## CIE policies

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#### 1 Aims

Our aim is to provide an environment in which students from a wide range of cultural, ethnic and religious backgrounds:

- Realise fully their academic and social potential
- Understand and appreciate the rich diversity of their various cultural traditions

Please see Our Aims for further details.

### 2 Absence - Students

CIE regards unnecessary absence from lessons as a serious issue because it:

- prevents students from benefiting fully from their chosen course
- creates extra work for the teachers
- affects the atmosphere of the group
- raises issues of whether the student is a "bona fide" student

All teachers keep an attendance record of their students and inform Simon as soon as an unexplained absence occurs – i.e., if a student has not turned up to the first expected contact at 9:00 A.M. Simon will know at 10:00 A.M. (the first break).

and he will inform Reception who will ring the student (and, if necessary, host family) asking for a reason for the absence, or leaves voice message advising the student/host family to contact the school with an explanation.

If the principal considers there is a concern, i.e. health issue, personal issue or other, details are passed to the Welfare Officer to deal with in more detail.

If the student is expected to be present the following day and is not, they will be spoken to by their personal tutor, who will reiterate the UKBA rules on 10 missed contacts as well as our own policy of 90% attendance. The student will be monitored and if, at a later date, the absenteeism

occurs again or attendance drops to 90%, Simon will speak to the student again and inform the agent.

If attendance drops below 90%, or if the absenteeism occurs again, Simon will arrange a meeting with the student and their agent/parent – or will send a written warning to the agent/parent as well as to the student – informing them that unless there is no improvement, the UKBA will be informed and the student will be asked to leave.

If the problem continues, and the student shows no indication of trying to conform to what the school requires, the student will be asked to leave and the Home Office informed.

Students will be made aware of UKBA rulings on expected contacts: if they miss 10 expected contacts (i.e., 10 consecutive days) without an adequate explanation (e.g., illness which is supported by a doctor or the host family), they will be asked to leave and the UKBA will be informed.

## 3 Alcohol & Drugs Policy

Being under the influence of alcohol and the use of illegal drugs is just one Health and Safety risk in the work place, not only to yourself but to that of your colleagues. With this in mind, CIE's policy on alcohol and illegal drugs is clearly set out below to ensure the safety of all concerned. The policy also applies during lunch and break times.

Students found to be in breach of this policy may be subject to disciplinary action being taken against them. Students suspected of being under the influence of alcohol or illegal drugs will be suspended from their classes immediately. Such suspension may result in being invited to attend a disciplinary meeting, which ultimately may lead to expulsion.

# 4 Anti-Bullying Policy

Bullying is understood to be behaviour which makes others feel uncomfortable or threatened, whether intended or not.

There are different forms of bullying:

- PHYSICAL BULLYING e.g. hitting, kicking.
- DAMAGING PROPERTY
- NON-PHYSICAL BULLYING e.g. teasing, insulting gestures
- EMOTIONAL BULLYING e.g. taunting, spreading rumours

All staff and pupils at CIE are encouraged to establish and maintain happy and harmonious relationships to ensure that students can thrive without fear.

Students are encouraged to seek help whenever it is needed, whether it be for themselves or for others, and they are reminded that help can be sought from many different people.

Concerns about bullying should be raised in the first instance with a person who may be able to help, for example, Simon, a teacher, the Accommodation Officer or Welfare Officer. After discussion the matter will be investigated with the other person(s) concerned, and appropriate action taken.

A full factual record will be taken and the member of staff will monitor the situation.

The principal will be informed immediately, and the parents will be contacted if appropriate. Students should be aware that although the matter will be discussed in confidence, information may sometimes need to be forwarded and further help sought.

#### **5 Appointed Persons/First Aiders**

In order to protect the wellbeing of our employees and to promote a safe working environment, CIE have appointed persons/first aiders in place to deal with any emergencies. Such personnel are trained to the required standard and identified around the building.

## 6 Child Protection/Safeguarding

#### 1 Introduction

- 1.1 This policy has been developed in accordance with the principles established by the Children Act 1989 and in line with Oxfordshire Safeguarding guidelines.
- 1.2 The management at CIE takes seriously its responsibility under section 11 of the Children Act and duties under "working together" to safeguard and promote the welfare of children; to work together with other agencies to ensure adequate arrangements exist within our setting to identify, and support those children who are suffering harm or are likely to suffer harm. We recognise that all staff have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern. Our school should provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child free from discrimination or bullying where children can learn and develop happily.
- 1.3 The aims of this policy, which applies to all staff and volunteers working at CIE, are:
- 1.3.1 To support the child's development in ways that will foster security, confidence and resilience.
- 1.3.2 To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- 1.3.3 To raise the awareness with all staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- 1.3.4 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we contribute to assessments of need and support plans for those children where appropriate.
- 1.3.5 To acknowledge the need for effective and appropriate communication between all members of staff in relation to safeguarding children and young people.
- 1.3.6 To develop a structured procedure within the school which will be followed by all members of the staff in cases of suspected abuse.
- 1.3.7 To develop effective working relationships with all other agencies, involved in safeguarding children.
- 1.3.8 To ensure that all adults within our school who have access to children have been checked as to their suitability. This includes other community users of our facilities, following correct staff recruitment and selection procedures

### 2 Procedures

The definition of a 'minor' in the United Kingdom is a person who is under 18. However, in your pre-arrival communication with us, you will note that we will ask for different permissions for different ages 18 and under, for example we would allow a 15 year old to travel to and from school alone (if their parents sign a consent form) but someone 14 years old and/or under would need to be signed in and out of the school by a recognised adult on a daily basis.

2.1 CIE's procedures for safeguarding children will be in line with Oxford Local Education Authority and Oxfordshire Safeguarding Children Board Child Protection Procedures, and "Working Together to Safeguard Children 2015".

The Designated Safeguarding lead (DSL), Principal, Simon Llewellyn, will ensure that:

- 2.1.1 The Senior Staff understands and fulfils its safeguarding responsibilities.
- 2.1.2 We have Designated Members of staff who have undertaken appropriate training for the role, as recommended by the LA/OSCB within the last two years. Our designated staff will update their training with LA/OSCB approved training every two years. Our Designated staff member is Simon Llewellyn.
- 2.1.3 All adults, (including volunteers) new to the school will be made aware of this policy and the procedures for child protection, the name and contact details of the Designated person and have these explained as part of their induction into the school.
- 2.1.4 All members of staff are provided with opportunities at least every three years to receive training in order to develop their understanding of the signs and indicators of abuse, how to respond to a pupil who discloses abuse and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse.
- 2.1.5 Host families are aware of and understand the need for compliance with CIE's child protection guidelines and procedures.
- 2.1.6 The name of any member of staff considered not suitable to work with children will be notified to the DBS (Disclosure and Barring Service) with the advice and support of the LADO.

