

# Safeguarding Policy

	Policy item
<p>A1</p> <p><b>Context</b></p>	<p>Capital School of English is situated at 63-65 Cowbridge Road East, Cardiff.</p> <ul style="list-style-type: none"> <li>• Capital School of English accept students aged 16+ throughout the year and from many different countries around the world. The summer programme is for students from 12-16 years of age and runs from late June or early July for 4 or 5 weeks.</li> <li>• Capital School of English offers General English Courses, IELTS preparation courses, Cambridge Exam preparation courses, Individual Classes, Closed Group programmes and a Summer Junior programme.</li> <li>• Closed Group programmes may be for adults or Juniors.</li> <li>• In its busiest weeks the school may have up to 130 students, 22 staff and work with up to 45 homestay providers, offering full-board and half-board accommodation.</li> </ul>
<p>A2</p> <p><b>The Safeguarding team and terminology of the policy</b></p>	<p>Capital School of English has a senior team consisting of 4 senior members of staff, and a team of designated people, trained with level 2, to assist in safeguarding matters and act if any safeguarding concerns are raised regarding the senior team.</p> <p><b>Sally Pennington</b>      Lead Senior Designated Person, Level 3  <b>James Pennington</b>      Senior Designated Person, Level 3  <b>Alun Jones</b>              Designated Person, Level 2  <b>Rachel Williams</b>        Designated Person, Level 2  <b>Rosie Shelmerdine</b>      Designated Person, Level 2</p> <p><b>Definitions of terms used in this document:</b></p> <p><b>Child/under 18/under18(s)</b>      a person under 18</p> <p><b>Vulnerable adult</b>              a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited. This <b>may</b> include a person who:</p> <ol style="list-style-type: none"> <li>1. is elderly and frail</li> <li>2. has a mental illness including dementia</li> <li>3. has a physical or sensory disability</li> <li>4. has a learning disability</li> </ol>

# Safeguarding Policy

	<p>5. has a severe physical illness 6. is a substance misuser</p> <p><b>Student</b> any person who a member of staff may come into contact with as a result of their employment in an educational establishment.</p> <p><b>Safeguarding</b> an umbrella term for the way that Capital School of English looks after its students, in special regard to vulnerable adults and under-18s.</p> <p><b>Child protection</b> protecting children from direct harmful behaviour</p> <p><b>Social contact</b> the exchange of personal information between two or more people.</p> <p><b>Electronic contact</b> the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment and computers. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.</p> <p>This policy applies to the relationship between children, students and staff before, during or after a course.</p>
<p>A3 <b>Statement</b></p>	<p>Capital School of English seek to maintain that it is unacceptable for a child or young person to experience abuse of any kind, and recognises its responsibility to safeguard the welfare of all children, young people and vulnerable adults. This policy pertains to all adults working with Capital School of English.</p> <p><b>The Purpose of this policy is:</b> To safeguard the welfare of children and young people who are enrolled on any of Capital School’s courses. To provide staff and homestay providers, group leaders and all other adults employed by Capital School and working with under18s with guidance on procedures that they should adopt in the event of any allegation of or concern about any actual or suspected abuse. To avoid making ourselves vulnerable to suspicion of any form of abuse.</p>
<p>A4 <b>Under 18s entitlement</b></p>	<p>Every child has an entitlement to be protected regardless of race, gender or nationality.</p>

# Safeguarding Policy

<p>A5 <b>Responsibilities of adults</b></p>	<p>All adults associated with under 18s have responsibilities to safeguard them. There must be a strong safeguarding ethos amongst everyone; they must be aware, vigilant and know to report any concerns or allegations to Sally Pennington who will take appropriate action after consultation with James Pennington. This may involve contacting outside bodies such as the LCSB, NSPCC or Police. All members of the Safeguarding team will have training and all adults will have both online training and face-to-face training with either the Safeguarding lead (homestays) or with the teaching safeguarding member of the team (teachers). In addition, all adults employed by Capital School will receive copies of our policy documents.</p>
<p>A6 <b>Associated policies</b></p>	<ul style="list-style-type: none"> <li>• Prevent Policy</li> <li>• Code of Conduct (Teachers)</li> <li>• Code of conduct (Students)</li> <li>• Handbooks (Student, Teacher, Group Leader)</li> <li>• Homestay guidelines and associated documents</li> </ul>
<p>A7 <b>Policy review</b></p>	<p>The policy will be reviewed annually and will be signed off by a suitably trained member of staff. Any safeguarding concerns and reports will be included as part of the review. The policy will also be reviewed after any major safeguarding incidents, where signs of improvement may be more visible.</p>
<p>A8</p>	<p><b>Roles and responsibilities</b></p> <p><b>Under U18s:</b></p> <ul style="list-style-type: none"> <li>• Under 18s are asked to look out for each other and raise concerns with adults if necessary.</li> <li>• They must sign a student code of conduct and Capital rules form.</li> <li>• They must abide by the rules of the school.</li> </ul> <p><b>Adults</b></p> <ul style="list-style-type: none"> <li>• Staff and homestay providers are asked to sign a self-declaration statement confirming that they have no convictions for any offence involving any type of harm to a child or children, and should declare anything that may affect their suitability to work with children. DBS checks are required for all adults who have substantial contact with under 18s.</li> <li>• All appointments are made subject to staff signing a declaration that they are <b>not</b> unfit to be working with children under the age of 18, and will be informed in writing that DBS checks are required.</li> </ul>

