responsible for ensuring all new homestay hosts are trained in Safeguarding Basic Awareness and that this is renewed annually.

## 9. Designated Safeguarding Team

- a. The Chief Executive Officer has overall responsibility for child welfare, protection and safeguarding at senior management level which will be delegated on a day-to-day basis
- b. The designated members of staff with day-to-day responsibility for welfare will normally be the Operations Team and Academic Management team

Senior Manager with overall responsibility	Designated Safeguarding Leads (DSL)	Designated Safeguarding Staff (DSS)	
SAFEGUARDING SPECIALIST L3	SAFEGUARDING SPECIALIST L3	SAFEGUARDING ADVANCED L2	
Shoko Doherty <b>Chief Executive Officer</b>  <b>OVERALL RESPONSIBILITY</b>	Marta Abellan <b>Operations Manager</b>  <b>DSL - ADULTS</b>	Carla Morgan <b>Accommodation Officer</b>	Emelyne Burkhard <b>Organisational Development &amp; Communications Manager</b>
	Louise Ellis <b>Assistant Director of Studies</b>  <b>DSL – JUNIORS</b>	Elodie Mallet <b>Marketing &amp; Student Support Officer</b>	Helen Lunney <b>Assistant Director of Studies</b>
	Grant Hubbard <b>Groups &amp; University Manager</b>  <b>DSL – GROUPS</b>	Joshua Nixon <b>Finance &amp; Student Support Officer</b>	Andrew Bodgin <b>Senior Teacher</b>
	Ceri Thomas <b>Director of Studies</b>		

In the absence of one of the DSLs, the Director of Studies assumes her/his responsibilities.

Weekly meetings are held on Wednesdays between the Designated Safeguarding Lead and the Academic Management team to discuss any ongoing student welfare and safeguarding issues. Quarterly meetings are held with the Designated Safeguarding Team to review the Academy's Safeguarding Policy and Procedures. Staff have the opportunity to bring up Safeguarding concerns in their weekly staff meetings on Monday and are encouraged to speak to the DSL or DSP at any time if they have a concern or are unsure about anything connected to Safeguarding.

## 10. External Safeguarding Contacts

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

Tel: 029 2233 0880 / 029 2233 0883

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

Consists of:

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

### Local Safeguarding Children's Board (LSBC): Cardiff Children's Services

Tel: 02920 536 490 (Press 3 to register a 'Significant concern about the safety of a child or young person')

Out of hours Emergency Duty Team: 029 2078 8570

### Local Safeguarding Adults Board (LSAB)

Vale of Glamorgan Adult Services: 01446 700111

Cardiff Multi-Agency Safeguarding Hub (MASH): 02920 338439  
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 Services**

Tel: 01325 953795

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

**Cardiff Central Police Station**

King Edward VII Avenue, Cardiff. CF10 3NN.

Open 8.00am - 6.00pm, 7 days a week.

Tel: 02920 222111

**Emergency 999**

## PART B : SAFER RECRUITMENT

### Recruitment

CEA will ensure safe recruitment practices are always followed.

- a. With regard to employment of administration and teaching staff, these measures will include requesting a DBS disclosure for all staff and requiring written references.
- b. In the instance that unsatisfactory or concerning references are returned, or a DBS fails the following procedures will be used - Reference Failure Procedure (Appendix 1) and DBS Failure Procedure (Appendix 2)
- c. With regard to homestay accommodation providers who host under 18s, these measures will normally require:
  - a valid DBS disclosure within the last 3 years covering each member of the household
  - an initial inspection and subsequent annual inspections of homestay providers' facilities and the gathering of regular feedback from students
  - homestay hosts who accept under 18s to undertake initial safeguarding training with CEA Accommodation Officer on recruitment and complete annual training refreshers during their annual revisit.
- d. With regard to service providers (e.g. tour providers, taxi/coach companies), these measures will include requiring an annual declaration and written evidence that their staff have undergone satisfactory DBS disclosure within the last 3 years.

**THE ACADEMY WILL REQUIRE ETOS/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.**

## PART C: CARE OF UNDER 18S SAFEGUARDING PROCEDURE

### 1. Introduction

Celtic English Academy's courses are primarily aimed at adults aged over 18 but we welcome students aged 16 and 17 on adult courses, tailor-made programmes to closed groups as well as our Junior Summer/Winter Programme in Cardiff. We also welcome students aged under 16 (please see the Policy on Students Under 16). Celtic English Academy has a responsibility to provide a safe & healthy learning environment for all our students and staff but especially for students under the age of 18. This document describes how we care for students aged under 18 but it should be noted that:

- CEA does not provide 24-hour supervision
- students under the age of 18 will study in classes with adults
- students will travel between homestay and academy unsupervised
- students will be unsupervised outside lesson times and the time spent at homestay

Prior to booking the course, under 18 students (and their parents) are made aware of the level of supervision and the extent of CEA's responsibility. On arrival students are given guidelines appropriate to their age, level, course type etc, regarding what they may do outside of scheduled class or activity time and without supervision. (e.g. CEA's Under 18s Policy and Procedure, Student Welcome Packs, Induction and Parental Consent, weekly social programme).

### 2. Parental Agreement

Before arrival at CEA, we require the parents/guardian and students aged under 18 to sign and send to CEA a "Parental Agreement" to confirm that they understand the systems and rules that we have in place for the welfare of under 18s and the level of supervision that we provide for under 18s.

### 3. Arrival/Departure from/to airport to/from accommodation

We strongly advise all parents/guardians of students under 18 to arrange a taxi transfer from/to the airport on arrival and departure.

All students must travel with a completed Parental Consent to Travel form signed by their parents/guardians.

CEA arranges all taxi transfers with a local taxi driver/company who provide an annual declaration that the drivers they use have had a satisfactory DBS check and the vehicles they use all comply with legal requirements.

### 4. Accommodation

In the case of students under 18, we normally require that they stay in full board homestay accommodation.

Alternative arrangements where the student will have adult supervision, such as staying with a family friend, will be accepted provided we have written confirmation of the arrangements from the parents at the time of the enrolment. We would not expect individual students aged under 18 to stay unsupervised in a hotel or guest house.

## Recruitment and Training of Hosts

CEA will normally only place a student under 18 in a homestay following an initial inspection by our Accommodation Officer and a satisfactory DBS (Disclosure and Barring Service) check on each member of the household. The lead homestay member is also required to sign an annual declaration covering all adult members of the family stating that they accept and understand CEA's homestay agreement.

When recruited, homestays who host under 18s will undergo initial CEA safeguarding and Prevent training from the Accommodation staff who will also check understanding of key points of CEA policy and procedure. CEA requires all hosts to complete online Level 1 safeguarding and Prevent training.

