

Safeguarding Policy

1. Policy Statement

Cambridge Academy of English (CAE) is an independent well established language school recognised under the British Council Accreditation UK and ISI Accreditation schemes. It is a member of English UK, The English Network, IALC and Quality English. CAE offers a portfolio of courses for children, teenagers and adult, general and professional students. Courses are aimed at children (8 to 13 years); teenagers (12 to 17 years) and adults (17 years plus). Professional Centre Courses are aimed at students 25 +. CAE has a responsibility for the well-being of all students and a statutory duty of care to children under the age of 18, whatever their programme of study.

The CAE Safeguarding Policy aims to promote best practice by:

- providing children and young people with appropriate safety and protection whilst in the care of CAE
- informing CAE staff and all other adults involved in the delivery of CAE courses of their responsibilities and duty of care when working with children
- allowing all staff to make informed and confident responses to safeguarding and child protection issues.

Core principles and definitions:

- the policy applies to all children attending our courses regardless of age, gender, race, culture, religion and sexual identity.
- a child is defined as a person under the age of 18 (The Children Act 1989) and for the purpose of this policy document the term ‘child’ or ‘children’ will be used to describe **all students under the age of 18**.
- the term ‘staff’ will be used to describe **all CAE employees, homestay hosts, group leaders and other adults** involved in delivery of courses for children in our care.
- ‘Safeguarding’ refers to: action taken to promote the welfare of children and protect them from harm. It means caring for children appropriately and protecting them from what is not in their best interests (includes health & safety, child protection & pastoral care)
- ‘Child protection’ refers to actions taken to protect children from abuse.
- named members of staff will lead on child protection, raising awareness of the policy and its guidelines among other staff and where appropriate the children, group leaders, agents and parents.
- the policy **applies to all staff**, and **all contexts** both in real (physical) and virtual (online) environments
- Staff act in ‘loco parentis’ when considering the academic needs and welfare of the students and have a professional duty of care to take all reasonable steps to promote the safeguarding of all children under the age of 18 years in the care of CAE in accordance with the Children’s Act 1989 and 2004.

In providing for children, CAE accepts that:

- all children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity, have the **right to be treated with respect, to be safeguarded from harm and be protected from abuse**
- the **welfare of the child is paramount**
- children must feel they can tell an adult about any incident that frightens or confuses them or makes them unhappy
- children know that if they go to an adult for help, they will be listened to seriously and supported
- all staff have a responsibility to report concerns to the appropriate child protection lead member of staff
- all concerns, suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately

The policy is implemented by following the policy **guidelines** contained within this document.

All staff must comply with this policy in conjunction with the *CAE Code of Practice*, failing which disciplinary action may be taken.

The CAE Safeguarding policy covers the following areas of provision:

2. **Code of Conduct** and Guidelines for safer practice when working with children;
3. **Child Protection**;
4. **Training**;
5. **Safer recruitment**, and
6. **Welfare/ Safeguarding** and
7. **Useful contact information**

It refers to and can be read in conjunction with a number of **Related CAE documents** (see examples below)

GENERAL policy	Educational Policy	Recruitment Policy	Health and Safety Policy	
CAE STAFF	Contract of employment	Job Description	Staff handbooks	Staff Code of Practice
HOMESTAYS	Homestay agreement	Student handbooks		Student Code of practice
SAFEGUARDING	Bullying & Harrassment policy	Care of U18s on Adult courses	Electronic and Social Media	

This is not an exhaustive list. Policy documents are working documents and may be amended; updated and added to at any time. Copies available on request.

This **CAE Safeguarding policy** will be presented in a **range of formats** applicable to setting, role and responsibility of all staff and students.

