

2025 POLICY ON SAFEGUARDING

(stakeholders)

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4. OTHER RELEVANT SAFEGUARDING POLICIES

As well as ensuring that child protection concerns are addressed, we will also ensure that children who attend the school are kept safe from harm whilst they are in our charge.

To this end, this policy must be seen in light of the Company's following policies:

- Policy on recruitment
- Policy on the recruitment of ex-offenders
- Policy on student attendance
- Policy on fire safety
- Policy on abusive behaviour towards students
- Policy on bullying towards students
- Policy on first aid and administration of medicine
- Policy on risk assessments
- Policy on health & safety
- Policy on first aid
- Policy & procedures for students with special needs, including SEN and LDD
- Policy on E-safety for students
- Policy on E-safety for staff
- Policy on staff use of social networking
- Policy on the use of physical restraint by staff
- Policy on student mental health issues
- Student Code of Conduct
- Staff and Adult Stakeholders Code of Conduct

1. CHILD PROTECTION AND SAFEGUARDING STATEMENT

Studio Cambridge is a language school based in Cambridge that also runs a chain of summer camps at various other locations in July and August. Our year-round students are aged 13 to adult, and our summer camps are for ages 9 to 17. Our year-round programmes are for both individuals and groups, of both adults and juniors. We offer a combination of homestay and residential accommodation.

This safeguarding policy is for all of our students though our rules vary from course to course, according to location and age of the students.

Safeguarding and promoting the welfare of children is defined in KCSIE as 'protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.' These are fundamental principles to which Studio Cambridge adheres.

Although everyone in the school community who comes into contact with children has an important role to play in safeguarding and providing a safe environment in which students can learn, there are several key members of staff who play an important role as the school's safeguarding team.

The Designated Safeguarding Lead (DSL) and the Deputies (DDSLs) are most likely to have a complete safeguarding picture and are the most appropriate person to advise on the response to safeguarding concerns. However, should the need arise, anyone may refer a safeguarding issue directly to the local authority or to the police.

We recognise that all adults working at the school, including temporary staff, volunteers and group leaders, have a full and active part to play in protecting our students from harm, and that the child's welfare is our paramount concern.

Key documents which provide the background to this policy:

- Keeping Children Safe in Education September 2023:
https://assets.publishing.service.gov.uk/media/64f0a68ea78c5f000dc6f3b2/Keeping_children_safe_in_education_2023.pdf
- Working Together December 2023
https://assets.publishing.service.gov.uk/media/65803fe31c0c2a000d18cf40/Working_together_to_safeguard_children_2023_-_statutory_guidance.pdf
- Prevent Duty Revised December 2023
<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

Studio Cambridge has safeguarding as a top priority in every area of the organisation's operation. We are committed to ensuring that our staff always act in the best interests of the child, and we aim to promote a culture of vigilance.

Studio Cambridge believes that every child regardless of age, race, gender or nationality has at all times and in all situations a right to feel safe and protected from any situation or practice that results in physical or psychological damage. We believe that safeguarding the welfare of students is of paramount importance.

Students' worries and fears will be taken seriously if they seek help from a member of staff and, where possible, their confidentiality will be respected. However, staff cannot promise confidentiality if concerns are such that referral must be made to appropriate agencies in order to safeguard the child's welfare.

If a member of staff has suspicions about a child's physical, sexual or emotional well-being, or that they are being neglected, they have a duty to notify the Designated Safeguarding Lead.

Studio Cambridge will ensure that all staff are trained to:

- be alert to the possibility that a child is at risk of suffering harm
- know how to report concerns or suspicions

1.1. Definitions

In order to be clear, here is a list of terminology used in the policy, and our definition of it.

Safeguarding	Umbrella term meaning 'looking after'
Child protection	Protecting a child from abuse
Child	Anyone under the age of 18
Staff	Anyone employed by, or volunteering for, Studio Cambridge
Group leaders	Adults with responsibility for a specific group of students, not employed by Studio
Adults	Studio staff, group leaders and the staff of facility, service or transport providers
DSL	Designated Safeguarding Lead – a member of Studio staff
DDSL	Deputy Designated Safeguarding Lead – a member of Studio staff
WO / HoPC	Welfare Officer / Head of Pastoral Care
LADO	Local Authority Designated Officer
MASH	Multi-Agency Safeguarding Hub
DST	Designated Safeguarding Team

1.2. Adult stakeholders

All adult stakeholders have a legal 'duty of care' and responsibility to safeguard the under 18s in our care. Therefore, they must follow this policy, share Studio Cambridge's commitment to safeguarding, undertake training if required, and be ready to report any concerns, even small ones, or allegations to the DSL or DDSL. All adult stakeholders have a responsibility to respond if they a) notice something themselves, b) are told something by another person (adult or child), or c) have disclosed to them by a child.

