

MAYFAIR SCHOOL OF ENGLISH
SAFEGUARDING POLICY

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MAYFAIR SCHOOL OF ENGLISH

SAFEGUARDING POLICY

March 2019

To be reviewed: January 2020

1 Introduction

1.1 Location

Mayfair School is located at 103a Oxford Street, a busy thoroughfare in central London within a short walk from two tube stations and with good bus links.

1.2 Age groups

Mayfair School of English offers English language courses to both adults and young learners aged 10 -17 years. The young learners are separated into two groups as follows:

- **Junior students** (10 -15 years) attend courses and are accompanied by group leaders on specific dates throughout the year but especially during the summer. They will be taught in closed or mixed nationality groups.
- **Teenagers** (16 -17 years) attend adult courses throughout the year. Mayfair School provides only homestay accommodation for individual teenagers aged 16 to 17.
- Individual, one-to-two or small groups of juniors or young learners can take lessons by arrangement throughout the year.

1.3 Accommodation

- Accommodation for junior groups may be arranged in student residences, hotels, hostel or with homestay families.
- Unaccompanied juniors or teenagers may only stay with a nominated family member or friend or with a homestay family.

2 Commitment to Safeguarding

- 2.1 Mayfair School of English works conscientiously and rigorously to create an ethos in which our young students feel secure and listened to. Our aim is to provide students with a safe and supportive learning environment where they are listened to, cared for and protected from harm. We take every step to safeguard young learners by following a code of practice that is in line with government guidelines in Working Together to Safeguard Children 2015.

3 Our commitment to Safeguarding

3.1 Our Safeguarding Policy is designed to safeguard the wellbeing of our young students. Our policy is written and reviewed by the Principal (who is currently the Designated Safeguarding Lead). A printed copy is available for all members of staff in the staffroom and office. Electronic copies are shared with our accommodation providers as appropriate with both prospective students and parents via the school website and with Group Leaders.

3.2 Statutory framework

In accordance with '*Working Together with Children under the Children Act 2004*', Mayfair School has procedures in place to prevent and also for responding to situations in which it is believed that a child is at risk of harm. These procedures will also cover circumstances in which a member of staff is accused or suspected of misconduct towards children.

3.3 Our policy is based on the following principles:

- **Young people and vulnerable adults have rights as individuals and should be treated with dignity and respect.**
All young people and vulnerable adults have the right to safeguarding from harm irrespective of their age, culture, disability, gender, race, language, socioeconomic status, religious belief and/or sexual identity.
- **We are responsible for providing a safe environment for any young people in our care while they are studying at our school.**

4 Designated Safeguarding Lead

The person currently responsible for Safeguarding within the organisation is Helen Thompson, Principal. She is responsible for implementing the school policy on Safeguarding, for training, for liaison with external agencies and for the maintenance of secure records. She is available to advise staff concerning Safeguarding issues.

4.1 Responsibilities of the Designated Safeguarding Leader

- 41.1 Ensuring that all staff working with young students are familiar with the school guidelines for identifying and reporting abuse, including allegations of abuse against staff.
- 4.1.2 Ensuring that the school operates an effective safeguarding policy and for updates and amendments to the existing policy.
- 4.1.3 Ensuring that all staff working directly with under-18s and vulnerable adults receive foundation training in Safeguarding.
- 4.1.4 Ensuring that the same checks and procedures apply to other staff employed by another organisation on the same site.
- 4.1.5 Ensuring that there are established channels for communicating with other agencies and support services over safeguarding issues.
- 4.1.6 Ensuring staff have up-to-date training on appointment and then at regular intervals.
- 4.1.7 Ensuring that information about students is treated confidentially and with discretion.
- 4.1.8 Ensuring that written records are kept regarding concerns and disclosures and that these are given to the DSL without delay.
- 4.1.9 Ensuring that records are stored securely in a dedicated filing system.
- 4.1.10 Deciding in consultation with a Social Services advisor the action to be taken.
- 4.1.11 Maintaining records of staff training in Safeguarding.
- 4.1.12 Communicating the policy to parents. It is available on the school website and also on request from the office.
- 4.1.13 Ensuring that pupils are aware of how the system works and who they should talk to if they have any concerns.

4.2 Designated Safeguarding Deputies

The Director of Studies or Senior Teacher will deputise in the absence of the DSL (Principal). They will report any allegations or disclosures to the Principal or follow the procedures outlined in the policy.

