Celtic English Academy

Safeguarding Young People and Vulnerable Adults and Child Protection Policy

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Celtic English Academy

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Section 1 – Introduction

1.1 Context

Celtic English Academy (CEA) is a private language school which offers English language tuition in Cardiff and started trading in 2004. The year-round academy is situated in three Edwardian properties on a quiet street in central Cardiff: 12, 14 and 18 Park Grove. Building 18 is the main building and contains all offices as well as classrooms and reception. Buildings 12 and 14 contain classrooms as well as two student lounges. Entry to 3 buildings is by secure keypad. The academy is close to public transport links including Cathays and Queen Street railway stations (5-minute walk) and bus stops (3-minute walk).

Many 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.

The aim of this policy is to ensure that all stakeholders connected to Celtic English Academy are aware of their roles and responsibilities with regards to safeguarding so as to ensure the health, safety and well-being of under 18 students, young adults and vulnerable adults at Celtic English Academy.

The person with overall responsibility for this policy is Sondrine Sharland.

1.2 Scope

In addition to the year-round centre, CEA offers a Junior Summer Programme which takes place at Monmouth School in South Wales. A separate safeguarding policy and procedures are in place for the CEA Junior Summer Programme.

1.3 Accommodation

The academy places students in a range of accommodation, primarily:

- Homestay,
- Its main student residence: The West Wing.

Only students aged 17 and above are offered the option of residence. Our residence offers students the option of staying in a shared flat or a studio flat. Individual students under the age of 17 are required to stay in homestay accommodation.

In addition to The West Wing and Homestay, CEA also places students in:

- Youth Hostels (closed groups only), and
- Alternative residence accommodation.

1.4 Statement of Policy

We recognise our duties in caring for the welfare of all students – inclusive of those under 18 and vulnerable adults - regardless of race, nationality, sex, gender identity, religious beliefs or sexual orientation.

We believe all children are entitled to protection from harm and recognise the role we play in this.

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.

1.5 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 protect them from harm. Practical safeguarding can include (depending on age of students / situation):

- food and eating
- medical needs
- pastoral care
- supervision and security
- smoking, alcohol and substance misuse

- e-safety
- visitors to site
- preventing radicalisation
- child protection

Child protection	A part of safeguarding: This is the need to protect under 18s from direct harmful behaviour, e.g. abuse.
Under 18	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 English Language Tuition (ELT) provision.
Duty of care	Duty of care is the moral and legal obligation to ensure the safety and wellbeing of others. This applies particularly to 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 themself, or unable to protect themself against significant harm or exploitation. Individuals may be considered to be more vulnerable if they have one or more of the following attributes: ○ Physical (e.g. sight or hearing impediment, mobility) ○ Psychological (e.g. emotional or mental health difficulties) ○ Special needs (e.g. dyslexia, behavioural difficulties) ○ Low level of English ○ Unfamiliarity with the local area and local customs.

Designated Safeguarding Lead (DSL)	A person who has undertaken specialist safeguarding Specialist for designated lead training and has overall responsibility for ensuring this policy is implemented at a practical and operational level. Responsibilities fall into three broad areas: Managing referrals, training, Safer Recruitment and raising awareness. At CEA, this person is **Sondrine Sharland**. In her absence, this role is undertaken by **Marta Abellan.**
Senior Designated Safeguarding Staff (DSP)	A person who has undertaken Specialist safeguarding for designated lead training, and is responsible for managing referrals, training and raising awareness on a day-to-day basis. At CEA, this person is **Louise Ellis.**
Designated Safeguarding Staff (DSS)	Members of staff who have undertaken Advanced safeguarding for designated staff, and are responsible for ensuring safeguarding measures are implemented on a day-to-day basis and maintaining records. CEA has a number of designated safeguarding staff to ensure that there is coverage at all times and details of the staff members can be found in section 1.7.
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.

Throughout this policy, "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.

1.6 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 Safeguarding Basic 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 DSL is within the academy.

At least three staff within the academy are trained to advanced level at any one time to ensure there is always cover in the case of absence.

1.7 Designated Safeguarding team

CEO
Shoko Doherty (CEO) Trained to Basic Location: Management Office, Top Floor, 18 Park Grove Email: shoko@celticenglish.co.uk | Tel: 02920 828287
Designated Safeguarding Lead And Child Protection Officer
Sondrine Sharland (Head Of Operations) Trained to Specialist Location: Finance Office, First Floor, 18 Park Grove Email: Sondrine@celticenglish.co.uk | Tel: 02920 828282
Secondary Designated Safeguarding Lead
Marta Abellan (Operations Manager) Trained to Specialist Location: Operations Office, Ground Floor, 18 Park Grove Email: marta@celticenglish.co.uk | Tel: 02920 828283
Senior Designated Safeguarding Person
Louise Ellis (Assistant Director of Studies) Trained to Specialist Performs the role of Safeguarding Lead if the DSL and Secondary DSL are unavailable Location: Academic Office, First Floor, 18 Park Grove **Email:** louise@celticenglish.co.uk | Tel: 02920 828292
Other Designated Safeguarding Persons – trained to Specialist
Helen Lunney (Director Of Studies) Trained to Specialist Location: Academic Office, First Floor, 18 Park Grove **Email**: helen.l@celticenglish.co.uk | 02920 828292
Other Designated Safeguarding Staff – All trained to Advance

Alice Harper (Accommodation & Groups Officer) Trained to Advance Location: Operations Office, Ground Floor, 18 Park Grove **Email**: Alice.H@celticenglish.co.uk |
Claire Garcia (Accommodation Officer) Trained to Advance Location: Operations Office, Ground Floor, 18 Park Grove **Email**: Claire@celticenglish.co.uk |
Chloe Evans (Student Support Officer) Trained to Advance Location: Reception, Ground Floor, 18 Park Grove **Email**: Chloe.E@celticenglish.co.uk |
Ewan Turner (Senior Teacher) Trained to Advance Location: Academic Office, Ground Floor, 18 Park Grove **Email**: Ewan@celticenglish.co.uk | 02920 828292
Filippo Colamorea (Senior Teacher) Trained to Advance Location: Academic Office, Ground Floor, 18 Park Grove **Email**: Filippo@celticenglish.co.uk | 02920 828292

1.8 Key training responsibilities

- The **Administrator** is responsible for organising initial training and external training.
- The **DSL** is responsible for organising and 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.

1.9 Outside Contacts

Local and regional services can provide professional advice and support with regards to any safeguarding concerns. We recognise that as an English language provider within Wales there are differences to policy and procedures here compared to those in other parts of the U.K.

If a child or adult is in immediate risk of harm or danger call 999 and speak to the police.

Below is a list of key contacts which Celtic English Academy can work with regarding safeguarding.