They will also be visited by a member of the Accommodation staff annually. During the revisit, the Academy will check any change in circumstances for the host and also offer refresher training on safeguarding and Prevent.

## Placement

CEA tries to match students to homestays that take account of their needs (e.g. allergies, sex, diet, cultural background, length of stay) and considering factors such as distance from Academy, proximity to other students, bus routes, well-lit roads, local area (pubs in area etc.), as appropriate

Students will be placed in a single room, unless travelling with a friend of the same sex and similar age in which case twin room accommodation may be possible. In summer, unless otherwise requested, and subject to availability, we will normally place a student enrolled to Junior Summer Programme in a twin room with another student of the same gender and a similar age but different first language. The benefit of this is that they can travel together to the Academy on public transport, or on foot or a lift from the homestay. If such a student is placed in a single homestay room, he/she will be placed close to other students so they can travel back together.

CEA will avoid placing 16-and 17-year old children in homestay accommodation which has other guests aged 18 and over in it. If this is unavoidable the Accommodation Officer will take into consideration differences in ages, background and sex.

CEA will not place under 16 and 18+ students in the same homestay accommodation at the same period.

## Homestay Guidance

- The student should be treated as part of the host's family and they eat together in the evening
- There must always be a responsible adult at home overnight.
- Student curfews are risk assessed according to local factors, time of year and supervision. Normally, a student who is 16 or 17 will be required to return home by 22.00 every night. Students under the age of 16 are normally required to be home by 21.00. If any students are accepted under the age of 13, they are not normally allowed to stay out unsupervised after academy. Our homestays have been asked to contact the academy if this rule is broken.
- The student must provide written permission from their parents 1 week beforehand should they wish to stay out overnight or go on an overnight trip. A specific form is required, signed by the parents which includes the contact details of where they will be staying. Any overnight stay

away from homestay or day trip away from the town/city must be approved by the academy's safeguarding team in writing.

## 5. Mealtimes

Homestays provide breakfast and dinner every day and under 18 students are usually required to book full-board and will receive a packed lunch provided from their homestay. Alternative lunch arrangements may be put into place for groups with lunches being provided by an outside caterer.

## 6. Disciplinary Procedure for under 18 students

In the event that an under 18-student does not adhere to the rules of the school, the following steps will be taken.

CEA will initially speak to the student about minor breaking of the rules. CEA will inform the parents in the case that the student is regularly not abiding by the agreed terms of the Parental Agreement, or immediately in the case of a serious breaking of the rules.

If any student under 18 receives a written warning about their behaviour, their parent/guardian will be informed. If a student under 18 is required to leave the academy, the academy will make appropriate arrangements for their safe return to their country (at their parents' expense).

## 7. Day One at CEA

After an initial test supervised by DoS/ADoS, CEA provides a full induction for new students that includes a tour of the building, Health & Safety Information and introduces key staff (e.g. Accommodation & Welfare, social organiser). Under 18s specifically:

- are made aware who they should talk to if they have a problem or need help
- are given an CEA student card which includes the Academy's emergency number which we ask they immediately add to their mobile phone
- are given our "Information for Under 18 booklet which contains advice, emergency contact information and a reminder of curfew times
- complete an Enrolment Form to double-check that we have up-to-date contact details for parents/guardians

## 8. Ongoing support for under-18s during the course

- The Academy's emergency number will be made known to all students under 18, and the parents or legal guardians of students under the age of 18. The Academy will obtain a 24-hour emergency number for the parent or legal guardian of any student under the age of 18.
- All registers include the ages of students so that teachers are aware of students aged under 18 in their class and provide necessary support as required. Under 18 students are highlighted in yellow.
- If a student under 18 is ill or requires medical treatment, the Academy will arrange for an appropriate person to accompany the student to the doctor or other medical professional (as appropriate).
- Where possible closed classes with under 16s will be placed separately from adult students, in a different building or on a different floor.
- Under 16s will also have different breaktimes to adult students

## 9. Attendance and lateness

If a student under the age of 18 does not come to Academy when expected for class, or for an activity, or at their homestay by the agreed time, the Academy or homestay will follow up immediately until they are satisfied the student is safe. If this happens outside of normal Academy hours, the person discovering this will call the academy emergency phone for advice if required.

We keep a register of attendance for all students and mark lateness. The age of students is on registers and highlighted in yellow so teachers are aware of under-18 students. If an under-18 student has not arrived to class within 15 minutes of the class starting, the teacher will inform reception by Slack. Reception or a member of the operations team will check with the homestay and follow up until we are sure that the student is accounted for. In cases where CEA cannot locate the student and cannot be sure of their safety, the DSL will contact the police and register the student as missing until they can be located.

If an under 18 arrives late to class, teachers should not ask the student to return to the class after the break and should accept the student into the class so they are supervised during class times.

## 10. Internet access and Wi-Fi

CEA provides all our students with free access to the internet via PC or Wi-Fi so that they can stay in contact with friends and family. Our servers are set to block content that is not suitable for under 18s. (e.g. violence / hate / racism / radicalism / extremism, adult / mature content, drugs / alcohol abuse).

## 11. Online lessons

CEA's responsibility to provide a safe learning environment extends to courses where tuition takes place online on a video conferencing platform. The online environment poses additional risks such as:

- Online grooming
- Online radicalisation
- More access to inappropriate and harmful content
- Online bullying and peer to peer abuse

Staff, students under 18 and their parents are made aware of CEA policies on abusive or inappropriate behaviour and who to speak to if they have any concerns of abuse or inappropriate behaviour. Any platform or medium used for online lessons is secure and protects the privacy of students and their data, all lessons are by invite only and password protected.

All course materials and content is appropriate for the ages of the students. Teachers control screen sharing rights. All student interaction including chats, break out or waiting rooms with other students are monitored appropriately by the teacher. If lessons are delivered from home, tutors choose neutral locations for lessons and maintain the professional environment of the academy.

As in normal lessons, non-attendance is followed up after 15 minutes or earlier. The DoS or other relevant staff regularly visit online classes. Parents are informed of the content and timetable of the online lessons. For one-to-one courses, parents are encouraged to visit classes on occasion.

While we also need to maintain a supportive and friendly learning environment, we need to take care that normal professional standards are maintained. CEA staff should maintain the safe Academy culture

established at our premises in the online environment as there may be an element of informality that can build up due to the different setting.

- All appointments of staff involved in online lessons undergo the same safe recruitment procedures and safeguarding training as others.
- Teachers who offer online lessons receive additional guidance and training on safeguarding online
- Students aged under 18 and their parents receive guidance and support for their online safety
- Classes with students aged under 18 are appropriately monitored and supervised by the teacher
- Staff and students know how to report any concerns of abuse.

