



Safeguarding Policy 2018 Condensed Version

Revised: Reviewed 08/02/2018; JME, DAT

The Cambridge Centre for Languages Safeguarding Children Policy 2016

1. Policy Statement

The Cambridge Centre for Languages (CCL) takes its responsibility for safeguarding children and young people seriously. We firmly believe that it is unacceptable for any child in our care to suffer any kind of abuse.

This document is designed to raise the awareness of both teaching and non-teaching staff and Homestay Providers and anyone working in cooperation with CCL of the need to safeguard the children in our care and of their responsibilities in identifying and reporting possible cases of abuse and of children in need.

It outlines the policies and procedures which we have in place to ensure the safety and wellbeing of the children under our protection, and lay out their role in ensuring that these procedures are adhered to.

This policy will be reviewed at least annually and in accordance with any internal procedural updates or official updates in legislation.

Associated policies include: Health and Safety, Emergency Action Plan, Anti-bullying policy, ITC policy and Prevent policy. Summarised versions of this document are available for specific groups (group leaders, homestay providers, temporary staff etc.) in a condensed format intended to convey key information in an efficient manner.

What is safeguarding?

Safeguarding is an umbrella term relating to general 'looking after' of children in our care. Child Protection can be defined as 'protecting children from direct harmful behaviour'.

It might be difficult to accept, but every child can be hurt, put at risk of harm or abused, regardless of their age, gender, religion or ethnicity. Safeguarding legislation and government guidance states that safeguarding means:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care.
- taking action to enable all children and young people to have the best outcome

CCL identifies that:



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- The action we take to promote the welfare of children and protect them from harm - is **everyone's responsibility**. Everyone who comes into contact with children and families has a role to play.
- All children have an entitlement to protection against abuse or harm regardless of age, gender, racial origins, sexual orientation, religious beliefs, or disability.

Safeguarding legislation

In England the law states that people who work with children have to keep them safe. This safeguarding legislation is set out in The Children Act (1989) and (2004). It also features in the United Nations Convention on the Rights of the Child (to which the UK is a signatory) and sets out the rights of children to be free from abuse. The Government also provides guidance in their document Working Together to Safeguard Children.

1.1. Key Roles of Responsibilities

All adults associated with under 18s have responsibilities to safeguard them. Everyone must have safeguarding training, a well-developed ethos of safeguarding, be vigilant and know the procedures for reporting any concerns or allegations and who to contact within and outside our organisation.

Responsibilities for under 18s include looking out for each other and raising concerns with adults if necessary.

Roles and Responsibilities:

Daniel Taylor (Accommodation and Welfare Manager) Emergency number: 07809 725914
accommodation@camlang.co.uk

Responsible for:

- Designated Safeguarding Lead
- Reporting concerns and/or allegations to Local Authority Designated Officer and other related agencies
- Keep a record of any allegations or concerns
- Assist in providing basic (level 1) training to all staff
- Recruit host families and ensure that they have DBS checks
- Make sure host families read and sign the code of practice, declaration and other relevant documentation
- Overseeing and reviewing this policy

James Errington (Centre Director) 07803504849 cd@camlang.co.uk



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Responsible for:

- Deputise as Designated Safeguarding Lead in the absence of Daniel Taylor
- Assist in providing basic (level 1) training to all staff
- Carry out DBS checks for all relevant staff
- Perform safe recruitment procedures for key staff
- Ensure key staff have read and understand safeguarding policy, code of conduct and other relevant policies
- Assist in overseeing and reviewing this policy

Laura Chen (Principal) 01223 470535 info@camlang.co.uk

Responsible for:

- Act as Designated Safeguarding Lead in the absence of the above
- Obtain police record checks for all group leaders
- Ensure contractors and transport providers are DBS checked
- Oversee the implementation of this policy across the organisation

Contact details for agency involvement:

Cambridgeshire Direct Contact Centre (social care) 0345 045 5203

Emergency Duty Team (out of hours) 01733 234724

Police Central Referral Unit 01480 847743

For more information see:

Cambridgeshire Local Safeguarding Children Board - Safeguarding Interagency procedures
www.cambslscb.org.uk

2. Code of Conduct

All members of staff are required to adhere to CCL's Code of Conduct Policies which are in place to ensure and build a culture of trust between adults and under 18s. The code of conduct is designed to protect both adults and children from any behaviour which may be misinterpreted.

