CES POLICIES & PROCEDURES

Safeguarding Policy
UK Schools



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DEFINITIONS

Safe-guarding and Child Protection

Safeguarding is the ongoing, proactive work done to promote children's welfare, prevent harm before it happens and to create safe environments for children and young people.

Safe-guarding includes:

- Safe recruitment and training
- Policies and procedures (codes of conduct, online safety)
- Teaching children about staying safe
- Listening to concerns early
- Working with families and other services to reduce risks

Safeguarding applies to all children, all the time, even when there is no specific concern.

Child protection is a subset of safeguarding and comes into play when a child is already being harmed or there is significant risk of harm. Child protection is reactive and case-specific.Child protection involves:

- Responding to specific concerns or disclosures
- Referrals to children's social care
- Investigations and assessments
- Child protection plans
- Multi-agency intervention to keep the child safe

A child's rights

Anyone under the age of 18 is legally considered to be a child in the UK

- All children have rights. No one can take away a child's right to be safe
- All children have a voice
- All children have the right to say 'no' if any person tries to do something to them which they feel is wrong.
- All children have the right to be supported against bullies.
- All children must feel they can tell an adult of any incident that frightens or confuses them or makes them unhappy.
- All children must know that if they go to an adult for help, they will be listened to seriously and supported.
- All children have the right to be treated with respect and to be safeguarded from harm

AIMS

Policy Statement

CES has a moral and legal duty of care to safeguard all children from harm. All children have a right to protection, and the needs of disabled children and others who may be particularly vulnerable must be taken into account. CES will ensure the safety and protection of all children through adherence to the Safeguarding Policy guidelines adopted by CES.
A child is defined as a person under the age of 18 (The Children Act 1989).

Policy Aims

The aim of this policy is to promote child welfare in our schools by having training, and policies and procedures in place to raise awareness of safe-guarding; promote good practice; discourage poor practice; set out clear procedures to support good safe-guarding; and to provide guidance on how to manage concerns. This policy applies to both real world and online environments.
All people, whether adults or children, who have any contact, in any form, with young people, aged under 18 are covered by this policy.

Centre of English Studies is committed to ensuring that:

- the welfare of children is paramount
- all children, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have rights in general and in particular the right to protection from all types of abuse.
- all suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately
- all staff, students, contractors and homestays, are covered by this policy and have a responsibility to report concerns to the appropriate person, normally the Designated Safeguarding Person (herein after known as the DSP) in the first instance
- all staff receive appropriate training
- this policy is disseminated to all staff, students and homestays,

PREVENTATIVE MEASURES

The CES Staff Code of Conduct

The following appears in relevant handbooks:

- promote an atmosphere of tolerance and respect and will actively challenge extremist views that threaten this atmosphere. In the UK Only : Staff and responsible adults will promote core British values of democracy, the rule of law, individual liberty and tolerance of different beliefs and cultures. Staff will report any concerns to the PREVENT lead (please read the PREVENT policy carefully)
- need to set standards and to be excellent role models. For example, be somebody children can trust, use appropriate language, be punctual, be fair and not to have favourites, not to give preferential treatment, give clear instructions, be positive, react and respond appropriately to a variety of situations
- All staff and responsible adults know professional boundaries
- All staff and responsible adults must treat all students and young people with due respect
- All staff and responsible adults need to have appropriate appearance and to dress in a manner that is appropriate to their role.
- All staff and responsible adults should refrain from smoking, drinking alcohol and of course taking any form of illegal drug

- Members of staff or homestays should declare if they are on prescribed medication that might affect their ability to fulfil their duties
- All staff and responsible adults should not swear in front of young learners
- All staff and responsible adults should be aware of CES guidelines on the use of social networks and misuse of IT.
- All staff and responsible adults in residential centres should be aware of appropriate forms of behaviour in accommodation, particularly around bedrooms and bathrooms and the right to privacy
- All staff and responsible adults should be aware of the correct action to take with regard to arranging transportation for young learners
- All staff and responsible adults have a duty of care towards all students but in particular towards students under the age of 18
- All staff and responsible adults should avoid all forms of physical contact with students unless in certain clearly defined situations (e.g. administering of first aid by a trained first aider ideally in the presence of another member of staff)
- All staff and responsible adults should be aware of CES guidelines relating to the use of photographic and video equipment with young people
- All staff and responsible adults should share any concerns with the appropriate member of staff immediately

Promoting Good Practice

All staff should be encouraged to demonstrate exemplary behaviour in order to promote a child's welfare and reduce the likelihood of allegations being made. The following are common sense examples of how to create a positive culture and climate. **Remember, following good practice can be as much for your benefit as for the student's benefit**.