1.3. Designated Safeguarding Team (DST)

There is a member of staff, who is named as the Designated Safeguarding Lead. This person has knowledge and skills in recognising and acting on child protection concerns.

The DSL acts as a source of expertise and advice. He or she is responsible for coordinating action within the Company and liaising with outside agencies. Studio Cambridge ensures that the DSL receives the appropriate training.

If the DSL is unavailable, one of the Deputy DSLs (DDSLs) undertakes these duties. There is always a DSL or DDSL available to contact by phone (via the EP if outside office hours).

The DSL is Richard Elstub. The DDSLs are Edwina Warrington and Luke Fitzjohn.

The combination of the DSL and the DDSLs make up the Safeguarding Group.

For non-urgent issues, their email addresses are:

Richard Elstub	Richard.elstub@studiocambridge.co.uk
Luke Fitzjohn	Luke.fitzjohn@studiocambridge.co.uk
Edwina Warrington	Edwina.warrington@studiocambridge.co.uk

Alternatively, for more urgent concerns one of them can always be contacted via the Studio Emergency Phone on 0044 7817 907911.

Additionally, there are Designated Safeguarding Staff (DSS) at each summer camp. These are the Course Director and the Welfare Officer and Assistant Welfare Officer, or the Assistant Course Director if there is not a Welfare Officer.

The DSL, DDSLs and DSS make up the Designated Safeguarding Team.

All staff working at Studio Cambridge should know the name of the DSL and DDSLs and follow relevant child protection and safeguarding policy and procedures. All staff have a duty to report any child protection concerns to the DSL or a DDSL.

2. SAFEGUARDING AIMS

At Studio Cambridge we are committed to safeguarding children and young people and we expect everyone who works in our organisation to share this commitment. Staff in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child.

Studio Cambridge is committed:

- To supporting the child's physical and mental development in ways that will foster security, confidence and independence.
- To providing an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to approach adults if they are in difficulties, believing they will be effectively listened to.
- To raising the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse; specifically: to ensure that staff know: how to identify the signs of abuse and neglect: how to pass on and record concerns about a pupil; that they have an individual responsibility to be alert to the signs and indicators of abuse and for referring child protection concerns to the DST; that they have a responsibility to provide a safe environment where children can learn.
- To emphasising the need for good levels of communication between all members of staff on pastoral and on safeguarding matters.
- To developing a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To developing and promoting effective working relationships with other agencies, especially the police and other appropriate external children's services.
- To ensuring that all staff including temporary staff working within the school who have substantial access to children have been checked prior to their starting dates as to their suitability, including verification of their identity, qualifications, and a DBS check, and a central record is kept for audit.
- To ensuring that all students are provided with the guidance they need to keep themselves safe including when online.
- To safeguarding the protected characteristics of students under the Equality Act 2010, namely:
 - disability
 - gender reassignment
 - race
 - religion or belief
 - sex
 - sexual orientation.
- To ensure that the safeguarding policy is up-to-date, incorporating the most recent DfE and local authority guidance, and is suitable for its purposes: the policy will be reviewed at least annually by the DSL and following scrutiny by the Managing Director (MD), and any changes required to the policy will be published.
- To maintain confidentiality with regards to safeguarding matters - the MD and DST will disclose information about a child to other members of staff on a need-to-know basis only.

- To recognise the importance of the role of the Designated Safeguarding Team (DST) and ensure they have the time, training and support necessary to undertake their duties which include, providing advice and support to staff, students' online safety and taking part in inter-agency meetings.
- To ensuring that all members of staff are aware of who the DSL and Deputy DSLs are and their role.
- To ensuring that all members of staff are aware of our child protection procedures.
- To information sharing when appropriate. The DST will discuss any concerns with the MASH or LADO as appropriate.
- To ensuring, through correct recruitment procedures, that all staff employed are suitable to work with children. This will include undertaking DBS checks and taking references.
- To promptly reporting to the DBS, any person whose services are no longer used because he or she is considered unsuitable to work with children
- To ensuring that deficiencies or weaknesses which are identified in the child protection and safeguarding arrangements are remedied without delay.

