

**Clubclass London Safeguarding Policy
v.3 March 2015**

A: Policy Statement

A1 – Context

Clubclass London offers a range of English language courses predominantly to adults but also runs junior programmes throughout the year. The junior programmes consist of Parent and Child courses during Easter and summer vacation periods and Closed Group courses that run throughout the year for school groups. Clubclass generally does not provide accommodation for Junior Programmes. Host families can be provided for the Parent and Child course and also for juniors aged 16 and 17 who have parental permission to join an adult course. At this time Clubclass does not provide accommodation for Closed Groups. As a result, Clubclass London has developed a number of safeguarding provisions to protect and ensure the rights of all children and adults that study at Clubclass Language School.

A2 – Terminology

Under 18s (U18) – any student who has not yet reached their 18th birthday is considered to be a child and therefore falls within the bounds of this policy

Safeguarding – caring for children and adults appropriately and protecting them from anything that is not within their best interest, including (but not limited to) health and safety, child protection and pastoral care. Clubclass recognises that we have a ‘Duty of Care’ or legal responsibility as children depend on adults for their safety and well-being

Child Protection – protecting children from abuse or maltreatment, which includes all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child’s health, survival, development or dignity in the context of a relationship of responsibility, trust or power

Safer recruitment – recruitment procedures and practices aimed at preventing the appointment of people who may pose a risk to children. Robust screening of applicants through enhanced suitability checks and following up on references will act as a deterrent for offenders seeking employment with access to children in order to harm them

Regulated activity – refers to any position that has direct contact with children or a position that manages staff that work with children. At Clubclass regulated activity includes but is not limited to; teaching, leisure programme supervision, general care or supervision (including group leaders, homestay hosts or residential staff). Regulated activity at Clubclass also

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Clubclass London is accredited by:

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extends to include any individuals visiting the school frequently (once a week or more) or intensively (4 times or more in a 30 day period) who have the opportunity to have unsupervised contact with children.

Suitability checks – check made to identify any known reasons a person would be considered unsuitable to work with Under 18s. Clubclass conducts Enhanced Disclosure and Barring Service (DBS) checks on all prospective staff members. As these take about 4 weeks to obtain, staff members must sign a Declaration if they have to start working before the enhanced DBS check is back. If Clubclass has not received the DBS check by the time a new staff member is due to start work, they will not be given unsupervised access to Under 18s until the checks have come back.

Police ‘certificate of good conduct’ – a document that covers criminal record checks done outside the UK. For closed groups all leaders must have one before being accepted to bring their group to study at Clubclass London.

A3 – Statement

Clubclass London affirms the position that we have a legal duty of care toward the children and young people (Under 18s) who use our services. Clubclass London believes that all children have potential and that every child matters. Clubclass London is committed to ensuring that all children have the right to be protected from all forms of abuse as set out in article 19, UNCRC, 1989.

At Clubclass London safeguarding is about:

- building and not compromising relationships of trust between U18s and adults
- ensuring appropriately safe systems are in place for the well-being of U18s
- having clear procedures in place if things do go wrong

A4 – Under 18’s Entitlement

Clubclass London recognises that the welfare of all children and young people regardless of race or gender is paramount and that they have equal rights of protection. We have a duty of care when they are in our charge and will do everything we can to provide a safe and caring environment whilst they attend our classes and activities.

Clubclass will:

- treat all children and young people with respect and celebrate their achievements
- carefully recruit and select all adults whether paid or unpaid
- respond to concerns and allegations appropriately

A5 – Adult's Responsibility

When or if concerns regarding the welfare of any person under the age of 18 arise, all adults at Clubclass London Ltd are expected to share those concerns with the Designated Safeguarding Lead (DSL), that is, Maxine Hurford.

Adults at Clubclass London Ltd are responsible for:

- respecting all children and young people
- adhering to and understanding that the safeguarding of children and young people is of paramount importance.
- monitoring and reporting concerns to the DSL (Maxine Hurford)
- adhering to the 'Every Child Matters' agenda and ensuring that every child regardless of background or circumstance is healthy, stays safe, enjoys their education and achieves high standards.

A6 – Associated Policies

The policies that share some common ground and/or are associated with the Child Safeguarding Policy are:

- Quality Assurance Policy
- Complaints Policy
- Abusive Behaviour Policy
- Recruitment Policy
- Attendance Policy
- Special Educational Needs Policy

A7 – Policy Review

The Child Safeguarding Policy will be reviewed and audited yearly by the DSL, the DSP and the Board of Directors (audit). Proposed changes or revisions will be submitted to the Board of Directors for approval and signing off.

A8 – Roles and Responsibilities

Clubclass London Ltd has three responsible persons to deliver the Child Safeguarding policy – a Designated Safeguarding Lead (DSL) Maxine Hurford and two Designated Safeguarding Persons (DSP) Mark Sibley and Federica Cesario.