One to one contact

Staff and Homestay Providers should not spend excessive amounts of time alone with children, away



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from others. In the event of having to meet with an individual child or young person, make every effort to keep this meeting as open as possible. If privacy is needed, ensure that others are informed of the meeting and its whereabouts.

2.1. Position of Trust

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 the legal age of consent is 16).

2.2. Setting Standards

Treat everyone with dignity and respect, set an example you wish others to follow and treat everyone equally. Aim to build relationships based on mutual trust and be aware that perfectly innocent behaviour and actions can from time to time be misunderstood. Respect a young person's right to privacy, and act as a role model.

Staff who are involved in relationships with other members of staff should ensure that their personal relationships do not affect their roles within their work. Public displays of affection should be avoided at all times.

2.3. Adult – Under 18 Interaction

Physical contact between adults and under 18s is not generally acceptable. Never allow, or engage in, inappropriate touching of any kind.

Staff and Homestay Providers should never engage in sexually provocative or rough physical games, including horseplay.

Never do things of a personal nature for a child or a young person that they can do for themselves. If such an incident arises, for example, where a child or young person has limited mobility, CCL staff should seek a senior staff member of school to deal with such an incident. Homestay Providers should seek advice from the Designated Child Protection Officer.

2.4. Appropriate appearance

Staff and Homestay Providers should ensure that they dress in a manner appropriate to their role for example by avoiding extremely short skirts and shorts and revealing tops. Teaching staff should dress smartly and respectfully with sensitivity to cultural background of students.

2.5. Alcohol, Drugs and Smoking

CCL Staff and Homestay Providers are expected to provide role models to the students in their care, this means we have strict policies on smoking, drinking and drugs.



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CCL is a dry campus this means that no alcohol should be consumed on the site nor should it be consumed before going on duty. If you suspect that another member of staff has been drinking you should inform a senior staff member immediately.

If you are staying in the residence there should be no alcohol on the premises, you may consume alcohol off site on evenings when you are not on duty, but you should avoid contact with students after doing so. Be moderate and show consideration to others by returning quietly to your room.

Smoking is not permitted anywhere on the campus, any staff who smoke should do so out of sight of the students and well away from the school buildings.

Homestay Providers should never offer alcohol or cigarettes to students. Under no circumstances should they buy either product for students in their care. They should ensure that they do not consume excessive amounts of alcohol while caring for students.

2.6. IT and Social Networks

Under no circumstances should staff disclose any personal contact details to a student such as telephone numbers, your address or your email address. Social media should not be used in connection with students.

2.7. Accommodation

Staff and Homestay Providers should:

- Be aware that someone might misinterpret their actions no matter how well intentioned.
- Never draw any conclusions about others without checking the facts.
- Never allow themselves to be drawn into inappropriate attention seeking situations such as tantrums or crushes.
- Never exaggerate or trivialise child abuse issues or make suggestive remarks or gestures about, or to a child or young person, even in fun.
- Endeavour to provide an example, which they would wish others to follow
- Challenge any inappropriate language used by a young person or child or an adult working with young people.
- Not use inappropriate language in front of a child.

The Accommodation and Welfare Manager has a responsibility to screen potential host families before receiving students. Homestay providers are visited at least every 18 months. A DBS check must be carried out on the main carer in families hosting under 18s and the code of conduct and other related documentation should be read and signed by them.

Appropriate attire should be worn in the in the corridors of the residence and in the home where students are present. There are clearly marked staff and student showers, please ensure that these are adhered to. Boys and girls are not allowed into each other's dormitories under any circumstances. Should it be necessary to enter a student's bedroom always knock and wait for a response unless there is an emergency.



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2.8. Whistleblowing

CCL recognises the importance of ensuring that all staff feel able to raise concerns about any issues regarding child protection, welfare or poor or unsafe practices with regards to children.

All CCL Staff should understand that they have a responsibility and a legal obligation to inform management if they have concerns about another staff member's inappropriate behaviour or actions that conflict with the CCL code of conduct.

It should be clear that staff who make such reports concerning the above or any other matters will not be penalised and that their report will remain in strict confidence.