3. CHILD PROTECTION

3.1. Recognising main forms of abuse

If staff are concerned about the safety or welfare of a student, they should talk to the Designated Safeguarding Lead (DSL). Abuse can be:

- **Physical abuse** is a form of significant harm which may involve including hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent fabricates the symptoms of, or deliberately induces illness in a child
- **Emotional abuse** is a form of significant harm which involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as over protection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

- **Sexual abuse** is a form of significant harm which involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities,

encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the Internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **Neglect** is a form of significant harm which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate caretakers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

3.2. Possible signs of main forms of abuse

All staff need to be alert to signs and symptoms that may indicate that a young person has suffered or is suffering abuse. Many of the signs and symptoms listed below may have an alternative explanation but all are a concern, particularly if several of these occur or they are persistent:

- Unexplained bruises or injuries – particularly if these appear inconsistent with the explanation
- Untreated injuries
- Withdrawal from physical contact
- Asking to move class
- Attention seeking or over compliance
- Attempted suicide / self-harm / self-mutilation
- Aggression to others / violent outbursts
- Poor peer relationships
- Inappropriate sexual remarks or behaviour
- Pregnancy
- Eating disorders
- Depression / low self-esteem / self-deprecation
- Alcohol or drug abuse
- Lying / delinquency / stealing
- Poor personal hygiene
- History of running away
- Inappropriate response to painful situations
- Overreaction to mistakes
- Reluctance to go home
- Fear of parents being contacted
- Mental health issues

3.3. Secondary forms of abuse

Abuse often goes beyond the four main types of abuse. These are known as secondary types of abuse. It's important that all staff and adult stakeholders are aware of some of the most common forms of secondary abuse and know that they should immediately report any of these forms of abuse to the DST.

3.3.1 Peer-on-peer abuse

Peer-on-peer abuse refers to a range of types of abuse perpetrated by a child on another child. This may include:

- physical assault (e.g. hitting, kicking, shaking, biting, hair pulling)
- verbal bullying
- cyberbullying
- sexual assault
- sexual harassment, including upskirting, skirt raising, touching breasts etc

- gender-based violence
- sexting (also known as 'youth-produced sexual imagery')
- initiation and ritualistic types of violence (also known as 'hazing')

3.3.2 Possible signs or symptoms of peer-on-peer abuse

The signs and symptoms of peer-on-peer abuse may include, but are not limited to:

- bruises
- asking to move class
- asking to move homestay or residence
- depression / low self-esteem
- student appearing withdrawn
- truancy
- poor peer relationships
- eating disorders
- alcohol or drug use
- mental health issues
- disclosure

3.3.3 Reporting peer-on-peer abuse

Members of staff are required to report peer-on-peer abuse as soon as possible and certainly within one working day instances or suspected instances of peer-on-peer abuse to the welfare staff or DST.

3.3.4 Minimising risk of peer-on-peer abuse

Studio Cambridge seeks to minimise the risk of peer-on-peer abuse by:

- promoting an atmosphere in which 'telling' is safe and acceptable
- building the confidence of pupils by valuing them and their work as individuals
- informing students about the behaviour expected of them, stressing that they should be friendly and respectful towards each other
- accepting diversity and encouraging the sharing of different cultural experiences
- fostering an environment that encourages students to make friends with each other
- providing positive role models to students
- ensuring clear communication between all members of staff regarding the behaviour of students
- being vigilant to signs of unhappiness, distress or change of character in students
- providing training to staff on how to understand and identify peer-on-peer abuse, appreciate its consequences and follow the Company's policies
- ensuring adequate supervision

3.3.5 Procedure for dealing with peer-on-peer abuse

Alleged instances of peer-on-peer abuse will be investigated by either the DST or a member of welfare staff. Records of the investigation will be kept by the DST. The school will provide appropriate support for both the victim and the perpetrator.

The school policy on anti-bullying is set out in a separate document - Policy on Bullying Towards Children.

3.3.6 Child sexual exploitation (CSE)

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a person under the age of 18 into sexual activity. This can be a) in exchange for something the victim needs or wants, and/or b) for financial advantage or increased status of the perpetrator or facilitator. This imbalance may arise from a range of factors including gender, sexual identity, cognitive ability, physical

strength, status, and access to economic and other resources. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

3.3.7 Possible signs or symptoms of CSE

Children rarely self-report child sexual exploitation so it is important that staff are aware of potential indicators of risk, including:

- Acquisition of money, clothes, mobile phones etc without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Association with other young people involved in exploitation
- Exclusion or unexplained absences from school
- Persistently going missing or returning late
- Excessive texts or phone calls
- Returning to residence or host under the influence of drugs or alcohol
- Inappropriate sexualised behaviour for age
- STIs or pregnancy
- Evidence/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Frequenting areas known for sex work
- Concerning use of internet or social media
- Increased secretiveness around behaviours
- Self-harm or significant changes in emotional well-being

3.3.8 Child criminal exploitation (CCE)

CCE typically refers to county lines guidance. County lines is the police term for urban gangs supplying illegal drugs to suburban areas and market and coastal towns using dedicated mobile phone lines. It involves CCE as gangs use children and vulnerable people to move and/or store drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion. This is known as cuckooing. County lines exploitation can still be exploitation even if it appears consensual and can involve force or enticement based methods of compliance. It often involves serious violence or threats of violence and can be perpetrated by males and females, individuals and groups, young people and adults. There is usually a power imbalance in favour of those perpetrating the exploitation. As with CSE, the imbalance may arise from a range of factors, including gender, sexual identity, cognitive ability, physical strength, status, and access to economic and other resources.