# 3 Definition of abuse

- 3.1 Although the definition of child abuse detailed below is considered unlikely to apply to the children in our care/ care of host families, there is still a small possibility that some individuals should choose to abuse, groom or sexually exploit minors in our care. Such individuals are able to gain the confidence of vulnerable children (i.e. children away from home in a foreign country), with a view to abusing them.
- 3.2 Four categories of abuse are recognised in legislation:
  - physical abuse
  - neglect
  - emotional abuse
  - sexual abuse
- 3.3 The NSPCC defines child abuse as:

"Child abuse is the term used when an adult harms a child or a young person under the age of 18. Child abuse can take four forms, all of which can cause long term damage to a child:

- physical abuse
- emotional abuse
- nealect
- child sexual abuse.

Bullying and domestic violence are also forms of child abuse.

## 4 Symptoms of Abuse

- 4.1 The NSPCC lists some of the signs and behaviours which may indicate that a child is being abused:
  - repeated minor injuries
  - children who are dirty, smelly, poorly clothed or who appear underfed
  - children who have lingering illnesses which are not attended to, deterioration in school work, or significant changes in behaviour, aggressive behaviour, severe tantrums

- an air of 'detachment' or 'don't care' attitude
- overly compliant behaviour
- a 'watchful attitude'
- sexually explicit behaviour (e.g. playing games and showing awareness which is inappropriate for the child's age), continual open masturbation, aggressive and inappropriate sex play
- a child who is reluctant to go home, or is kept away from school for no apparent reason
- does not trust adults, particularly those who are close
- 'tummy pains' with no medical reason
- eating problems, including over-eating, loss of appetite
- disturbed sleep, nightmares, bed wetting
- running away from home, suicide attempts
- self inflicted wounds
- reverting to younger behaviour
- depression, withdrawal
- relationships between child and adults which are secretive and exclude others
- pregnancy
- 4.2 These signs are not evidence themselves; but may be a warning, particularly if a child exhibits several of them or a pattern emerges. It is important to remember that there may be other explanations for a child showing such signs. Abuse is not easy to diagnose, even for experts.

# 5 Child sexual exploitation (CSE)

- 5.1 The 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, affections, gifts, money) as a result of them performing and/or others performing on them, sexual activities. 5.2 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.
- 5.3 Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child's or young person's limited availability of choice, resulting from their social/economic and/or emotional vulnerability. (DCSF 2009)
- 5.4 Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8.
- 5.5 It affects both girls and boys, and can happen in all communities.
- 5.6 Any person can be targeted but there are some particularly vulnerable groups: Looked After Children, Children Leaving Care and Children with Disabilities.
- 5.7 Victims of CSE may also be trafficked (locally, nationally and internationally).
- 5.8 Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.

5.9 Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

## 5.10 Good practice – Individuals

- Recognise the symptoms and distinguish them from other forms of abuse
- Treat the child/young person as a victim of abuse
- Understand the perspective / behaviour of the child / young person and be patient with them.
- Help the child/young person to recognise that they are being exploited
- Collate as much information as possible
- Share information with other agencies and seek advice / refer to Social Care

## 5.11 Good practice – Organisations

- Ensure robust safeguarding policies and procedures are in place which cover CSF
- Promote and engage in effective multi-agency working to prevent abuse
- Work to help victims move out of exploitation
- Cooperate to enable successful investigations and prosecutions of perpetrators

## Link to guidance

## 6 Forced marriages (FM)

- 6.1 A FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014.
- 6.2 A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.
- 6.3 FM is illegal in England and Wales.

#### This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not)

### Link to the guidance

# 7 Female Genital Mutilation (FGM)

- 7.1 FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.
- 7.2 FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.
- 7.3 Other than in the excepted circumstances, it is an offence for any person (regardless of their nationality or residence status) to:
  - perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
  - assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the Act); and

 assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a UK national or permanent UK resident (section 3 of the Act).

## Link to the guidance

## 8 Supporting Staff

- 8.1 We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 8.2 We will support such staff by providing an opportunity to talk through their anxieties with the Designated Person and to seek further support. This could be provided by another trusted colleague, Occupational Health, and/or a representative of a professional body or trade union, as appropriate.
- 8.3 We recognise that our Designated Person(s) should have access to support and appropriate workshops, courses or meetings as organised by the LA.
- 8.4 In consultation with all staff, we have adopted a code of conduct for staff at our setting. This forms part of staff induction and is in the staff handbook. We understand that staff should have access to advice on the boundaries of appropriate behaviour.

# 9 Guidance for Safe Working Practice of Children and Staff in Education

- 9.1 The majority of adults who work with children seek to provide a safe and supportive environment, which secures the well-being and very best outcomes for children and young people in their care. It is recognised that achieving these aims is not always straightforward. Much relies on pupil and staff interaction where tensions and misunderstandings can occur. It is here that staff behaviours can give rise to allegations being made against them. Allegations may be genuine, malicious or misplaced. They may arise from differing perceptions of the same event, but when they occur, they are inevitably distressing and difficult for all concerned.
- 9.2 Staff should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- 9.3 A relationship between a member of staff and a child or young person cannot be a relationship between equals. All staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification.
- 9.4 All staff are expected to treat information they receive about children and young people in a discreet and confidential manner.
- 9.5 Staff should not make sexual remarks to a student or engage in sexual activities with a student.
- 9.6 Staff should not discuss their own sexual relationships, with, or in the presence of, students.
- 9.7 Staff should not discuss a student's sexual relationships in inappropriate settings or contexts.
- 9.8 Staff should report any behaviour by colleagues that raises concern.
- 9.9 Staff should not establish or seek to establish social contact with young students for the purpose of securing a friendship or to pursue or strengthen a relationship.
- 9.10 Staff should be aware that even well intentioned physical contact may be misconstrued by the child, an observer or by anyone to whom this action is described. Where possible, a gap or barrier should be maintained between teacher and child at all times.
- 9.11 Staff should never indulge in horseplay, tickling or fun fights.

- 9.12 Staff should never give their personal emails to students or befriend students through social media (social media contact with students is inappropriate).
- 9.13 Staff should not under any circumstances take photos of students using any device other than CIE's camera or Ipad.
- 9.14 Staff should consider the way they offer comfort to a distressed child.
- 9.15 Staff may legitimately intervene to prevent a student from committing a criminal offence, injuring themselves or others or causing damage to property. In these cases any physical contact should be the minimum required for restraint. All incidents of the use of physical restraint should be recorded in writing and reported immediately to the DSL. See "Classroom expectations and behaviour".
- 9.16 Under no circumstances should physical force be used as a form of punishment.
- 9.17 Staff should ensure that there is visual access and/or an open door to one to one situations.
- 9.18 The curriculum can sometimes lead to unplanned discussion about subject matter of a sexually explicit or otherwise sensitive nature. Staff must ensure that such discussion is neither inappropriate nor offensive.