3. Child Protection

Overview

The Cambridge Centre for Languages recognises that it has special duties of care towards under 18s and it is committed to protecting children and young people from harm. It makes every effort to avoid placing members of its staff in situations where abuse might be alleged. The Cambridge Centre for Languages takes every reasonable step to safeguard children by adopting child protection guidelines through a code of conduct, and following procedures for vetting and training people who work directly with children and young people. We recognise that all staff, including volunteers, have a full and active part to play in protecting our children from harm.

3.1. Nominated Persons

CCL recognises its responsibility to nominate a Designated Safeguard Lead person (DSL) who has completed an Advanced Safeguarding for Designated staff (formally level 3). If the DSL person is not available, CCL must ensure that a deputy DSL person is available and trained to at least Advanced level (formally level 2).

Designated Safeguarding Lead:

Daniel Taylor (Accommodation and Welfare Manager,) Emergency number: 07809 725914
accommodation@camlang.co.uk

Responsible for:

- Reporting concerns and/or allegations to Local Authority Designated Officer and other related agencies
- Keep a record of any allegations or concerns



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- Assist in providing basic (level 1) training to all staff
- Recruit host families and ensure that they have DBS checks
- Make sure host families read and sign the code of practice, declaration and other relevant documentation
- Overseeing and reviewing this policy

Deputy Designated Safeguarding Lead in the absence of Daniel Taylor:

James Errington (Centre Director) 07803504849 cd@camlang.co.uk

Responsible for:

- Assist in providing basic (level 1) training to all staff
- Carry out DBS checks for all relevant staff
- Perform safe recruitment procedures for key staff
- Ensure key staff have read and understand safeguarding policy, code of conduct and other relevant policies
- Assist in overseeing and reviewing this policy

3.2. When to Respond

If you suspect a child is suffering from any of the four areas of abuse (physical; emotional; sexual and neglect.) you must report this to the designated person while following any specific procedures outlined in this document

An adult member of staff should respond if:

- they note themselves that something is wrong
- they have been informed about something by another adult or under 18 year old

3.3. Recognising Symptoms of Abuse

It can be difficult to identify abuse as it has various forms, but in general you should look out for physical injuries which the student is unable to explain satisfactorily or changes in behaviour or personality. If another student raises concerns about their friend then obviously this should be taken seriously and investigated (see reporting procedures).

Identifying the signs of abuse is vital in order to protect those in our care. There are four main categorisations of abuse:



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Physical Abuse – This involves causing physical harm to a child through for example hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Neglect – This involves the carer continually failing to meet a child's basic physical and/or psychological needs, provide adequate food, clothing and shelter (including exclusion from home or abandonment); failing to protect a child from physical and emotional harm or danger; failing to ensure adequate supervision (including the use of inadequate care-givers); or failing to ensure access to appropriate medical care or treatment.

- It is likely to result in the serious impairment of the child's health or development.
- It may occur during pregnancy as a result of maternal substance misuse.
- It may involve the neglect of or lack of responsiveness to a child's basic emotional needs.

Emotional Abuse – This involves persistent emotional maltreatment so as to cause severe and adverse effects on a child's emotional development. It includes making a child feel that they are: worthless, unloved, inadequate, valued only insofar as they meet another person's needs

It may include: not giving the child opportunities to express their views, deliberately silencing them, 'making fun' of what they say or how they communicate

It may also feature age or developmentally inappropriate expectations being imposed on children including: interactions that are beyond the child's developmental capability, overprotection and limitation of exploration and learning, preventing participation in normal social interaction

Emotional abuse may also involve:

Seeing or hearing the ill-treatment of another, serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger, the exploitation or corruption of children

Some level of emotional abuse is involved in all types of maltreatment although it may occur alone

Sexual Abuse – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

This may involve: physical contact including assault by penetration (e.g. rape or oral sex), non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing, non-contact activities involving: children in looking at, or in the production of, sexual images, children in watching sexual activities or encouraging children to behave in sexually inappropriate ways, grooming a child in preparation for abuse (including via the internet).

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.



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3.4. Disclosure (A child telling an adult)

Reporting Procedures

In any case where an allegation is made, or someone at CCL has concerns, these should always be reported to the Designated Person. A written record should be made as soon as possible after any conversation, details should include, as far as is practical: the words used by the child and any noticeable non-verbal behaviour.