The Academic Manager is the DSL and is responsible for:

- overall governance of Child Safeguarding policies and procedures
- strategic leadership of safeguarding policies and procedures

- ensuring Child Safeguarding policies and procedures are up-to-date, enforced and maintained
- chairing staff meetings regarding Child Safeguarding
- liaising with DSP about day-to-day issues and feedback on policies and procedures.
- maintaining up-to-date suitability checks on staff members and ensuring all staff members are adequately trained and informed about Child Safeguarding
- participating in training regarding Child Safeguarding

The Assistant Director of Studies is the DSP and is responsible for:

- ensuring day-to-day compliance regarding Child Safeguarding policies and procedures
- organising staff meetings targeted towards Child Safeguarding
- liaising with the DSL to ensure compliance, keeping the DSL up-to-date with the day-to-day implementation of Child Safeguarding policies
- participating in training regarding Child Safeguarding

The DSL and the DSP may be reached on the following numbers

- **During work hours - +44 (0) 207 242 1185**
- **After work hours - +44 (0) 7831 704 158**

Adults are responsible for:

- maintaining constant vigilance and ensuring that all under 18s are safe, healthy and happy
- making themselves available to hear any concerns from under 18s and taking any disclosures seriously and reporting any concerns to the DSL and DSP or relevant authorities
- participating in training and meetings regarding Child Safeguarding

Under 18s are responsible for:

- looking after and looking out for each other
- reporting any concerns they have to an adult as soon as possible
- behaving in a considered, respectful and responsible manner whilst enrolled with us.

A9 – U18s Involvement

U18s will receive an information sheet highlighting their rights and responsibilities that are outlined in this policy. (See appendix) U18s will receive the names and contact details of relevant DSPs at the school and information about local authorities that can offer support to U18s. This information sheet will be emailed to students and their parents/guardians at booking stage. It will also be included in the student's welcome pack upon arrival at the school and explained to the students during their welcome meeting on their first day of school.

A10 – Policy Availability

The full policy will be published on the website. A simplified version is available and sent to all staff, homestay providers, group leaders, parents, taxi transfer providers and any other related party that requires it.

B: Code of Conduct

B1 – Overview and Principles

The Code of Conduct is in place to ensure an appropriate base of trust is built between U18s and adults that create a safe culture within the school. The Code of Conduct is to protect both adults and U18s from any behaviour or action which could be misconstrued or misunderstood. Both U18s and Adults will be given a condensed/summarised version of the Code of Conduct to sign; in the case of adults the code will be signed upon commencement of their employment with Clubclass and for U18s on commencement of their course (see Appendix)

B2 – Standards Setting

Adults working with U18s are expected to:

- be excellent role models at all times
- use appropriate language at all times
- maintain a professional relationship at all times
- dress appropriately and conservatively

B3 – Adult-U18 Interaction

Any interaction between an adult and U18 at Clubclass should be carried out in a thoughtful and professional manner. Every interaction should be undertaken with the possibility in mind that a child may be suffering abuse and that a disclosure or symptom relating to this may become apparent during an interaction or that there may be children present who have not yet revealed they are being abused. It is important that the environment created in the classroom and indeed the school, is a professional and supportive environment that is conducive to support a child in such a situation.

For the protection of U18s and adults in Clubclass, but primarily as best practice and good manners, all adults are advised that children should initiate any physical contact. This will not apply in situations where a child needs to be removed from a situation that is threatening their or others' safety.

Within the classroom and around the school, staff members should always be positive and use as much praise as possible with U18s. Positive reinforcement is considered best practice. All adults must be fair when dealing with U18s; adults should never show any favouritism towards any student at any time. Topics discussed and language used must be appropriate to the age group of the students.

Socialising outside of school hours/activities with U18s is not appropriate and will not be tolerated by the school. Adults must maintain a professional relationship with U18s at all times and should not be socialising with any U18s outside of organised school activities and school hours.

B4 – Appropriate Appearance

While at the school or on school trips, all adults are expected to dress appropriately to ensure they maintain their status as a role model and promote respect from all students, both U18 and adult students. A more casual appearance is acceptable on school trips, however all clothes should be smart and modest and in good condition.

Women:

- Skirts and dresses should be at least knee length
- Trousers should be smart and ironed
- Tops/t-shirts should not have spaghetti straps or show any bra straps. They should also be modest and not reveal any bust areas
- Shoes should be comfortable and sensible
- Jeans are appropriate for school activities but must not have any rips and be in good condition

Men:

- Long trousers should be worn at all times. School trips may be an exception depending on the weather and location. Any shorts worn on a school trip must be at least knee length
- T-shirts/shirts should always have a collar and in good condition
- Shoes should be smart casual. Trainers are permitted on school activities provided they are smart and in good condition

B5 – Alcohol, drugs and smoking

All adults have a responsibility to promote healthy lifestyles to U18s. Discussions about addictive substances should not be taken lightly and all staff members have the responsibility to better educate U18s about the lifestyle consequences of addictive substances. No consumption of alcohol or recreational drugs on school premises will be tolerated. Any member of staff found to be consuming alcohol or drugs on school premises will immediately lead to disciplinary action. Where possible, staff members should smoke out of sight of any

student under the age of 18. Staff members should also ensure they have rid themselves of the smell of any cigarette before entering the classroom through taking a breath freshener or applying deodorant.

B6 – IT and Social Networks

All computers in the school are password protected and all students are prohibited from using the computers and/or equipment in the classrooms without a teacher present. Students under the age of 16 are not permitted to use the school's computers and internet without the supervision of their parent or legal guardian/group leader in the case of closed groups. Students over 16 but under 18 are allowed to access the school's computers provided their parents have given them permission or a DSP is available to supervise. All students are issued with the school rules regarding online safety. Teachers are actively encouraged to participate in safeguarding students against the internet and it is a topic that should be discussed in class to better educate students about the dangers the internet poses.