You should:

- work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- implement this policy at all times
- remember, other people may misinterpret your actions, no matter how well intentioned
- challenge unacceptable attitudes of behavior from other members of staff or students
- set an example you wish and expect others to follow
- treat all young people equally, avoiding favourites
- respect a young person's right to personal privacy
- make the experience of studying with CES fun and enjoyable: promote fairness, confront and deal with bullying.
- treat all young people (including disabled young people) equally, and with respect and dignity.
- put the welfare of each young person first, before winning or achieving goals.
- maintain a safe and appropriate distance with young children in your care (e.g. it is not appropriate for staff to have an intimate relationship with a child or to share a room with them).
- avoid unnecessary physical contact with young people. Where any form of manual/physical support is required it should be provided openly and with the consent of the young person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the young person's consent has been given. Keep any physical contact with a child brief and don't touch a child anywhere that would normally be covered by a swimming costume.
- use the procedure: demonstrate – ask permission – touch if you have to touch a child – for example to demonstrate a sporting technique. However, it is always best to avoid touching at all and simply to demonstrate the technique.

- try to ensure that other students and if possible other staff members or group leaders are present if physical contact is prolonged or sensitive - for example to comfort a crying child, if someone is injured or if you have to separate fighting children.
- request written consent from the group leader if staff are required to transport young people in your car. **You should avoid doing this alone.**
- ensure you work in pairs with the appropriate gender of staff doing the supervising if students have to be supervised in changing rooms.
- be an excellent role model - this includes not smoking or drinking alcohol in the company of young people.
- give enthusiastic and constructive feedback rather than negative criticism.
- recognise the developmental needs and capacity of young people and disabled adults -avoiding excessive training or competition and not pushing them against their will.
- keep a written record of any injury that occurs, along with the details of any treatment given. This should be recorded in the incident books provided.
- ensure you know the location of medical consent forms for the administration of emergency first aid (provided you are qualified to do so) or other medical treatment if the need arises.
- recognise if a student is developing a 'crush' on you. Do nothing that might be construed as encouraging this. Inform the Centre Manager. Never flirt with a student or make sexually suggestive or provocative comments, even in fun.

Avoiding Poor Practice

You should not:

- spend time alone with young people away from others.
- betray a situation of trust
- permit abusive peer activities (eg initiation ceremonies)
- share changing rooms, washrooms, toilets or bedrooms with children. Always warn children before entering these places. Avoid being in these places with children unless absolutely necessary, and pay particular attention to avoid being alone with a child in these places. Always make sure you are there with another member of staff of the correct sex.
- take young people alone in a car on journeys, however short
- engage in rough, physical or sexually provocative games or contact, including horseplay
- engage in inappropriate language with young people – writing, phoning, email or internet
- hit, throttle, push, kick or otherwise act aggressively either physically or verbally towards a child even in pretense
- share a room with a child
- enter children's rooms alone in a residence or invite children into your rooms
- take young people to your home where they will be alone with you
- allow or engage in any form of inappropriate touching
- allow children to use inappropriate language unchallenged
- make sexually suggestive comments or threats to a child, even in fun
- reduce a child to tears as a form of control
- fail to act upon and record any allegations made by a child
- do things of a personal nature for children or disabled adults, that they can do for themselves
- invite or allow children to spend time with you alone and unsupervised
- Male and female students under the age of 18 should not be accommodated in the same homestay
- under-16s and over-18s should not be put in the same homestay
- Male and female students under the age of 18 should not be accommodated in the same homestay

Professional boundaries

The following are some examples of where professional boundaries may be exceeded

- Personal relationships between a member of staff and a student is prohibited. This includes relationships through social networking sites. If CES learns of such relationships, they will be investigated by the DSP or DSL.
- Use of abusive language is prohibited
- Use of punishment or chastisement is prohibited
- Passing on personal contact details to students is prohibited
- Taking students to a member of staff's home is prohibited
- Selling to or buying items from a student is prohibited
- Accepting responsibility for any valuables on behalf of a student is prohibited
- Accepting money as a gift/ borrowing money from or lending money to a student is prohibited

N.B. It may sometimes be necessary for staff to do things of a personal nature for children, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of the child concerned and the group leader. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. **Do not take on the responsibility for tasks for which you are not appropriately trained and do not perform these tasks without another member of staff of the opposite sex with you**

Safer Recruitment

CES recognises that anyone may have the potential to abuse children in some way. CES commits to taking all reasonable steps to ensure unsuitable people are prevented from working with children in our schools or hosting them in homestays. CES follows a policy of safer recruitment which means:

- A minimum of 2 professional references that explicitly ask about suitability to work with under-18s, and disciplinary history.
- A self-disclosure form about any criminal record and suitability to work with young people must be completed prior to employment
- We will require completion of a DBS disclosure before the induction day and normally prior to employment commencing.
- Staff must provide proof of identity and abode prior to taking up employment with CES
- Any gaps in CVs must be explained satisfactorily
- Applications for employment will normally only be accepted via the official Centre of English Studies application form.
- Online web searches can be conducted
- Staff recruited from abroad would be asked to produce a *local police check* if available, and /or if your prospective member of staff has worked in the EEA recently we check if any sanctions are in place by obtaining a letter from the professional regulating authority in the relevant country. **European Commission's Regulated professions** .