Organisation	Details	Contact Information
Regional Safeguarding Board: Cardiff and Vale of Glamorgan	• Cardiff and Vale Regional Safeguarding Children's Board (RSCB) • Cardiff and Vale Regional Safeguarding Adults' Board (RSAB) **Cardiffandvalersb.co.uk**	**Tel:** 029 2233 0880 / 029 2233 0883 **Email**: cardiffandvalersb@cardiff.gov.uk
Local Safeguarding Children's Board (LSCB): Cardiff: Multi – Agency Safeguarding Hub (MASH)		**Children's Access Point** **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 Children's Board (LSCB): Vale of Glamorgan Children and Young People's Service		**Family Support Team** **Tel:** 01446 725 202 **Emergency Duty Team:** 029 2078 8570
Local Safeguarding Adults Board (LSAB)	Cardiff Multi- Agency Safeguarding Hub (MASH) Vale of Glamorgan Adult Services Regional Out of Hours	Cardiff Tel: 02922 330880 Vale of Glamorgan: 01446 700111 **Out of hours**: 02920 788 570
NSPCC	If you cannot contact LSCB or are not satisfied with LSCB's advice.	**Tel:** 0808 800 5000 **Under 18's Tel:** 0800 1111

National Society for the Prevention of Cruelty to Children		
Disclosure and Barring Services	Forms and Guidance: https://www.gov.uk/government/publications/dbs-referrals-form-and-guidance	**Tel:** 03000 200 190
Cardiff Central Police Station	King Edward VII Avenue, Cardiff, CF10 3NN. Open 9.00am - 5.00pm, 7 days a week.	**Tel:** 02920 222111

Prevent

South Police contacts and online reporting forms accessed here.

Carl Davies Home Office Prevent Co-ordinator Operational Manager Cardiff	**Local Authority Tel:** 02920 873281 **Mobile:** 07742 931475 **Email:** carl.davies@cardiff.gov.uk
Jennifer Lenczner Home Office Prevent Education Officer Cardiff Local Authority	**Tel:** 02920 873281 **Mobile:** 07811 980031 **Email:** jennifer.lenczner@cardiff.gov.uk
Martyn Thomas Wales Extremism and Counter Terrorism Unit (WECTU), City of Cardiff	**Email:** martyn.thomas@south-wales.pnn.police.uk

1.10 Legal framework

Children Act 1989	Duty to safeguard and promote the welfare of children
Keeping Learners Safe under Education Act 2002 (Welsh Government)	Safeguarding in an educational setting.

Children Act 2004	Safeguarding Children Boards established
Equality Act 2010	Protection against discrimination
Rights of Children and Young Persons (Wales) Measure 2011	Placing the United Nations Convention on the Rights of the Child into law
Social Services and Well-being (Wales) Act 2014	Became law in April 2016; far-reaching changes in social care provision in Wales, based on need.
Counter-Terrorism and Security Act 2015	Prevent Duty: action to counter radicalisation/extremism
Well-being of Future Generations (Wales) Act 2015	7 well-being goals, core aims linked to articles in UNCRC, for everyone living in Wales
Working Together to Safeguard Children 2023	A guide to multi-agency working to help, protect and promote the welfare of children

1.11 Key publications

- 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
- Keeping Children Safe in Education July 2025 (for information - pending publication)

1.12 Industry specific/best practice guidance

- Accreditation UK Criteria, Requirements and Guidance Document (specifically criteria S1 – S8)
- Accreditation UK
- The Independent School Inspectorate's framework (2023)

1.13 Policy review

This policy is reviewed at least annually and is updated whenever legislation or guidance changes or when a named person in the policy changes. The policy may also be updated following inspections and guidance from external bodies.

The last time the policy has been reviewed is recorded at the start of the policy and within the footer, along with a date for review.

1.14 Policy Availability

This policy can be found on the academy's Google Drive in the Staff Policies folder to which all staff have read only rights. The policy is also available electronically on CEA's website.

Section 2: Code of Conduct

2.1 Statement of intent

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.

2.2 Guidelines for all Celtic English Academy staff

2.2.1. Attitudes

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

- We are role models for under 18s in our care
- We hold a position of trust
- 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 / vulnerable adult or may turn into an allegation (e.g. if the child / vulnerable adult seems to become infatuated with a member of staff)

2.2.2. Prohibited Actions

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

- 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 our 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

2.2.3. Ensuring General Well-Being

The following applies to all students; however, staff need to consider the implications of the following to those under 18s and vulnerable adults.

- All students should be dressed appropriately for school and should not wear any clothes that would offend anyone, e.g. clothes that are too revealing or T-shirts with offensive slogans or images. If you see anyone who is dressed inappropriately or is wearing something which may cause offence, please speak to them, or ask a member of staff of the same gender as the student to speak to them.

- While bullying is clearly against the school rules, staff should be particularly sensitive to the possibility of under 18s being bullied. Ensure that all students treat others with respect and don't allow students to talk to one another in an inappropriate way even if they say it's just a joke or they don't really mean it. Please refer to the section on Recognising Abuse under Child Protection below.

- Keep an eye on who under 18s appear to be socialising with. Do they appear to be uncomfortable with the people they are with?

2.2.4. Welfare provision

Looking after the welfare of students is the responsibility of all staff and in most cases, can be attended to by the receiving member of staff. If the student is upset about a specific area of their experience, for instance, their accommodation, then they should be directed to the appropriate member of staff.

If the student is upset about a personal problem, they should be listened to and the matter reported to the DSL/DSP. If appropriate, the student should be signposted to the mental health first aider or to external services they can access through their GP or local charities.

If relevant, their group leader should be spoken to and a monitoring process agreed to make sure someone is keeping them under observation.

2.2.5. One-to-one contact with students

Staff should:

- Not spend excessive amounts of time alone with any student away from others.
- In the event of having to meet with an individual vulnerable adult, child or young person make every effort to keep this meeting as open as possible.

If privacy is needed, ensure that other staff are informed of the meeting and its location. For these meetings there should be two members of staff, one male and one female, present. Staff are strongly advised against meeting any student, especially of the opposite sex, alone in a closed space.

2.2.6. Whistleblowing

The Academy recognises that effective and honest communication is essential if concerns about breaches or failures are to be effectively dealt with and the Academy's success ensured.

This policy applies where a staff member reasonably believes that one of the following sets of circumstances is occurring, has occurred, or may occur within the Academy and that the disclosure is in the public interest.

- A criminal offence has been committed, is being committed or is likely to be committed.
- A person has failed, is failing or is likely to fail to comply with any legal obligation to which he or she is subject.

In the context of Safeguarding, this would be any instance when a member of staff is worried a colleague may be engaging or may have engaged or may be at risk of engaging in any inappropriate or illegal activity with students.