B7 – Accommodation

All hosts, residential staff (if applicable) and group leaders must maintain a professional demeanour around U18s in the more informal setting of accommodation. Respecting privacy is vital. Hosts, residential staff and group leaders will not enter an U18s bedroom without knocking and gaining permission prior to entry, exceptions may be in the case of an emergency. This code of conduct further applies to the bathroom. U18s must feel secure when going to the bathroom and therefore hosts; residential staff and group leaders will give U18s full privacy when they are using the bathroom and/or shower. All partner agencies need to agree to this code of conduct and provide written consent. Host family agencies must also provide a written record that all students will be placed with a family with a clear DBS check.

B8 – Transport

All taxi and coach providers must be DBS checked and their company must have a Safeguarding policy in place that complements Clubclass's policy. All taxi and coach drivers must have a current, clear DBS check. Taxi and coach drivers must act in a professional manner at all times and ensure that they transport all passengers safely and securely to their destination. Drivers must wait in the arrivals lounge for passengers with a sign identifying themselves to the student. The driver must also make their mobile numbers available to passengers in the event they cannot easily find the driver. Drivers must ensure all passengers have their seatbelts on before setting off and assist with luggage as and when required. When the destination is reached, drivers should ensure that all passengers go inside their destination safely before departing again.

C: Child Protection

C1 – Overview

Clubclass London affirms the position that we have a legal duty of care toward the children and young people (Under 18s) who use our services. Clubclass London believes that all children have potential and that every child matters. Clubclass London is committed to ensuring that all children have the right to be protected from all forms of abuse as set out in article 19, UNCRC, 1989. Clubclass meets its child protection responsibilities by having a robust policy and clear and transparent procedures for dealing with U18s that fall under their duty of care.

C2 – Nominated/Designated Person

At Clubclass there is a DSL and two DSPs:

1. Maxine Hurford, Academic Manager (Level 2 Training). Contact numbers: +44 7831 704 158 or +44 7577 394 920
2. Timothy Mark Sibley, Assistant Director of Studies and Student Welfare Officer (Level 1 Training). Contact number: +44 207 242 1185
3. Federica Cesario, Receptionist (Level 1 Training). Contact number: +44 207 242 1185

In the unlikely event that none of the above can be contacted, Camden Council's Multi-agency Safeguarding Hub can be called on:

- Office hours (09:00 to 17:00)
+44 (0) 207 974 3317
+44 (0) 207 974 6600
+44 (0) 207 974 4094
- Out of hours
+44 (0) 207 974 4444

Alternatively, the NSPCC Helpline can be called 24/7 on 0808 800 5000 or texted on 88858.

Our LSCB is Camden and the contact details are:

c/o Children Schools and Families,
Crowndale Centre,
218 Eversholt Street,
London, NW1 1BD
tel: 0207 974 6639

LSCB Chair: Dominic Clout, dominicclout@gmail.com

LSCB Development Officer: Terry Ellis, terry.ellis@camden.gov.uk

Business Manager: Lucy Flaws, Lucy.Flaws@camden.gov.uk

C3 – How to respond to concerns:

All staff and other adults must be aware of their responsibility to keep the Lead and Deputy informed of any safeguarding concerns that they have. All concerns must be reported to the DSL or DSP as soon as possible. The Concern and Disclosure/Allegation Form must be completed (see Appendix) by the person who raises the concern, either electronically or in hard copy. All concerns will be stored chronologically in a separate file that is securely kept and can only be accessed by the DSL and DSPs. Records will be collated yearly for analysis and review to determine if any patterns are emerging. This will be included in the annual review and audit.

Once a concern is raised, it is the DSL or DSPs responsibility to respond and record the response. Responses could include:

- information gathering
- monitoring (regularly, if applicable)
- discussions with group leader/parent/agent/homestay host and/or agency/other DSPs/management prior any action being taken.

C4 – Recognising symptoms of abuse:

There are four areas of abuse:

1. Physical – where an U18s body is deliberately hurt or injured. Look out for unexplained bruises or burns, particularly symmetry. Wearing clothes to cover injuries, even in hot weather.
2. Sexual – where adults use U18s to satisfy sexual desires; other U18s can also be abusers. Look out for acting in an inappropriate sexual way with objects or peers, becoming withdrawn or clingy, personality changes, unaccountable fear of particular places or people, physical signs including unexplained soreness around genitals
3. Emotional – where U18s are deprived of love, may be continually shamed, given responsibility beyond their years or witness the ill treatment of another. Look out for showing extreme passivity or aggression, sudden speech disorders, overreaction to mistakes and neurotic behaviour (rocking, hair twisting, self-mutilation)

4. Neglect – a persistent failure to meet an U18s physical or psychological needs. Look out for hunger, bad hygiene and poor appearance, abuse of alcohol or drugs and tiredness.

All staff members are issued with the Good Practice Guidelines from SAFEChild that covers areas of abuse and things that may be observed which would raise concern. For the full list, refer to the appendix.

C5 – A child telling an adult:

A child may choose any adult at Clubclass to disclose to; therefore Clubclass recognises that all adults need to know the right way to respond. It is important to:

- Always take what a child says seriously
- Listen but DO NOT investigate

If an allegation is made:

1. Ensure the child is safe and supported
2. Inform the DSL or DSP and/or senior manager/director immediately
3. If/when safe and appropriate, return the child to their routine
4. Ensure a clear written record has been made, signed and dated by the person who heard the allegation
5. If the allegation refers to a DSP, inform another DSP or contact another senior manager
6. The senior manager or DSP must contact the LSCB immediately
7. No decisions are to be made without referring to the LSCB.