All advertisements for staff and host families will state 'CES follows a policy of safer recruitment'. Furthermore, some of the questions asked in interview will be specifically designed to explore the candidate's attitude towards working with young learners. Evidence or disclosure of a criminal record will not necessarily result in a candidate not being appointed to a position. Naturally, the nature of the disclosure will be taken into account and if deemed irrelevant to dealing with young people, the candidate may well be successful if all other employment criteria are met. Such issues will of necessity be dealt with on a case by case basis

Disclosure and Barring Service (DBS) in England or Protecting Vulnerable Groups (PVG) in Scotland

It is CES policy to DBS check all teaching, social, administrative staff and homestays (if hosting students under the age of 18) prior to employment. If homestays host under-18s, the main homestay parent must do an enhanced DBS check that includes all over-16s registered at the address. This is done every 3 years. References will be followed up for hosts and staff and such references will specifically ask if the referee knows of any reason why a particular person is not suitable to host or work with people under the age of 18.

Staff will not be allowed to take part in 'regulated' activity (unsupervised) while a DBS is pending. If a member of staff is deployed prior to receiving a DBS that person will be supervised by someone who does have a clear and current DBS. He or she will also be risk assessed by their line manager and it will be demonstrated in the risk assessment how that person will be kept out of unsupervised regulated activity. No student under the age of 18 will be placed in a homestay that has not been appropriately DBS checked. In addition to this, before employment we check that:

- The suitability to work with children declaration form has been read and signed
- References have been received outlining their suitability to work with U18s
- Prospective employees and members of staff have read the safeguarding policy, had the training from the DSP and signed in agreement to these.

Training

CES will assist staff through training to

- analyse their own practice against established good practice, and to ensure their practice is not likely to result in allegations being made
- recognise their responsibilities and demonstrate how to report any concerns about suspected poor practice or possible abuse
- respond to concerns expressed by a child or young person.
- work safely and effectively with children.
- receive advisory information outlining good practice and informing staff about what to do if they have concerns about the behaviour of an adult towards a young person.
- gain national first aid training (where necessary).

Safeguarding Training

The DSL and DSP will be Level 3 trained.

CES undertakes to provide training sessions and to promote understanding and awareness of Safeguarding.

- all new staff must do an online safeguarding (and Prevent in the UK) course prior to starting
- online safeguarding courses must be done annually
- all new staff receive an abridged version of the CES Safeguarding Policy
- all staff know where the Safeguarding Policy is for reference
- all staff receive annual 'cascade training' provided by the CES DSPs through PowerPoint presentations
- safeguarding' is a standing item on all meeting agendas, thereby raising awareness

CES undertakes to review (usually on an annual basis) the practice and implementation of its Safeguarding Policy and to provide any such further training as may be deemed necessary.

Inductions

All employees will be required to undergo an interview. All employees will receive an induction, during which:

- checks will be made that self-disclosure forms have been completed.
- qualifications will be substantiated.

- the job requirements and responsibilities will be clarified.
- safeguarding procedures will be explained and training needs will be identified.
- staff will be asked sign up to the organisation's Code of Practice and Conduct and Safeguarding Policy by signing the Self Declaration form

Electronic contact with students under the age of 18

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 on-line environments. Broadly speaking, never engage in any electronic communication with any pupils under the age of 18. In particular:

- Never initiate electronic contact with a child unless for clear pedagogical purposes that have been sanctioned by the Centre Manager or Director of Studies.
- 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 any 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 the DSP and send a copy of any relevant communications. Do not engage in electronic communication with a student.
- If a child confides sensitive information to you electronically, such as details of abuse, react as described in this policy document.
- Do not initiate or accept 'friendship' requests from children, however innocent these requests may seem, as this provides access to photos and other intimate details of each other's personal lives.
- Do not establish or seek to establish social contact with pupils under the age of 18 during or after the course.
- Do not give personal email addresses or personal phone numbers to students under 18.
- Do not communicate via email, text, phone or social networking sites, blogs, web pages or instant messaging services with under 18s.
- Do not post photos or videos of students under 18 on any social networking sites.
- Do not distribute (by any means) images or information about students of any age.
- Always avoid becoming personally involved in a student's personal affairs.
- Always be aware that personal web profiles can be viewed by anyone and therefore you should be especially cautious about public web profiles and privacy settings.
- Always seek advice from the DSP if an under 18 seeks to establish social contact with you. **Normally, you should never do this**

Use of photographic/filming equipment

There is evidence that some people have used sporting events and summer camps as an opportunity to take inappropriate photographs or film footage of young and disabled people in vulnerable positions. All members of staff should be vigilant and any concerns should to be reported to the DSP and record the incident.

We need consent to take photos of students.

- Under-16s cannot give consent to being photographed. We ask parents whether they give consent for their children to be photographed for media and publicity purposes in the student's consent form.
- 16 and 17 year-olds can give consent. Staff must use the Photo Consent form before taking pictures.
- even for those students who have or can consent, prior to taking photos staff must remind students that pictures may be used on social media and publicity and give them the opportunity NOT to appear in them if they choose.

- any photography/filming must take place in an open, public area and never in isolation
- the reasons why any photography/filming is taking place must be fully explained to those concerned.
- the results of any photography/filming must be carefully stored, controlled and used only for the purpose for which they were intended.