# Safeguarding Policy

	<ul style="list-style-type: none"> <li>• All staff will under-take the online child protection training to ensure that they recognise the symptoms of possible abuse and how they should respond to suspicions of abuse. Staff are also required to take internal training, issued by the safeguarding team, to prove that they know the relevant information.</li> <li>• All adults will share information and act promptly and professionally in response to any concerns.</li> <li>• Teachers must sign Capital School’s Code of Conduct.</li> <li>• All students must sign Capital School’s Code of Conduct (Rules)</li> </ul> <p><b>Designated persons.</b></p> <ul style="list-style-type: none"> <li>• The designated safeguarding lead will ensure that Capital School practises safer recruitment in checking the suitability of homestays and office staff. Alun Jones will ensure that Capital School practices safer recruitment in checking the suitability of teaching staff. All staff and homestays are interviewed and asked to provide a CV and two 2 references. All references will be followed up. They will also be required to have an up-to-date DBS.</li> <li>• Will adopt Safeguarding Children and Young People guidelines and accepted procedures including a Code of Conduct for staff and homestay providers.</li> <li>• Will adopt Prevent guidelines as part of the safeguarding process.</li> <li>• Will provide children and young people with expected codes of behaviour and will ensure they understand what those are, especially bullying.</li> <li>• Will ensure that staff adopt the staff code of conduct.</li> <li>• Will ensure that when using coach/taxi companies for under 18s, we use DBS checked drivers.</li> </ul>
<p>A9</p> <p><b>Documents and legal framework</b></p>	<ul style="list-style-type: none"> <li>• The Children Act 1989</li> <li>• Local Government Act 2000</li> <li>• Sexual Offences Act 2003</li> <li>• Children Act 2004</li> <li>• Department for Education – Use of Reasonable Force 2011</li> <li>• Protection of Freedoms Act 2012</li> <li>• Counter Terrorism Act 2012</li> <li>• English UK documents prepared for the Advanced Safeguarding for Designated Staff course</li> <li>• British Council advice on writing a safeguarding policy.</li> <li>• Working Together to Safeguard Children (DfE 2013)</li> <li>• Guidance issued by the Wales Government including:</li> </ul>

# Safeguarding Policy

	<ul style="list-style-type: none"> <li>• All Wales Child Protection Procedures (2008)</li> <li>• Safeguarding Children in Education Circular No 005/2008 (April 2008)</li> <li>• Safeguarding Children: Working together under the Children Act Circular No:12/2007</li> <li>• Guidance for School Governing Bodies on Procedures for Complaints involving Pupils Circular No: 39/2006</li> <li>• Child Protection: Preventing Unsuitable People from working with Children and Young People in the Education Service Circular No: 34/2002</li> <li>• Safeguarding Vulnerable Groups Act 2006</li> <li>• Respecting others: anti-bullying guidance 2003</li> <li>• Consideration will be given to other relevant bodies such as Cardiff Local Safeguarding Children Board, the Vale of Glamorgan Local Safeguarding Children Board (LSCB) and the South Wales Child Protection Forum (SWCPF). In relation to protecting vulnerable adults, consideration will be given to the South Wales Safeguarding Adults Strategic Management Board (SWAP) and the Improving Social Care in Wales South Wales Forum (SSIA)</li> <li>• Hwb materials created by the Welsh Government and available online and as downloadable documents.</li> </ul>
<p>A10</p> <p><b>Policy Availability &amp; Formats</b></p>	<p>The full policy is available on Capital School's website and on the desktop for the teachers.</p> <p>Guidelines are prepared for</p> <ul style="list-style-type: none"> <li>• Teachers (in the Teacher's Handbook)</li> <li>• Homestays (in the Homestay guidelines)</li> <li>• Group leaders (in the Group leader handbook)</li> <li>• Under 18s (in the under 18s handbook)</li> <li>• Students (in the Student Handbook)</li> </ul>
<p>A11</p> <p>Local Authority and Relevant Contacts</p>	<p><b>Cardiff Children's Services</b> Tel: 029 2053 6490, Option 3 for Emergency Referrals (MASH Team, Multi-Agency Safeguarding Hub) (Monday-Thursday 0830-1700, Friday 0830-1630) Out of Hours Emergency Duty Team: 029 2078 8570</p> <p><b>The Local Authority Designated Officer, Children's Services, Cardiff: Lynda Gallagher</b> Lynda Gallagher Tel: 029 2233 0889 Email: <a href="mailto:lgallagher@cardiff.gov.uk">lgallagher@cardiff.gov.uk</a></p> <p><b>Cardiff Education Safeguarding Team</b></p>