A Referral Form must be completed and sent to LSCB (see appendix)

When responding to an allegation of abuse:

Should	Shouldn't
Find out about the general subject area. Ask <i>'What is it all about?'</i>	Refuse to listen e.g. tell them you're too busy or to see them later. Or overreact.
If the subject matter requires privacy, suggest to go somewhere quieter and inform another staff member where you are having the private meeting.	Start asking more questions. Show worry or concern with facial expressions.
Be open and ready to listen. Ask <i>'What do you want to tell me?'</i>	Be in a room on your own with a student with the door closed
When the student has told you all they want to, reassure them and say <i>'You've done the right thing'</i> .	Draw too much attention to the situation.
	Promise confidentiality if they ask you to keep a secret. Explain <i>'If it's necessary, I will tell somebody else'</i>

Find someone responsible to sit with the student whilst you inform the DSL/DSP.	Put words in their mouth or write while they are talking to you.
Write a report of the meeting using the student's exact words and giving facts only	Ask any direct or leading questions or start probing.
Ensure the report is filed in a secure place	Leave the student alone after they have disclosed
Look after yourself and seek support if required	Write any opinions or draw conclusions.

C6 – Keeping Records

Clubclass London has a separate folder for keeping records concerning allegations of abuse. The records are kept locked in a filing cabinet in the Reception area and can only be accessed by the DSL and DSPs. Records are kept for a period of two years before they are archived and/or destroyed (as appropriate). Annual reviews and audits are done to give an overview of safeguarding over a 12 month period. The report contains:

- Number of concerns raised and dealt with (statistics)
- If any patterns have emerged
- How effective safeguarding strategies have been
- If any major safeguarding issues have arisen
- Record of training done and any changes made to training procedures
- Any feedback from staff/students regarding safeguarding awareness
- Any areas of weakness
- If any new initiatives should be considered/implemented over the coming year.

An audit of the report will be done by an Executive Manager and it must be checked against available evidence. This will be followed by a strategy meeting to discuss the report and the way forward.

C7 – If an adult is accused

Any concerns about the behaviour of adults in the organisation are to be referred without delay to the DSL or DSPs who will contact the Local Authority Designated Officer (LADO) or Local Safeguarding Children Board (LSCB) at Children's Social Care Services, or the police in an emergency.

In the unlikely event that the concerns are about the DSL, it is important to refer to the DSPs. This may not be appropriate, in which case any member of staff may personally refer directly to the LADO or LSCB at Children's Social Care Services.

C8 – If a child is accused

In the case that a child is accused of inappropriate behaviour or abuse, the DSP should report the issue to the DSL who will consult with the owner of the company and refer the issue to the local LADO/LSCB immediately. The DSP and DSL will then take direction and advice from the LSCB.

D: Training

D1 – Responsibility

The DSL and DSP hold overall responsibility for training. Adults are to be trained to Level 1 Safeguarding and the DSL is trained to Level 3 Safeguarding.

D2 – How training is delivered

All staff member receive a copy of the Child Safeguarding Policy upon commencement of their employment at Clubclass. In addition, staff members are required to take an online Level 1 Safeguarding Course within the first 4 weeks of employment at Clubclass. Level 2 Safeguarding training is booked with English UK as and when required.

Refresher training courses are offered either online or face-to-face as and when required.

E: Safer Recruitment

E1 – Overview

Clubclass is committed to safer recruitment procedures, both for its own staff and partner organisations. Safer recruitment for Clubclass staff is conducted through obtaining DBS checks on all staff, at least two written references, rigorous interview process that addresses previous work with children and young people and any gaps in an applicant's CV. In the case of outside agencies, all Child Safeguarding Policies are rigorously checked before any agreement is signed. Group leaders are required to provide a police check at enquiry stage before any group is accepted for courses at Clubclass.

E2 – Recruitment Materials

All published recruitment material includes reference to our commitment to Child Safeguarding. Applicants are requested to have a current DBS check prior to application and there is a written expectation that all applicants share Clubclass' ethos on Child Safeguarding and activity engage in looking after U18s safety.

E3 – Recruitment stages for all

Safeguarding is addressed in all recruitment material as stated above. Safeguarding is also addressed at interview stage. All applicants must show identification papers before the interview begins and current DBS check if applicable. The interview process involves a discussion about Child Safeguarding at Clubclass and there are several questions to directly address the applicant's attitude towards working with U18s (for sample questions see appendix). All applicants are asked at interview stage if there is any reason they would not be able to work with U18s.

E4 – Applicants informed that

At interview stage, applicants are told of the school's ethos towards Safeguarding. Applicants are also told that all references will be followed up, all gaps in CVs must be explained, proof of identity and qualifications is required, reference requests will ask specifically about suitability to work with U18s and appropriate suitability checks will be carried out prior to confirmation of appointment.

E5 – Applicants awaiting DBS checks

In the event that an applicant is due to start working with U18s but they have not yet received their DBS check, they will not be able to start working with U18s. A member of staff who has a DBS check will be seconded to teach the U18s and the applicant will not be allowed any unsupervised access to U18s until the DBS check has arrived.

E6 – Applicants with a Criminal Record

Applicants with a criminal record will be required to satisfactorily explain the record. The Lead Child Safeguarding Officer and Deputies will investigate the criminal record and make decisions on a case-by-case basis. A risk assessment will be carried out to determine the implications for an applicant with a criminal record working with U18s and decisions will be made for each individual case.