Online safety for under-18s

There is a tendency for people to behave online in a way they never would face-to-face. Under-18s (and young adults) are usually more comfortable (and savvy) using technology and are generally trusting and believe what they read; this makes them more vulnerable to grooming, sharing personal information/passwords, meeting strangers.

Online bullying (Cyberbullying) is common; at least 20% of UK under 18s receive unwanted sexual/nasty comments online. Under 18s often lack well-developed moral and health awareness; they do not understand why sexting is wrong / know it is illegal / realise health implications of spending too long online.

Generative AI Misuse

Generative AI can create sexualized, violent, or otherwise inappropriate content. Children may be exposed to this either accidentally or intentionally. AI can generate realistic but false videos or images, which is being used for cyberbullying, sexual harassment, and grooming. AI-generated responses may contain fabricated information, causing children to learn or act on inaccurate knowledge.

- School premises, residences and homestays must filter internet access and block adult websites, chat rooms etc
- Use of Internet Poster displayed in the classrooms.
- Under-18s sign that they understand and will comply with the Use of Internet in induction in the under 18 Information and Rules
- Staff must report AI-related concerns) to the Designated Safeguarding Lead (DSL)

Use of the internet

The internet is there for all to use. Please follow these rules to make it safe for everyone. Do not use the internet to:

- take part in in ANY form of cyber/internet bullying
- search for or look at obscene or pornographic material
- use the internet to say bad things about other people
- **search for or look at websites which can in any way:**
    - **be regarded as extremist (for example, religious, political, sexual)**
    - **be intolerant of other's faiths and beliefs**
    - **challenge the rule of law**
    - **challenge the right to individual liberty (freedom)**

Social networking sites

- DON'T search for illegal and inappropriate things.
- DON'T bully **anyone** through blogs, emails, chatrooms, or any other form of internet use
- DON'T download anything illegally.
- DON'T use the internet to give opinions that are **extremist, intolerant of other's faiths and beliefs, or that challenge the rule of law and the right to individual liberty**
- DO use the computers for school/study use or to connect with other students **in a positive manner.**
- DON'Tpost images or videos on social media without the permission of your group leader/or the principal

Sharing nude and semi-nude pictures online (Sexting)

Making, possessing, and distributing any imagery of someone under-18 which is indecent is

illegal. This includes imagery if the distributors are under-18. An image covers photographs, videos and streaming

Indecent is not succinctly defined in law, but would probably include the following images:

- naked young person / a topless girl / an image displaying genitals
- sex acts including masturbation / overtly sexual images even if wearing underwear

Sharing sexual images between under-18s is illegal and risky, but often the result of teenage curiosity. Young people need education and safeguarding support rather than criminalisation. However, adults sharing sexual imagery of under-18s is child abuse and must be reported to the police.

Handling an incident of Sexting- involving two under 18s

- Refer to Designated Staff (usually lead person), who meets young people involved.
- Do not view images, rather discuss the circumstances around producing them, e.g.
  - Shared with knowledge of the person? / Any adults involved in sharing?
  - Pressure to make image? / Impact on those involved? / Additional vulnerabilities of person
- If other agencies do not need to be involved (e.g. police), best to get young person to delete images; this is recorded and signed by them. If refuse, remind them it is illegal to keep. UK Safer Internet Centre (see below) may be able to get inappropriate images removed from internet sites.

Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

Do not say or do anything to blame or shame any young people involved.

Some measures for under-18 students who identify as transgender

Schools must always protect single-sex spaces with regard to toilets, showers and changing rooms. Responding to a request to support any degree of social transition must not include allowing access to these spaces. As a default, all children should use the toilets, showers and changing facilities designated for their biological sex unless it will cause distress for them to do so. In these instances, schools and colleges should seek to find alternative arrangements, such as single occupancy toilets.
Students are free to dress in non-gender-conforming manner if they choose (barring the normal concerns of appropriacy and modesty)
In allocating sleeping arrangements such as dormitories, tents or shared rooms for school trips, each child's sex is relevant. Schools and colleges must meet their safeguarding obligations set out in Keeping Children Safe in Education (KCSIE). No child should be allowed to share a room with a child of the opposite sex. If a child questioning their gender does not wish to share a room with another child of the same sex, where possible, the student should have single occupancy rooms. See Transgender Guidance for more details

Health and Safety Items

Part of providing a safe and secure environment for all of our students and staff means implementing robust health and safety policies, risk assessments and suitable levels of supervision. This Safeguarding Policy forms one of a suite of CES policies, including Health and Safety, and they should all be read and considered in their totality. In other words, the health and safety of a young person needs to be considered along with safeguarding.

Risk Assessments

Risk Assessments are completed for every activity and excursion undertaken and are central to effective safeguarding of our students. The Centre Manager ensures that the correct risk assessment is given to relevant staff leading an activity or excursion. That staff member reads the Risk Assessment prior to starting the activity or excursion and confirms that they have read and understood the potential risks involved in the activity or excursion by initializing it. The Risk Assessment is then filed.