## 12. Social Programme

We provide a range of programme in afternoon and evening activities Monday to Friday, and full-day guided excursions at weekends. Although the programme is not specifically designed for students aged under 18, we do aim to offer a number of activities every week that are suitable for under 18s. We publish the social programme every month on our student app and on posters around the Academy.

Activities are clearly marked:

\* - a member of CEA will be present for this activity

18+ - you must be 18 or over to attend this event and will need to provide identification

CEA ensures that the Health & Safety Policy and risk assessments for social activities, both on and off site will pay particular attention to the welfare of students under the age of 18.

For activities where the meeting point is not given as CEA, students will need to make their own way to the event unsupervised. After all activities, students will make their own way home unsupervised. For evening activities, particularly when it is dark, we strongly advise all students under 18 to travel back to their homestay with a friend living nearby.

CEA organises one-day guided excursions at weekends to destinations such as Gower, West Wales, London, Oxford, Cambridge, Bath, Salisbury & Stonehenge. These are supervised by CEA staff but there will normally be some time (2-3 hours) where the students will be unsupervised, for example to go shopping. We require that all students provide the activities leader with their mobile phone number and take particular care to ensure that under 18s have the mobile phone number of the activity leaders in case of emergency.

CEA also sells tickets for excursions run by a local company (Adventure Tour Wales) which organise full day and weekend excursions for students from other local language schools. These companies have carried out their own risk assessments and say they follow best practice in particular with regard to students aged 16 and 17. As with excursions organised by CEA, one-day excursions organised by these companies are guided but there will normally be some time (2-3 hours) where the students will be unsupervised.

## 13. Supervision on social events and excursions

Appropriate adult staffing supervision ratios are considered and set according to the activity type and the age, gender, interests and needs of the students, and set out in risk assessments. As a general rule where activities involve under students aged 16 and 17 attending an adult programme, the ratio is 1:16 under-18s and special provision is made for those students under-18 as required.

**For closed groups under 16**

ON – SITE (In academy + regular local facilities)

Supervision ratios at any one time 1: 15

OFF –SITE EXCURSIONS

Supervision ratios at any one time from 1: 10 to 1: 15 depending on the activity.

**For groups of students under the age of 14 in closed groups**

ON – SITE (In academy + regular local facilities)

Supervision ratios 1: 15

OFF –SITE EXCURSIONS

Supervision ratios at any one time 1: 8 to 1: 15, Students aged 12-14 1:10 to 1:15

Students under 12, 1:8

Provision will be made for these minimum supervision ratios to be exceeded as appropriate in order to ensure the safety and welfare of the students. Risk assessments for adult excursions including students under the age of 18 will address any supervision concerns.

We also accept 16 and 17 year olds in closed groups accompanied by group leaders. In such cases, the ratio is 1:16 with group leaders forming part of the supervision ratio (Group leaders are not to be responsible for students other than those in their group).

At least two supervisory adults (including where appropriate group leader supervising his or her own students) will participate on any off-site Academy-organised activity

For groups with students from different categories the requirements of the youngest age category will normally be applied to the supervision ratio for the group as a whole.

Group leaders are fully briefed on arrival and made clear of their responsibilities. Clear systems of communication are established between group leaders, CEA management and Social activities organisers, with the leaders receiving regular support throughout their stay from management and social activities organisers. Where a group makes its own arrangements for activities outside of the academy, the academy will be made fully aware of the plans and will assess them from a safeguarding perspective

**Specialist Qualifications**

The Social Activities Leaders has first aid training but no other specialist qualifications. Activities requiring specialist qualifications or training (eg kayaking, horse-riding, etc) are out-sourced to external providers who have suitably qualified staff and meet all legal requirements in terms of risk assessments, premises, etc.

**14. Child Trafficking and Sexual Exploitation**

Young people under 18 entering the UK might be at risk of trafficking and possible sexual exploitation. There are a number of precautionary measures that the Academy staff will undertake to assist in preventing this:

- The Academy will be wary of any unusual circumstances in the application process which raises suspicions that a child might be being trafficked into the UK.
- When a child is met at the airport, the Academy will not allow the child to be met by anyone else unless this has been fully agreed and vetted in advance. If a young person under 18 does

not appear for their transfer on arrival, or does not turn at their homestay unexpectedly, the academy will fully investigate and, if necessary, inform the police.

- If any staff or homestay are suspicious that a young person (especially under the age of 18) is being inappropriately approached during their stay in the academy, the police will be notified immediately.

## 15. Personal data and safeguarding

The principle set out in Keeping Children Safe in Education is helpful:

*“Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children.”*

Further information about how the academy manages personal information, and special measures for data held about students under the age of 18, can be found in the Academy’s Privacy Policy.

## PART D: REPORTING CONCERNS

All CEA staff, homestay hosts and suppliers have a legal responsibility to report suspected cases of abuse or allegations of abuse. For CEA staff concerns should be reported as described in the section 'CEA Staff' below. It is not staff's role to investigate or assess whether or not abuse or radicalisation has occurred. CEA staff have a responsibility to pass on concerns to those who can investigate them, so that action to protect the student and others can be taken if necessary.

### Abuse

Abuse is defined as anything that causes significant harm to children and vulnerable adults physically or emotionally. It can be deliberate or unintentional and can take many forms, the list below is not exhaustive:

- Neglect
- Physical
- Sexual
- Psychological i.e. repeatedly being made to feel humiliated, afraid or devalued by others
- Financial or material – i.e. stealing or denying access to money or possessions

Abuse rarely exists as a standalone event that is easily covered by one category. Sexual abuse, for example, is always also emotional abuse as there is always a power imbalance. In most abuse cases, multiple issues will overlap with one another.

Secondary forms of abuse can include:

- Peer-on-peer abuse (under 18s, particularly teenagers can abuse their peers, gender based violence, bullying, cyber-bullying, sexual harassment and violence are examples.
- Teenage relationship abuse if one partner starts to dominate and manipulate their partner
- Child Sexual Exploitation when under 18s receive 'something' (attention, gifts, money, alcohol, drugs) by an exploiter. Young people could potentially be trafficked into the UK for purposes other than learning English
- 'Honour Based' Violence (HBV) to protect the honour of a family and/or community.
- Female Genital Mutilation (FGM), the non-medical, partial or total removal of external female genital organs. This is illegal if done in UK, or if a UK resident is taken overseas to have it done. If you receive a disclosure concerning FGM from a student under 18, it is a legal obligation to report to the police. Staff must report to the Designated Safeguarding Lead.