1. Record the date, time, place of the conversation
2. Name of child or young person
3. Residential or Homestay Provider address
4. Date of Birth (if known)
5. Telephone numbers if available
6. Is the person making the report expressing their own concerns, or passing on those of somebody else? If so, record details
7. What has prompted the concerns? Include dates and times of any specific incidents
8. Draw a diagram for the Designated Child Protection Officer indicating the position of any bruising or other injury;
9. Has the child or young person directly concerned been spoken to? If so, what was said? Was a witness present, if so who?
10. Has anybody been alleged to be the abuser? If so, record details
11. Who has this been passed on to, in order that appropriate action is taken? e.g. school, line manager Director of Studies, Accommodation and Welfare Manager
12. Has anyone else been consulted? If so, record details

This information should then be passed to: **the Designated Child Protection Officer (Daniel Taylor)** who will follow up the allegations, consulting the local authority if necessary.

If a student raises concerns

If a student wants to talk about any concerns they may have, staff or Homestay Providers should allow them to do so bearing in mind the following:

- They should listen carefully to what is being said
- They should not offer judgement or advice
- They should take the allegations seriously, NEVER trivialise allegations of abuse
- They should offer understanding and reassurance
- They should not promise to keep information confidential
- They should follow the reporting procedures below
- They should not let allegations, suspicions or concerns go unreported



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3.5. Accusation of Adult

Dealing with allegations against a member of staff.

- All allegations should be reported immediately to the Designated Safeguarding Lead (DSL, Daniel Taylor)
- Should the allegations warrant it a referral to the local authority designated officer
- The Designated person will then advise on all further action to be taken in line with the advice of the DO
- Neither the designated person nor any other member of staff should seek to interview the student or member of staff involved until advice has been sought as this could jeopardise any police investigation
- Where staff are the subject of an investigation their case should be dealt with fairly, quickly and consistently
- Should it be deemed necessary the member of staff may be suspended
- Residential staff who have been suspended for child protection reasons will be required to leave the residence

*** Staff who feel that they have been in a situation which they feel could become compromising should report it in writing to the DSL

3.6. Accusation of DSL/Senior Manager

CCL must ensure that a system is in place in the event that a senior manager or DSL is accused of inappropriate behaviour or abuse.

If such a situation occurs, the concern or allegation should be made to the DSL, deputy DSL or the school Principal Laura Chen depending on the nature of the allegation and the person in question. In no circumstances should the person accused be communicated with directly, regardless of their position in the organisation.

3.7. Accusation of Child

If a child (under 18) is accused of abuse or inappropriate behaviour then the DSL should be informed immediately and the procedures outlined above should be followed. Please note that in these circumstances it should be noted that there is also a duty of care to the accused child and they should be supported by the designated person(s).

3.8. Child Sexual Exploitation

All staff and adults have a duty to recognise and understand that Child Sexual Exploitation (CSE) is a serious form of abuse where a young person is forced into or otherwise manipulated into participating in a sexual act. Any concerns that this is occurring should be shared with the DSL.

People under 18 may be exploited by receiving gifts, money, attention, drugs, alcohol or something else as a result of sexual activity with others.



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This is not a balanced relationship, however consensual it may seem; the power of the exploiter may be based on a number of factors:

- age
- physical strength, violence
- intellect
- economic resources
- coercion and intimidation

Signs to be aware of:

- missing school or lateness
- unexplained gifts
- older boyfriend/girlfriend
- having bad company
- STDs
- Mood swings or emotional wellbeing problems
- Drug or alcohol abuse
- Displaying inappropriate sexual behaviour

4. Training

The DSL (Daniel Taylor) has a responsibility to ensure all staff and other adults connected to the school have basic awareness training.

All CCL staff have basic awareness (formally level 1) Safeguarding training.

Senior management have Advanced Safeguarding training (formally level 2) in addition to the online training outlined above.

The DSL has Advanced Training for the Designated Lead (formally level 3) in addition to the training above.

5. Safer Recruitment

CCL undertakes to provide recruitment procedures at induction so that staff are confident about who the designated person is, how to identify signs of abuse and neglect, how to pass on and record concerns appropriately, how to respond to disclosures, the need to avoid asking leading questions,. They will also be made aware that they have a responsibility to be alert to signs of abuse and refer such concerns to the designated person.