F: Welfare/implementing Safeguarding

F1 – Use of Risk Assessments

Risk assessments are used to safeguard U18s and offset risks they may encounter while they are studying in London. Risk assessments have been carried out for taxi transfers, getting to and from school and on course content concerns. The risk assessments have been carried out in conjunction with partner agencies where appropriate. Students are fully informed of risks prior to their arrival and are given coping strategies so they always know what they should do in certain situations. Key information found in risk assessments are communicated to all adults.

Clubclass has a risk assessment form that is required for all school excursions. It is to be completed by the teacher, no later than 7 days before an excursion. Without a proper risk assessment, excursion will not be permitted to take place. This ensures that the proper procedure is being followed and delivered and also ensures the safety of students.

F2 – Supervision ratios

Clubclass uses the Ofsted guidelines for their supervision ratios:

Child's Age	Number of Adults	Amount of Children
0-2	1	3
2-3	1	4
4-8	1	6
9-12	1	8
13-18	1	10

F3 – Missing Students

U18 students must be contactable by phone and the school must be informed of their contact number before they arrive at school. All U18 students are required to sign in when they arrive at school each day. The sign-in sheet is checked 10 minutes after every lesson has begun and any student that has failed to sign in will be contacted. If we are not able to get in contact with the student directly, we will inform the host family agencies and their parents and/or next of kin. In the case that we are unable to locate a student, the police will be informed.

If a student misses their curfew time with their host families, the host family should call their agency and the agency should inform the school on the emergency number **+44 7831 704 158**. The DSL or DSP are responsible for following up with the student and reminding them of the importance of following the rules.

F4 – Welfare Provision

Refer to Welfare Policy

F5 – Fire Safety

Please refer to the H&S Policy for exact details. Clubclass recognises that U18s need additional consideration when it comes to Fire Safety. U18s are clearly identified on the register to all teachers and staff members. All fire wardens and teachers know to look out for and pay special attention to U18s in the event of a fire. The sign in sheets allows Fire Wardens to know exactly which U18 students are in the building at any given time and can also allow us check that they have made it safely to the meeting point.

F6 – First Aid and Medical

As U18s are dependent on adults for proper medical and first aid provision, consideration needs to be given to U18 first aid and medical needs. Clubclass relies on parents to disclose all relevant medical information regarding their child at reservation stage. Provisions can be made on a case-by-case basis where necessary. Clubclass fully informs host family agencies of any medical conditions and action that needs to be taken by host families e.g. monitoring dosage, reminding students to take their medication. The school has trained First Aid Officers on site for all office hours and if instructed to do so by an U18s parent/guardian can monitor or remind a student to take their medication and oversee this process.

First aid will be administered as and when required and Clubclass has a comprehensive first aid kit at reception and a log book for first aid incidences. Clubclass has an adequate number of staff trained to administer first aid.

F7 – U18 Behaviour and Discipline

U18s are informed of the school rules before they arrive and again upon arrival at the school. Not adhering to school rules will result in a meeting with a DSP or the DSL and appropriate disciplinary action will be taken on a case-by-case basis. Serious breaches of school rules may result in expulsion and an early return to their home country. If necessary, parents will be involved in the disciplinary process.

F8 – Airport Transfers

To ensure U18s safety on arrival in the UK and also on departure from the UK, Clubclass works with a transfer provider who has a similar ethos and policy regarding safeguarding. Clubclass has written assurance that all drivers are DBS checked and there is a clear

welcoming and farewell procedure. Students are required to have a contact number for when they arrive in the UK, which is passed onto their driver. Furthermore, students and parents are given the driver's number to ensure open lines of communication. Students are also given the school's emergency number and whoever has the emergency number has hard copies of all transfer booking confirmations and contact details of both student and driver and therefore can competently liaise with both parties to ensure positive outcomes. In the situation that an U18 would like to travel independently from the airport to the school or their accommodation, this can only be approved if we have parental consent and a pre-agreed route for the student to take. The U18 must also have a working mobile phone that they can be contacted on and must also carry the school's emergency number with them.

F9 – E Safety

E Safety is an incredibly important area of safeguarding as children are extremely comfortable and savvy with new technology. U18s are generally trusting and believe what they read, which makes them particularly vulnerable. There are also many websites that offer illegal or inappropriate material that large numbers of children receive unwillingly. In order to safeguard U18s from the internet, education is perhaps the best way. Teachers are encouraged to get involved in this way and have a lesson with their students about e Safety covering issues such as:

- not disclosing any personal information
- things stay online forever
- things online are for the world to see; not just a few friends
- the police can trace everything sent online
- inappropriate pictures or words sent via text/email are cyber bullying and not a joke
- it is easy to lie online using false words and false photos and many people do
- never open messages from people you don't know
- never access any illegal or inappropriate sites whilst on a course
- learn how to block people online and report to an adult anyone who sends sexual messages
- teach children how to manage the internet
- copyright issues and illegal downloading
- time spent online, on technology/games (health issues)

Student computers and the student WIFI network also have parental controls enabled to safeguard children from accessing inappropriate or harmful material.

If a student is found breaching the E Safety rules, it will result in a meeting with a DSP about their behaviour and where necessary disciplinary action. Disciplinary action will be decided on a case-by-case basis and could include informing parents, taking away access to the internet (to the extent possible), early departure and/or expulsion from the course.

F10 – Provision for those more vulnerable

Refer to SEN Policy.