## 10 Child Protection: Anti-Bullying (and Cyber-Bullying)

Bullying is understood to be behaviour which makes others feel uncomfortable or threatened, whether intended or not.

There are different forms of bullying:

- PHYSICAL BULLYING e.g. hitting, kicking.
- DAMAGING PROPERTY e.g. intentionally breaking school property
- NON PHYSICAL BULLYING e.g. teasing, insulting gestures
- EMOTIONAL BULLYING e.g. taunting, spreading rumours, cyber-bullying

It can be hard for adults, including parents, to know whether or not a child is being bullied as you can't always see the signs of bullying. And no one sign indicates for certain that a child's being bullied. But you should look out for:

- belongings getting "lost" or damaged
- physical injuries such as unexplained bruises
- being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- not doing as well at school
- asking for, or stealing, money (to give to a bully)
- being nervous, losing confidence, or becoming distressed and withdrawn
- problems with eating or sleeping
- bullying others.
- 10.1 All staff and pupils at CIE are encouraged to establish and maintain happy and harmonious relationships to ensure that students can thrive without fear.
- 10.2 Students are encouraged to seek help whenever it is needed, whether it be for themselves or for others, and they are reminded that help can be sought from many different people.
- 10.3 Concerns about bullying should be raised in the first instance with a person who may be able to help, for example the Principal, a Teacher, Welfare Officer, Accommodation Officer. After discussion the matter will be investigated with the other person(s) concerned, and appropriate action taken.

- 10.4 A full factual record will be taken and the member of staff will monitor the situation.
- 10.5 One of the co-principals will be informed immediately, and the parents will be contacted if appropriate.
- 10.6 Students should be aware that although the matter will be discussed in confidence, information may sometimes need to be forwarded and further help sought.

## 11 Child Protection: Student Complaints

- 11.1 The Children Act 1989 is a detailed and important piece of legislation concerned with (i) children and (ii) the people who have care of children and responsibility for them, including parents, guardians, activities leaders, teachers, doctors, nurses, police officers, social workers and others.
- 11.2 Central to the Children Act is the intention to make the care of every child in the country as sound and secure as possible. As a result of the Act, people who work professionally with children must aim to work effectively with colleagues in their own organisations and with colleagues from other organisations; and all adults who have responsibility for children, professionally or otherwise, must ensure that they carry out their responsibilities wisely, sensitively, honestly and fairly.
- 11.3 At CIE we support students in the following ways:
  - Provision of a caring and friendly environment where students feel free to discuss their problems
  - Regular meetings between student and tutor.
  - Notes in the Students Handbook which outlines the complaints procedure.
  - Immediate response to problems raised by agents, teachers and others.

#### 12 If a child reports abuse

11.1 Children who have a problem may speak to someone whom they trust. It is important that the member of staff sets the boundaries firmly at the outset of such a conversation, making it clear that no one can offer absolute confidentiality. A young student who is insistent upon confidentiality should be referred to an external source, such as ChildLine. If the student is only prepared to speak if absolute confidentiality is guaranteed, the member of staff should terminate the conversation at that point. The adult should provide Simon with a written account of what has transpired as a matter of urgency.

12.2 If a student decides to speak to a member of staff about the fact that either he/she, or a student known to them, is being bullied, harassed and abused, the member of staff should:

- React professionally, and remember that they are not carrying out an investigation, (which is a task for specialists)
- Take what the child says seriously, and calmly, without becoming emotionally involved.
- Make it clear why unconditional confidentiality cannot be offered. Explain that
  any adult member of staff is obliged to inform the DSL, if child protection or
  safeguarding issues are involved, in order that specialist help can be arranged
- Encourage the student to speak directly to the DSL.
- Explain that only those who have a professional "need to know" will be told, and,
  if appropriate, measures will be set up to protect the student from retaliation and
  further abuse.

- Reassure the student that he or she was right to tell, and that he/she is not to blame for having being bullied or abused.
- Allow the child to tell his or her own story, without asking detailed or leading questions.
- Record what has been said.
- Inform the DSL as soon as possible at least by the end of the morning/afternoon session of that day.
- Inform the DSL immediately in cases where abuse from a member of staff is alleged, or if the incident happened inside the school, or on a school trip.

# 13 Action to protect the student

- 13.1 Information about possible abuse may come to a member of staff in several ways direct allegation from a child that has been abused, through a friend, relative or other child, through a child's behaviour or through observation of an injury to the child.
- 13.2 In the case of an allegation being made by the child concerned or by a third party it is important to remember that:
- 13.2.1 Defendants have been acquitted where leading questioning or inappropriate investigation has been proven.
- 13.2.2 It is vital that subsequent enquiries should not be prejudiced by detailed questioning in school.
- 13.3 A referral, either in writing, or in written confirmation of a telephone call, will always be made to the local Social Services Department to carry out an investigation within 24 hours of an allegation or suspicion of abuse have arisen. Irma will consider how best to support and monitor the pupil concerned through the process of investigation, liaising closely with parents, the Local Safeguarding Children Board (LSCB), or other agencies involved to identify the support strategies that will be appropriate.

### 14 Allegations against staff

- 14.1 All staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 14.2 We understand that a child or young person may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the DSL or the most senior member of staff available.
- 14.3 The DSL, on all such occasions will discuss the content of the allegation with the LADO (Local Authority Designated Officer) before taking any action. In our county contact should be made with LADO team (01865 810603) or email <a href="mailto:lado.safeguardingchildren@oxfordshire.gov.uk">lado.safeguardingchildren@oxfordshire.gov.uk</a>
- 14.4 If the allegation made to a member of staff concerns the DSL, the person receiving the allegation will immediately inform the DDSL, who will consult with the LADO, without notifying the manager first.
- 14.5 The school will follow the procedures for managing allegations against staff, as outlined in keeping children safe in education 2015.
- 14.6 Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult with the LADO.

14.7 Our lettings agreement for other users requires that the organiser will follow LA procedures for managing allegations against staff and, where necessary, the suspension of adults from premises.

## 15 Whistle-Blowing

If a teacher or member of staff has concerns about the behaviour of another member of staff towards a pupil, he or she should report it at once to the DSL. Any concern will be thoroughly investigated under the school's whistle-blowing procedures. If there is evidence of criminal activity, the Police will always be informed. Wherever possible, and subject to the rights of the pupil, the member of staff will be informed of the outcome of the investigation. No one who reports a genuine concern in good faith needs to fear retribution.