Responsibility for update	Yvonne Chapman , together with CAE Management Team
Validity	to be reviewed every 12 months, or more frequently if necessary, and in conjunction with staff and students where possible
Key persons	Principal, John Barnett
Designated Safeguarding officers:	Director of Young Learner Courses, Yvonne Chapman Deputy Principal - Sheila Levy (U18s on adult courses)
Local lead persons:	Accommodation Officer – Fiona Craig (for Homestays); Course Directors (residential summer centres)
Access to the policy	see Staff Manuals/ handbooks; CAE network; CAE website http://www.cambridgeacademy.co.uk/practical.html

I have read the above and agree to fulfil its requirements.

Name	Signature	Post	Centre	Date
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2. CODE OF CONDUCT

Staff Conduct and Safer working best practice guidelines

The *Code of Conduct* is instrumental in building trust with children under 18, and creating a safe school culture. Staff must demonstrate exemplary behaviour, acting as role models, and to avoid finding themselves in situations which might be misconstrued or lead to allegations of misconduct. All staff are expected to agree and sign a CAE *Code of Practice* relevant to their setting and responsibility. Read the following guidelines together with **your Code of Practice**

- **Treat all children equally**, and with respect and dignity regardless of their age, gender, colour, race or religion.
- Conduct yourself in a manner that **sets a good example** to children and peers. Be an excellent role model.
- Build balanced relationships based on mutual trust which **empower children to share in the decision-making process**
- Maintain a **professional relationship** with all children and avoid exclusivity. Establish clear boundaries of acceptable behavior in school and in homestays. Act in a friendly supportive manner and treat all children equally.
Do not flirt with students or make sexually suggestive comments, even in fun. Be aware of different attitudes to boundaries, dress, personal space and sensitive topics.
- Always work in an **open environment** (e.g. avoid private or unobserved situations and encourage open communication with no secrets). Never allow yourself to be left alone with a student.

- **Be clear about the objectives** of an activity before it begins and always put the welfare of each child first, before winning or achieving goals.
- **Give enthusiastic and constructive feedback** rather than negative criticism
- Maintain a **safe and appropriate distance** when working with children. Never engage in any form of inappropriate touching.
- Challenge inappropriate language or behaviour by children.
- Never use physical force against a child, unless as reasonable restraint to protect him/her or another person or to protect property
- Do not act aggressively verbally or physically. Do not engage in rough, physical or sexually provocative games, including horseplay. When dealing with poor behaviour, focus on the behaviour not the person, and recognise the limits of your own patience and seek support.

- If children of mixed genders are to be supervised, ensure where possible that they are supervised by male and female staff.
- Consider carefully acceptable arrangements for adult supervision in residential centres and in homestays. Do not enter children's rooms unless on duty according to agreed duty responsibilities. Do not enter rooms of staff or children of the opposite sex.
- Consider carefully acceptable arrangements to ensure privacy in residential and homestay settings. Make these clear.
- Do not invite or allow children to stay with you in your room/ at your home or arrange meetings off-campus.
- Do not transport children in your personal vehicle unless you have written parental consent to do so.
- When booking taxi or coach services, use nominated CAE providers who share our commitment to safeguarding best practice.
- **Do not communicate with children via social media** unless through recognised school channels and for official reasons.
- Drinking alcohol or smoking in the presence of children while on duty is not permitted. Act responsibly and with discretion at all times.
- Challenge any unknown adult who enters the school premises and/or attempts to engage with the children

- Keep a written record of any incidents/ injuries that occur, along with the details of any action taken.
- **Refer any concerns relating to staff and students** to the Safeguarding lead member of staff.
Do not allow allegations made by a child to go unchallenged, unrecorded or not acted upon.

Refer to:

your *Contract of employment/ Homestay Agreement, Group leader agreement, Job Description* and *Code of Practice* and *staff handbooks* for requirements and guidance specific to your area of responsibility.