# Safeguarding Policy

	<p>Tel: 029 2233 0879 Email: <a href="mailto:slssafeguardingteaminformation@cardiff.gov.uk">slssafeguardingteaminformation@cardiff.gov.uk</a></p> <p><b>Cardiff and Vale of Glamorgan Regional Safeguarding Board</b> Tel: 029 2233 0880 / 029 2233 0883 Email: <a href="mailto:cardiffandvalersb@cardiff.gov.uk">cardiffandvalersb@cardiff.gov.uk</a> <a href="http://www.cardiffandvalesb.co.uk">www.cardiffandvalesb.co.uk</a> This regional board has separate boards for children and adults:</p> <ul style="list-style-type: none"> <li>• Cardiff and Vale Regional Safeguarding Children Board (RSCB)</li> <li>• Cardiff and Vale Regional Safeguarding Adults Board</li> </ul> <p><b>Cardiff Central Police Station</b> King Edward VII Avenue, Cardiff CF10 3NN Tel: 029 2022 2111</p> <p><b>PREVENT</b> Stephanie Kendrick-Doyle (Interim Prevent Co-ordinator and Head of Channel Project, Cardiff, based at County Hall) 07779961266 &amp; 02920 873266 <a href="mailto:stephanie.kendrick-doyle@cardiff.gov.uk">stephanie.kendrick-doyle@cardiff.gov.uk</a></p> <p>South Wales Police Prevent team: DC Darren Summerfield, PC Ak Ali &amp; PC Jonny Clemens (02920 774275) <a href="mailto:prevent@south-wales.pnn.police.uk">prevent@south-wales.pnn.police.uk</a></p> <p>Gareth Hughes at Race Equality First (02920 486207)</p> <p><b>NSPCC Whistleblowing Helpline</b> 0800 028 0285 This service is available to staff who do not feel able to raise concerns regarding child protection failures internally. This helpline is available from 08.00 – 20.00 Monday to Friday</p> <p><b>NSPCC</b> Tel: 0808 800 5000</p>
<b>CODE OF CONDUCT</b>	
<p>B1 <b>Overview &amp; principles:</b></p>	<p>At Capital School we want to create a safe culture for children and adults, where trust is built between under 18s and adults and both adults and under 18s are protected from any behaviour or actions that may be misconstrued.</p> <p>Please see Policies and Procedures for Code of Conduct (employees) and Disciplinary Procedure. Below is an excerpt from the Student Code of Conduct. The complete document can be found in student documents.</p>

# Safeguarding Policy

	<p><b>Student Code of Conduct</b></p> <p>We want all our students to be safe, secure and happy and to have a really enjoyable time on our courses. We expect the highest standards of behaviour from all our students at all times. Bad behaviour from a few students can spoil the enjoyment of the rest. That is why we ask all our students to <b>sign</b> a copy of this Code of Conduct.</p>
<b>B2 Positions of trust</b>	<p>As an adult you are in a position of trust and must abide by the laws of the country as well as the rules of the school. The 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. Capital School of English ensures all staff know this information as part of an internal safeguarding test.</p>
<b>B3 Setting standards</b>	<p>At Capital School of English, we would expect our teachers to behave in a way fitting for teaching professionals. Code of Conduct fits loosely into two categories:</p> <ol style="list-style-type: none"> <li>1. What we would expect of you as a teaching professional; and</li> <li>2. What we would not expect in you, in other words, those things that may lead to disciplinary procedure.</li> </ol> <p>The former is outlined in your job description and forms part of your contract and the latter is outlined in the notes on disciplinary procedure. For further information, it is also useful to look at our policies on:</p> <ol style="list-style-type: none"> <li>1. Prevent</li> <li>2. Fire drill and procedure</li> <li>3. Health and safety procedure</li> <li>4. Disciplinary procedure</li> <li>5. Grievance procedure</li> </ol> <p>All of these can be found in Capital School's 'Policies and Procedures'. If you are unclear on any point, please ask Alun, James or Sally.</p>
<b>B4</b>	<p><b>Adult - U18 interaction</b></p> <p><b>Safe working practices for adults:</b></p> <p>All members of staff, homestays and adults employed by Capital School should ensure that they avoid making themselves vulnerable to suspicion of any form of abuse by following the guidelines and procedures set out in this document. You need to be even in dealing with under 18s but, whilst it is important to be positive and use praise with under 18s, it is essential not to be over-familiar.</p> <p><b>Appropriate social contact (electronic or otherwise):</b></p>

# Safeguarding Policy

- Staff must maintain neutral, friendly relationships with students while avoiding exclusivity or over-familiarity.
- Staff must resist any attempt by a student to develop an over-familiar or exclusive social relationship.
- If a student confides sensitive personal information staff have a duty to listen and respond in a professional manner in accordance with organisational guidelines.
- Physical contact between adults and U18s is usually not acceptable, except in some special cases eg if emergency first aid is needed but this needs to be administered by a qualified first aider. (Please see acceptable restraint below.)
- Adults should not put themselves in a situation where they are alone with a child.

## **Non-compliance**

- Non-compliance with the above policy will result in disciplinary procedures.
- Capital School have a duty to remove an individual from regulated activity where there is risk of harm to children.
- Capital School have a 'duty to refer' to external authorities\* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children. (\* Police and local child protection authorities, LCSB [Local Child Safeguarding Board]).

## **Managing Behaviour and Acceptable Restraint**

(This has been formulated in accordance with Department for Education – Use of Reasonable Force 2011)

Physical contact with students must be appropriate for the age, understanding and sex of the child and must never threaten or be sexually inappropriate. In some cases, physical contact may be appropriate:

- To remove disruptive students from the classroom where they have refused to follow an instruction to do so;
- Prevent a student behaving in a way that disrupts a school event or a school trip;
- Prevent a student leaving the classroom where allowing the students to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- Prevent a student from attacking a member of staff or another or to stop a fight;
- Restrain a student at risk of harming themselves through physical outburst.

You cannot

Use force as a punishment – it is unlawful to use force as a punishment.

## **What happens if a student complains if force is used on them?**

- All complaints should be thoroughly investigated.