# **16 Confidentiality**

A member of staff who uses the whistle-blowing procedure is entitled to have his/her name protected from being disclosed by the DSL to the alleged perpetrator, without his/her prior approval. However, it has to be recognised that his/her evidence may be required by the Police to be used in any criminal proceedings.

### 17 Where a member of staff has concerns about a student

If a teacher or other member of staff has concerns about any pupil or incident that touches upon child protection issues, he or she should report them as soon as possible to the DSL.

## 18 Disclosure and Barring Service (DBS)

- 18.1 At CIE, we regard this primarily as a recruitment matter, and all new teachers are required to sign a declaration regarding their suitability to work with children and to agree to a DBS check if they cannot provide a current DBS disclosure. All of our host families are required to provide DBS disclosures, if hosting children under 18. Fostering arrangements with the Social Services department must be provided for children staying with a host family for more than twenty-eight days.
- 18.2 Your appointment is subject to the receipt of a Disclosure Certificate from the DBS which does not disclose any matter not voluntarily disclosed to CIE before or at interview or prior or during your appointment. In the event of the Disclosure Certificate revealing any such matter, you shall be liable to a review of the Disclosure in the context of the school's Policy on the Recruitment of Ex-Offenders, and subject to an unsatisfactory review, you will be liable to summary dismissal.
- 18.3 As an organisation using the DBS Disclosure service to help assess the suitability of applicants for positions of trust, CIE complies fully with the DBS Code of Practice regarding the correct handling, use, storage, retention and disposal of Disclosures and Disclosure information. It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of Disclosure information.
- 18.4 The full policy is available in the Employment Law folder kept in the staff room.

#### 19 The Recruitment of Ex-Offenders

19.1 As an organisation using the DBS Disclosure service to assess an applicant's suitability for positions of trust, CIE complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a Disclosure on the basis of a conviction or other information revealed.

- 19.2 CIE is committed to a fair treatment of its staff, potential staff, or users of its services, regardless of gender, race, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.
- 19.3 We actively promote equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records. We select all candidates for interview based on their skills, qualifications and experience.
- 19.4 A Disclosure will be requested for every employee at CIE.
- 19.5 As the position for which applicants will be applying is exempt from the terms of the 1974 Rehabilitation of Offenders Act, CIE is allowed to ask questions about candidates' entire criminal record for the purpose of assessing the applicant's suitability for the position.
- 19.6 We encourage all applicants called for interview to provide details of their criminal record at an early stage in the application process. We request that this information be sent under separate, confidential cover, to a designated person within CIE and we guarantee that this information will only be seen by those who need to see it as part of the recruitment process. 19.7 At the interview, or in a separate discussion, we ensure that an open and measured discussion takes place on the subject of any offences or other matters that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment. In the event that employment has commenced the person may be dismissed if it becomes clear that they have withheld information.
- 19.8 We undertake to discuss any matter revealed in a Disclosure with the person seeking the position before withdrawing a conditional offer of employment or before taking a decision to dismiss.

### 20 Prevent

20.1 CIE will have regard to our obligations to prevent students from being drawn into extremism or terrorism. We recognise that this is our statutory duty under The Counter Terrorism and Security Act 2015. We shall do this by:

- teaching students in a way that is consistent with our laws and values.
- equipping young people with the knowledge, skills and understanding to think for themselves, to challenge and debate.
- providing a safe environment for discussing controversial issues and helping young people to understand how they can influence others.
- providing our staff with the training so that they can handle these issues sensitively yet confidently.

## 21 Host Families/Carers

For many students the highlight of their stay in Oxford is their host family. To continue to ensure this, and in addition to the host family guidance and Code of Conduct, the following considerations should also be taken by our families as a matter of course:

- 21.1 Medical Emergencies: Host Parents will contact Julie or the CIE emergency number if the child in their care is taken to hospital or has any medical emergency.
- 21.2 Ages: If children need to share accommodation then, where possible, children under the age of 16 should be placed in homes with other children under 16, and 16-18 year olds should

be placed together (ie not with under 16s). Where children are of mixed ages Enhanced DBS checks will need to be completed on all occupants over the age of 18.

21.2 Sharing of bedrooms: Carer's own children will not be sharing accommodation with an international student. Children who are enrolled on a course that lasts for more than 2 months should not share a bedroom. The only exception to this is children who are same sex siblings and they are permitted to share a bedroom for up longer periods if specifically requested by the child's parents. However, wherever possible, parents should be given the option to place siblings within the same household in separate rooms to give them the best possible environment for completing their studies. It is never acceptable for a child to share a bedroom with an unrelated adult.

21.4 Curfews: Minors are expected to go straight home after school unless they have made an alternative arrangement with the host family with the conditions that they tell the host family who they will be with and where they will be. They must be home by the recommended curfew (or earlier if preferred). CIE guidelines should be reinforced to young students regarding freedom, meeting with friends, travelling on public transport, return times and so on. Any parental restrictions and/or those imposed by CIE must be observed.

# 22 E-safeguarding

CIE Oxford and its staff (including Host families) will do as much as possible to keep children and young people safe. The needs of the child are paramount and procedures that are in place should relate to all aspects of the child's life whether that applies to the school setting, the social enrichment programme or the place the child is living. CIE Oxford accepts responsibility for ensuring that the various aspects of this guidance are both in place and monitored regularly. 22.1 Aims

- to protect all children and young people attending CIE Oxford and who make use of technology (such as mobiles phones, computers, laptops and the internet) whilst they're within the care of CIE Oxford
- to provide staff with policy and procedure information regarding e-safety
- to ensure CIE Oxford is operating in line with their values and within the law regarding how the organisation uses information technology.

## 22.2 We believe that

- children and young people should never experience abuse of any kind
- children should be able to use the internet for education and personal development, but safeguards need to be in place to ensure they are kept safe at all times.

#### 7 Disability

CIE is committed to advancing an environment in which all applicants, students, and staff are given the opportunity to demonstrate and realise their full potential. With its Disability Policy, CIE aims to embed a culture of support and equal opportunities for students with disabilities or learning difficulties. Please be aware that there is no wheelchair access at CIE's main premises, Bocardo House.

CIE will ensure that:

 applicants and students are given the opportunity to disclose a disability or learning difficulty.

- the requirements of applicants or students who disclose a disability or learning difficulty are assessed on an individual basis.
- reasonable adjustments are provided, within the resources available, for applicants or students who disclose a disability or learning difficulty. In excess of our available resources, adjustments may be offered and made for an additional fee, if possible.
- all discussions and information regarding a disability or learning difficulty are treated in a confidential manner.