3.3.9 Possible signs or symptoms of CCE

Some indicators of involve in serious violence, county lines and criminal exploitation are listed below:

- Persistently going missing from school or home, and/or being found out of the area
- Unexplained acquisition of money, clothes or mobile phones
- Excess receipt of texts and/or phone calls
- Reference to gangs
- Association with other young people involved in exploitation
- Relationships with controlling/older individuals or groups
- Returning home under the influence of, or otherwise misusing drugs/alcohol
- Leaving home without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school performance
- Gang association or isolation from peers or social networks
- Self-harm
- Significant changes in emotional well-being

3.3.10 Honour-based abuse (HBA) including female genital mutilation (FGM)

Children may become entangled in disputes which involve some form of punitive violent action or non-violent abuse against a member of the child's family or the child themselves. There have been cases of acid attacks and arson as well as murder. Staff should be vigilant and report any suspicions of a child being at risk of, or already having suffered HBA to the DSL without delay. Honour-based abuse may also include, among other things, forced marriage or FGM.

Female genital mutilation (FGM) comprises all procedures involving partial or total removal of external female genitalia or other injury of the female genital organs. It is illegal in the UK and constitutes a form of child abuse with long-lasting harmful consequences. FGM is internationally recognised as a violation of human rights of girls and women, and it is essential that staff are aware of certain practices and the need to look for signs, symptoms and other indicators of FGM. It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons. There is a legal duty on staff to report any incident of FGM (whether planned or actual) to the police and children's services immediately. By law, staff who fail to report such cases will face disciplinary sanctions. The DSL must also be informed.

3.3.11 Possible signs and symptoms of HBA or FGM

Signs that HBA or FGM may take place:

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leone, Egypt, Nigeria, Eritrea, Yemen, Afghanistan, Kurdistan, Indonesia, Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

Signs that indicate child has undergone FGM:

- Behaviour change on return from a holiday, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from their social group
- Reluctances to take part in physical activity
- Repeated urinary tract infections
- Disclosure

3.3.12 Domestic abuse (DA)

Domestic abuse can be described as any incident, or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members, regardless of gender or sexuality. The abuse can be, but is not limited to, psychological, physical, sexual, financial and/or emotional. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse, or may have had to leave the family home as a result.

Domestic abuse affecting young people can also occur within their relationships, as well as in the context of their home life.

3.3.13 Possible signs and symptoms of DA

Children who witness domestic abuse, may amongst other indicators:

- Become aggressive
- Display anti-social behaviour
- Demonstrate incontinence
- Suffer from depression or anxiety, and not do as well at school due to difficulties at home.

3.4 Suspecting or hearing a complaint

Members of staff suspecting a problem or hearing a complaint of abuse must:

- record what they have seen, heard or know accurately at the time the event occurs
- share their concerns immediately with the DSL

3.5 If a student confides in an adult

A child may choose **any** adult to talk to; therefore **all** adults need to know the right way to respond.

Adults should be aware of the following basic steps if a student discloses something:

1. Listen
2. Reassure
3. Report

Adults should not ask questions, but simply follow the steps above and report to the DSL/DDSL asap.

If a child or young person wants to confide, the adult should:

- be accessible and receptive
- listen carefully and uncritically, at the child's pace
- take what is said seriously but be non-judgmental
- reassure the child that it is alright to tell
- explain that you must pass this information on
- remember that the child is feeling very vulnerable
- make a careful record of what was said (see below)
- gather information on a 'need to know' basis – you do not need the whole story, just enough to take the next step

The adult must not:

- make promises about confidentiality
- investigate or seek to prove or disprove the allegation
- assume that someone else will take the necessary action
- jump to conclusions, be dismissive or react with shock, anger etc
- speculate or accuse anybody
- investigate, suggest or probe for information
- ask leading questions
- confront another person allegedly involved
- offer opinions about what is being said or the persons allegedly involved
- forget to record what you have been told
- fail to pass this information on to the DSL
- gossip about what you have been told either to colleagues or others

3.6 Recording complaints

Staff should make a record of complaints which will:

- include the time, date and place of the disclosure and details of who was present
- be in the child's words wherever possible
- be factual
- differentiate between fact, opinion, interpretation, observation or allegations
- be passed on to the DSL immediately (within 24 hours at most)

3.7 Confidentiality

Any adult who becomes aware of child protection information must only share it with the designated team; not with anyone else, including their own family. Confidentiality about both the victim and the accused must be maintained.