If a staff member believes that any of the above practices are happening in the Academy, they should initially raise the issues with their Line Manager, who will treat the matter in confidence.

It is not necessary to prove the alleged breach or failure has occurred or is likely to occur, it is enough to simply raise a reasonable suspicion.

For more information, please consult the Employee Handbook.

Section 3: Practical Safeguarding measures

3.1 Before Arrival: Parental Consent

A parental consent form is required for all students under 18 years old and is sent by email for completion by a parent or guardian prior to the student's arrival.

The form asks for the following:

Whether or not permission is given for the student to:

- Receive emergency medical or dental treatment if a specialist deems necessary
- Participate in organised excursions
- Participate in organised activities, social, cultural and educational
- Appear in photographs
- Be out unsupervised at the weekend
- Be out with friends after dinner on Sundays to Thursdays
- Be out with friends after dinner on Fridays and Saturdays
- Participate in school evening activities
- Participate in evening excursions (if part of a group with a group leader)
- Travel home on public transport after school evening activities
- Travel home on public transport after school evening excursions

In addition, the form asks parents and guardians to:

- Agree to CEA collecting, storing and processing of data
- Agree that the student has the correct visa, if required, to enter the UK and a valid passport

Additionally, it makes it clear to parents that under 18s are not allowed to have overnight stays away from their accommodation unless there is written permission from the parents and that the under 18 will be supervised by a responsible adult appointed by the parent.

Information on medical conditions, including allergies is requested, as well as permission to give non-prescription drugs and for a medical practitioner to give a general anaesthetic, if necessary.

Two emergency contacts are requested to include telephone number, email address and the relationship to the student.

If under 18s are planning to travel alone by public transport from the airport to their accommodation, then parents need to sign an additional form stating they give permission for their child to do so.

3.2 Before arrival: Informing staff
Under 18s are highlighted on the new starters list for the next week which is sent to all support staff.

3.3 Arrival: Airport Transfers
Under 18s are strongly encouraged to book an airport transfer with Celtic English Academy for their arrival and departure. If an airport transfer is not booked through the academy, additional details are requested as to who will accompany the student, a contact name and number and confirmation of flight details. If homestay or residence has not been booked, accommodation details are also required.

The student is given details about the homestay provider including name, address, telephone number, email and google maps link to the accommodation. We encourage all students to contact their homestay provider prior to arrival to arrange a suitable move in time. If the student will be staying in residence, we provide check in instructions.

3.4 Arrival at the academy
Under 18s are highlighted on the new starters list for new arrivals so that staff are aware of new under 18 students joining the academy.

3.5 First week check
A DSS follows up with the student after one week at the academy to identify any problems in accommodation, class, or elsewhere.

3.6 During their stay: Identification of Under 18s
Under 18s are clearly identified:

- on the registers
- By an orange lanyard for their ID card.

3.7 In the Classroom

While all students are normally expected to attend classes and be on time every day, this is particularly important for under 18s and vulnerable adults, as it is our responsibility to know where they are during school hours. For this reason, if an under 18 or vulnerable adult is absent, teachers must report this to reception so that the student can be contacted.

3.8 Awareness

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.

3.9 Social programme

Events on the social programme take a range of forms, such as afternoon, evening or full-day excursions or activities

All social programme leaders should be aware of the potential risks for the activity they are leading. If in doubt, they must consult the Head of Operations before agreeing to do an event. All activity & excursion leaders are issued with the related risk assessment and instructions related to the Social Programme activity they are about to lead.

On excursions in which students have time to themselves, no-one under 18 should be left to wander around on their own. Students should be told to stay in groups of at least 3. All students should have the activity leader's mobile phone number to call in case of any problems and should be told to call the school emergency number if they are unable to contact.

When using public transport with a group of students the activity leader should ensure students stay together. In the event of there being two activity leaders with larger groups, one should take the lead while the other brings up the rear to ensure no students are left behind. They should do a head count (or if feasible, call out names) at every change of train/bus to ensure no-one has been left behind. Students will be easily identified by their lanyard. When known, inform students which platform/bus stop the group will be using in case they lose the group.

It is the responsibility of the activity leader to be aware of the environment that they are taking students into and to check websites for any potential danger (such as heavy traffic, crowded trains, demonstrations).

Activity leaders should ensure that all students understand where and at what time to meet the group after their free time is over.

Activity leaders are encouraged to take photographs of excursions. Particular attention needs to be paid to this. While all students need to give their consent to their image being used for publicity, photos of under 18s can only be used if their parents have given their consent.

On returning to the academy, under no circumstances should anyone under 18 be allowed to leave the group. It is the responsibility of the activity leader to ensure that all under 18s return safely.

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.

3.10 Unsupervised time

While every attempt is made to encourage students to get involved with academy-related activities it is recognised that there will be times when students are unsupervised. The following provisions are in place to help keep students safe:

- Students are encouraged to participate in school-run excursions at the weekend.
- Hosts are instructed to contact us if an under 18 is not abiding by curfew times. Under 18s have strict curfew times for when they must return to their hosts in the evening.
- If an under 18 tells a host they intend to be away for the night, hosts are asked to contact us immediately.
- All students are issued with the school's emergency number and given information on how to call the police, ambulance or fire brigade during the day-one welcome talk.
- Students are given information in the welcome talk on how to stay safe in Cardiff.

Under 18s are prohibited from making overseas trips to a third country, (for example, a weekend trip to Paris) unless this is as part of an organised group which has travelled here together with their own group leader and the school has been notified in writing in advance.

Usually it is not permitted for under 18s to go away overnight, in special instances, we can allow 17 year old students to do this if accompanied by an over 18 years old student or family member. We must receive parental consent in writing from parents/guardians and have details of their travel and accommodation arrangements. A DSL can override the decision of the parents if they feel it is not safe for the student to travel.

When hosting under 18's, a responsible adult must always be present overnight.

3.11 Electronic contact with students under 18

Electronic contact is defined as the communication of publication of information including images between two or more people using an electronic device. An electronic device in this instance is most likely to be a mobile phone, but may also be a landline, other handheld device, gaming console or software or computers or similar.

Electronic contact may include but is not limited to voice calling or voice messages, text messaging, instant messaging, email, social networking sites, apps, blogs, photos and videos.

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

- Do not connect with under 18s on social media or give them your personal phone number.

- Social media includes but is not limited to Facebook, Snapchat, Instagram, WhatsApp, Viber, WeChat or any other similar site or app.
- If contact with an under 18 is necessary, such as in the event of an emergency if they are missing, consider your language making sure it is simple, factual, unemotive and has no risk of being misconstrued.
- If there is a reason other than in an emergency when you feel it is necessary to contact an under 18, gain permission from the DSP, the Director of Studies or Head of Operations.