To ensure we provide fair and equal treatment of all students please familiarise yourself with the full policy which is available in the Employment Law folder kept in the staff room.

# 8 Disciplinary Rules

All members of the CIE community are asked to do all that they can towards maintaining a happy, calm and purposeful atmosphere throughout the school. We believe that good relations, good manners and a secure learning environment play a crucial part in the development of pupils as life-long learners.

#### **Student Guidelines**

- Remember that CIE is a place for study. Even if you have free time, other students will be studying, so you should be quiet at all times.
- Leave your classroom clean and tidy for the next group. Take all your papers with you when you leave, and respect college property.
- Look after your own property. CIE is not responsible for damaged or lost property.
- Show respect to other people. CIE is a place to learn and exchange experiences. Be aware that you are going to be studying with people from different cultures, religions and backgrounds.
- Do not smoke anywhere in the building. You are not allowed to drink alcohol in the building.
- If there is anything making you unhappy, you must tell this to either your teacher or another member of CIE staff.

#### Lessons at CIE

- Be on time, attend all lessons and do not be disruptive.
- Make sure you are prepared before your lesson begins.
- Complete all set homework and give it to your teacher on time.
- Make sure your mobile phone is off during your class period.
- Phone the school on 01865 202238 if you are going to be absent or late for class.
- You must attend all your lessons. If you are here on a student visa and you stop coming to lessons, you might lose your visa and have to leave the country.

If you are staying with a **host family**, please follow host family guidelines outlined in the 'pre-arrival information'. Always tell your host if:

- You are going to be late
- You are planning to miss a meal
- You are going to be out overnight
- You expect visitors

You break or damage anything

If a student does not follow the school guidelines, they will receive a verbal warning. This will be followed by a written warning and if the student still does not change, they will be asked to leave.

With specific reference to "absenteeism and lateness" students will, when they fall below 90% – and after CIE has phoned the student, family or agent – receive a verbal warning. If, after a further two weeks, they haven't raised their attendance to above 90%, this will result in a written warning which, after a further week without improvement, will result in a final written warning. No satisfactory response within a further week will result in expulsion.

Students who do not attend at least 90% of their lessons will not qualify for a certificate. CIE reserves the right, in the case of gross misconduct, such as bullying and violence, to expel the student immediately.

## 9 Disciplinary Rules for 15-17 y.o. at CIE

All under-18 students are strongly advised to attend a full-time programme (English+ activities or Intensive English (15+)). Any under-18 student choosing not to attend a full programme must have written permission from their parents or guardians because CIE offers no alternative arrangements in the morning or afternoon. If the student is staying with family or friends while in Oxford, a tuition-only option is available that does not include accommodation or activities. Student guidelines and disciplinary procedures outlined in **Disciplinary rules 8** apply to students under 18.

## 10 Disciplinary Rules for CIE Residential Junior Summer School

All under-18 students are strongly advised to attend a full-time programme (English+ activities or Intensive English (15+)). Any under-18 student choosing not to attend a full programme must have written permission from their parents or guardians because CIE offers no alternative arrangements in the morning or afternoon. If the student is staying with family or friends while in Oxford, a tuition-only option is available that does not include accommodation or activities.

Signing in/ out

- 10-17 year old non-residential students will be signed in before lessons/activities and signed out at the end of the school day by a recognised adult
- 14-17 year old non-residential students may sign in before lessons/activities and sign out at the end of the school day themselves only if CIE has a parent's written permission for them to travel to and from school alone.
- 10-17 year old residential students will eat their breakfast, lunch and dinner under the care of a member of CIE staff. They will sign in before each meal.
- 10-17 year old non-residential students will eat their lunch under the care of a member of CIE staff. They will sign in before each lunch.
- 10-13 year old non-residential students will be supervised at ALL times during the school day.

#### **Student Guidelines**

- Remember that CIE is a place for study. Even if you have free time, other students will be studying, so you should be quiet at all times.
- Leave your classroom clean and tidy for the next group. Take all your papers with you when you leave, and respect college property.

- Look after your own property. CIE is not responsible for damaged or lost property.
- Show respect to other people. CIE is a place to learn and exchange experiences. Be aware that you are going to be studying with people from different cultures, religions and backgrounds.
- No smoking or the drinking of alcohol is allowed at any time.
- If there is anything making you unhappy, you must tell this to either your teacher or a member of CIE staff.

#### Lessons at CIE

- Be on time, attend all lessons and do not be disruptive.
- Make sure you are prepared before your lesson begins.
- Complete all set homework and give it to your teacher on time.
- Make sure your mobile phone is off during your class period.
- Phone the school on 01865 202238 if you are going to be absent or late for class.
- You must attend all your lessons.

## Residential rules (Summer School)

These rules must be followed:

- Under no circumstances is alcohol to be brought onto or consumed on the premises.
- Smoking is not permitted anywhere on the premises.
- A curfew time set by CIE or your group leader must be obeyed.
- No playing loud music in your bedroom or in communal areas.
- You are not permitted to enter the bedrooms of other students.
- You must come and sign in for all meals.
- You have 3 meals each day and snacks will be provided at break times in communal areas. Please do not consume food or drink in your bedrooms.
- Respect all areas and property on the premises. Any breakages will be charged to the individual involved.
- You must have written parent's permission (only 14-17 y.o.) to go outside the campus between the end of activities/ lessons and dinner time.
- You must not leave the campus/ residential accommodation after dinner.

#### **Absenteeism**

You are expected to attend 100% of your lessons. We will only excuse an absence if your parent/ guardian or your group leader confirms you are sick or have a satisfactory reason for being unable to attend class. If you are late for a lesson or activity we will deduct 30 minutes from your attendance. If you are more than 15 minutes late for a 90 minute class, CIE reserves the right (in the interest of the other students) to refuse entry into that class and will have to stay in the school office.

Any 10-17 year old student who does not follow CIE guidelines will:

- get a verbal warning (after the first offence)
- after their second offence, the student will receive a written warning which will be also sent to their leader/ agent/ guardian or parents. The student will be expected to show consistent improvement within an agreed time period\*.

• the next time they do not meet the agreed expectations they will be asked to return home.

CIE reserves the right, in the case of gross misconduct, such as bullying and violence, to expel the student from the programme immediately.

\*after significant improvement in the agreed period the student can return to 'normal rules'.

## 11 Health and Safety

#### Introduction

CIE takes all reasonable precautions to provide and maintain safe and healthy working conditions which comply with duties under the Health and Safety at Work Act 1974 and the Management of Health & Safety at Work Regulations 1999. Such compliance, and how CIE manages this important area, is contained within the Health and Safety manual located in the staff room / office. Also contained within this manual is CIE's Health and Safety Statement and Policy which you are entitled to view upon request.