Abuse can manifest itself in a number of noticeable ways. This may be more difficult to discern in the context of cultural differences. However, here are some possible signs of abuse that may cause concern:

- Signs of physical injury with no satisfactory reason for its cause
- Changes in style of dress attempting to cover up any signs of physical injury
- Changes in behaviour, e.g. being or becoming isolated, eating disorders, poor hygiene, homesickness, not wanting to return to the country of origin, becoming needy or clinging to members of staff or other students
- Fall in standard of work, poor attendance, inattentiveness or disengagement from others both in and outside class
- Asking questions about certain topics (e.g. connected to abuse)
- Drawings or posters showing abuse

- Students voicing concerns about anyone

### Dealing with a disclosure

If a student discloses an alleged incident of abuse to a member of staff, they should follow the 4 R's:

- **Receive** – Do not guarantee confidentiality. Listen rather than question directly. Do not interrupt
- **Reassure** - Offer reassurance without making promises, and take what is said seriously. Alleviate feelings of guilt and isolation, while passing no judgement
- **React** - Do not overreact. Advise that you will try to offer support, but that you must pass the information on. Explain what you have to do and who you have to tell
- **Record** - Record the discussion accurately, as soon as possible afterwards

A member of staff dealing with a disclosure has a duty to report the disclosure.

### Concerns

It is not unusual to have concerns about students for all sorts of reasons. Staff should therefore discuss any concerns they have with one of the Academy's DSPs to clarify their understanding of the student's circumstances.

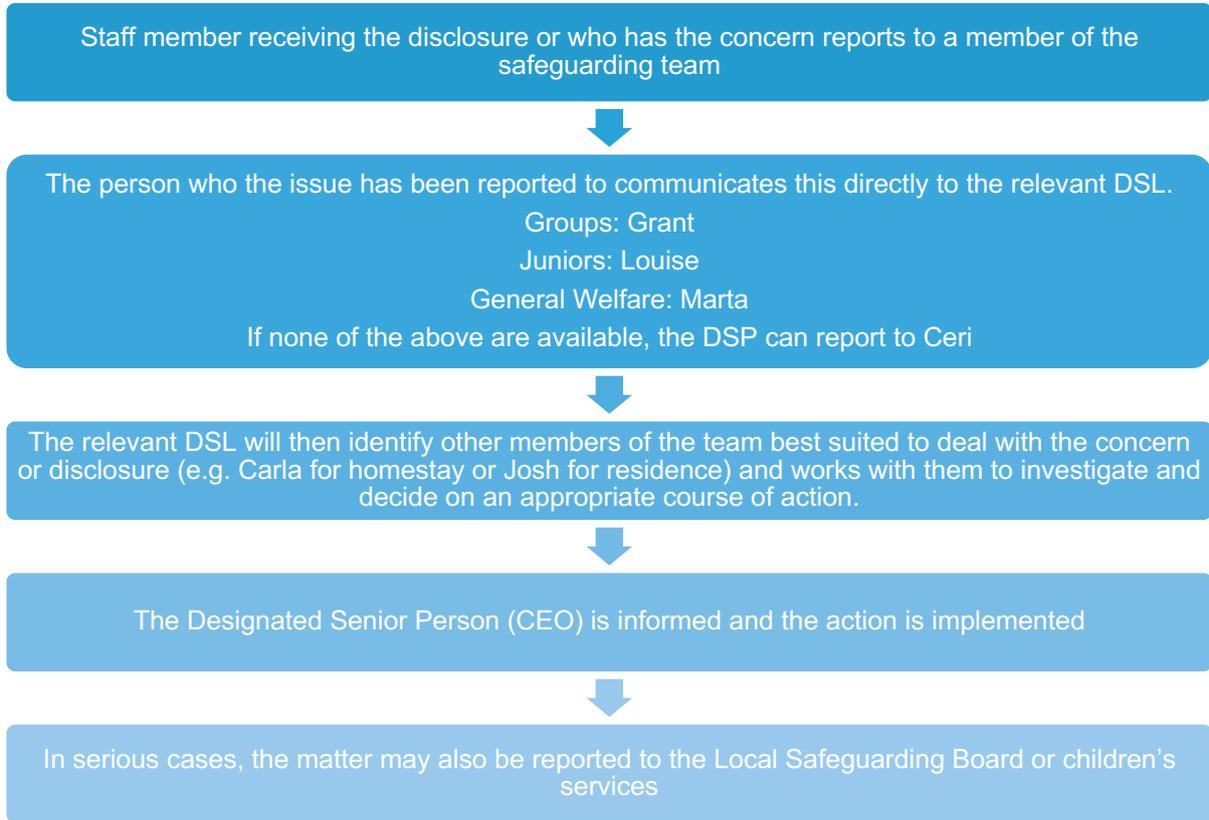
Any concerns no matter how small should be discussed with a member of the safeguarding team. They will then make a decision on how to proceed and may consult other members of the safeguarding team.

If there are still unresolved concerns or specific allegations that may be of a child protection nature, discussions should then take place - without identifying the child in question if necessary - with the front line staff in Children's Social Care or the Safeguarding Unit. Whatever discussions take place, the DSL will:

- never delay emergency action to protect a child from harm, ensuring that they take any necessary action on the same working day
- always record in writing concerns or discussions whether or not further action is then taken

At the close of discussions, there should always be a clear and explicit recorded agreement about who will be taking what action, or that no further action will be taken.

If a member of staff has a concern or deals with a disclosure, the following steps should be taken:



### Record-keeping

It is essential that clear and accurate records are kept regarding all welfare issues.

Reports should be factual and should not include opinions or personal interpretations of the facts presented as it may form part of a criminal investigation.

Reports should be signed, dated and passed, at the latest within 24 hours, to the Designated Safeguarding Person who will keep a copy stored in a secure place.

The DSP will keep written records of concerns about students even where there is no need to refer the matter immediately. All records are kept securely on Google Drive and can only be accessed by members of the safeguarding team and if necessary an official outside agency. These records are kept for at least 3 years.

Any disclosure of abuse from a student or another member of staff must be recorded in writing. This will cover:

- student and staff details
- reason for the concern
- any apparent physical signs of abuse
- an account given to the member of staff of abuse by the child concerned, as accurately as they are able to record it.
- dates and times of incidents
- dates and time of when notes were made.

## PART E: Prevent Policy

### 1. Introduction

Celtic English Academy has responsibility to provide a safe & healthy learning environment for all students and staff but especially for students under the age of 18 and vulnerable adults. As part of this broader context, CEA recognises its responsibilities under the Counter Terrorism and Security Act 2015 to help prevent people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways expressed in this policy document and within the contexts in which we operate.