# Safeguarding Policy

	<ul style="list-style-type: none"> <li>• Where a member of staff has acted within the law – that is, they have used reasonable force in order to prevent injury, damage to property or disorder – this will provide a defence to any criminal prosecution or other civil or public law action.</li> <li>• Capital School must consider carefully whether the circumstances of the case warrant a person being suspended until the allegation is resolved or whether alternative arrangements are more appropriate.</li> <li>• If a decision is taken to suspend a member of staff, Capital School will ensure that the member of staff has access to a named contact who can provide support.</li> <li>• A complaint is not completed until no further action is needed.</li> <li>• See non-compliance above.</li> </ul>
<b>B5 Appropriate appearance</b>	<p>Adults are expected to dress appropriately at all times when with all students, including under 18s in class, on activities and in accommodation. Please see excerpt from Dress Code below.</p> <p><b>Dress code</b> Capital School does not have a strict dress code but we do expect our teachers to look like the professionals that they are and so we ask that you wear smart but casual clothing both to be comfortable in yourself and in front of the class that you are teaching. It goes without saying that the appearance of employees contributes greatly to the reputation, professionalism and image of the school.</p>
B6	<p><b>Alcohol, drugs and smoking</b> Adults have a serious responsibility towards under 18s regarding drugs, alcohol and smoking. With alcohol, drugs and smoking, it is better to educate under 18s about addictive substances than to make light or joke about them. When with under 18s, the following rules must be followed:</p> <ul style="list-style-type: none"> <li>• Smoking is only permitted on Capital School premises in the designated area. Please use the outdoor smoking area at the side of the building and place all cigarette ends in the wall-mounted bins provided. Smoking when on activities with under 18s is not permitted.</li> <li>• Drinking alcohol when accompanying under 18s is not permitted.</li> <li>• The taking of drugs is strictly forbidden on school premises and on school activities.</li> <li>• The breaking of these rules may quickly lead to disciplinary procedures (please see Policies and Procedures on desktop).</li> </ul>
B7	<p><b>IT &amp; social networks</b> The Welsh Government has prepared downloadable and printable material for schools for all age groups. Please see their <b>Hwb</b> website.</p> <p><b>Electronic Contact with Children:</b></p>

# Safeguarding Policy

	<ul style="list-style-type: none"> <li>• In any electronic contact with students, staff must pay particular attention to use neutral, un-emotive language that will not be misconstrued.</li> <li>• Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.</li> <li>• Staff must avoid the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.</li> <li>• Staff must not publish photos, videos or any other information about students except with the express agreement of Capital School.</li> <li>• Staff should be aware that personal information about them may be available in various forms online. Staff should be particularly cautious about their public web profiles and privacy settings.</li> <li>• Staff should attempt to find ways of setting up and maintaining separate 'personal' and 'professional' electronic profiles.</li> </ul> <p><b>Social networking sites</b></p> <ul style="list-style-type: none"> <li>• If classes set up social networking forums like Facebook or WhatsApp for students, they should be closed groups.</li> <li>• Staff and students must not share the same social networking group, other than those adults necessary to monitor and administer the group.</li> <li>• Staff who monitor or administer social networking sites for students should use professional accounts that are as far as possible devoid of personal information.</li> <li>• Staff must not initiate or agree to 'friendship' requests or similar with students that will result in the sharing of personal information, photos, status updates and so on.</li> </ul>
B8	<p><b>Accommodation</b></p> <p>All accommodation is inspected before any student is placed and all accommodation is re-inspected regularly by Sally Pennington. Homestays are sent the relevant policies and guidelines. All homestay providers must provide an up-to-date gas certificate, renewed annually, a CV and 2 references and homestays for under 18s must be DBS checked. Please see homestay documents for further details.</p>
B9	<p><b>Transport</b></p> <p>When using coach/taxi companies for under 18s, reputable firms are used, the drivers of which use only DBS-checked drivers.</p>
B10	<p><b>Whistleblowing</b></p> <p>It is a legal obligation for staff to inform management of any concerns about colleagues not following the Code of Conduct. Staff who report this (or any other problems) will (a) not be penalised and (b) their report will remain confidential. The guidelines read as follows:</p> <p><b>Duty to report:</b></p>

# Safeguarding Policy

	<p>All members of staff/homestays are required to report to the Welfare Director any concern or allegations about Capital School practices or the behaviour of colleagues which are likely to put children/young people at risk of abuse or other serious harm.</p> <ul style="list-style-type: none"> <li>• Staff have a duty to report to the employer any actual or perceived inappropriate development of the relationship between student and staff, electronic or otherwise.</li> <li>• Any sensitive information communicated by a student to a member of staff, electronic or otherwise, must be reported to the employer.</li> </ul> <p><b>Failure to comply:</b></p> <ul style="list-style-type: none"> <li>• Non-compliance with the above policy will result in disciplinary procedures.</li> <li>• Capital School have a duty to remove an individual from regulated activity where there is risk of harm to children.</li> <li>• Capital School have a 'duty to refer' to external authorities* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children. (* Police and local child protection authorities, LCSB [Local Child Safeguarding Board]).</li> </ul>
<p>Child Protection  C1</p>	<p><b>Overview</b> Capital School of English seek to maintain that it is unacceptable for a child or young person to experience abuse of any kind, and recognises its responsibility to safeguard the welfare of all children, young people and vulnerable adults. Our aim is to create an environment where every student is safe, secure and happy. This policy pertains to all adults working with Capital School of English.</p> <p><b>What is child abuse?</b> Child Abuse, as described by the World Health Organisation:</p> <p><i>'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 or responsibility, trust or power'.</i></p> <p>The following section outlines the important points of Capital School's safeguarding policy.</p>
<p>C2</p>	<p><b>Nominated safeguarding persons</b></p> <ul style="list-style-type: none"> <li>• <b>Sally Pennington (Welfare Manager)</b> the Designated Safeguarding <b>Lead</b>, responsible for looking after day to day matters, accommodation and emergency contact for out of hours.</li> <li>• <b>James Pennington (Director)</b> Trained in Safeguarding (Level 3), who will assist Sally Pennington.</li> </ul> <p><b>Alun Jones, Rachel Williams and Rosie Shelmerdine</b> are trained in Safeguarding (Level 2), and are available to assist if needed.</p>