Upon commencement of employment, all employees will be trained on all Health and Safety aspects of CIE's activities, and you are asked to place Health and Safety high on the agenda. With this in mind, the following points are designed to serve as a reminder of your duties under the Health and Safety at Work Act 1974.

## **Duty of Employees**

All employees have a duty to take reasonable care of themselves and others, including visitors; this also applies when visiting other sites.

In the event you have an accident at work, whether you receive an injury or not, you must report it to either The Principal or the Academic Manager.

All accidents and 'near misses' must be entered into the accident book, which is situated at reception.

All employees shall inform the Principal of any hazard or danger that may be a risk to the Health and Safety of themselves or others.

All employees shall inform the Principal of any actions displayed or acts or omissions committed by other employees which may cause a risk to health and safety.

Failure to abide by CIE's Health and Safety policy and procedures may result in disciplinary action being taken against you. Such action, dependent on the seriousness of the breach, or repeated breaches of the policy, may result in dismissal.

## 12 Smoking

To comply with legislation, smoking is not permitted inside any of CIE buildings. If you do smoke, this will only be allowed during authorised breaks and only in outside areas as explained to you during your induction.

Employees found to be in breach of this policy, which will be regarded as gross misconduct, will be subject to the disciplinary procedures as laid out in the CIE Handbook.

#### **13 Complaints Procedure**

We hope you will be happy at CIE. However if you have a problem or a complaint, we hope you will find the information below helpful.

### How do I make a complaint?

By talking about it or by writing it down, whichever you find the easier. You can make a complaint by yourself or as part of a group or through your parents. Complaint forms may be found in a plastic pocket on the blue notice board in the common room (next to the exit).

#### To whom?

- A parent
- A brother or sister
- A member of the family outside the immediate family
- A family friend
- A school friend or other personal friend
- A housemother
- A teacher
- The Accommodation Officer, Julie King
- The Finance Officer, Hisashi Chida
- The Principal and Designated Safeguarding Lead, Simon Llewellyn

If you are not happy with any of the above, please feel free to contact any of our accrediting bodies: **British Council** or the **British Accreditation Council** who will also be able to effectively deal with your complaint.

#### Does it matter what the issue is?

No, it can be a big problem or a small one. By discussing it, you may come up with some positive ideas.

### Do others have to know?

If you are worried about confidentiality, tell the staff: they will understand. Even if you find the issue hurtful or embarrassing, do not worry: the matter will only be discussed by staff who can help you, and you will be consulted and kept informed about any action to be taken.

### What will happen next?

If possible, the member of staff will deal with the problem in person. If not, the member of staff will seek the help of a colleague (for example, the Co-Principal, the Academic Manager/Designating Safeguarding Lead, or ADOS.)

If a matter remains unresolved, it should be referred to one of the Co-Principals. If there is a serious problem with which you need help or about which you wish to make a formal complaint, you should report the matter to one of the Co-Principals.

A formal complaint may be made either verbally or in writing. The Co-Principals will see you in order to clarify and, where appropriate, discuss the complaint, and you may be accompanied, if you wish, by a member of staff of your choice, a parent or a fellow pupil. You will receive a response to the complaint within 28 days.

You should bear in mind that there are people at CIE who are ready to listen: there are also outside independent sources of help available.

If, after you have followed the steps outlined above, the matter still remains unresolved, then it should be referred to the Directors who will arrange for your complaint to be heard by an independent body, Stellard Kane, who are Human Resources and Health and Safety representatives.

#### 14 Recruitment and Appointment of Staff

The wording of the advertisement will include:

CIE is committed to safeguarding and promoting the welfare of children, and applicants must be willing to undergo Safeguarding screening appropriate to the post, including checks with past employers and DBS(Disclosure and Barring Service)

Notes to accompany the application form.

Applications will only be accepted from candidates completing the application form in full. With the application form please send an accompanying letter of application and a full curriculum vitae.

Applicants should be aware that all posts at CIE involve some degree of responsibility for safeguarding children. Accordingly, this post is exempt from the Rehabilitation of Offenders Act 1974, and therefore all convictions, cautions and bind-overs that are unspent must be declared. Before the interview, we shall seek references on shortlisted candidates and may approach any previous employers for information to verify experience or qualifications.

Applicants should be aware that provision of false material is an offence and could result in an application being rejected or summary dismissal if the applicant has been selected, and possible referral to the Police and/or DfE Children's Safeguarding Unit.

Applicants are asked to be aware that the interviews will include discussion of their suitability to work with children.

All candidates invited to interview must bring documents confirming any educational and professional qualifications necessary or relevant for the post. Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained from the awarding body. All candidates invited to interview must also bring with them:

- A valid driving licence
- Passport
- Birth statement showing current name and certificate.
- Utility bill or financial address.

#### 3. The Application Forms

Full name

Former surnames

Date of birth

Current address

Previous address ( and if resident at current address for less than five years any previous address(es) during this period

National Insurance Number

Details of all Academic/Vocational Qualifications

### Further Education and Career History

Please provide a full history in chronological order (with start and end dates) of all training, further education, employment, self employment and any periods of unemployment since leaving secondary education. Provide where appropriate explanations for any periods not in employment, self-employment, further education or training, and, in each case, give reasons for leaving.

#### Referees

Please name at least two referees. One referee should be your current employer or most recent employer. Where you are not currently working with children but have done so in the past, one referee must be the employer by whom you were most recently employed in work with children.

#### Declaration

I declare that the above information is accurate and complete to the best of my knowledge. I am aware that the post for which I am applying is exempt from the Rehabilitation of Offenders Act 1974 and therefore all convictions, cautions and bind-overs, including those regarded as "unspent" must be declared. I have not been disqualified from working with children, am not on the Children's Barred List, am not subject to any sanctions imposed by a regulatory body.

Signed.....

## 4. Letter to Referees:

Dear xxx, I have been given your name as a referee by xxx whom I interviewed recently for a temporary position teaching English to young adults in Oxford this summer.

I would very much appreciate your professional opinion of xxx, taking into consideration the following points: a) How long and in what connection have you known the applicant? b) Teaching ability c) Working relationship with colleagues and students d) Suitability to work with children e) Any performance management issues, disciplinary investigations and any proven disciplinary offences, whether expired or not. Any additional information you can give will be most helpful. I thank you very much for your time.

Best regards

# 15 Privacy Policy (Website)

CIE Oxford is concerned with protecting your right to privacy. The following terms are provided to explain how we collect and use information about you so that you can make an informed choice about using our website.

If you use our website to request admissions information, then we will normally store your contact details on a database. This is to allow us to send you other related information in the future and we do not sell, trade or offer this information to others.