Challenging Behaviour

'Bad' behaviour is often a response to a situation, or a way to seek attention. Keep children occupied so there is less of a need to seek attention and less of a chance for boredom to set in. Use the following guidelines to deal with challenging behaviour constructively:

- **Be aware of what unacceptable behaviour is.** Ask your lead member of staff if you are unsure. Children attending certain activities will have been issued with a code of conduct/ set of rules.
- **Explain to children why certain behaviour is unacceptable.** This makes children feel responsible for their behaviour and they are less likely to repeat it.
- **Punish the behaviour and not the person.** Always avoid labelling someone as 'bad'.
- If appropriate, ignore the bad behaviour for a while – a child may only be attention seeking.
- Record and report any instances and follow up action taken.
- Refer to the *Disciplinary policy* for further information on how to proceed.

Use of images

CAE requests written consent to take and use images of children on enrolment. This consent must be checked at the start of the course and prior to the taking of photographs and/or video footage. Any still or moving images taken as part of the course are the property of CAE and must not be shared publicly or used for anything other than official CAE purposes and with the consent of the parent/ guardian as above.

Children should be encouraged to be careful when taking and using images, especially in the online environment.

Electronic contact with children

Staff must exercise the same discretion and maintain the same professional distance in any electronic contact with children as they would in normal day to day life. Electronic contact includes telephone communications (including texting and instant messaging) and online environments.

- Never initiate electronic contact with a child unless for official purposes sanctioned by CAE. Do not accept or respond to 'friendship requests' from children.
- If a child contacts you electronically, keep your tone friendly, professional and neutral
- Avoid situations that involve the exchange of personal information, personal photos, virtual gifts or the use of an application that suggests or encourages the sharing of personal feelings
- If a child seeks to develop an inappropriate personal relationship with you electronically, do nothing to encourage this. Inform CAE and send a copy of the relevant communications to them.
- If a child confides sensitive information to you electronically (such as details of abuse), react as shown in the table below. Record the details and send a copy of all relevant communications to CAE.

Bullying policy

We welcome students from all backgrounds and will not permit discrimination by students or staff on the grounds of either religion, gender, sexual orientation, or ethnicity. In addition, even greater sensitivity will be shown to students who are arriving in the UK from territories currently in the midst of internal or international conflict.

CAE finds that Harassment and bullying are unacceptable from students, staff or homestay hosts. Staff should be vigilant at all times.

Examples of harassment or bullying might be:

- the use or threatened use of physical action/violence,
- the use of social exclusion – e.g. isolating individuals the use of disparaging names, phrases or language that could be considered offensive towards target individuals, and other such 'name calling'
- persistent and deliberately wounding or hurtful remarks especially where such remarks refer to a target individuals origins or physical appearance or attributes
- repetitive actions or sounds which are intended to provoke target individuals in to action or anger and for the harasser/s to gain benefit/enjoyment from that reaction
- actively spreading malicious gossip or hurtful remarks about target individuals
- fostering an atmosphere of distrust and actively fomenting such an atmosphere so as to cause hurt and disruption to the target individual in the pursuance of their everyday activities
- any form of mental abuse

If you suspect bullying:

- Investigate all reports, however seemingly trivial
- Make notes in the incident book or against the student's file
- Once established that an incident has taken/ is taking place, refer the situation to your line manager and director
- Explain the consequences of the bully's actions on others. Ask them to suggest appropriate ways to put things right or to apologise
- Ensure that apologies are made in the presence of staff so that records can be made
- If actions continue, send the child to Course director or Principal for further action which may include contacting the parents of both parties.
- Continued unacceptable behaviour will result in suspension from the programme, and sending home
- Matters of staff or homestays bullying children will be dealt with through the staff disciplinary and grievance procedures. (see CAE harassment and bullying policy)

3. CHILD PROTECTION PROCEDURES

Child Protection is defined as protecting children from abuse. It includes inflicting harm and failing to act to prevent harm.