3.14 Dealing with problems outside of work hours

Celtic's duty of care extends outside of the opening hours of the academy. All students have the emergency contact number provided to them before they depart for the U.K.

If any member of staff sees an under 18 engaging in inappropriate, dangerous or illegal activity outside of the academy, they should report it to the emergency contact immediately.

3.15 Use of risk assessments

Underpinning the above provision is CEAs use of risk assessments and a comprehensive range of risk assessments are carried out at least annually for review or when needed.

Before engaging in any activity with students, teachers and social programme activity leaders must read the relevant risk assessment and sign to say they have read and understood it.

The fact that an activity has been risk assessed does not mean that there are no risks to students. However, potential risks to students can be significantly reduced when staff follow safety provisions outlined in the risk assessment.

Section 4: Accommodation and Transportation

4.1 School Accommodation

Celtic English Academy offers two main types of accommodation: Homestay and Residence. Students under the age of 18 are required to stay in homestay accommodation. If they are 17 years old, they are also allowed to stay in residence. In addition to these two main types, groups of under 18 students may also stay in a youth hostel provided that they are staying with a group leader and appropriate ratios are met.

Care must be taken by homestay hosts when they have students under the age of 18 present in their homes. Hosts need to be sensitive to the need for students to have a reasonable degree of privacy, particularly in their bedroom and bathroom. Hosts must ensure:

- They dress appropriately when they are outside of their bedroom, particularly when they go to or from the bathroom and insist that students do the same.
- They seek permission from the student before entering their bedroom and must knock and wait before entering.
- They make students aware that they are not allowed to enter hosts' bedrooms.

Homestay providers are given specific guidelines in their handbook on how to manage under 18s, covering issues such as curfews, alcohol, internet restrictions (available from the Accommodation Officer).

4.2 Safeguarding under 18s in homestay accommodation – practical measures

- All new hosts must complete the online modules Safeguarding Basic and Prevent Training. Links are provided in the homestay providers handbook and are checked for completion by the Accommodation Officer.

- Two references are required to assess the homestay provider's suitability to host under 18s. This would be somebody who knows them well but not a family member. We will also request to see their job history in the form of a CV and Identification.

- To update and engage homestay providers, is sent covering all aspects of safeguarding and prevent information containing best practices, news and updates.

- The main household member must have an up-to-date enhanced DBS certificate which must be checked by the Accommodation Officer and renewed every 3 years. DBS Checks must also include any family members over the age of 18 years.

- 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.

- Our guidelines can be lifted in certain cases, when requested, if all parties agree, and have signed the appropriate forms for approval. Under 16s are never accommodated for longer than 28 days in homestay accommodation due to private fostering legislation.

4.3 Safeguarding under 18s in residence – practical measures

- Students who are 17 and 6 months years old upon arrival can stay in residence. Since they will be unsupervised, we ask the parents to agree with the following points when they complete the parental consent form:
    - There is no direct supervision outside of school hours, but an emergency phone number is available 24/7
    - There is no curfew
    - The student will be in contact with over 18s from Celtic, other schools and visitors
    - If sharing a flat, they will be sharing the kitchen and communal areas with others
    - No food is provided (self-catered accommodation) with cooking risks involved
    - Laundry must be arranged by the student using the Residence facilities
    - Welfare meetings to be completed with the student at scheduled time during their stay

- The students are also informed about the above during the welcome presentation for under 18s on their first day.

- The Accommodation Officer is available during school hours should the students need some help or have any questions. The school's emergency phone number is available outside of school hours. The residence staff is in contact with the academy regularly, so they can also inform us of any safeguarding concern.

4.4 Transportation

- **DBS Checks for Taxi/Coach Drivers:** Confirmation is obtained from all taxi and coach companies that they only employ drivers who have been subject to appropriate Enhanced DBS checks.

- **Approved Transport Providers:** Only used pre-approved transport providers, who meet our safeguarding criteria, are used for transporting U18s. Regular reviews are conducted to ensure continued compliance.
    - Request notifications of any safeguarding concerns which arise

- **Use of Staff-Owned Vehicles**
    - Staff may only transport U18s in their personal vehicles under exceptional, pre-approved circumstances. In such cases, staff must:
    - Have business use car insurance
    - Hold a valid, clean driving licence
    - Have undergone a satisfactory Enhanced DBS check
    - Never transport a child alone unless in an emergency and with senior management approval.

- **Code of Conduct for Transport:** All staff and drivers are expected to follow a transport code of conduct, which includes maintaining professional boundaries, not using mobile phones while driving, and ensuring seatbelt use.

Section 5: Child Protection

5.1 Definition

Child protection means protecting children from abuse. Celtic English Academy uses the definition of abuse adopted by the British Council and commonly used by the World Health Organisation:

'Child abuse' or 'maltreatment' constitutes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship of responsibility, trust or power.'

Abuse is also defined by inflicting harm or by failing to act to prevent harm (*Working together*, 2013). It can be inflicted by a child to another child as well as an adult to a child.

5.2 Introduction
Celtic English Academy recognises and is committed to its child protection duties, protecting children from direct harmful behaviour or abuse. We recognise our duties in caring for the protection of all students under 18, regardless of race, nationality, sex, gender identify, religious beliefs or sexual orientation.

Through training, all staff are aware of the recognised types of abuse including neglect, physical, sexual and psychological and how the signs of these can present themselves.

All staff are trained in awareness of child protection as part of their induction. The Head of Operations has overall responsibility that this is in place, as part of their DSL responsibility.

5.3 Children and young people
Celtic English Academy ensures it provides its young learners with the information they need in order to recognise how to access help if they need it and who are the best people to ask for help from. This includes how to identify Celtic staff, first aiders, the emergency contact number and, if present, group leader contact information.

5.4 Parents
Celtic English Academy needs to assure parents and guardians that they are making an informed choice when placing the safety and welfare of their child temporarily in our hands.

We do this by providing a clear and accessible Safeguarding policy, available for all to download via our website. There is also a dedicated page on our website which explains that level of care that parents can expect of under 18s.

5.5 Staff
As a part of Safeguarding training, all staff are aware of their responsibilities under Child Protection legislation and as employees of our organisation. We ensure we equip them for this with Basic Safeguarding training during their initial induction and training at least annually with a DSP.

5.6 Visitors to Celtic English Academy

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 reception.

Visitors are given visitor lanyards to identify them, and they are asked to sign in and out of the visitor book on arrival and departure. In addition, visitors are wherever possible, escorted throughout the premises.

5.7 Third party organisations

Celtic English Academy recognises our responsibility to ensure the organisations we work with uphold our values and share our commitment to safeguarding children. As such we try wherever possible to work with companies that can evidence this, and where this is not possible, we share our expectations with them through our Safeguarding Policy.