#### **Data Protection**

We automatically collect some data about our users' browser actions and patterns. This is aggregate data that does not identify any individual, but instead aids in improving our understanding of our users and their preferences. It also helps us develop our website and audit its use.

#### Cookies

This website uses cookies, a small piece of information stored on your computer in the form of a file, to allow you to access restricted areas and to monitor usage by tracking which URLs are accessed and the sequence in which they are accessed.

We use Google Analytics to analyse use of the website. The information collected will not include any information from which you will be identifiable. You can set up your browser to reject cookies, although some functionality of the website may be impaired.

### Sending us an email

You may decide to send us personally identifying information, for example, in an electronic mail message containing a question or comment, or by filling out a web form that provides us with this information. We use personally identifying information from email primarily to respond to

your requests. We may forward your email to other employees who are better able to answer your questions. We may also use your email to contact you in the future about our programmes that may be of interest.

We want to be very clear: We will not obtain personally identifying information about you when you visit our site, unless you choose to provide such information to us. Providing such information is strictly voluntary. Except as might be required by law, we do not share any information we receive with any outside parties.

# **User name and passwords**

You are solely responsible in all aspects for all use of and for protecting the confidentiality of any usernames and passwords that may be given to you or selected by you for use on our website.

# **Website Privacy Policy**

We have created this statement to demonstrate our firm commitment to your privacy. We do not collect personally identifying information about you when you visit our website, unless you chose to provide such information to us. Providing such information is strictly voluntary. This policy is your guide to how we will handle information we learn about you from your visit to our website.

By accessing the CIE Oxford website you consent to us collecting the data described. If we decide to change our privacy policy, all changes will be immediately posted to this website. If you have further questions about this privacy statement, the practices of this site, or your dealings with this website, you can contact <a href="marketing@cie-oxford.com">marketing@cie-oxford.com</a>

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- (1) the link does not imply any association, endorsement or sponsorship by CIE Oxford of your site or any products or services offered on your site;
- (2) the link is to the CIE Oxford's home page at (https://cie-oxford.com) and
- (3) linked pages from the website are displayed without alteration of any kind; specifically, you may not cause a user's web browser to display a "framed" version of the website in response to activating a link.

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You agree that CIE Oxford may terminate your use of the website if CIE Oxford reasonably believes that you have violated or acted inconsistently with the letter or spirit of this agreement, or violated the rights of CIE Oxford or any third party, or for any reason with or without notice to you. You agree that CIE Oxford may modify or discontinue this website, with or without notice to you. You agree that CIE Oxford will not be liable to you or any third party as a result of such modification or discontinuation. The provisions entitled "Your Submissions", "Disclaimer", "Limitation of Liability", and "General Provisions" will survive termination of this agreement. LIMITATION OF LIABILITY

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## **SEVERABILITY**

If any portion of these terms is held to be unenforceable, the unenforceable portion shall be construed in accordance with English law to the greatest extent possible. If any of the terms of this Agreement become or are declared to be illegal or otherwise unenforceable by any Court of competent jurisdiction, such term(s) shall be null and void and shall be deemed deleted from this agreement. All remaining terms of this agreement shall remain in full force and effect. GENERAL PROVISIONS

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# 16 Data Protection Policy

1. GDPR Record of Personal Data Processing Processing Ref2018Date of Review9th October, 2020Nature of ActivityHuman ResourcesFunctionHuman ResourcesDescription of functions carried out

Managing and supporting Personal Data Processing activities for

- 1. Applicants (current, past and unsuccessful);
- 2. Data Controller / Data Processor Details Data Controller The Company (Simon Llewellyn, Principal) Details of any Joint Data Controllers

For Agent bookings the agent will be a joint Data Controller

For external Audits the Auditor will be a joint Data Controller

Details of any contracts in placeIndividual admissions / Group admissionsDetails of any Data Processors

Line Managers will all be data processors

Teachers will be data processors (limited to academic and welfare details)

Details of any Data Processor AgreementsIndividual contracts3. **Processing Purpose Details**Description of the purpose (reason) for processing personal data

Administration and maintenance of client records and the activities required for the support and management of them for our clients, including:

- 1. Enrolment details.
- 2. Criminal records checks for group leaders,
- 3. Managing Performance and Conduct,
- 4. Managing Attendance.
- 5. Managing welfare tutorials
- 6. Managing progress tutorials

Basis for the processing of the personal data

**Processing basis 2:** Processing necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6 1 b re contract of employment or for the provision of a service to commercial client.)

**Processing basis 4**: Processing is necessary for a legitimate interest of the company.

Link to privacy notice

and/or

Link to awareness raising materials

Prospective clients are informed about the processing of their personal data through information included in the pre-arrival form and process.

Clients are informed about the processing of their personal data through information included in the contract of enrolment / letter of engagement / letter leaving and at the point of collection when appropriate through internal policies.

The Company's Privacy Notice published on our website

## https://cie-oxford/our-policies

Privacy Notices are in place for the processing of the personal data of clients when this is done as part of a commercial contract.

Details of any Privacy Impact Assessments carried out

To enable company to identify the most effective way to comply with Data Protection obligations while meeting data subjects expectations of privacy e.g. introduction of new technology and will include:

- A description of the processing operations and the purpose
- An assessment of the necessity in relation to the purpose
- An assessment of the risks to individuals
- The measures in place to address risk and demonstrate compliance

Does the processing involve automated decision making, including profiling No Is personal data used for direct marketing purposes No

## 4. Details of Personal Data Processing

Categories of data subjects

- 1. Applicants (current, past and unsuccessful);
- Applicant's next of kin;

Categories of personal data being processed

- 1. Personal details; (name, date of birth, gender, address, allergies...)
- 2. Financial details (in some cases);
- 3. Education details (in some cases);
- 4. Visual records.

We also process special categories of personal data:

5. Physical or mental health;

Source of the personal data Personal data will be received from client or client's agent to support enrolment, ongoing enrolment, activities including the data subject, their representative, next of kin or other family member, auditors, educators and examining bodies, and partner schools. How is the personal data collected? Through established activities linked to the recruitment of the data subject or commercial contracts. When is the personal data collected? Through established activities linked to the recruitment of the data subject or commercial contracts. Estimate of the number of records held

Electronically: 10338

Hard copies: 2889 (three years)

Retention period(s) in place for the personal data See Human Resources Retention Schedule which is based on national guidance and business need.