CAE undertakes to:

- have a **lead member of staff** for child protection who has received appropriate training and support for this role, and that all staff know who this is and what they do
- ensure all **staff understand their responsibilities** in being alert to the signs of abuse and responsibility for referring any concerns to the lead staff member. However, staff should remember that they are not trained to deal with situations of abuse or to decide if abuse has occurred.
- **communicate with parents** providing them as best possible with an understanding of the responsibility placed on the school and its staff for child protection. CAE duty of care and child protection responsibilities are available on the CAE website and in all supporting documentation.
- develop effective links with relevant Child Protection agencies and co-operate as required with their enquiries regarding child protection matters including attendance at case conferences.
- keep written records of concerns about children, even where there is no need to refer the matter immediately.
- **ensure all records are kept securely in locked/ secure locations.**
- develop and follow procedures where an allegation is made against a member of staff or volunteer.
- adopt a procedure for dealing with concerns about possible abuse.

Key persons	John Barnett , Principal
Designated Safeguarding officers	Yvonne Chapman , Director of Young Learner Courses Sheila Levy, Deputy Principal (for U18s on adult courses) Fiona Craig, Accommodation Officer - (for Homestays); Course Directors (residential summer centres)
Local Lead persons	
Contact telephone numbers:	+44 1223 277230 CAE school office +44 7908 179170 CAE emergency mobile +44 7900 868931 CAE Young Learner mobile
LADO (Cambridgeshire)	01223 727 968 or 01223 727 969

Responsibility

- It is the **duty** of anyone working with children **to report disclosure of abuse.**
- It is not for staff to decide whether or not a suspicion or allegation is true.
- Staff should never try to deal with a suspicion, allegation or actual incident of abuse by him/herself.
- All suspicions or allegations must be taken seriously and dealt with according to this procedure
- Whatever the reaction, truth or circumstances of disclosure, an appropriate response in line with the procedure below must be made, and will be supported by CAE.

Child abuse

Child abuse is a term used to describe ways in which children are harmed, with damage to their physical and mental health.

The four broad categories (P.E.N.S) of abuse are as follows:

- **Physical** abuse: through hitting, shaking, squeezing etc. (**P**)
- **Emotional** abuse: through persistent lack of affection, unrealistic adult demands, verbal bullying and cyberbullying (**E**)
- **Neglect**: failing to provide for a child's basic needs: food, proper clothing and safe supervision (**N**)
- **Sexual** abuse: through inappropriate physical contact, the taking of indecent images of children, or the encouragement of sexual activity by children for the purpose of adult gratification (**S**)

Abuse may become apparent in one of the following ways :

- Unexplained injuries: A child may show signs of physical injury for which there appears to be no satisfactory explanation
- A child describing an abusive act
- Another child telling you of their concern about a friend or fellow student: children may find it easier to tell a friend than to tell an adult.
- Serious distrust of adults and sexually explicit behavior in games and activities: a child's behaviour may indicate that it is likely that he/she is being abused.
- Difficulty in making friends and socialising appropriately with other children
- A child discloses abuse
- A member of staff's behaviour, or in the way in which he/she relates to a child causes concern

How to react if you suspect child abuse

- If you notice any physical or behavioural signs of abuse, tell the designated person
- If you suspect an adult is a threat to a child, tell the designated person. Continue to be vigilant
- If a child tells you that they are being abused, react calmly according to the procedures below and contact the designated person.

How to react to an allegation or disclosure

DO	DO NOT
Stay calm	Don't panic or over-react. It is unlikely that the alleged victim is in immediate danger.
Listen, hear and believe	Don't PROBE for more information. Questioning the participant may affect how the participant's disclosure is received at a later date.
Give the person time to say what they want. use TED Questions: Tell me... Explain ... Describe	Don't make assumptions. Don't paraphrase. Don't offer alternative explanations.
Reassure and explain that they have done the right thing in telling. Explain that you will need to pass the information on to the relevant person.	Don't promise confidentiality to keep secrets, or that everything will be OK (it might not)
Act immediately in accordance with the procedure in this policy. Pass it on.	Listen, record and refer. Don't investigate. Don't delay or try to deal with it yourself.
Record in writing as near as verbatim as possible what was said as soon as possible	Don't make negative comments about the alleged abuser
Report to the lead member of staff	Don't 'gossip' with colleagues about what has been said to you Don't make a child repeat a story unnecessarily
The lead member of staff will seek advice from the local statutory agency who will provide further guidance.	