5.8 Child Protection Officer

The Designated Safeguarding Lead is the Child Protection Officer and is responsible for handling any concerns, allegations or incidents. The Designated Safeguarding Person deputises the DSL in their absence. Please see the Designated Safeguarding Team staff list for more information.

Section 6 – Dealing with disclosures

6.1 Procedure for reporting allegations or suspicions of abuse

Celtic English Academy has a clear procedure for reporting allegations or suspicions of abuse that is made known to all staff.

6.2 Responsibility of staff to report

Celtic English Academy staff are advised to always raise any disclosure of abuse or allegations of abuse to the Designated Safeguarding Lead without hesitation or delay.

It is not for a member of staff to pass judgement on any disclosure of abuse or allegation; their role is to pass on any and all disclosures or allegations in confidence and to take them seriously.

6.3 Guidance on handling a disclosure from a child

Child abuse is a difficult subject that can be hard to accept and even harder to talk about. Children who are abused are often threatened by the perpetrators to keep the abuse a secret. Thus, telling an adult takes a great amount of courage.

All members of staff should be prepared to receive a disclosure. They may not always be part of the Designated Safeguarding Team.

Children may find it difficult to deal with a lot of issues, including the fear that no one will believe them. So, care must be taken to remain calm and to show support to the child throughout the disclosure phase.

If a child has started to disclose, you should allow them to continue to talk without interrupting using the following guidance.

The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

Steps	Actions	Dos	Don'ts
Receive 	Listen to what is being said without displaying shock or disbelief.	✓ Accept what is being said without judgement. ✓ Take it seriously. ✓ Make an attempt to ensure a safe space is created for disclosure (quiet, away from immediate others) whilst also making sure the meeting is visible and known (tell another member of staff 'I am having a meeting with a student').	× A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down.
Reassure 	Reassure the child, but only so far as is honest and reliable.	✓ Reassure the child that they did nothing wrong and that you take what is said seriously. ✓ Tell the child that you will need to tell some people, but only those whose job it is to protect children. ✓ Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.	× Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". × Don't promise confidentiality – never agree to keep secrets. You have a duty to report your concerns.
React 	Listen quietly, carefully and patiently.	✓ Do ask open questions like "Is there anything else that you want to tell me?" ✓ Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English.	× Do not assume anything – don't speculate or jump to conclusions. × Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own

		✓ Refer directly to the named child protection officer or designated person in your organisation (as set out in the organisation's child protection policy).	words what happened, but don't ask leading questions. × Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and whom you have to talk to. × Do not discuss the case with anyone outside the child protection team.
Record 	Make some very brief notes at the time and write them up in detail as soon as possible.	✓ Record the date, time, place, words used by the child and how the child appeared to you – be specific. ✓ Record the actual words used; including any swear words or slang. ✓ Record statements and observable things, not your interpretations or assumptions – keep it factual.	× Do not destroy your original notes in case they are required by the Court.

6.4 Further 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 person who heard the disclosure must fill in the Concern, Disclosure and Allegation Form.
- The priority of the DSL is to 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, the academy's disciplinary policy will be employed whilst ensuring that they receive support as an employee in consultation with the academy's external HR consultancy firm.
- 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

6.5 Review of allegations

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.

6.6 Differentiating between a concern and danger of significant harm

It is essential that all staff know the difference between safeguarding and child protection, or abuse and that most of what ELT has to deal with is safeguarding.

- A concern (safeguarding) should be raised with the DSP in a timely manner – ideally the same day, but there is no danger of immediate harm.
- If there is a situation where an under 18 may be in immediate danger of significant harm (abuse) then the response should be immediate. The police should be called first, before alerting the DSP.

The speed of reaction required for significant harm or abuse is faster than for a concern/safeguarding, however, concerns may turn into danger of significant harm if not attended to promptly.

6.7 Record keeping

Records

All records, information and confidential notes should be kept by the Designated Safeguarding Lead in secure electronic files. Only the Chief Executive Officer, Director of Studies or another nominated senior manager and the Designated Safeguarding Lead and Designated Safeguarding Persons will have access to these files, and only when necessary.

In any case where an allegation is made, or someone in Celtic English Academy has concerns, a record should be made. Details must include, as far as practical:

- Name of vulnerable adult, child or young person
- Age
- Home address (if known)
- Date of birth (if known)
- Name/s and Address of parent/s or person/s with parental responsibility
- Telephone numbers if available
- Is the person making the report expressing their own concerns, or passing on those of somebody else? If so, record details
- What has prompted the concerns?
- Include dates and times of any specific incidents
- Has the vulnerable adult, child or young person been spoken to?
- If so, what was said?
- Has any individual been identified in the allegation?
- If so, record details
- Who has this been passed on to, in order that appropriate action is taken? E.g. CEO, DSL, DSP, Head of Operations, Operations Manager, Director of Studies, local social services, police, etc.
- Has anyone else been consulted?
- If so, record details
- Action taken.

6.8 Information Sharing
Sharing information regarding child protection and confidentiality

Information sharing is essential for effective safeguarding and promoting the welfare of children and young people. When sharing information about a child Celtic English Academy staff will consider the following consideration “whether sharing information is likely to support the safeguarding and protection of the child”.

If yes, it should be:

- Necessary and proportionate
- Relevant
- Adequate
- Timely

- Secure
- Recorded

Information sharing surrounding Child Protection is on a 'need to know' basis. A member of staff who becomes aware of any child protection information should only share this with the Designated Safeguarding Lead or Designated Safeguarding Person.

Child protection information should not be shared with anyone else, including other colleagues, friends or members of the family.

Confidentiality for both the victim and the accused must be upheld.

Under the GDPR and Data Protection Act 2018, information may be shared without consent if there is a lawful basis to do so, such as where safety may be at risk such as in the case of suspicion of abuse.

A record of the decision must be kept and the reasons for it – whether it is to share information or not. If information is shared, then a record should be kept of what has been shared, with whom and for what purpose.

Department for Education document on Information Sharing; Advice for practitioners providing safeguarding services for children, young people, parents and carers (May 2024)

6.8 If an adult is accused

It is the duty of Celtic English Academy staff to disclose cases of abuse or allegations of abuse to the Designated Safeguarding Lead or Designated Safeguarding Person without delay.

It is NOT for staff to decide whether a suspicion or allegation is true. All suspicions or allegations of abuse must be taken seriously. If a member of staff has suspicions, they should contact the Designated Safeguarding Lead or Person in confidence. If a child starts to talk to the staff member directly, they should allow the child to continue talking following the guidelines above in Procedure for reporting allegations or suspicions of abuse.

It is important to ensure that the child is away from any possible harm. That may require changing the accused adult's work duties or accommodation house if they are a member of staff, or even requiring them to leave the school while the investigation takes place. At all times the Director of Studies and the Operations Manager will be kept informed of events and the Designated Safeguarding Lead will decide on when it is appropriate to involve the Cardiff and Vale of Glamorgan Regional Safeguarding Board.