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Please see the separate Recruitment Policies for further details

6. Welfare/Implementing Safeguarding

6.1. Missing Students

Registers are taken at the start of each activity or lesson. Any absences are followed up through contact with group leaders or phoning the mobile of the student concerned or the Homestay Providers. Contact telephone numbers of all students, group leaders and Homestay Providers are kept in the office.

If a student goes missing on a trip, SAOs should let a senior manager know immediately. The office will then try and locate that student, calling the police should this become necessary.

6.2. First Aid and Medical

Posters displayed in school list the designated first aiders. All designated first aiders possess a basic first aid qualification. First aid boxes are located in the office. For further information please refer to the first aid policy document.

6.3. Under 18 Behaviour and Discipline

CCL aims to maintain a positive learning environment for all students and recognises the need to reinforce positive attitudes with recognition and praise. A friendly and supportive atmosphere with good relations between students, staff and homestay providers is essential to nourishing an atmosphere of mutual trust and understanding.

Students do however need to be aware of the rules and boundaries and respect them. The following behaviour should not be tolerated:

- Lateness and poor attendance
- Disruptive behaviour and rudeness
- Abuse of the school building, fellow students or members of staff
- Smoking or drinking alcohol
- Any other illegal activity.
- Bullying



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- If a student misbehaves in class or during an activity, in the first instance the teacher or SAO should speak to the student and explain why their behaviour is inappropriate and what the consequences will be of their continued poor behaviour.
- If their poor behaviour continues, if necessary, the student should be sent to the Centre Director. He / She will reinforce the fact that their behaviour is unacceptable and that its continuation will not be tolerated and may have consequences. The student will be required to apologise to the member of staff concerned.
- Should the behaviour continue the child's parents will be informed.
- As a last resort and as a result of serious misbehaviour (illegal activity, violent or threatening behaviour) the student will be asked to leave the course and sent home.

6.4. Fire Safety

Fire drills should be carried out in school weekly. There should be a drill early in the morning for residential students, before morning break and before afternoon break. This is to ensure that all students get the benefit of the practice. All staff in school should ensure that they and any students in their care assemble on the lawn in front of the tennis courts. A register will then be taken to ensure that all students have evacuated the building. Once the all clear is given students will be allowed to return to the building.

All Homestay Providers are required to complete a fire risk assessment, which they should go through with students when they arrive.

See separate fire safety policy for more details.

6.5. E-safety

CCL aims to make sure students are safe on-line and also to educate learners about E-safety. Staff should not share personal data, information, photos or personal media with students or people they do not know. Students are encouraged to speak to a staff member if they receive unwanted contact or content online or digitally.

Precautions are in place such as firewalls and filters to screen unsuitable content. Supervision of the computer room by staff members is in place. All staff should refer to the code of conduct.

CCL will develop/review its E-safety Policy annually.

6.6. Radicalisation and Extremism (PREVENT)

CCL is a multicultural and international community that actively promotes international understanding and encourages an awareness of the different ways we all live, think and learn. We will make an effort



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to educate young learners about acceptance and tolerance of a range of outlooks, that people think differently and believe different things, all of which are acceptable as long as these views and beliefs are reasonable and do not extend to hurting or demeaning those with different beliefs.

CCL recognises its responsibilities under the Counter Terrorism and Security Act 2015 to help prevent people of all ages being radicalised or attracted to terrorism and aims to meet its obligations within the contexts in which we operate. **Prevent** is part of the national counter-terrorism strategy and aims to stop people being drawn into or supporting terrorism. Daniel Taylor is the PREVENT lead for CCL and is responsible for staff training.

Say NO to extremism:

- **Respect** other people and the views of other people
- **Challenge** any behaviour that does not allow all students and staff to work together easily
- **Reject** the display or allow the promotion of extremist materials or organisations
- **Support** any students or staff reporting concerns about extremism in the school
- **Talk** to your teacher or a school manager if you have any concerns about extremism in the school.
- **Understand** that mutual respect and tolerance are an important part of culture in the UK
- **Recognise** and observe **core British values**:
 - democracy
 - the rule of law
 - individual liberty
 - respectful tolerance of different faiths or beliefs.

Please refer to CCL's Prevent Policy for further details

I have read and understood the above document.

Name Position

Signed Date