# Safeguarding Policy

<p>C3</p>	<p><b>When adults need to respond</b></p> <ul style="list-style-type: none"> <li>• If you notice any physical or behavioural signs (see C4), tell the Welfare Director.</li> <li>• If you suspect an adult is a threat to a child in some way tell the Welfare Director and continue to monitor the situation</li> <li>• If a child/young person makes any comment that gives cause for concern, react calmly and act accordingly, as outlined below.</li> <li>• Make a note of what was said and who was present. Contact the Welfare Director immediately.</li> </ul> <p>The Welfare Director will take appropriate action which may involve external agencies and contacting parents/guardians.</p> <p><b>How to react:</b></p> <ul style="list-style-type: none"> <li>• Stay calm, accessible and receptive.</li> <li>• Listen, hear and believe.</li> <li>• Communicate with the child in a way that is appropriate to their age, understanding and preference – this is very important for children whose first language is not English.</li> <li>• Be aware of the non-verbal messages you are giving.</li> <li>• Acknowledge their courage and reassure them that they are right to tell.</li> <li>• Don't probe for more information. Questioning the participant may affect how the participant's disclosure is received at a later date.</li> <li>• Don't promise confidentiality to keep the information a secret.</li> <li>• Don't deal with this yourself, act in accordance with the procedure in this policy.</li> </ul> <p>An adult would need to respond if noting something themselves, if being told about something by another person (adult or under 18), as well as following a specific procedure (C5) if an U18 disclosed to them.</p>
<p>C4</p>	<p><b>Recognising symptoms of abuse</b></p> <p><b>There are four main categories of abuse, and they are as follows:</b></p> <ul style="list-style-type: none"> <li>• Physical: through hitting, shaking, squeezing, kicking, punching etc.</li> <li>• Sexual: though inappropriate physical contact, the taking of indecent images of children, or the encouragement of sexual activity by children for the purpose of adult gratification.</li> <li>• Emotional: through persistent lack of affection, unrealistic adult demands, verbal bullying including cyber bullying.</li> <li>• Neglect: persistent lack of appropriate care of children, including safety, nourishment, warmth, education and medical attention.</li> </ul> <p><b>Identifying Child Abuse</b></p>

# Safeguarding Policy

	<p>It can be difficult to identify child abuse as it has various forms. Below are some typical indicators to look for:</p> <ul style="list-style-type: none"> <li>• Unexplained injuries</li> <li>• A child describing an abusive act that has happened to them</li> <li>• Another child telling you of their concern about a friend/ fellow student</li> <li>• Sexually explicit behaviour in games/ activities</li> <li>• Serious distrust of adults</li> <li>• Difficulty in making friends/ socialising with other children.</li> </ul> <p>In general, if you have any concerns, communicate these to the Welfare Director.</p>
C5	<p><b>A child telling an adult (Disclosure)</b></p> <p>An adult would need to respond if noting something themselves, if being told about something by another person (adult or under 18), as well as following a specific procedure (C5) if an under 18 disclosed to them.</p> <p><b>How to react if an under 18 decides to disclose that they are being abused:</b></p> <ul style="list-style-type: none"> <li>• Stay calm, accessible and receptive.</li> <li>• Listen, hear and believe.</li> <li>• Communicate with the child in a way that is appropriate to their age, understanding and preference – this is very important for children whose first language is not English.</li> <li>• Be aware of the non-verbal messages you are giving.</li> <li>• Acknowledge their courage and reassure them that they are right to tell.</li> <li>• Don't probe for more information. Questioning the participant may affect how the participant's disclosure is received at a later date.</li> <li>• Don't promise confidentiality to keep the information a secret.</li> <li>• Don't deal with this yourself, act in accordance with the procedure in this policy.</li> </ul>
C6	<p><b>Keeping records</b></p> <p>The lead safeguarding team are responsible for keeping all records concerning allegations of abuse. These records are kept within the management office. Access is for Sally Pennington &amp; James Pennington, and relevant outside agencies, including the British Council. These records would be kept indefinitely.</p>

# Safeguarding Policy

C7	<p><b>If an adult is accused</b>  <i>State the procedure clearly, including and stages of investigation and/or suspension, and when outside agencies, e.g. the LSCB (Local Safeguarding Children Board) might be involved.</i></p> <ul style="list-style-type: none"> <li>• All complaints will be thoroughly investigated.</li> <li>• Capital School will consider carefully whether the circumstances of the case warrant a person being suspended until the allegation is resolved or whether alternative arrangements are more appropriate.</li> <li>• Capital School will consider carefully if outside agencies will be involved.</li> <li>• If a decision is taken to suspend a member of staff, Capital School will ensure that the member of staff has access to a named contact who can provide support.</li> <li>• All complaints will be fully documented.</li> </ul> <p><b>Non-compliance</b></p> <ul style="list-style-type: none"> <li>• Non-compliance with the above policy will result in disciplinary procedures.</li> <li>• Capital School have a duty to remove an individual from regulated activity where there is risk of harm to children.</li> <li>• Capital School have a 'duty to refer' to external authorities* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children. (* Police and local child protection authorities, LCSB [Local Child Safeguarding Board]).</li> </ul>
C8	<p><b>If a child is accused</b></p> <ul style="list-style-type: none"> <li>• All complaints will be thoroughly investigated.</li> <li>• Capital School will consider carefully whether the circumstances of the case warrant a child being suspended from class or school until the allegation is resolved or whether alternative arrangements are more appropriate.</li> <li>• Capital School will contact parents and may arrange for the child to be sent home.</li> <li>• Capital School will consider carefully if outside agencies will be involved.</li> <li>• All complaints will be fully documented.</li> </ul>
C9	<p><b>CSE - Child Sexual Exploitation</b>  Please see C4</p>
C10	<p><b>FGM – Female Genital Mutilation.</b>  All adults working at or for Capital School need to be aware that Female Genital Mutilation is illegal in the UK and there is a legal duty to report if adult finds out or is told it has happened.</p>