### 2. Contexts

CEA is a multicultural and international community that actively promotes inter-cultural understanding and encourages an appreciation of the different ways we all live, think and learn. We will endeavour to educate students about acceptance and tolerance of a range of views, that people think differently and believe different things, all of which are acceptable as long as these views and beliefs are reasonable and do not extend to hurting or denigrating those with different beliefs.

Courses at CEA are aimed at people from overseas who have a need to develop their competence in the English language, whether that is for work, future study at a UK university, travel or personal advancement. Our students are primarily adults aged over 18 but we do welcome students aged 16 and 17 and under 16.

Our students come from a wide range of ages, cultures, religions and backgrounds. Our students may study with us for 1 week up to 44 weeks. CEA exists to give all our students the best teaching and learning facilities we can. We are committed to providing students with excellent courses in a warm, friendly and professional environment, as well as caring for every aspect of their stay.

### 3. Definition of Terms

**Radicalisation:** act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Extremism \*: holding extreme political or religious views which may deny rights to any group or individual. Can be expressed in vocal or active opposition to

**Core British values:** including

- democracy
- the rule of law
- individual liberty
- respectful tolerance of different faiths or beliefs.

NB: extremism can refer to a range of views, e.g. racism, homophobia, white supremacism, right-wing ideology, as well as any religious extremism such as islamophobia.

### 4. General principles

The main elements to our policy are:

- strong leadership to ensure that our Prevent Duty is met and that all stakeholders are aware of their obligations
- appointing sufficient and suitably-trained staff to provide support and guidance to stakeholders
- assessment of risks and drawing up an action plan at least on an annual basis

- working with local partners
- education and training for staff, students and other stakeholders
- having clear procedures for reporting and recording concerns about vulnerable individuals, and making referrals

## 5. Designated Members of staff for Prevent

The CEO has overall responsibility for ensuring CEA's Prevent Duty is met and as such has responsibility for reviewing and delivering the prevent risk assessment/action plan, policy and procedures.

Key personnel and responsibilities:

**Senior manager with overall responsibility for Prevent:**

Shoko Doherty (CEO)

**Designated Lead Person for Prevent**

Shoko Doherty (CEO)

Marta Abellan (Operations Manager)

**The Designated Leads cover for each other**

In the absence of the above, the following person can substitute  
Ceri Thomas (DoS) – trained to Safeguarding Specialist (level 3)

**Staff who can deal with day-to-day issues welfare and safeguarding (including Prevent duty)**

Louise Ellis (ADoS) - trained to Safeguarding Specialist (level 3)

Grant Hubbard (Group Manager) – trained to Safeguarding Specialist (level 3)

## Risk Assessment and Management

In order to have an effective policy it is important that all staff including homestays understand the ways in which risks may arise, how warning signs may manifest themselves and how to react when they do.

## 6. Understanding risk of extremism

Staff, students & other adults (group leaders, homestays etc) may arrive at the Academy already holding extremist views. Or, whilst part of the Academy, they may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials via hardcopy or online, inspirational speakers, friends or relatives being harmed, social networks.

People who are vulnerable are more likely to be influenced. Their vulnerability could stem from a range of causes: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime or discrimination, bereavement

### 6.1. Ways to counteract risks

CEA will promote a safe and supportive international environment with clear expectations of accepted behaviours and those, including radicalisation and extremism that will not be tolerated.

CEA will promote inter-cultural understanding and encourage an appreciation of the different ways we all live, think and learn, and core British values of democracy, rule of law, individual liberty and respectful

tolerance of different faiths or beliefs through documents given to students, notices around academy, behaviour towards each other via classes on British culture and via curriculum. Our approach is to educate students about acceptance and tolerance of a range of views, that people think differently and believe different things, all of which are acceptable as long as these views and beliefs are reasonable and do not extend to hurting or denigrating those with different beliefs. Where appropriate, lessons will develop critical awareness and thought to counter accepting extremism without question, especially of online material.

We expect staff and homestays to challenge radical or extremist views in any context (formal or informal). In most situations this would require an immediate response, referring to the international environment of academy, and tolerance expected, then reporting concerns to designated members of CEA staff.

CEA firewalls and group policies for internet and WiFi access are set to prevent access to extremist / terrorist websites and use of social networks to exchange extremist/terrorist views.

Any guest speakers invited to present to staff and/or students are carefully vetted. All notices and material from external people must be approved by the CEO before they can be distributed. Any outside organisations wishing to rent rooms outside Academy hours must personally meet CEA staff before any agreement is reached and must provide 2 references which will be followed up.

Staff and homestays will be encouraged to get to know their students, their home circumstances and friendship groups. Through knowing students well, it is easier to spot changes in behaviour. Staff and homestays will be to be observant and vigilant in noticing any signs of radical or extremist behaviour.

Accommodation & Welfare staff and all staff and homestays will work hard to support any students identified as vulnerable.

## 7. Training

CEA recognises the importance of training in enabling staff and homestays to perform their Prevent duty. For staff, this training will consist of documents, online and face-to-face training to ensure that all staff:

- understand context and expectations of Prevent
- their duty to implement the policy
- understand terminology and risks associated with radicalisation and extremism
- how to identify and support vulnerable students
- ways the academy will counteract the risks
- signs to notice that may cause concern
- know the lead Prevent person and procedures for communicating concerns
- know the importance of their own behaviour and professionalism in
  - o (a) being exemplars of British values and
  - o (b) not discussing inflammatory subjects with students (Code of Conduct).

Training materials will be tailored to ensure that homestay hosts understand the sections of the policy they need to be aware of.

Students and group leaders will be made aware of key parts of the policy:

- understanding terminology
- importance of maintaining a supportive and tolerant society within academy
- what core British values are and why they are considered important
- that they must report any concerns/incidents, and procedure for that.

## 8. Signs that may cause concern

Students talking about exposure to extremist materials or views outside academy. This information must be passed on and reported to the relevant local authority.

- Changes in behaviour, e.g. becoming isolated
- Fall in standard of work, poor attendance, disengagement
- Changes in attitude, e.g. intolerant of differences /having closed mind
- Asking questions about certain topics (e.g. connected to extremism)
- Offering opinions that appear to have come from extremist ideologies
- Attempts to impose own views/beliefs on others
- Use of extremist vocabulary to exclude others or incite violence
- Accessing extremist material online or via social network sites
- Overt new religious practices
- Drawings or posters (e.g. in accommodation) showing extremist ideology/views/ symbols
- Students voicing concerns about anyone

NB: Any concerns relating to a person under 18 are safeguarding issues and should be dealt with by safeguarding staff (if different from Prevent staff) and, where necessary, the LSCB contacted.