Tel: 029 2233 0880 / 029 2233 0883

Email: cardiffandvalersb@cardiff.gov.uk www.cardiffandvalesb.co.uk

6.9 Procedure if the DSL or a senior manager is accused

If an accusation is made against the DSL, the matter must be reported to a senior manager (The Chief Executive Officer or the Director of Studies) immediately. If none of these are immediately on site, it should be reported to another member of the Designated Safeguarding Team who will follow the procedure outlined above.

If an accusation is made against a member of the Senior Management Team, the DSL will follow the same procedure but keeping at least one other member of the Senior Management Team informed.

6.10 Accusations against children

It should be recognised that abuse can come from children as well as adults and it is possible that a student under the age of 18 may be accused of abuse against another child. In such a circumstance it is important that the accused is recognised as being vulnerable by being under 18 and must be given all required support by a member of the Designated Safeguarding Team.

Section 7 – Recognising Abuse

7.1 Types of abuse

There are four main categories of abuse and neglect:

- physical abuse
- emotional abuse
- sexual abuse
- neglect

Each has its own specific warning indicators, which you should be alert to:

Sexual Abuse	Emotional Abuse
Definition	**Definition**
Sexual abuse is any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is	Emotional abuse is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development.

wrong. Sexual abuse can have a long-term impact on mental health.	
Sexual Abuse: Examples	**Emotional Abuse: Examples**
Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children. Sexual Offences Act 2003 states that any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law (even though legal age of consent is 16).	Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child's peers.
May present with any or all of the following:	**May present with any or all of the following:**
● 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	● Delayed physical or emotional development ● Shows extreme passivity or aggression ● Sudden speech disorders ● Overreaction to mistakes or continual self-depreciation ● Neurotic behaviour (rocking, hair-twisting, self-mutilation) ● Signs of radicalisation (see the academy's "Prevent policy" for further information)

Physical abuse	Neglect
Definition	**Definition**
Physical abuse is deliberately physically hurting a child.	Neglect is a pattern of failing to provide for a child's basic needs.
Examples	**Examples**
It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child.	whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in the serious impairment of a child's health or development.
May present with any or all of the following:	**May present with any or all of the following:**
● 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	● Often hungry; may beg or steal food ● Badly dressed in clothes that need washing ● Poor appearance and personal hygiene; unwashed, hair not brushed ● Lacks need medical or dental care ● Often tired ● Might abuse alcohol or other drugs

Key Abuse Awareness Points:

- Concerns reported immediately to the DSL
- No confidentiality promised to students disclosing abuse
- Clear records maintained and reviewed

Child Sexual Exploitation (CSE)

- Involves manipulation or coercion into sexual activity, often for rewards
- Signs: older friends, secrecy, gifts, absent from class and activities

Child Criminal Exploitation (CCE) / County Lines

- Children used in crime, especially drug trafficking
- Signs: unexplained money, multiple phones, fear of police

Child-on-Child Abuse (Bullying & HSB)

- Includes bullying, sexual harassment/assault, and harmful sexual behaviour (HSB)
- All incidents treated seriously and reported

Honour-Based Abuse (HBA) & Forced Marriage

- Abuse linked to family or cultural honour. May involve threats, control, or forced marriage
- Signs: anxiety, restricted freedom, sudden travel plans

Female Genital Mutilation (FGM)

- Illegal; must be reported to the police if disclosed or known
- Signs: talk of ceremonies, travel abroad, withdrawal from activities

Section 8 Recruitment and Training

8.1 Safer recruitment

Celtic English Academy recognises the need that one of the keys of safeguarding is to ensure that when staff are recruited thorough checks are undertaken to assess their suitability to work with children, young and vulnerable adults. It also recognises the needs for and benefit of training new staff as well as ensuring staff are retrained on a regular basis.

8.1.1 Terminology related to safer recruitment

Safer recruitment	Recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children; this is an essential part of safeguarding. The robust screening of applicants is proven to act as a deterrent for offenders seeking employment with access to children in order to harm them. Training is widely available (see below).
Regulated activity	The term most commonly used to describe roles where a suitability/criminal records check is required by law – the Accreditation UK Handbook uses the phrase 'roles involving responsibility for or substantial access to under 18s'. In broad terms regulated activity is any position that has direct contact with children, or a position which manages staff who work with children. Any person that is engaged in 'regulated activity' as defined by the Safeguarding

	Vulnerable Group Act 2006 (England & Wales) and parallel laws in Scotland and Northern Ireland requires an enhanced disclosure check. This also applies to existing employees who move from a post that is not regulated to one that is. **Regulated activities most applicable to ELT providers are:** ● Teaching ● Leisure programme supervision ● General care or supervision (e.g. by a group leader, homestay host or residential staff). when they are carried out frequently (once a week or more), intensively (four times or more in a 30-day period) or overnight. Regulated activity also includes any activity of any kind carried out by an individual visiting a school frequently or intensively, for or in connection with the school, and which gives the individual opportunity to have unsupervised contact with children.
Suitability checks	**Checks made to identify any known reasons a person would be considered unsuitable to work with under 18s, such as criminal records checks.** **In the UK, there are three primary criminal record disclosure services:** ● DBS (Disclosure and Barring Service), ● Disclosure Scotland ● AccessNI. All services provide parallel checks as they conduct searches through police records (the Police National Computer and other data sources) and maintain the barred lists for individuals assessed as unsuitable to work with children and/or vulnerable adults. The DBS cannot currently access criminal records overseas. **There are four types of checks in the UK:**

	• **Basic** – checks for unspent convictions only (available through Disclosure Scotland). • **Standard** – checks for spent and unspent convictions, cautions, reprimands and final warnings. • **Enhanced** – includes the same as the standard check plus any additional information held by local police that is reasonably considered relevant to the workforce being applied for (adult, child or 'other' workforce). ('Other' workforce means those who don't work with children or adults specifically, but potentially both, e.g. taxi drivers. In this case, the police will only release information that's relevant to the post being applied for.) • **Enhanced with list checks** – this is like the enhanced check but includes a check of the DBS barred lists. Generally, it can take about eight weeks to get a DBS check, but it can take considerably longer at times of higher demand.

8.1.2 Recruitment
Stage 1: Job Descriptions, Advertising, Information to Applicants, Applications, References

Recruitment materials for roles will include reference to the organisation's commitment to safeguarding, and inform applicants that:

- Details of safeguarding responsibilities as part of the role
- Enhance DBS mandatory as part of employment
- 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

Stage 2: Interview Stage

At the interview stage, for appropriate roles (e.g. summer activity leaders), questions on dealing with problems specific to children are asked.