## 5. Recipients of Personal Data (in the UK)

Categories of the recipients of the personal data

- 1. Data Subject;
- 2. Past, present, prospective and failed applicants;
- 3. Professional Bodies (like the British Council);

- 4. Law enforcement agencies and bodies;
- 5. Courts and Tribunals;
- 6. Legal representatives;
- 7. Ombudsman and Regulatory bodies;
- 8. Partner organisations;
- 9. Licensing authorities;

Safeguards in place for the transfer of the personal data Any disclosure or transfer of personal data / special categories of personal data will be in full compliance with the General Data Protection Regulation and established Company processes. Details of any Information Sharing Agreements in place None

# 6. Recipients of Personal Data (outside of the UK)

Categories of the recipients of the personal data

- 1. Data Subject
- 2. Educational Agent of data subject
- 3. Parent(s)/carers of data subject
- 4. School of data subject

Details of any transfers of personal data outside of the UK – to a third country or to an international organisation

- 1. Personal details
- 2. Academic progress reports
- 3. Academic attendance reports
- 4. Academic behavioural and disciplinary details

Safeguards in place for the transfer of the personal data Mails marked as confidential and only sent over secure networks. Where personal data is being transmitted the data subject will be informed in advance and will be in full compliance with the General Data Protection Regulation and established Company processes. Details of any Information Sharing Agreements in place Not Applicable

**7. Processing Measures in Place** Technical and organisational measures in place for data security and protection

PC's are password protected.

Information is only accessible to Data Controller's, joint data controllers and data handlers Format information is held in Both hard copies and electronically on our secure management system

Systems data is held on Google hosts our server. To see their policy on GDPR please contact Simon Llewellyn, CIE Oxford's DPO, at <a href="mailto:dos@cie-oxford.com">dos@cie-oxford.com</a>

## **8. Any Additional Information** None

## 17 Emergency Response Policy

Emergencies come in many forms. Some of these are:

- A serious accident
- Problems caused by an existing medical condition
- A student going missing
- A terrorist incident

Precautions:

To minimise the problems created by an emergency during an outside visit it is important that all colleagues should:

- Have contact telephone numbers of all students who are being taken on a visit
- Have contact numbers of the management team
- Have ensured that group members have your telephone number
- Have ensured that CIE Office have numbers of all students
- Be aware of medical conditions of students
- Have completed a Risk Assessment
- Have an awareness of your location during a visit
- Take this document with them
- Take First Aid Kit

In the event of a serious emergency, it is the responsibility of the Group Leader to:

- Assess the situation
- Inform emergency services if necessary
- Safeguard uninjured members of the group
- Ensure that an adult accompanies casualties to hospital and stays until relieved by a Parent or Agent and that the rest of the group are adequately supervised at all times and kept together
- Inform the Welfare Officer or call the emergency number 07963905355 and keep school informed at all times, reporting in particular the following details: the nature, date, time and location of the incident, names of casualties and details of injuries and names of others involved, the action taken so far and by whom, the action yet to be taken and by whom, the telephone numbers for future contact
- Write down accurately and as soon as possible all relevant facts and witness details, and preserve any vital evidence
- Keep a written account of all events, times and contacts following the incident
- Ensure that no one in the group speaks with the media but that all enquiries are referred to DSL/Welfare Officer
- Ensure that no one in the group discusses legal liabilities with other parties
- Provide the DSL / Welfare Officer with a full record of the incident, actions taken and outcomes

It is important that for all residential visits, a dedicated mobile phone is carried for use in an emergency. The dedicated mobile phone number should be distributed only to the Emergency Contact and staff on the visit so that the line can be kept clear.

In the event of a terrorist attack:

- If groups are caught up in a security incident, Leaders should attempt to keep everyone together whilst moving away as quickly as possible. Staying low and even better, moving away whilst behind solid objects such as concrete barriers or buildings (as opposed to just parked cars) will provide good protection
- Once accounted for, it may seem obvious to try and travel from the town or venue as soon as possible. If this involves public transport, it may not be the best option as some terrorist organisations plan secondary attacks that specifically target transport hubs

- The Group Leader should notify the 'home base' contact as soon as practicable, noting the known whereabouts of all members
- The Home Base should:
- Activate the organisation's Emergency Response Procedure. Establish a crisis team at the school or head office that can become a communication focal point and receiving area for next of kin and students upon return to school.
- Arrange the group's return transport when the situation is sufficiently secure to do so. CIE should communicate with parents using their normal methods where possible, including email, phone and secure website areas
- Consideration should be given to arranging proactive trauma counselling for students and staff after such an event; this can be provided at short notice by Pharos Response (01183 800 140).

# 18 Role Of The Designated Safeguarding Lead (DSL) and Deputy

The designated safeguarding lead will take **lead responsibility** for safeguarding and child protection. This will be explicit within the role-holders job description. This person will have the appropriate status and authority within the school to carry out the duties of the post. They will be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings – and to support other staff to do so – and to contribute to the assessment of children.

# **Deputy designated safeguarding leads**

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding lead/s. Any deputies will be trained to the same standard as the designated safeguarding lead.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately training deputies, the ultimate **lead responsibility** for child protection, as set out above, remains with the designated safeguarding lead; this **lead responsibility** should not be delegated.

The designated safeguarding lead is expected to:

## Manage referrals

- Refer cases of suspected abuse to the local authority Children's Social Care as required;
- Support staff who make referrals to local authority children's social care;
- Refer cases to the Channel programme where there is a radicalisation concern as required;
- Support staff who make a referrals to the Channel programme;
- Refer cases where a person is dismissed or left due to risk/ harm to a child to the Disclosure and Barring Service as required; and
- Refer cases where a crime may have been committed to the Police as required.

#### Work with others

 Liaise with the headteacher or principal to inform him or her of issues especially on-going enquiries under <u>section 47 of the Children Act 1989</u> and police investigations;

- As required, liaise with the case manager and designated officers at the local authority (also known as local authority designated officer/LADO) for child protection concerns (all cases which concern a staff member); and
- Liaise with staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- Act as a source of support, advice and expertise for staff.

## **Undertake training**

The Designated Safeguarding Lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at every two years.

The designated safeguarding lead should undertake Prevent awareness training. In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments;
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff;
- Be alert to the specific needs of children in need, those with special educational needs and young carers;

Be able to keep detailed, accurate, secure written records of concerns and referrals;

- Understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- Obtain access to resources and attend any relevant or refresher training courses; and
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

#### Raise awareness

- The designated safeguarding lead should ensure the school or college's policies are known, understood and used appropriately;
- Ensure the school or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;

- Ensure the child protection is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

### **Availability**

- During term time the designated safeguarding lead (or a deputy) should always
  be available (during school or college hours) for staff in the school or college to
  discuss any safeguarding concerns. Whilst generally speaking the designated
  safeguarding lead (or deputy) would be expected to be available in person, it is
  a matter for individual schools and colleges, working with their designated
  safeguarding lead to define what "available" means and whether in exceptional
  circumstances availability via phone and/or Skype or other such medium is
  acceptable.
- It is matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.