# Safeguarding Policy

Training D1	<b>Responsibility</b> DSL, Sally Pennington holds responsibility for training non-teaching staff, homestays and teachers. Staff do Basic Awareness online (Level 1).
D2	<b>How training is delivered</b> Level 1 online training, Level 2 and 3 training given by English UK. Internal training in safeguarding sessions is delivered at the school by the DSL or another member of staff with Level 3 training. All staff must complete online awareness training certificate.
Safer Recruitment E1	<b>Overview</b> Capital School is committed to safer recruitment. We follow the following safer recruitment practices: Teachers: Prior to employment, all teachers are interviewed and the two references supplied are followed up; in addition, they must be DBS checked (no unsupervised contact with under 18s is allowed without DBS). At interview, any gaps in CV must be satisfactorily explained. Whilst on a probationary period, they are observed twice and then will be observed once a year. See E4. Homestays: All homestays are visited and inspected and must be DBS checked if they are to take under 18s. Homestays are re-inspected every 12-18 months. Other staff: Will supply two references and will be DBS checked. Taxi and bus drivers: We only use firms whose drivers are DBS-checked. All staff receive a Code of Conduct; a 'Guidelines for teachers on the Safeguarding policy' document and relevant associated documents.
E2	<b>Recruitment materials</b> All interviewees are sent copies of the Code of Conduct, Safeguarding policy and associated documents to be read before appointment.
E3	<b>Applicants informed that</b> In the initial emails sent to applicants they are informed that: <ul style="list-style-type: none"> <li>• References will be followed up</li> <li>• All gaps in CVs must be explained satisfactorily</li> <li>• Proof of identity and qualifications will be required</li> <li>• References will ask specifically whether there is any reason that you should not be employed in situations where you have responsibility for, or substantial access to, persons under 18</li> <li>• Appropriate Criminal Records Bureau (DBS) disclosure will be required prior to confirmation of appointment.</li> </ul>
E4	<b>Applicants awaiting DBS</b>



# Safeguarding Policy

	<p>Capital School of English as a policy in place for teachers or applicants who are awaiting the return of a DBS. For those members of staff who are not currently signed up to the DBS update service, it is the policy of the school to do all of the following, where relevant and possible:</p> <ul style="list-style-type: none"> <li>• Ensure that the member of staff gets signed up to the DBS update system as soon as possible</li> <li>• Ensure that the member of staff completes a self-declaration form</li> <li>• Double check all written references</li> <li>• Allow no more access to students under 18 year of age than is required</li> <li>• Supervise those members of staff when they are in contact with students under 18 (Supervision can involve sharing responsibilities, leaving doors open, only using rooms with windows, locating teachers in classrooms which are in very close proximity to other staff, use separate toilets from students under 18 years old, avoid mingling with students under 18)</li> </ul>
E5	<p><b>Applicants with a criminal record</b></p> <p>An applicant’s suitability to work with children will be judged on a case by case basis and in light of the results of the relevant pre-appointment checks carried out on him or her. The fact that a person has a criminal record does not automatically make him or her unsuitable to work with children. A judgement about suitability, taking into account only those offences which may be relevant to the particular job or situation in question, will be made. In deciding the relevance of convictions, a number of points will be considered</p> <ul style="list-style-type: none"> <li>• <b>Seriousness and nature of offence/s</b> – in general, serious convictions for sexual, violent or drug offences will be particularly strong contra-indicators for work with children. This includes assault and violence against a person, affray, riot and violent disorder, aggravated criminal damage, arson, drink and drug induced driving, drug offences, robbery and sexual offences.</li> <li>• <b>Nature of appointment</b> – will help to assess the relevance of the conviction. For example, serious sexual, violent, drug or drink offences would give rise to particular concern where a position involves the care or supervision of children or teaching, training or instruction of children. Driving or drinking offences would be relevant in situations involving transport of children.</li> <li>• <b>Age of offence/s</b> – offences which took place many years in the past may often have less relevance than recent offences. However, convictions for serious violent or sexual offences are more likely to give cause for concern than for instance an isolated case of dishonesty committed when the person was young. The potential for rehabilitation must be weighed against the need to protect children.</li> <li>• <b>Frequency of the offence/s</b> – a series of offences over a period of time is more likely to generate cause for concern than an isolated minor conviction.</li> </ul> <p>The disclosure will be discussed with the prospective employee and the information contained on the disclosure will be verified to check that it does indeed relate to the person concerned. This verification will be sought prior to any judgements being made. The discussion will also aid the decision-</p>