Stage 3: Offer of employment

Upon recruitment, references are followed up and an application made for an enhanced DBS check, job offer 'subject to receipt of a satisfactory DBS check'. At this stage a barred person check and/ or an overseas police check may also be carried out.

8.1.3 Training
Induction

Upon induction, staff members are:

- Made aware of the safeguarding policy and the DSSs
- Requested to undertake Basic 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 missing students from class (teachers only)

8.1.4 Delayed DBS Checks

The DBS check can sometimes take a while to be returned, under these circumstances, the following steps should be taken:

- References should be scrutinised again and followed up with a phone-call to check their reliability
- Additional references may be requested
- A barred list check should be performed to identify if the individual has been barred from working with children
- Where appropriate an overseas police check should be sought
- The individual should be risk assessed using the pro-forma in appendix 1 which should be personalised for the individual
- The individual should be allocated duties which do not involve supervision of under 18s on their own
- The individual should be allocated a workspace with other members of staff who have been DBS checked
- The individual may be restricted from certain activities/ areas of the academy in which under 18 students may be present.

8.1.5 Failed DBS checks

In the case that a DBS check is failed, the DBS Failure Policy should be followed:

Step 1: The nature of the offence should be considered. If it relates to an offence involving children or raises concerns about the suitability of the individual to work with children, young or vulnerable adults then employment should not be continued, or the job offer should be rescinded.

Step 2: If the offence is not one which involves children or raises concerns about the individual's suitability to work with children, young adults and vulnerable adults, the following job-related factors should be taken into account through a risk assessment approach outlined in checklist in appendix 2.

- 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 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)
- The degree of remorse, or otherwise, expressed by the applicant, and their motivation to change
- Whether the offence has since been decriminalised

The full checklist can be found in appendix 2.

Step 3: 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 to continue employment, then a risk assessment must be undertaken.
- If the decision is not to continue employment, a letter will be sent to the individual confirming the reasons for this decision.

The above process will also apply 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.

8.1.6 Record Keeping

There is a central database of enhanced DBS checks and their issue dates for all staff, including information on the level of certification and date of training completed and expiry.

8.1.7 Failure to renew or complete DBS check

All staff working at CEA and any host provider must hold a valid and up to date Enhanced DBS check throughout their employment and whilst actively hosting. This is to maintain a safe learning environment. DBS checks are a non-negotiable condition of employment and Hosting.

Staff and Hosts will be notified in advance of a renewal date with clear instructions for completion.

Failure to renew or complete a DBS check will result in the following actions:

1. When refusal or non – compliance is identified, this will be escalated to the DSL and Senior Management Team.
2. Non-completion or delay in renewing a DBS check will result in immediate suspension from any role involving direct contact with learners until the check is completed and verified.
3. Refusal to complete a DBS renewal will be treated as a serious breach of safeguarding policy and may be considered gross misconduct, potentially leading to disciplinary action, up to and including dismissal.
4. No staff member or Host Provider may continue in any regulated activity or unsupervised learner-facing role without a valid DBS clearance.

8.2 Training

- The DSL is responsible for ensuring the training of staff need to be trained to Basic Level and to ensure that ongoing safeguarding training is arranged in-house. The DSL works in conjunction with the DoS in ensuring that training takes place for teaching staff and the accommodation officer for ensuring that training of homestay hosts takes place. The Chief Executive Officer is responsible for ensuring that the training needs of the DSL and secondary DSL are met.

- The DSL is responsible for ensuring that safeguarding training is refreshed every year as a minimum.

- DSL will identify staff who may also need to be trained to Advanced or Specialist. Once these needs are identified, external training is arranged by the Administrator.

Minimum levels of training required

Level	**Who**
Basic	All staff who have substantial access to under 18s are required to undertake Basic training online courses and attend in house training.
Advanced	All staff who are required to act as Designated Safeguarding Staff.

Specialist	The DSL, secondary DSL, Senior DSP and DoS

Maintaining Awareness

A ‘Safeguarding Awareness’ poster is displayed in each of the three buildings to communicate to all staff and students who the DSSs and who the primary and secondary DSL are what to do if faced with a concern, allegation or disclosure.

Training of 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.

Section 9 - Online safety for students

9.1 E-Safety Advice

Using the internet and other technology is a useful way for students to practise their English. However, there are also some dangers involved in using the internet. We provide these rules for our students to make sure that they stay safe online:

- Do not disclose any personal information
- Remember that once information or photographs are posted online, they can exist forever
- Although you may post something for your friends to see, the whole world may end up seeing it
- If you receive inappropriate pictures or messages by text or email that make you uncomfortable, this is cyberbullying, NOT a joke
- If someone is sending you inappropriate texts, messages, emails, or photos, tell a member of staff
- Remember that people you meet online may not be who they say they are
- Never access any illegal or inappropriate sites
- Try not to spend too much time on the internet as this can be bad for your health
- You are not advised to view or share extreme political material.

Section 10 – Prevent

10.1 Introduction to Prevent

Prevent is a government strategy to reduce the likelihood of people becoming involved in violent extremism and/or in supporting terrorism. Prevent applies to all forms of extremism; racism, far-right ideology, religious, homophobia and it involves everyone (staff, students, homestays).

The Prevent duty is an important tool in safeguarding learners. Prevent in Wales is coordinated by the Wales Extremism and Counter Terrorism Unit (WECTU).

Celtic English Academy understands its responsibilities under the Counter Terrorism and Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways shown below.

We have always recognised our duties in promoting a multicultural environment where respect for and tolerance of others' beliefs is required.

10.2 Responsibilities

- Ensuring Prevent Duty is met lies with Sondrine Sharland (Head of Operations).
- For the Prevent risk assessment/action plan and policy lies with Marta Abellan (Operations Manager) as Prevent Lead.
- When the Operations Manager is away, responsibility is passed to Helen Lunney (Director of Studies).

The duties of the named staff members are as follows:

- Ensure effective delivery of the Prevent risk assessment
- Ensure effective delivery of the Prevent action plan
- Ensure effective delivery of the Prevent policy as outlined in this document.

This policy is subject to annual review by the staff members named above. However, all related adults are welcome to comment and make suggestions for the policy at any time.

10.3 Sources

- Prevent Duty Guidance for Further Education Institutions in England and Wales – March 2015
- Revised Prevent Duty Guidance for England and Wales – 2023
- Revised Prevent Duty Guidance for England and Wales Information about Prevent e-learning training package published. - March 2016
- *Industry specific/best practice guidance*
- The Prevent Strategy – Guidance for English UK member centres – November 2015

10.4 What we do
Working with local partners

We work with local Prevent authorities 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

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

10.5 Understanding terminology

We use the following definitions of terminology related to Prevent duty and are committed to transmitting these definitions to staff, students, homestays, group-leaders and any other adults involved in the school:

Radicalisation	An act or process of making a person more radical or favouring extreme or fundamental changes in political, economic or social conditions, institutions or habits of 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 (see below). Extremism can refer to a range of views e.g. racism, homophobia, right-wing ideology, any religious extremism.