The Risk Assessments include safe-guarding and sexual harassment items and an emergency action plan.

Group leaders that take their own students on private excursions and activities not organized by CES should also read and initial the appropriate Risk Assessment and sign that they assume responsibility for the safety of their students.

Incident reporting

Staff are reminded during inductions of the importance or recording incidents and 'near misses' and the correct procedure for doing so.

Ratios

Staff/adult to student ratios will be age appropriate and activity appropriate but will never be fewer than 1:15 for students aged 12 -17. Group leaders will never be made responsible for students who are not in their own group.

Road safety

All students, irrespective of age, are given appropriate training during inductions in the area of road safety, crossing roads safely, using pedestrian crossings and so on.

Supervision levels

Students are given guidance in inductions and handbooks as to levels of supervision and in particular curfew times and what they may and may not do in their spare time. Supervision notes are sent to the student's parents at home so that they are aware of what levels of supervision to expect for their son or daughter.

Missing students

Daily registers are kept for all lessons and activities. Social programme staff do classroom checks first thing in the morning to ensure all students are present. Missing students are reported to the Centre Manager who then follows this up with the group leader or with the Accommodation Office who will then contact the host family (Summer School). In the adult school, students under the age of 18 must sign in and out every day and teachers check the registers for missing under age students. An attendance policy is printed in the student handbook and expectations regarding attendance are covered in the student induction

Fire safety

A full fire safety policy is in the policies folder but essentially regular drills are held and fire marshals are appointed. Staff receive training in the use of firefighting equipment and fire risk assessments are completed. Fire safety is covered in inductions for students and staff.

First aid and medical

Medical consent forms are obtained for all students as are personal details forms. Medical information is first relayed to the Registrar or Assistant Registrar. They would then put the information on the computer system in the individual student's record. In addition to this they would provide a report in writing to the relevant Centre Manager or department head concerning any specific medical issues for students in their centre. Parents are advised on the medical consent forms that medicines should be left with host parents for safe supervision and administration. In the case of residential centres, medication is handed to the Centre Manager to be kept in a secure and cool location, to be administered at the appropriate time along with the group leader. A Register of Medicine Administration is kept.

Discipline and boundaries

Disciplinary procedures and possible consequences of poor behaviour are outlined in student and staff handbooks.

Airport transfers

All drivers used by taxi companies and coach companies have DBS clearance. If a student wants to travel independently from the airport to the host family, we still ask for arrival details so we can ensure the family is in when the student arrives. We also provide the student with information regarding the safest and best way to get to the school. For all students under-16 travelling independently, we recommend either to the agent or to the parent that they have assisted check in and travel as an unaccompanied minor. CES provides assisted check in.

Visitors
All visitors and contractors must sign in and sign out in reception. Each is given a slip of paper explaining that there are under-18s in the building and listing the expectations of the visitor's behaviour during the visit.

Welfare

Our DSL is also our Welfare Officer and this person is named as such on notices throughout the school. In the summer centres, the Centre Managers have this pastoral role and again they are named on posters throughout the school. Of course, all staff have a responsibility to ensure a good level of welfare support for all students. In the adult school we have specific activities for under-18s in addition to a weekly meeting where welfare issues may be discussed. This meeting is compulsory and registers are taken.

Activities

Activities will be age appropriate. In sporting activities students of roughly similar ages will be put together.

Signs

There will be signs prominently displayed in all centres showing who to go to for a welfare or safeguarding issue

Transfers policy for individual students under the age of 18

This policy is sent to parents of students under the age or 18 who do not wish to use CES arranged transportation on arrival or departure

Centre of English Studies has a strict policy regarding transfers for individual students under the age of 18 from any port of entry in the UK to the school and or host family. Normally we would expect any student under the age of 18 to come to the school and / or host family via transportation booked and arranged by Centre of English Studies. Parents of students may decide to make their own arrangements but only if the following conditions are strictly followed. The parent must:

- provide Centre of English Studies with the name, address and phone number of the person meeting and delivering the student to the school and/or host family as soon as possible and preferably with the enrolment

- provide Centre of English Studies with a signed letter or consent form agreeing to such a transfer and giving Centre of English Studies the details (flight number, arrival time etc)

- agree to Centre of English Studies contacting the person doing the transfer to verify the details of the transfer

- agree to pass Centre of English Studies emergency contact details to the student and the person collecting the student

- ensure that the student carries with him or her a letter from Centre of English Studies on Centre of English Studies headed paper letter stating that this student is not being met by the school but by a family friend or relative and to give their phone number

- ensure that the student also carries a copy of the CES form **'**Parental consent for a relative or family friend to provide a transfer for a student under the age of 18 to the school or host family'

- return the completed consent form. By completing and signing the consent form the parent agrees to the above conditions.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact social services or the police direct, or the NSPCC Helpline on 0800 136 663 or Childline on 0800 1111

DEFINING CHILD ABUSE

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. Remember **P.E.N.S.**

Physical Abuse: This is where adults physically hurt or injure a young person e.g. hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, drowning. Giving young people alcohol or inappropriate drugs would also constitute child abuse.