# Safeguarding Policy

	<p>making process, and would focus on the seriousness and nature of the offence/s, the nature of the appointment, age of offence, frequency of the offence/s and any concealment of offences at the application process.</p> <p>Based upon the findings of this discussion, a judgement will be made with regard to the suitability of the prospective employee. A clear record will be made of the decision, bearing the judgement and the signature of at least two of the directors. This record will not, however, contain details of the offences.</p>
E6	<p><b>Applicants where criminal check not possible</b> Staff or homestays who are unable to get a criminal check may not be employed or would certainly not be deployed in areas where they had significant unsupervised access to under 18s. Homestays who are not DBS-checked cannot be given under 18s.</p> <p>Group leaders accompanying under 18s must complete a signed self-declaration form from and are made aware of the organisation's safeguarding policy and practices. If a criminal check is not possible, a police certificate of good conduct or equivalent is required.</p>
E7	<p><b>Recruitment of homestays</b> All homestays must provide a CV and two references, which are checked. The homestays are inspected before they are put onto the database and re-inspections are carried out every 18 months. The main care-giver must be DBS-checked. They must indicate on the form (question 66) that the activity takes place in their home – the check will then incorporate checks on other adults in the home (spouse, adult children). Separate individual DBS checks may be required by local authorities in the case of private fostering arrangements. The main care-giver is sent the safeguarding policy and relevant homestays guidelines and information.</p>
E8	<p><b>Pre-appointment Records</b> DSL keeps a record of all homestays and group leaders. (See Homestay database). The Academic Manager keeps the staff files and there is a separate DBS-checked list. (See staff file frontispieces and Staff DBS list).</p>
Welfare / Implementing	<p><b>Use of risk assessments</b> Risk assessments are used on:</p> <ol style="list-style-type: none"> <li>1. The school premises</li> </ol>

# Safeguarding Policy

<p>Safeguarding F1</p>	<ol style="list-style-type: none"> <li>2. For activities and trips</li> <li>3. Certain policies (safeguarding &amp; Prevent)</li> <li>4. Safeguarding risk assessment &amp; action plan</li> </ol> <p>Guidance is given to teachers and activities co-ordinator and accompanying adults and forms have to be completed on all activities. These are updated and assessed annually. Please see guidance notes on risk assessments for details.</p>
<p>F2</p>	<p><b>Supervision ratios</b></p> <p><b>In the classroom</b> Aged 12 - 17 years: the ratio is 1 teacher to 16 children maximum. The average class size is 10-12 students.</p> <p><b>On trips and excursions</b> The 1998 DfEE publication Health and Safety of Pupils on Educational Visits advises the following ratios: 1:15–20 (11+). Providers would be expected to exceed these ratios if the safety and welfare of the students required it.</p> <p>For Capital School, the ratios are as follows:</p> <p>For students under the age of 18 the ratio is 2:16. In the case of closed groups, the ratio can include group leaders as they have a responsibility for their students. The ratio for adults is 1:12.</p> <p>On activities and excursions, if the group is mixed gender, the supervising staff will include both male and female staff wherever possible. In certain situations, however, it will be necessary to have a higher number of adults than our recommendations suggest. If, for instance, the children or young people have specific support needs, or a risk assessment identifies behaviour as a potential issue for the group or event, in which case the number of supervising adults will need to be higher and there should be enough supervisors to deal with an emergency, identified by the risk assessment for the specific activity.</p> <p>Every effort will be made to achieve the best level of supervision of children at all times.</p>
<p>F3</p>	<p><b>Missing students</b> <b>Absent from school/class:</b></p> <p>A note is kept in reception of all students that we know will be absent and this is passed to teachers by Sally Pennington or James Pennington. For under 18s there are 3 check:</p> <ol style="list-style-type: none"> <li>1. They must report to reception on arrival at school.</li> </ol>

# Safeguarding Policy

	<ol style="list-style-type: none"> <li>2. Teachers are informed that any unexpected absence must be reported to reception at the beginning of each session.</li> <li>3. The student is phoned and</li> <li>4. The homestay and/or guardian of the under 18 is contacted immediately.</li> </ol> <p><b>Missing during excursion or activity</b></p> <ol style="list-style-type: none"> <li>1. Student is phoned (all mobile numbers are noted by the activity leader as part of the risk assessment/activity procedure.</li> <li>2. Welfare Director is contacted who will make a decision on the next course of action.</li> </ol> <p><b>Not returning to homestays</b></p> <p>Homestays are to phone Sally Pennington immediately who will decide on the next course of action. Sally Pennington keeps all emergency numbers of student and next of kin.</p>
F4	<p><b>Welfare provision</b></p> <p>Capital School recognises its responsibility to safeguard children and young people. Our policy applies to all staff working in the school setting as well as homestay providers. We will ensure that we provide a safe and supportive environment for all young learners and implement procedures for identifying and reporting cases, or suspected cases, of abuse.</p> <p>Our aim is to safeguard our young learners by:</p> <ol style="list-style-type: none"> <li>1. Applying safe recruitment practices, i.e. asking all applicants at the interview stage to provide at least one reference which will be followed up and to explain fully any gaps in their employment history.</li> <li>2. Carrying out DBS checks on staff with regular unsupervised contact with under 18s.</li> <li>3. Providing students with welfare support and pastoral care, so that they are encouraged to talk about any problems they might experience.</li> <li>4. Ensuring teachers monitor students to identify any symptoms of possible abuse.</li> <li>5. Ensuring that all staff with significant contact with children understand their responsibilities in being alert to the signs of abuse and in reporting any concerns they may have.</li> </ol>
F5	<p><b>First Aid &amp; Medical</b></p> <p><b>Please see First Aid policy</b></p> <p><b>Excursion and activities documents</b></p> <p><b>Risk assessments for excursions and activities</b></p> <p>The following staff all have current First Aid certificates:</p> <ul style="list-style-type: none"> <li>• <b>Alun Jones (Emergency First Aid – 3 day course)</b></li> <li>• Scott Newcome (Emergency First Aid at Work – 1 day course)</li> </ul>