Reporting suspected, alleged, or actual incidents of abuse

It is sometimes difficult to accept that something disclosed in confidence by a child or anyone else, should be passed on to a colleague. Remember that the **welfare of a child is paramount** and **you have a duty to report** suspicions, allegations or actual incidents to the designated member of staff. Information should also be reported if you yourself have concerns that a child may be suffering harm or is at risk of abuse, even if you are unsure about your suspicions.

Recording suspected or actual incidents

No matter what happens to a suspicion, allegation or actual incident of abuse, (that is whether or not it is processed through a statutory agency or not), all details must be recorded. Important information to record includes:

- The date and time of disclosure, suspicion, allegation or actual abuse incident.
- Details given to you about the above, e.g. date & time of when things occurred.
- An indication of who is involved.
- Details of what action you and CAE have taken.
- Details of reporting on, e.g. who to (statutory agency) and when.
- If it is decided not to consult with a relevant statutory agency, a full explanation of why must be documented.
- Recording should be factual, with no reference made to your own subjective opinions.

Records should be kept completely confidential and secure and only shared with those who need to know about the suspicion, allegation or actual incident of abuse.

Once this initial report has been made, the **lead member of staff will consult with the relevant statutory agencies.**

In order to do this, the following information may be required:

- Staff details: name, address, telephone number, position/role within the organisation
- Child details: as many details as possible, e.g. name, nationality, date of birth
- Reasons for telephoning, e.g. the suspicions, allegations, what has been said, giving details of times and dates and the child's emotional state, or what the child has said in response to the suspicions/concerns. Make a clear distinction between what is fact, opinion or hearsay.
- Actions taken so far
- referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

The relevant statutory agency will then instruct you as to what to do next and take the responsibility for further action.

If an adult is suspected or accused, CAE will

- Risk assess any immediate danger to children
- Immediately remove the adult from contact with children, or restrict all unsupervised access
- Keep full records of the allegation according to the procedures described above
- Investigate and inform the parents
- If there is evidence to support the allegation, refer the matter to the Local Authority Designated Officer (LADO) and to the NSPCC who will advise on the next steps.
- This may include criminal prosecution and informing of referees, and the Disclosure and Barring Service.

4. TRAINING

Yvonne Chapman is the person responsible for Safeguarding Training.

- All staff are required to confirm that they have read and understood the *CAE Safeguarding Policy* and to sign the relevant *Code of Practice*.
- All CAE employees are expected to undertake a *Level One Basic Awareness course* and to submit a certificate to confirm completion. Training records will be kept on staff files. Homestays, Group leaders and other adults are encouraged to do the same.
- Further instruction and training on Safeguarding with specific contexts will be given at induction, INSETD, through regular communications and in special training sessions as appropriate.
- Local lead members of staff (including residential senior staff) will be Level 2 trained wherever possible. Appropriate support will be provided if this is not the case.

5. SAFER RECRUITMENT

CAE is committed to safeguarding and promoting the welfare of children and young people and expects all staff (employees, homestay hosts and other adults) to share this commitment to safer recruitment. Safer recruitment procedures and practices aim to prevent the appointment of people who may pose a risk to children.

All Staff are selected on their suitability for the requirements and responsibilities for the particular activity and their ability to demonstrate that they can work safely with children.