## 9. Working with local partners

We work with local Prevent authority to understand their role and the support available (e.g. Channel). The local contacts for Cardiff are:

Carl Davies (County Hall): Tel: 02920 873281  
Mobile: 07742 931475  
[carl.davies@cardiff.gov.uk](mailto:carl.davies@cardiff.gov.uk)

We have developed links with other English language providers in the area who are committed to sharing information on local contacts as appropriate.

## 10. How and when to react to concerns

It is essential that any concern or incident, however small, be reported to a line manager who will follow the appropriate course of action. In all cases these will be dealt with sensitively and carefully with confidentiality assured for the person reporting a concern.

The line manager will then make an assessment of the situation and involve Prevent Lead as appropriate.

In the case that the Prevent Lead is involved, a decision will be made as to whether the matter should be taken further. This will be usually be done where it is believed there is a risk of exploitation by extremists.

Where the Prevent Lead decides that further action is necessary, this may be to seek further advice from the local Prevent team.

In all cases a record should be written up and kept in the confidential file.

## PART F: CODE OF CONDUCT

### 1. Introduction

Our students come from a wide range of ages, cultures, religions and backgrounds. CEA exists to give all our students the best teaching and learning facilities we can. We are committed to providing students with excellent courses in a warm, friendly and professional environment, as well as caring for every aspect of their stay. We understand the importance of our staff in creating such a professional environment and we are committed to their care, training and support. CEA also recognises that it has a responsibility to provide a safe & healthy learning environment for all students and staff but especially for students under the age of 18 and vulnerable adults.

### 2. Purpose, Scope and Principles

The aims of this Code of Conduct are:

- to both support and protect students and staff
- to set boundaries and give clear guidelines on what is expected of CEA 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

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

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

As such, whilst maintaining the identity we wish to have and complying with our statutory and legal obligations, we should be sensitive to different cultural backgrounds and expected behaviours. All students are clients of CEA and should be treated with respect and professionalism. In day-to-day life at Academy, staff can become privy to sensitive, private or confidential information regarding a student. CEA expects all staff to exercise great care with any personal information and to divulge only to relevant staff or to their line manager if they have any concerns for the student.

Even if it were desirable, it would be impossible to write up an exhaustive list of rules prescribing staff behaviour. We trust staff to make professional and common-sense decisions. As a general guideline we would 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 surrounding environment, language and cultural norms. If you have any questions or doubts about points in this Code of Conduct, or matters not covered here, please speak to your line manager for guidance.

### 3. Under 18s (and vulnerable adults)

Safeguarding & Child Protection policies and procedures have been developed and are available on our website, from line managers and provided as part of training. In considering the vulnerability of adults, age is not necessarily the determining factor. It could be said that anyone of any age with a

limited level of English in the UK for the first time is vulnerable so some of the following may equally be relevant to 18+.

This section of the code of conduct is written to give clear and formalised guidance to Academy staff on creating a safe Academy culture for under 18s. This includes protecting both adults and students under 18 from behaviours or actions that might be misconstrued, and to ensure that staff do everything reasonable in their power to ensure the safety and well-being of under 18s studying at the academy.

In all we do, the yardstick we will use is that of adopting behaviours that we would expect a responsible parent to adopt, and treating students under the age of 18 in the way we would wish our own family members under the age of 18 to be treated in a foreign environment. Young people may well look up to staff and look to them for clues about how to behave in a new environment: hence it is important that staff consider this in their behaviour and provide an appropriate role model for them where appropriate. 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.

#### 4. Child protection

We have a legal and moral duty to protect our students from the risk of sexual, physical, financial and emotional abuse, and neglect.

Academy staff are in a position of trust as defined in the Sexual Offences Act 2003. Staff engaged in any form of sexual contact (eg kissing, touching) with students under the age of 18 are breaking the law even though the legal age of consent is 16. This applies to all adults working or volunteering with under 18s.

If staff or other stakeholders are concerned that a colleague or other person working with under 18s is not acting within the letter or spirit of this code of conduct, there is a legal obligation to report this to school management.

#### 5. Interaction with under 18s

The Academy expects staff to behave with common sense to ensure the safety and well-being of young people under the age of 18. Students under 18 will be clearly identified on class lists where they are participating in adult courses. They will also be identified in out of school activities. For the purposes of this code of conduct, here are a few particular areas to consider:

- 1) Staff should avoid situations where they are left alone. If a confidential meeting is necessary, it should be undertaken with a door open close to other staff or adults.
- 2) Staff should be as positive and even-handed with under 18s as possible, using praise where appropriate and ensuring that all of the students are treated equally and fairly.
- 3) 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. Clearly physical chastisement is illegal and any incidence of a member of staff using physical chastisement would result in dismissal and the police being informed.
- 4) Staff should be especially careful in any dealings with under 18s they might have in a social setting outside of the school, particularly when alone. These might easily be misconstrued by the under 18 year old(s) or by others.
- 5) 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 Academy's CEO.

- 6) Any sexual relationship 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.
- 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) Staff should wear their lanyard at all times when working in or for the school. This is so that all students, but particularly under 18s, can identify members of staff

## **6. IT, the internet, social networks and other technology**

While access to the internet and phones are wonderful ways for young people to stay in touch with their friends and family, they also provide opportunities for abuse and inappropriate behaviour. In particular, there are risks to young people through cyber bullying (possibly by their peers), exposure to radical/extremist views, grooming by adult sexual predators, and downloading of illegal or copyrighted materials and possibly computer viruses. The Academy has therefore established the following guidelines:

- 1) Staff should not as a matter of course give out their personal mobile number, email address, Facebook contact details to students, especially to those under 18. The exceptions to this may be if a member of staff is carrying out CEA business – for example, taking a group of students out of Academy and for safety concerns they give all students their number. CEA can provide official email addresses for staff, to receive homework for example. If Facebook is used for CEA business, for example a 'closed group' for an exam course, then set up a separate account and advise your line manager.
- 2) Inappropriate access to websites should be reported to the CEO. Inappropriate websites include pornographic sites, excessively violent videos and games, websites promoting extremist/terrorist views and some age inappropriate social networks and chat rooms. Most inappropriate sites are blocked on the academy's network, but may be accessed by students in a home setting or possibly by bypassing safeguards. Therefore, all staff are asked to be 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 and/or action taken to remove access.
- 3) Where possible, in a homestay access to Wi-Fi should be restricted, particularly after bedtime, to ensure that young students are not distracted and get enough sleep.
- 4) All students are made aware of the school's IT policies at induction and these are displayed prominently in the school and in particular in the computer rooms. Groups of younger learners, for example teens, will have a special session as part of their induction on e-safety.

## **7. Accommodation specific issues**

Please note: all students under the age of 18 are required to stay with a homestay recruited and inspected by the school, or with a close relative or private fosterer arranged by the parents or guardian of the child. In addition to the above guidelines, homestay providers should be aware of the following areas:

- 1) Respect the privacy of the individual 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.