Appendix 1 – Rules for U18s

What is expected:

Under 18s are responsible for:

- looking after and looking out for each other
- reporting any concerns they have to an adult as soon as possible
- behaving in a considered, respectful and responsible manner whilst enrolled at Clubclass

Attendance:

- Students MUST arrive on time for lessons. If a student is going to be late they need to call the school on +44 7831 704 158 or +44 207 242 1185 and inform them as soon as possible.
- Sign in at reception every morning.
- If students have not arrived at the school 10 minutes after the lessons have commenced, the school will start calling them and/or their parents/guardians.
- If Clubclass are unable to find them, the relevant authorities will be involved.

Behaviour:

- Students are expected to behave in a responsible and mature manner whilst enrolled at Clubclass
- Students must show respect and consideration for all other cultures
- Students are to speak in English at all times and make sure they include other students. It is rude to speak in a language that others may not understand.
- Any inappropriate behaviour will have consequences and may result in disciplinary action

Accommodation:

- Students must respect house rules and curfew times
- Students must be kind, courteous and helpful around the house

E Safety:

- Students need to be aware that the internet is a dangerous place and they must exercise caution when using it
- Not everything you read is true
- Students must report anything inappropriate to an adult as soon as possible
- Student should spend no longer than 2 hours using games and social networking sites a day
- Students are not permitted to use classroom computers without a teacher being present and giving them permission
- Do not participate in cyber bullying, report it to an adult immediately

- Students should never open a message from someone they don't know. They should report it to an adult immediately
- All status updates and photo postings should be done in a mature, thoughtful and responsible manner

Outside of school:

- Students should always act in a considered, respectful and responsible manner while in London.
- Students are ambassadors for their family, school and country and should therefore behave in a mature manner when in public.

Appendix 2 – Condensed version of Safeguarding Policy and confirmation of understanding

A3: Statement

Clubclass London affirms the position that we have a legal duty of care toward the children and young people (Under 18s) who use our services. Clubclass London believes that all children have potential and that every child matters. Clubclass London is committed to ensuring that all children have the right to be protected from all forms of abuse as set out in article 19, UNCRC, 1989.

At Clubclass London safeguarding is about:

- building and not compromising relationships of trust between U18s and adults
- ensuring appropriately safe systems are in place for the well-being of U18s
- having clear procedures in place if things do go wrong

B: Code of Conduct

B1 – Overview and Principles

The Code of Conduct is in place to ensure an appropriate base of trust is built between U18s and adults that create a safe culture within the school. The Code of Conduct is to protect both adults and U18s from any behaviour or action which could be misconstrued or misunderstood. Both U18s and Adults will be given a condensed/summarised version of the Code of Conduct to sign; in the case of adults upon commencing their employment with Clubclass and for U18s on commencement of their course (see Appendix)

B2 – Standards Setting

Adults working with U18s are expected to:

- be excellent role models at all times
- use appropriate language at all times
- maintain a professional relationship at all times
- dress appropriately and conservatively

B3 – Adult-U18 Interaction

Any interaction between an adult and U18 at Clubclass should be carried out in a thoughtful and professional manner. Every interaction should be undertaken with the possibility in mind that a child may be suffering abuse and that a disclosure or symptom relating to this may become apparent during an interaction or that there may be children present who have not yet revealed they are being abused. It is important that the environment created in the classroom and indeed the school, is a professional and supportive environment that is conducive to support a child in such a situation as is possible.

For the protection of U18s and adults in Clubclass, but primarily as best practice and good manners, all adults are advised that children should initiate any physical contact. This will not apply in situations where a child needs to be removed from a situation that is threatening their or others' safety.

Within the classroom and around the school, staff members should always be positive and use as much praise as possible with U18s. Positive reinforcement is considered best practice. All adults must be fair when dealing with U18s; adults should never show any favouritism towards any student at any time. Topics discussed and language used must be appropriate to the age group of the students.

Socialising outside of school hours/activities with U18s is not appropriate and will not be tolerated by the school. Adults must maintain a professional relationship with U18s at all times and should not be socialising with any U18s outside of organised school activities and school hours.

B4 – Appropriate Appearance

While at the school or on school trips, all adults are expected to dress appropriately to ensure they maintain their status as a role model and promote respect from all students, both U18 and adult students. A more casual appearance is acceptable on school trips, however all clothes should be smart and modest and in good condition.

Women:

- Skirts and dresses should be at least knee length
- Trousers should be smart and ironed
- Tops/t-shirts should not have spaghetti straps or show any bra straps. They should also be modest and not reveal any bust areas
- Shoes should be comfortable and sensible
- Jeans are appropriate for school activities but must not have any rips and be in good condition

Men:

- Long trousers should be worn at all times. School trips may be an exception depending on the weather and location. Any shorts worn on a school trip must be at least knee length
- T-shirts/shirts should always have a collar and in good condition
- Shoes should be smart casual. Trainers are permitted on school activities provided they are smart and in good condition

B5 – Alcohol, drugs and smoking

All adults have a responsibility to promote healthy lifestyles to U18s. Discussions about addictive substances should not be taken lightly and all staff members have the responsibility to better educate U18s about the lifestyle consequences of addictive substances. No consumption of alcohol or recreational drugs on school premises will be tolerated. Any member of staff found to be consuming alcohol or drugs on school premises will immediately lead to disciplinary action. Where possible, staff members should smoke out of sight of any student under the age of 18. Staff members should also ensure they have rid themselves of the smell of any cigarette before entering the classroom through taking a breath freshener or applying deodorant.