Where new (and existing) staff will be working with children, safer recruitment procedures are as follows:

- A CAE **Application Form**/ or Returner Application or Homestay Questionnaire must be submitted. These forms will elicit information about the applicant's past and any gaps must be explained.
- All correspondence with applicants will include reference to the **CAE commitment to Safeguarding**.
- **Interview procedures** will make specific reference to Safeguarding awareness, experience and sensitivities
- Current **references** from past employers will be taken up
- Appointment/ deployment decisions are made with careful consideration to different age groups, backgrounds etc.
- **Offers of employment** are made subject to certain conditions, including receipt of suitability checks.
- At Contract stage, Staff and homestays are asked to complete a *Declaration Regarding Suitability to Work with Children*, and to sign the *CAE Code of Practice* appropriate to their role.
- **Suitability checks** are carried out for all staff (e.g. DBS checked, Police Checks etc.) Where there is a delay in returned DBS check, a risk assessment will be made and if appropriate the individual will be employed under supervision and without direct access to children. Having a criminal record will not necessarily prevent a candidate from working at CAE. This information should be disclosed at application stage.
- Safeguarding best practice, the CAE Safeguarding Policy and the CAE Code of Practice will be discussed at induction as appropriate. The CAE Safeguarding policy is made available to all staff on the website; via staff manuals and on the shared staff X: CAE Policy
- Awareness of safeguarding and child protection issues will continue to be addressed through INSETD, regular communications with homestays, group leaders and other adults, and support to attend training days as appropriate.

6. Other WELFARE and SAFEGUARDING considerations

Health and safety

All members of staff are asked to comply with *CAE Health and Safety Policy*, a copy of which you will be asked to sign. Staff are responsible for ensuring that CAE property and that of the host school is used with respect, care and economy, both by themselves and by students. Any cases of disorder, damage to property and Health and Safety concerns should be acted on immediately. See staff handbooks and Health and Safety guidelines.

Risk assessments

General risk assessments are available for all areas of provision. Risk assessments are live documents and should be considered and updated as appropriate for each activity, particularly those involving direct responsibility for children. See Staff handbooks and Health and Safety guidelines.

Behaviour and Discipline

All students receive a Code of Conduct relevant to their particular setting. These documents are available prior to arrival, in handbooks and during the course. Staff will discuss the Code of Conduct, expectations of behaviour and disciplinary procedures at induction and will continue to monitor and support students throughout their stay.

Supervision ratios

An adequate adult presence must be maintained at all times. See the Guidelines for Supervision levels.

Prevent Strategy

CAE has a statutory duty to implement the Government's Prevent Strategy and to protect adults and children who may be vulnerable to extremism. As professionals, we are well placed to recognise individuals whether adults or children who are vulnerable to the various types of risk and harm which may be caused by exposure to extremist views. See CAE Prevent Policy and CAE Prevent Risk Assessment.

U18s on Adult courses

Detailed policy and guidance is available for children U18 who join an adult programme of study. Staff should be particularly vigilant in this situation and monitor risk and levels of support given to children carefully. See Policy for Care of U18s on Adult courses; U18s Parental Consent form.

Airport transfers

CAE provides inclusive airport transfers for all students joining its young learner programmes. Children joining an adult programme of study are advised to book a CAE transfer. See Policy for Care of U18s on adult courses; FAQ Airport Transfers for YLS.

7. Useful contact numbers

L.A.D.O Cambridgeshire	01223 727 968 or 01223 727 969
NSPCC	0207 825 2500
Cambridgeshire County Council	
Children's Social Care Services	0345 045 5203
Education Child Protection service	01223 729 046
Prevent Referral	prevent@cambs.pnn.police.uk
Helpline	0808 800 5000 or www.nspcc.org.uk
Childline UK	0800 1111 or www.childline.org
DBS	0870 909 0811 https://www.gov.uk/disclosure-barring-service-check/overview
Samaritans	08457 909 090 www.samaritans.org
Cambridge Academy of English	01223 277 230 or 07908 179 170
Yvonne Chapman	07900 868 931 yvonne@cambridgeacademy.co.uk
CAE website	www.cambridgeacademy.co.uk
CAE Practical Information documents (including Safeguarding Policy)	http://www.cambridgeacademy.co.uk/practical.html
Level 1 Basic Awareness in Safeguarding Training	http://www.courses.kirkleessafeguardingchildren.co.uk/