Core British values	Democracy, the rule of law, individual liberty, and respectful tolerance of different faiths or beliefs.

10.6 Understanding the risk of extremism

We understand that the following situations can cause extremism to arise and are committed to transmitting knowledge of these risks to all staff involved in the school:

- Staff, students and other adults (group leaders, homestay providers, etc.) may arrive at the school already holding extremist views.
- Whilst staff, students and other adults are attending the school they may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials (hardcopy or online), inspirational speakers, friends or relatives being harmed, social networks, etc.
- People who are vulnerable are more likely to be influenced. Vulnerability could stem from a range of causes, including loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime or discrimination, and bereavement.

10.7 Counteracting risks

In order to minimise the risk of extremism we are committed to the following:

- Promoting a safe and supporting international environment via clear expectations of accepted behaviours and those that will not be tolerated (including radicalisation and extremism).
- Promoting core British values through notices around the school, discussions on British culture and traditions on arrival and via curriculum. We do this to educate how things are in the UK, as we appreciate that views may be different in different countries.
- Countering acceptance of extremism without question, especially of online material.
- Challenging radical or extremist views in any context, formal or informal, via stated procedures. This challenging should take place immediately and reference should be made to the international environment of the school, stating that tolerance is expected. Any serious concerns should be reported.
- Being ready to react when particular world or local events cause upset and there is a greater likelihood of conflicting feelings being expressed.

- Having clear rules on accessing extremist/terrorist websites and on using social media to exchange extremist/terrorist views.
- Ensuring that staff and homestay providers are encouraged to get to know students, their home circumstances and friendship groups, therefore making it easier to spot changes in behaviour.
- Ensuring that staff and homestay providers are observant and vigilant in noticing any signs of radical or extremist behaviour.
- Working together with all staff and homestay providers to support any students identified as vulnerable.

10.8 Training and awareness

Celtic English Academy understands the importance of training and is committed to making all staff, students, homestay providers, group leaders and sub-contractors aware of their Prevent duty. This is done by:

- Ensuring that all members of staff complete online Prevent training
- Staff training throughout the year to include Prevent information:
    - Context and expectations, their duty to implement the policy
    - Ideas on how to promote core British values and critical awareness
    - Terminology and risks associated with radicalisation and extremism

10.9 How to identify and support vulnerable students

Signs that may cause concern

We recognise the following as signs that may cause concern:

- Students talking about exposure to extremist materials or views
- Changes in behaviour, e.g. becoming isolated
- Fall in standard of work, poor attendance, disengagement
- Changes in attitude, e.g. intolerant of differences/having a 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 materials online or via social network sites
- Overt new religious practices

- Drawings or posters (e.g. in accommodation) showing extremist ideology/views/symbols

How and when to react to concerns

Celtic English Academy is committed to ensuring that all adults involved in the school know who to contact (and how to contact them) in the event of a concern. All adults should be encouraged to report any concern or incident, however small, and reassured that all concerns will be dealt with sensitively and carefully.

All concerns will be dealt with promptly and confidentially by one of the three named staff members in this policy. The contact at the local authority will be informed and records kept of all correspondence.

Appendix 1: Risk Assessment

Risk Assessment for Staff who are awaiting DBS clearance

Identifying the hazards-assessing the risk	Risk rating	**Control measures – reducing the risk**	Outcome
Staff have been working abroad which causes difficulties in the DBS checking process			
Offences abroad have not been taken into consideration	Medium	Request a Police Check from the country in which the candidate/ employee has been working	Low
The candidate/ employee does not have the requisite documents to carry out a check	Medium	Carry out a Barred List (List 99) check	Low
Teaching – Classrooms			
Teacher has exclusive access to under 18 students	Medium	Deploy teacher against adult classes	Low
	Medium	If it is not possible to deploy teachers against adult classes, ensure that there is another member of staff located in close proximity to the classroom who has passed the vetting procedure.	Low
Outside Class times			
The member of staff may try to access student accommodation	Medium	Brief staff members involved that they are not to access student flats/ rooms. Ensure the staff member does not have access to any keys to enter any flats.	Low
The member of staff may have access to individual students during social activities.	Medium	Ensure students participate in groups during social activities. Ensure members	Low

The member of staff may have access to students who are unwell and confined to their bedrooms during activities or need medical attention.	Medium	of staff who have fully passed vetting procedures are part of the activity so that the member of staff who is waiting for clearance is not working on his/ her own. Do not allocate these duties to the staff member.	Low
Breaktimes			
The staff member could have individual access to under 18 students during break times.	Medium	Ensure vetted members of staff are available during break times and any unvetted members of staff are not left unsupervised during break times.	Low
Additional Risks to Assess			

Appendix 2: Full DBS Failure Checklist

DBS Failure: Process checklist

No	***Vulnerability/Risk Area***	***Answer from candidate***	***Evidence to be relied upon to support this decision***	***Initial***
1	**Leadership** Are the Secretary/Line managers/DSL aware of DBS Outstanding and Failure Procedure and their responsibilities?			
2	**References** Have the appropriate references been obtained and scrutinised?			
2a	**References** Are the references acceptable? (Any reference to the employee not suitable for working with Under 18's?)			
3	**Self-Declaration** Was the employee open and honest concerning any convictions? Spent or unspent.			
4	**DBS/List 99 Result** Does the conviction relate to children? Yes – Terminate employment/Withdraw offer of employment No – Continue with risk assessment			
5	**Contact** Does the post involve direct contact with students or the public?			
6	**Supervision**			

	What level of supervision will the post-holder receive?			
7	**Trust** 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?			
8	**Financial/Value** Does the post involve any direct responsibility for finance or items of value?			
9	**Under 18s** Does the post involve any contact with under 18s or other vulnerable groups?			
10	**Relevance/seriousness** The seriousness of the offence(s) and relevance to the safety of other employees, students, research subjects, the public etc.;			
11	**Time** The length of time since the offence(s) occurred;			
12	**Honesty** 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;			
13	**Remorse** The degree of remorse, or otherwise, expressed by the			

	applicant, and their motivation to change;			
14	**One-off/trend** Whether the offence was a one-off or part of a history of offending;			
15	**Circumstance** Whether the applicant's circumstances have changed since the offence(s) was committed, making reoffending less likely;			
16	**Adjustments** Can the role be adjusted? (Increased supervision/only work in set building/classroom)			
17	**Law change** Whether the offence has since been decriminalised.			
18	**Policy** Are the above points covered in DBS Outstanding and Failure policy?			