- 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.

## **8. Transport and other contractors**

- 1) All contractors working for the school to transport children and contractors who regularly do work in the school will provide annual written evidence that their staff have been properly DBS checked. If a contractor working in the school is not able to provide this evidence, they will either be supervised or will not be allowed into areas where they might encounter students under the age of 18
- 2) If for any reason a member of staff is required to transport a child in your car or the school minibus:
  - Ensure seatbelts are used, and that children under 16 sit in the back if possible.
  - 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.
  - Ensure you have appropriate insurance cover.

## **9. Staff Dress Code**

Please refer our staff handbook.

## **10. Personal Relationships**

Please refer our staff handbook.

## **11. Publicity and digital content**

In addition to our websites, brochures and promotional materials, digital media has a much greater impact on how the organisation is perceived and 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 also request that any such content that represents the school, should be approved by a line manager and use official CEA channels.

## **12. Socialising with students and clients outside work**

It is part of the nature of our industry that staff, and particularly teaching staff, social organisers and guides, may socialise with students and clients outside of the school setting. In some cases this may be an organised CEA activity. In other cases it may be an informal gathering of, say, 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 an CEA event and as such staff should represent CEA 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. Please see above for guidance with regards to interaction with under-18s.

### 13. Misuse of drugs and alcohol

It would be considered a disciplinary offence for staff or students to be on CEA premises and/or, in the case of staff, carrying out official duties when under the influence of alcohol or non-medically prescribed drugs. If you have good reason to suspect a student of taking/dealing in drugs whether on CEA premises or outside, please advise your line manager who will follow it up through the appropriate channels.

### 14. Harassment and bullying

In order to achieve a safe, warm, friendly and professional environment for students and members of staff CEA 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 CEA has a part to play by ensuring that their own behaviour, whether intentional or unintentional, does not constitute harassment. CEA will take action against inappropriate behaviour which shows lack of respect for others or which leads people to feel threatened (see Student Disciplinary Policy and Procedure).

### 15. Radicalisation and extremism

CEA is a multicultural and international community that actively promotes inter-cultural understanding and encourages an appreciation of the different ways we all live, think and learn. We will endeavour to educate students about acceptance and tolerance of a range of views, that people think differently and believe different things, all of which are acceptable as long as these views and beliefs are reasonable and do not extend to hurting or denigrating those with different beliefs.

While this is unlikely at CEA, 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 Operations Manager's attention so that any action can be considered. This is particularly important if it appears that this person is attempting to radicalise other students with these views. In extreme cases, the Police may need to be notified.

## PART G: POLICY ON UNDER 16 STUDENTS

### 1. Introduction

Our courses and teaching are designed to provide effective training for students who need English for their work, study or travel. We endeavour to treat everyone equally and with respect, understanding that everyone is unique with different needs and different goals.

### 2. Principles

On General English, Junior Summer/Winter programme and Examination courses, we reserve the right to accept students who are 15 where they come as part of a group with a leader who will take responsibility for their welfare outside of class times and during activities. Applications from students outside the published age limit are treated on a case by case basis. CEA will accept these bookings for the following reasons:

- These students will already know other members of the group and will already have studied with them at school in their own country. It would therefore be discriminatory to bar such students from studying with their classmates in the UK.
- If the no U16 rule were applied rigidly on the General English, Junior Summer/Winter programme, Examination courses, there could potentially be U16 students who would arrive in the UK with the rest of the group who would then be barred from attending the course. This would raise obvious welfare issues. It is easier to monitor the welfare of these students within the school environment.

CEA practises safer recruitment. All staff are DBS checked and interview and reference requests explore the organisation's and staff member's responsibilities to younger learners. We also accept students aged 12 to 16 in closed groups. In cases where there are students aged under 16, we will take additional safeguarding measures. It is accepted that it is difficult to apply different rules to groups containing members from different age groups. Groups containing members who are both under 16 and over 16 will be judged on a case by case basis, but in all cases the DSL should be satisfied that all arrangements in place do not compromise the safety of any students under 18.

### 3. Private fostering

Local authority in Cardiff require notification if any person under the age of 16 is placed with a local family for more than 27 nights, and for the homestay family to be registered as a private fosterer. The Academy has a policy of not providing accommodation for any student under the age of 16 for more than 27 nights. Therefore, the Academy does not offer courses to under 16 year olds that require stays of more than 27 nights.

### 4. Procedure for under 16s

The booking will only be accepted if the group is accompanied by a Group Leader.

At the Academy:

- It is explained to Group Leaders pre-arrival and during their induction that relevant Group Leader(s) must monitor, and be responsible for, any U16 student in their group during breaks and lunch times and after lessons finish. (N.B. Common areas of the school are regularly patrolled by Academic Management during these times.)

- Weekly starters highlight the list of all U16 students enrolling on the following week
- As part of their induction on the first morning all U16 students receive additional information about their welfare and ensuring their safety. They are introduced to the Operations Manager and given advice about who to speak to if they have concerns.
- Closed groups of U16 students are required to use the Academy's transfer service which ensures they are assisted with safe arrival and departure, unless it can be demonstrated to the satisfaction of the DSL (and documented) that appropriate alternative safe arrangements are in place.
- Induction/welcome are talks tailored to their group. They may also have separate social activities.
- Groups of students under the age of 16 normally follow a slightly different timetable to main academy students so that break times do not overlap with the adult students who are in the academy at the same time.
- All students under 16 wear orange lanyards so they can be readily identified at all times. (staff: black / 18+: blue)
- It is illegal for young people under 16 to smoke in public, and this will be enforced by the Academy.

#### In class:

- When placing new students into class, the DoS/ADoS will take age as well as level into account.
- Where possible closed classes with under 16s will be placed separate from adult students, in a different building or on a different floor.
- Teachers are made aware of any student who is under 16 (U16 students are clearly marked on class registers with their age and highlighted in yellow).
- Teachers ensure that all class activities, and materials used, are age-appropriate for all class members. Materials refers to course books, supplementary materials, videos, online materials, and any realia brought in by the teacher or other students in the class. The aim is to make sure that U16 students are not exposed to inappropriate materials and where there are 18+ students, they do not feel that they are not studying in an adult class. Unsuitable materials may include, but are not limited to, materials which
  - Contain overly sexual references
  - Contain violence
  - Include the use of language which may cause offence
- With pair and group work, teachers will take account of the ages and maturity of students working together, matching students appropriately and ensuring all students are comfortable with their pair/group partners.
- All students are expected to attend all classes while studying at CEA. Attendance is monitored and a record kept of lateness and absence. If a under 16 student does not arrive to their class within the first 15 minutes, the teacher will report this to reception. Reception/ a member of the operations team will then follow up either directly with the student or via their homestay.
- Classes with students under the age of 16 are not allowed to go on class activities out of the Academy.