B6 – IT and Social Networks

All computers in the school are password protected and all students are prohibited from using the computers and/or equipment in the classrooms without a teacher present. Students under the age of 16 are not permitted to use the school's computers and internet without the supervision of their parent or legal guardian/group leader in the case of closed groups. Students over 16 but under 18 are allowed to access the school's computers provided their parents have given them permission or a DSP is available to supervise. All students are issued with the school rules regarding online safety. Teachers are actively encouraged to participate in safeguarding students against the internet and it is a topic that should be discussed in class to better educate students about the dangers the internet poses.

B7 – Accommodation

All hosts, residential staff (if applicable) and group leaders must maintain a professional demeanour around U18s in the more informal setting of accommodation. Respecting privacy is vital. Hosts, residential staff and group leaders will not enter an U18s bedroom without knocking and gaining permission prior to entry, exceptions may be in the case of an emergency. This code of conduct further applies to the bathroom. U18s must feel secure when going to the bathroom and therefore hosts; residential staff and group leaders will give U18s full privacy when they are using the bathroom and/or shower. All partner agencies need

to agree to this code of conduct and provide written consent. Host family agencies must also provide a written record that all students will be placed with a family with a clear DBS check.

B8 – Transport

All taxi and coach providers must be DBS checked and their company must have a Safeguarding policy in place that complements Clubclass's policy. All taxi and coach drivers must have a current, clear DBS check. Taxi and coach drivers must act in a professional manner at all times and ensure that they transport all passengers safely and securely to their destination. Drivers must wait in the arrivals lounge for passengers with a sign identifying themselves to the student. The driver must also make their mobile numbers available to passengers in the event they cannot easily find the driver. Drivers must ensure all passengers have their seatbelts on before setting off and assist with luggage as and when required. When the destination is reached, drivers should ensure that all passengers go inside their destination safely before departing again.

C2 – Nominated/Designated Person

At Clubclass there is a DSL and two DSPs:

1. Maxine Hurford, Academic Manager (Level 2 Training). Contact numbers: +44 7831 704 158 or +44 7577 394 920
2. Timothy Mark Sibley, Assistant Director of Studies and Student Welfare Officer (Level 1 Training). Contact number: +44 207 242 1185
3. Federica Cesario, Receptionist (Level 1 Training). Contact number: +44 207 242 1185

In the unlikely event that none of the above can be contacted, Camden Council's Multi-agency Safeguarding Hub can be called on:

- Office hours (09:00 to 17:00)
+44 (0) 207 974 3317
+44 (0) 207 974 6600
+44 (0) 207 974 4094
- Out of hours
+44 (0) 207 974 4444

Alternatively, the NSPCC Helpline can be called 24/7 on 0808 800 5000 or texted on 88858.

Our LSCB is Camden and the contact details are:

c/o Children Schools and Families,
Crowndale Centre,
218 Eversholt Street,
London, NW1 1BD
tel: 0207 974 6639

LSCB Chair: Dominic Clout, dominicclout@gmail.com

LSCB Development Officer: Terry Ellis, terry.ellis@camden.gov.uk

Business Manager: Lucy Flaws, Lucy.Flaws@camden.gov.uk

C3 – How to respond to concerns:

All staff and other adults must be aware of their responsibility to keep the Lead and Deputy informed of any safeguarding concerns that they have. All concerns must be reported to the DSL or DSP as soon as possible. The Concern and Disclosure/Allegation Form must be completed (see Appendix) by the person who raises the concern, either electronically or in hard copy. All concerns will be stored chronologically in a separate file that is securely kept and can only be accessed by the DSL and DSPs. Records will be collated yearly for analysis and review to determine if any patterns are emerging. This will be included in the annual review and audit.

Once a concern is raised, it is the DSL or DSPs responsibility to respond and record the response. Responses could include:

- information gathering
- monitoring (regularly, if applicable)
- discussions with group leader/parent/agent/homestay host and/or agency/other DSPs/management prior any action being taken.

C4 – Recognising symptoms of abuse:

There are four areas of abuse:

1. Physical – where an U18s body is deliberately hurt or injured. Look out for unexplained bruises or burns, particularly symmetry. Wearing clothes to cover injuries, even in hot weather.
2. Sexual – where adults use U18s to satisfy sexual desires; other U18s can also be abusers. Look out for acting in an inappropriate sexual way with objects or peers, becoming withdrawn or clingy, personality changes, unaccountable fear of particular places or people, physical signs including unexplained soreness around genitals
3. Emotional – where U18s are deprived of love, may be continually shamed, given responsibility beyond their years or witness the ill treatment of another. Look out for showing extreme passivity or aggression, sudden speech disorders, overreaction to mistakes and neurotic behaviour (rocking, hair twisting, self-mutilation)

4. Neglect – a persistent failure to meet an U18s physical or psychological needs. Look out for hunger, bad hygiene and poor appearance, abuse of alcohol or drugs and tiredness.

All staff members are issued with the Good Practice Guidelines from SAFEChild that covers areas of abuse and things that may be observed which would raise concern. For the full list, refer to the appendix.

C5 – A child telling an adult:

A child may choose any adult at Clubclass to disclose to; therefore Clubclass recognises that all adults need to know the right way to respond. It is important to:

- Always take what a child says seriously
- Listen but DO NOT investigate

If an allegation is made:

1. Ensure the child is safe and supported
2. Inform the DSL or DSP and/or senior manager/director immediately
3. If/when safe and appropriate, return the child to their routine
4. Ensure a clear written record has been made, signed and dated by the person who heard the allegation
5. If the allegation refers to a DSP, inform another DSP or contact another senior manager
6. The senior manager or DSP must contact the LSCB immediately
7. No decisions are to be made without referring to the LSCB.