Emotional Abuse: This is the persistent emotional ill treatment of a young person, likely to cause severe and lasting adverse effects on the child's emotional development. It may involve telling a young person they are useless, worthless, unloved, inadequate or valued in terms of only meeting the needs of another person. Emotional abuse may occur when the young person is constantly criticised, given negative feedback, expected to perform at levels that are above their capability. Other forms of emotional abuse could take the form of name calling and bullying. Ill treatment of children, whatever form it takes, will always feature a degree of emotional abuse.

Neglect*:* This occurs when an adult fails to meet the young person's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the child's health or development. For example, failing to provide adequate food, shelter and clothing, failing to protect from physical harm or danger, or failing to ensure access to appropriate medical care or treatment. Refusal to give love, affection and attention can also be a form of neglect.
Neglect in sport could occur when a coach does not keep the young person safe or exposing them to undue cold/heat or unnecessary risk of injury.

Sexual Abuse*:* This occurs when adults (male and female) use children to meet their own sexual needs, whatever form this may take. Showing young people pornography or talking to them in a sexually explicit manner are also forms of sexual abuse.

Possible Indicators of Abuse

Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that a child is being abused may include one or more of the following:

- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- an injury for which an explanation seems inconsistent
- the young person describes what appears to be an abusive act involving them
- another young person or adult expresses concern about the welfare of a young person
- unexplained changes in a young person's behavior e.g. becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper
- inappropriate sexual awareness
- engaging in sexually explicit behavior
- nightmares, sleep problems,
- sudden or unexplained personality changes/mood swings; seems withdrawn, angry, clingy,
- shows significant changes in eating habits.
- an older child behaving like a younger child, e.g. bedwetting or thumb-sucking
- develops fear of particular places or resists being alone with particular child or young person for unknown reasons
- shows resistance to routine bathing, toileting or removing clothes even in appropriate situations
- play, writing, drawings or dreams include sexual or frightening images
- refuses to talk about a secret he/she has with an adult or older child
- stomach aches or illness, often with no identifiable reason
- leaves clues that seem likely to provoke a discussion about sexual issues
- uses new or adult words for body parts; engages in adult-like sexual activities with toys, objects or other children
- develops special relationship with older friend that may include unexplained money, gifts or privileges
- intentionally harming himself or herself, i.e. drug/alcohol use,cutting, burning, running away,
- sexual promiscuity
- develops physical symptoms, e.g.unexplained soreness, pain or bruises around genital or mouth;
- sexually-transmitted disease;
- pregnancy

This list is of course not exhaustive

Specific Examples of Abuse

Child-on-child Abuse

Child-on-child abuse (sometimes called peer-on-peer abuse) is any form of abuse that occurs between children, where both the victim and the alleged perpetrator are under 18.

Forms of child-on-child abuse include:

- Sexual abuse – sexual harassment, sexual violence, unwanted sexual touching, coercion, or pressure
- Sharing of nude or semi-nude images or videos (including pressure to create or share them) is illegal in the UK for under 18s.
- Physical abuse – hitting, kicking, shaking, or causing physical harm
- Emotional or psychological abuse – threats, humiliation, intimidation, manipulation
- Bullying – including cyberbullying
- Abuse linked to power imbalance – such as differences in age, strength, status, ability, social group, or vulnerability
- It is never dismissed as "banter", "a joke", or "part of growing up"
- Abuse can be a one-off incident or a pattern of behaviour

- Both the child who has been harmed and the child responsible may need safeguarding support
- Responses must be child-centred, prioritising safety and wellbeing

Female genital mutilation

You are unlikely to come across the above two types of abuse in the setting of an EFL school. FGM is illegal in the UK yet is still practised in certain cultures and religions. In the unlikely event that you have suspicions that FGM has taken place please advise the DSP (Designated Safe-guarding Person). DSP and DSL contact details are at the end of this policy. Remember FGM is a form of child abuse.
The NSPCC – they have a helpline dedicated to FGM that is anonymous and open 24/7, you can call them on: 0808 800 5000. For more information on services available and one-to-one support you can call FORWARD on 0208 960 4000They are open Monday to Friday from 9:30 am to 5:30 pm or email us at support@forwarduk.org.uk.

Child sexual exploitation

Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people (or a third person or persons) receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. In all cases, those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child or young person's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Child sexual abuse online

When sexual exploitation happens online, young people may be persuaded, or forced, to:

- send or post sexually explicit images of themselves
- take part in sexual activities via a webcam or smartphone
- have sexual conversations by text or online.

Abusers may threaten to send images, video or copies of conversations to the young person's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the sexual abuse has stopped

Child sexual exploitation in gangs

Sexual exploitation is used in gangs to:

- exert power and control over members
- initiate young people into the gang
- exchange sexual activity for status or protection
- entrap rival gang members by exploiting girls and young women
- inflict sexual assault as a weapon in conflict.

Girls and young women are frequently forced into sexual activity by gang members

Who sexually exploits children and young people?