#### After school

- A responsible adult who has been vetted through the school's DBS procedures will always be present overnight in a homestay accommodating a student aged 16 or under. The Academy will ensure that students aged 16 and under are not accommodated with other students aged 18 or over.
- Students under 16 can go out unsupervised on Saturdays and Sundays during the day but the host family needs to be informed of where they are going must not go alone
- Students under 16 cannot go out with friends after dinner unless supervised by a group leader.
- Students under 16 can participate in evening activities organised by the Academy (these normally finish by 9.30-10.00pm) or by group leaders. Students must be accompanied home by a group leader or by taxi. Arrangements are in place for ensuring the safe travel of any

students aged 16 and under when returning to their homestay after an evening event. They will return either by taxi, homestay, or by being escorted to the bus station by academy staff.

- A student under the age of 16 who is unwell will not be left unsupervised: if the homestay is unable to care for the student, the student will be looked after in academy.
- Students under 16 or on the Summer/winter programme would normally be placed in a shared homestay address and travel together to academy on public transport, or on foot or a lift from the homestay. If such a student is placed in a single homestay room, he/she will be placed close to other students who can travel back together.
- For students under the age of 16, or any student studying on the Summer/winter programme, the cost of any excursion programme offered will be included in the overall course fee.

#### **5. Additional provisions in place for students under 13 (or for groups containing students under 13)**

The school would only accept these groups in exceptional circumstances agreed by the Chief Executive Officer. Special supervision arrangements are made for students under the age of 13 during break times: usually the group leader will be expected to monitor and be present with these students outside of class time and in particular if they wish to go into the city centre.

Any students under 13 are only accepted in the academy if it is agreed that they will be escorted to and from the homestay by minibus, taxi or by the homestay. The cost of this will be passed on as part of the course fee.

## APPENDICES

### APPENDIX 1 – Reference Failure Procedure (7. Recruitment)

#### Introduction

At the point of employment at Celtic English Academy, all employees are required to provide at least two references. This policy outlines the procedure to be followed should a reference be returned with less than satisfactory answers.

#### Procedure

All discussions relating to references must take place after the selection process has been completed and may involve the Chief Executive Officer and Designated Safeguarding Lead (DSL), where there is a potential safeguarding issues and/or the employee's line manager.

As part of the decision-making process they will normally meet with the individual; the aim of this meeting will be to obtain further information and to achieve a structured, well-managed, open and honest discussion between the two/three parties.

#### Poor reference considerations

The suitability for employment of a person with a poor referenced will clearly vary, depending upon the nature of the job and the details. The decision should be made on the based on the information provided by the referee and after a discussion with the new employee. Dependant on the reason for the poor reference the following job-related factors should be taken into account:

- Does the post involve direct contact with students or the public?
- What level of supervision will the post-holder receive?
- What level of trust is involved? Will the nature of the job present any opportunities for the post-holder to re-offend in the place of work?
- Does the post involve any direct responsibility for finance or items of value?
- Does the post involve any contact with under 18s or other vulnerable groups?

The assessment is also likely to include consideration of the following factors relating to the individual's poor reference:

- The seriousness of the poor reference and relevance to the safety of other employees, students, research subjects, the public etc.
- Relevant information offered by the applicant about the circumstances
- The degree of remorse, or otherwise, expressed by the applicant, and their motivation to change

Having considered carefully and thoroughly all these matters, and obtained any further information from relevant bodies such as the Local Safeguarding Children Board or probation service, a decision can then be taken as to whether the individual should be appointed. If the decision is not to appoint, a letter will be sent to the individual confirming the reasons for this decision.

The above process will also be followed in the event of a poor reference coming to light after the formal offer of employment has been made or during employment. In such cases the company would reserve the right to withdraw the offer of appointment where appropriate or terminate employment.

## **APPENDIX 2 – DBS Failure Procedure (7. Recruitment)**

### **Introduction**

At the point of employment at Celtic English Academy, all employees with substantial access to under 18s must apply for an enhanced Disclosure and Barring Service (DBS) check. If awaiting the outcome of a DBS check or in the rare case that a DBS is not necessary, the employee must fill in a self-declaration form. This policy outlines the procedure to be followed should a check be returned with a conviction or an employee self-declares a conviction.

### **Procedure**

All discussions relating to convictions must take place after the selection process has been completed and will involve the Chief Executive Officer, Designated Safeguarding Lead (DSL) and the employee's line manager. As part of the decision-making process they will normally meet with the individual; the aim of this meeting will be to obtain further information and to achieve a structured, well-managed, open and honest discussion between the three parties.

### **Criminal Record Considerations**

The suitability for employment of a person with a criminal record will clearly vary, depending upon the nature of the job and the details and circumstances of any convictions. The decision should be made on the basis of a risk assessment to enable the applicant's criminal record and circumstances to be assessed in relation to the tasks he or she will be required to perform and the circumstances in which the work is to be carried out. Any convictions which are for a road traffic offence for which the individual received a fixed penalty fine with a maximum of three penalty points should be disregarded, unless driving is a core activity of the post.

The following job-related factors should be taken into account:

- Does the post involve direct contact with students or the public?
- What level of supervision will the post-holder receive?
- What level of trust is involved? Will the nature of the job present any opportunities for the post-holder to re-offend in the place of work?
- Does the post involve any direct responsibility for finance or items of value?
- Does the post involve any contact with under 18s or other vulnerable groups?

The assessment is also likely to include consideration of the following factors relating to the individual's offence(s):

- The seriousness of the offence(s) and relevance to the safety of other employees, students, research subjects, the public etc;
- The length of time since the offence(s) occurred;
- Relevant information offered by the applicant about the circumstances that led to the offence(s) being committed, for example the influence of domestic or financial difficulties;
- The degree of remorse, or otherwise, expressed by the applicant, and their motivation to change;
- Whether the offence was a one-off, or part of a history of offending;
- Whether the applicant's circumstances have changed since the offence(s) was committed, making re-offending less likely;
- Whether the offence has since been decriminalised.

Having considered carefully and thoroughly all these matters, and obtained any further information from relevant bodies such as the Local Safeguarding Children Board or probation service, a decision can

then be taken as to whether the individual should be appointed. If the decision is not to appoint, a letter will be sent to the individual confirming the reasons for this decision.

The above process will also be followed in the event of an unspent criminal conviction coming to light after the formal offer of employment has been made or during employment. In such cases the company would reserve the right to withdraw the offer of appointment where appropriate or terminate employment.