A Referral Form must be completed and sent to LSCB (see appendix)

When responding to an allegation of abuse:

Should	Shouldn't
Find out about the general subject area. Ask <i>'What is it all about?'</i>	Refuse to listen e.g. tell them you're too busy or to see them later. Or overreact.
If the subject matter requires privacy, suggest to go somewhere quieter and inform another staff member where you are having the private meeting.	Start asking more questions. Show worry or concern with facial expressions.
Be open and ready to listen. Ask <i>'What do you want to tell me?'</i>	Be in a room on your own with a student with the door closed
When the student has told you all they want to, reassure them and say <i>'You've done the right thing'</i> .	Draw too much attention to the situation.
Find someone responsible to sit with the	Promise confidentiality if they ask you to keep a secret. Explain <i>'If it's necessary, I will tell somebody else'</i>
	Put words in their mouth or write while they

student whilst you inform the DSL/DSP. Write a report of the meeting using the student's exact words and giving facts only Ensure the report is filed in a secure place Look after yourself and seek support if required	are talking to you. Ask any direct or leading questions or start probing. Leave the student alone after they have disclosed Write any opinions or draw conclusions.
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I, _____, confirm my understanding and consent to the above Safeguarding policy.

Signed _____

Print name _____

Date _____

Appendix 3 – Concern and Disclosure Allegation Form

Please complete if you have any (Safeguarding) concerns about an under 18 student. You must complete the boxes in bold; the other information can be filled in by DSP later if you do not know

Date	
Student first name	
Student family name	
Gender	
Date of birth	
Nationality	
Group / individual	
Student ID	
Name of person noting concern	
Role/connection with school	
Date and time concern noted	
Location	
Concern (please provide as much detail as possible) <i>NB: If reporting a disclosure / allegation made by a student, please use this space to describe verbatim (or as close as you can remember) the conversation. Use the other side to write more.</i>	
Signed	

Response to concern.

This section to be filled in by the DSP.

Do parents / group leader / agent / homestay / other need to be informed?

Response	By whom (full name)	When (date & time)

Appendix 4 – Referral Form

Date & time (form submitted)	
Name of School	
Referrer's name and contact details	

Details of Staff / Other Adult or Student involved

Full name	
Date of birth	
Gender	
Nationality	
Any disability?	
Role/connection with school	
Home address	

Details of Student under 18 involved

Full name	
Date of birth	
Gender	
Nationality	
Any disability?	
Home address	
Parents name	
Is student known to be at risk?	

Details of Alleged Incident

Date and time of incident	
Place of incident	
Brief circumstances of incident	
Names of Potential Witnesses	
Any other information?	

Nature of Allegation

Category (physical / sexual)	
Was technology involved?	
If Yes, what type?	

Signed (by person submitting referral)	
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Appendix 5 – Risk Assessment

Risk Assessment for _____

Date of Risk Assessment _____

What are the hazards?	
Who might be harmed and how?	
What are you already doing?	
Do you need to do anything else to control this risk?	
Action – who by?	
Action – by when?	
Done (Date and sign)	

Appendix 6 – Safer Recruitment Interview Question Examples:

1. What attracted you to teaching / this post / this school?
2. Give an example of how you dealt with bullying behaviour between students. What did you do? What made it successful? How could you have done it better?
3. Young people can develop 'crushes'. How would you deal with that?
4. What would you do if you were concerned about a colleague's behaviour towards children?
5. What motivates you to work with young people?
6. Give an example of how you've managed poor student behaviour.
7. How do you define an appropriate teacher-pupil relationship?
8. When do you think it is appropriate to physically intervene in a situation involving students? How would you go about doing that?
9. Give examples of what you would consider appropriate and inappropriate staff behaviour around our students.

Appendix 7 – Safer Recruitment Reference Letter

Applicant's name _____

What is/was the applicant's position?

What are/were his/her responsibilities?

How does he/she relate to management and colleagues?

How long have you known the applicant?

Please rate the applicant on a scale of 1-5 in all of the following areas: (1=Poor 5=Excellent)

Attendance	Time Keeping
Conduct	Attitude
Flexibility	Quality of Work
Honesty	Loyalty

In your opinion, what are the applicant's strengths?

In your opinion, what are his/her weaknesses?

How do you feel he/she relates to his/her students?

Do you know of any reason he/she could not work with students under the age of 18?

If you have any further information that may help us with deciding whether or not to employ this applicant, please detail below.

All the information I have given herein is true and complete to the best of my knowledge and belief.

Signed _____

Referee's name _____

Date _____

Clubclass Teacher Reference Form v.2

Appendix 8 Teacher Induction Checklist

	Date covered/By whom
Health & Safety/Child Safety	
Sent Health & Safety and Child Safety policies	
Fire procedure	
First Aid kit and Accident Book	
Teacher's Issues	
Staff appraisals	
Staff meetings	
Staff workshops	
Teacher's paperwork and checking attendance	
Job descriptions	
Contract/employee handbook	
Hours/holidays/sick leave	
Student feedback form	
Resources	
Photocopier – location/how to use	
Audiovisual resources – list/where	
Books – list	
Authentic/laminated resources	
Basic Interactive Whiteboard Training	
Induction on e-learning portal	
Other	
Toilets – location	
Stationery – in office (pens/paper)	
Refreshments	
Registration process	
Students cannot enter class if 15+ mins late	