We don't know a great deal about who commits child sexual exploitation. Identifying abusers is difficult because:

- data often isn't recorded or is inconsistent or incomplete
- children and young people often only know their abuser by an alias, nickname or appearance
- victims may be passed between abusers and assaulted by multiple perpetrators
- children and young people are often moved from location to location and abused in each place
- young people may be given alcohol or drugs
- The number of known perpetrators is likely to be far higher than those reported.

People who sexually exploit children are often described as highly manipulative individuals. They exert power over young people through physical violence, emotional blackmail or financial pressure, for example holding them in debt. To maintain control or to distance children and young people from those who may be able to protect them, abusers create or exploit weaknesses such as:

- being isolated/distant from friends and family
- disengagement from services such as education or health
- challenging or criminal behaviour

The focus on manipulation and control has similarities with domestic violence, although more research is needed to establish this link and fully explore motivations for child sexual exploitation

REPORTING SUSPICIONS OF ABUSE

If you suspect that a child is being abused:

- Stay calm
- Listen, hear and believe. Do not interpret or put words into the mouth of someone making an allegation. Give time to the child to say what they want
- Reassure & explain that they have done the right thing in telling.
- Don't try to deal with it yourself
- Don't gossip with colleagues about what has been said to you
- Don't make a child repeat a story unnecessarily
- Explain that you need to take the child to speak to the DSP. If you cannot immediately find the DSP, contact the DSL (Designated Safe-guarding Lead), stay with the child until you can find a person who has responsibility for dealing with such a situation.
- DSP and DSL contact details are at the end of this policy.

IF IN DOUBT – REPORT IT!
EVERYBODY HAS A LEGAL RESPONSIBILITY TO ACT UPON AND TO REPORT SUSPICIONS TO THE APPROPRIATE PERSON

Dealing with a Report of Abuse

The DSL or Principal should be the only people to actually deal with a report of abuse. The person handling the disclosure will follow the principle of T.E.D.

- Tell me
- Explain to me
- Describe to me.

  - The DSL, Principal will take a written statement from all parties involved (see below for more information).
  - The DSL, Principal will ensure that all contact between the child concerned and the alleged abuser ceases with immediate effect.

- The Principal or DSL will speak to the person concerned to advise them of the allegations and advise them that no further contact is permitted.
- The Principal or DSL will take appropriate action which may involve contacting external agencies, contacting agents / parents, suspending the member of staff concerned (or student) pending an investigation
- If the Principal is the subject of the suspicion/allegation, the initial report must be made to the directors of CES), who will decide whether or not to refer the allegation to Social Services and inform other relevant parties.

What information should be recorded in the statements?

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern, which should include the following:

- The child's name, age and date of birth of the child.
- The child's home address and telephone number.
- Whether or not the person making the report is expressing their own concerns or those of someone else.
- The nature of the allegation. Include dates, times, any special factors and other relevant information.
- Make a clear distinction between what is fact, opinion or hearsay.
- A description of any visible bruising or other injuries. Also any indirect signs, such as behavioural changes.
- Details of witnesses to the incidents.
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred.
- Have the parents been contacted?
- If so what has been said?
- Has anyone else been consulted? If so record details.
- If the child was not the person who reported the incident, has the child been spoken to? If so what was said?
- Has anyone been alleged to be the abuser? Record details.
- Where possible 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.

All reports will be reported to and recorded by the DSP and/or DSL, and kept securely Only the DSP and DSL will have access to this, and outside agencies as appropriate.

Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information will be handled and disseminated on a need to know basis only. This includes the following people:

- the Directors
- the parents of the person who is alleged to have been abused
- the person making the allegation
- social services/police
- the alleged abuser (and parents if the alleged abuser is a child)

Information (eg incident reports) will be stored in a secure place with access limited to designated people.

It is not the responsibility of anyone working for CES to decide whether or not child abuse has taken place. However there is a responsibility to act on any concerns by reporting these to the DSP and DSL. CES ensures all staff that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child.

Handling a disclosure by a child

Care must be taken to remain calm and to show support to the child throughout the disclosure phase. The following guidelines will help lessen the risk of causing more trauma to the child and/or compromising a criminal investigation during the disclosure phase.

Receive - Listen to what is being said without displaying shock or disbelief. A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a child, or show shock or disgust at what they are saying, the child may be afraid to continue and will shut down. Accept what is being said without judgement. Take it seriously.

Reassure - Reassure the child, but only so far as is honest and reliable. Don't make promises that you can't be sure to keep, e.g. "everything will be all right now". Reassure the child that they did nothing wrong and that you take what is said seriously. Don't promise confidentiality -- never agree to keep secrets. You have a duty to report your concerns. Tell the child that you will need to tell some people, but only those whose job it is to protect children. Acknowledge how difficult it must have been to talk. It takes a lot for a child to come forward about abuse.

