

Table of changes

Date	Version	Summary Amendments	of	Author
14 May 2020	1	n/a		JC
9 May 2022	2	Change to CEE		JC

Scope

This policy sets out how to deal with all adult behaviour towards students which does not fall under the scope of the Safeguarding policy. It is to be read in conjunction with CEE's Safeguarding Policy, Complaints Procedure and Whistleblowing Policy.

Definition

All behaviour of an adult towards a student which is not consistent with the staff and host family code of conduct and the positive and constructive attitude towards young people described in the hosting agreements, host family handbook and staff handbook constitutes a low level concern incident. Unprofessional behaviour towards a student by a member of staff also falls under the scope of this policy.

The behaviour in question can be intentional or unintentional.

Reporting

Students, schools and host families may report incidents to any member of staff either verbally or in writing. Staff are required to report any unusual incidents immediately and in writing to the DSL using the *unusual incident form*.

Response

The Designated Safeguarding Lead (DSL) or Deputy Designated Safeguarding Lead will speak to the reporting individual and review the case. On this basis, they will decide if the reported incident is acceptable or constitutes a safeguarding issue or a low level concern.

If in doubt, the DSL will ask the LADO for advice on a no-names basis.

In case of a safeguarding incident, the DSL will follow the procedure set out in the Safeguarding Policy.

Date: 5 May 2022

24h emergency phone line: +44 (0)7796 997780

Review by: 5 May 2023

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In case of a low level concern, it is important to treat the incident sensitively, proportionally and on a need-to-know basis. The DSL will speak to the reported adult and make them aware of the concern, explain why the behaviour is of concern, what change in behaviour is required and, where appropriate, ask what CEE can do to support them with the change. It should also be set out what the consequences of repeated failure to change behaviour will be.

Records

A record of the report will be stored on Zoho (unusual incidents form). The record is to contain a summary of the concern, the actions taken and the decisions reached. All fields on this form are encrypted when they are being stored in Zoho's database, for added security. The DSL or deputy DSL will take notes about any conversations concerning the case and about its progress and conclusion. Keeping records enables CEE to see patterns of behaviour spread out over time.

Consequences

Most cases will be minor and require no or minimal intervention. Where the impact on the student is more significant but fails to qualify as abuse or neglect under the Safeguarding Policy, and the reported adult does not change their behaviour despite being repeatedly spoken to, it is in the discretion of the company director to decide what further consequences will be appropriate, up to and including terminating the contract of employment or hosting agreement with this individual.