# Safeguarding Policy

	<ul style="list-style-type: none"> <li>• Rachel Williams (Emergency First Aid at Work – 1 day course)</li> </ul> <p>All First Aiders would be responsible for making sure students are referred to hospital or a doctor where necessary and Lead First Aiders would arrange for registration at a student’s local practice. A qualified first aider would be present on excursions and activities and a small first aid kit would be taken on the excursions. The main first aid box is kept at reception and regular checks are made on supplies.</p> <p>Homestays are asked to contact Sally Pennington if they have any problems, questions or queries and she will then decide on the best course of action.</p>
F6	<p><b>U18 Behaviour &amp; discipline</b></p> <p>We expect all staff and students to follow the school rules and codes of conduct and we have clear systems and sanctions for responding to situations that arise. On day 1 of the course, under 18s are taken through the rules, their roles and responsibilities by their teachers to ensure that these are understood.</p> <p>Please see</p> <ul style="list-style-type: none"> <li>• Student rules</li> <li>• Code of conduct – students, teachers and staff</li> <li>• Student handbook</li> <li>• Homestay guidelines and documents</li> <li>• Teacher handbook</li> <li>• Group leader handbook</li> <li>• Who to see poster</li> <li>• Disciplinary procedure documents</li> <li>• Terms and conditions</li> </ul>
F7 <b>Fire Safety</b>	<p>Fire safety is a legal requirement for all students and we take the safety and well-being of our students very seriously. Under 18s should never be left unsupervised when at school, on activities or in homestay. On day 1 of the course, under 18s are taken through the rules, their roles and responsibilities by their teachers to ensure that these are understood.</p> <p>Fire drills are held quarterly in the school, to ensure that staff are trained in the response to the fire alarm and any problems are identified.</p> <p>Please see:</p>

# Safeguarding Policy

	<ul style="list-style-type: none"> <li>• Fire Safety policy</li> <li>• Fire risk assessment documents</li> <li>• Student rules</li> <li>• Code of conduct – students, teachers and staff</li> <li>• Student handbook</li> <li>• Homestay guidelines and documents</li> <li>• Teacher handbook</li> <li>• Group leader handbook</li> </ul>
<b>F8 Airport transfers</b>	<p><b>Groups and individuals</b></p> <p>Group leaders will accompany their groups. They will be met at and delivered to the airport by a DBS-checked driver and/or member of staff and transferred directly to their homestays or the school on arrival or the airport on departure. Information is sent to group leaders on booking and the relevant forms must be completed, signed and returned to us before arrival. Individuals are met at or delivered to the airport either by a member of their family or a DBS-checked driver and are delivered to the school or homestay on arrival and the airport on departure. The parents and legal guardians of all under 18s, whether students arrive in groups or as individuals, are sent information on booking and must complete, sign and return a letter of consent for unaccompanied travel before arrival.</p> <p>All travel arrangements are made by the school. If an under 18 wishes to make their own travel arrangements, permission must be gained in writing from the parents or legal guardian prior to travel. This would be allowed only in exceptional circumstances.</p>
<b>F9 E Safety</b>	<p>Students are made aware of the importance about being safe online; not believing all they read, not sharing personal data or photos with people they don't know and so on. There are rules about internet use and students are told that they must tell adults if they receive any unwanted contact online or via text. When possible, teachers use E safety as a topic in class activities, encouraging discussion and awareness.</p>
<b>F10 Radicalisation &amp; Extremism PREVENT</b>	<p>Capital School has its own Prevent Policy (see Policies and Procedures) and guidelines are available for staff and homestays. Capital School of English has an allocated staff member to act as the PREVENT co-ordinator, <b>Rachel Williams</b>.</p>

## Safeguarding Policy

<p><b>F11 Provision for those more vulnerable</b></p>	<p>Students who are identified as being more vulnerable, e.g. some physical disabilities, especially those requiring more help with personal care; or students coming from difficult home situations - which could be for a variety of reasons would be looked at on a case by case basis and bookings would not be taken for those we could not furnish with suitable provision. Booking forms ask for details of any special requirements. Each case would need to be examined on its own merits and suitable provision would be made where possible. If suitable provision cannot be provided then the student cannot be accepted. If students are identified as being more vulnerable after they have arrived and suitable provision cannot be given then arrangements may have to be made for that student to leave the school and return home, their booking form having been incorrectly completed before arrival (see terms and conditions).</p>
<p>F12</p>	<p><b>Private Fostering</b> A homestay is classed as a private foster family if a student is under 16 (or under 18 if disabled) who is with not his/her own immediate family and is staying for more than 28 nights with a homestay. Should this be the case, Sally Pennington will inform the social care section of the local authority at least 6 weeks prior to the arrival of the child. The local authority will then inspect the homestay prior to the under 16s' arrival and will visit the homestay every 6 weeks to ensure that the homestay meets their requirements; this procedure will continue until the child reaches his or her 16<sup>th</sup> birthday.</p>

Reviewed January 2020