React - Listen quietly, carefully and patiently. Do not assume anything - don't speculate or jump to conclusions. Do not investigate, interrogate or decide if the child is telling the truth. Remember that an allegation of child abuse may lead to a criminal investigation, so don't do anything that may jeopardise a police investigation. Let the child explain to you in his or her own words what happened, but don't ask leading questions. Do ask open questions like "Is there anything else that you want to tell me?" Communicate with the child in a way that is appropriate to their age, understanding and preference. This is especially important for children with disabilities and for children whose preferred language is not English. Do not ask the child to repeat what they have told you to another member of staff. Explain what you have to do next and to whom you have to talk. Refer directly to the DSL or designated person in your organisation (as set out in the this policy). **Do not discuss the case with anyone outside the child protection team.**

Record - this would be for the Centre Manager, Principal or Designated Safeguarding Person).Make some very brief notes at the time and write them up in detail as soon as possible. Do not destroy your original notes in case they are required by Court. Record the date, time, place, words used by the child and how the child appeared to you - be specific. Record the actual words used; including any swear words or slang. Record statements and observable things, not your interpretations or assumptions - keep it factual

What can adults do to prevent sexually harmful behavior between children?

- Set and respect physical boundaries.
- Encourage children to also respect themselves and others.
- Demonstrate to children that it is all right to say “no” and that they need to accept “no” from others.
- Stay aware of how children are interacting with one another.
- Talk with children, and listen to what they have to say.
- Set clear guidelines
- Regularly remind children of other trusted adults whom they can talk to.

What should you do if a child accuses another child?

- Report to the DSP immediately
- The DSL will ensure that both parties have separate support (i.e. accuser and accused) and will ensure that all accounts are fairly, comprehensively and accurately reported.
- He or she may then contact the Local Safeguarding Children Partner (LSCP)

Responsibilities and Duty to Report

ALL staff have a duty to report any welfare concern, allegation or suspicion of inappropriate contact with children to the DSP. Confidentiality is expected at all times. All staff have responsibility to follow the guidance laid out in this policy and related policies, and to pass on information using the required procedures. We expect all staff to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

Failure to comply

Non-compliance with the policy on contact with students under-18 could result in disciplinary procedures. (See disciplinary procedure in staff handbook) ***We have a duty to remove and will remove an individual from any activity where there is risk of harm to children. Employers have a 'duty to refer' the suspicion or allegation of an individual having inappropriate contact with young people to external authorities where there is risk of harm to children.***

Investigations

The DSL and Directors will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries. Irrespective of the findings of the social services or police inquiries, CES will assess all individual cases to decide whether a member of staff can be reinstated and how this can be sensitively handled.

This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by the police. In such cases, CES will reach a decision based upon the available information which could suggest that on a balance of probability, it is more likely than not that the allegation is true. The welfare of the child should remain of paramount importance throughout.

Incidents that must be reported/recorded

If any of the following occur you should report this immediately to the DSP who will make a record the incident. You should also ensure the child's group leaders are informed (if they have one) and agent and or parents if they do not have a group[leader.
:

- Any allegation of abuse of any type
- If you accidentally hurt someone
- If a student seems distressed in any manner
- If a child appears to be sexually aroused by your actions
- If a child misunderstands or misinterprets something you have done.

Radicalisation, Extremism and PREVENT

Radicalisation **-** is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that

- reject or undermine the status quo or
- reject and/or undermine contemporary ideas and expressions of freedom of choice.

Extremism - represented on both sides of the political spectrum is an ideology (particularly in politics or religion), considered to be far outside the mainstream attitudes of a society or to violate common moral standards. Extremism can take many forms, including political, religious and economic

*P**REVENT*** - is a UK government strategy to stop people becoming involved in violent extremism or in supporting terrorism. PREVENT part of this policy only applies to the UK. It includes identifying and challenging those holding extremist views. Police forces now have PREVENT officers whose work is focussed in this area. Channel is a multi-agency support process to try and safeguard vulnerable people from being drawn into extremism.
More details on PREVENT may be found at

https://www.gov.uk/government/policies/protecting-the-uk-against-terrorism

ELT organisations have been identified as areas where extremists may expound their views and try to involve others. In order to minimise the potential for our students being radicalised CES

- Will ensure that all views are respected and challenge any which don't allow all students / staff to work easily together.
- Will identify a PREVENT Lead with specific responsibility for developing and implementing policies to challenge extremism and radicalisation and who will develop and share links with other local organisations in a similar position. We will also ensure that all staff undergo appropriate PREVENT training.
- Will ensure there is a culture prepared to understand the terms 'radicalisation and extremism' and, if necessary, to reassure staff and students that they will be supported if reporting any concerns in this area.
- Will reinforce to students and staff the importance of mutual respect and tolerance in UK culture
- Will focus on IT safety, ensuring appropriate filters are in place and that students understand what the organisation's IT rules are.
- Will ensure the school environment is one where everyone feels safe and supported; not allowing display or promotion of inappropriate materials or organisations.

There is a full policy document dedicated to PREVENT which is available on request

Further Reading

1) Keeping Children Safe in Education (September 2025) - Keeping children safe in education - GOV.UK (www.gov.uk)

2) Working Together to Safeguard Children (March 2026) - Working together to safeguard children - GOV.UK (www.gov.uk)