5 Mayfair School of English Safeguarding Policy for Under-18s

- 5.1 There is a clear line of accountability for the provision of services designed to safeguard and promote the welfare of children.
- 5.2 The Designated Safeguarding Leader is responsible for the organisation's safeguarding arrangements and for supporting other professionals to recognise the needs of children, including rescue from possible abuse or neglect. Arrangements for sharing information with other professionals and with the Local Safeguarding Children Board (LSCB) are understood.
- 5.3 Staff training in Safeguarding and Child Protection and codes of conduct enables staff to raise issues about safeguarding and children's welfare. Staff training will also raise awareness of other issues and understanding of our policies on harassment, bullying and homophobia.
- 5.4 We operate safe recruitment practices when appointing staff who will work with children and all such staff will undertake safeguarding training.
- 5.5 There are clear procedures to be followed if anyone has any concerns about a child's safety or welfare. Staff take seriously and respond promptly and appropriately to any concerns raised.
- 5.6 Our policies for dealing with allegations against staff are in line with those from the LSCB and make a clear distinction between an allegation, a concern about the quality of care or practice or a complaint.
- 5.7 Staff are aware of procedures for handling suspected cases of abuse of students, including procedures to be followed if a member of staff is accused of abuse. The school is committed to handling safeguarding concerns sensitively, professionally and in ways that support young students and vulnerable adults.
- 5.8 Staff should be aware of signs of children at risk and know to whom they should report any concerns or suspicions.
- Any allegation against a member of staff working with children should be reported immediately to the DSL (or deputy DSL) within the organisation. The DSL should also be informed within one working day of any allegation that comes to an employee's attention or is made directly to the police.
- 5.9 If an individual is identified as posing a risk of harm to children, the school will make a referral to the Disclosure and Barring Service.

- 5.10 Designated members of staff have responsibility for taking appropriate action within the school and for liaising with other agencies
- 5.11 Staff are required to work in accordance with the requirements of the Data Protection Act 1998 when dealing with personal information which will be shared by only relevant individuals and organisations when it is in the best interests of the child for this to take place.
- 5.12 Mayfair School will regularly review the policy and ensure good practice.

6 For further information on Safeguarding

1 Working Together to Safeguard Children

For statutory guidelines published in 2015 by the government on safeguarding:

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

2 Keeping Children Safe in Education

For government guidelines and the legal duties with which schools and colleges must comply in order to keep children safe:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

3 A guide for young people to help them understand what support is available to them and how the support framework works:

<http://www.childrenscommissioner.gov.uk/sites/default/files/publications/Working%20together%20to%20safeguard%20children.pdf>

4 LSCB (London Safeguarding for Children Board)

For support from your local authority to ensure that procedures involving children is properly co-ordinated and effective.

<https://www.londonscb.gov.uk/>

Telephone: 020 7641 4000 / 020 7934 9714

Out of hours: 020 7641 6000

Email: accesstochidrensservices@westminster.gov.uk

3 Childline

24-hour free, confidential counselling and advice for young people in the UK on a wide range of issues and to talk to a counsellor online:

Telephone: (Freephone) 0800 1111

Textphone service: 0800 400 222

Online chat: <https://www.childline.org.uk/get-support/1-2-1-counsellor-chat/>

4 London Child Protection

<http://www.londoncp.co.uk/>

7 Safeguarding Procedures

7.1 Causes for concern and disclosures

There are many causes for concern and examples of these include the following:

- 1 Injuries (frequent/unexplained/atypical) or inadequate explanations for the cause of injury
- 2 Inappropriate explicit sexual behaviour
- 3 A disclosure of an experience in which the child has been harmed, either from a child or a peer
- 4 Unusual behaviour or appearance, withdrawal and social isolation

7.2 Procedures for dealing with causes for concern

If you are concerned that a child, young person or vulnerable adult is, or may be subject to, abuse or harm:

- 1 Make a written, dated note of observations as soon as possible by recording statements, observations, illustrations of any injury sustained.
- 2 Inform your line manager or Safeguarding Officer as soon as possible.
- 3 If you have urgent concerns, make a referral to the appropriate external authority.

7.3 Procedures for dealing with a disclosure

If you are approached by a child, young person or vulnerable adult, with a disclosure that s/he is being, or has been harmed or abused, or you are informed of such a disclosure by a staff member, student or member of the public,

- 1 Listen without judging, criticising, asking open or leading questions.
- 2 Record the information and report it as quickly as possible to your DSL or line manager who will decide what further action is to be taken.
- 3 Not promise confidentiality as it may be necessary to refer the matter on.
- 4 Reassure the student that is the right thing to tell
- 5 Explain what has to be done next

Recording a disclosure:

The member of staff involved in a disclosure or cause for concern should make notes as soon as possible by recording statements, observations, illustrations of any injury sustained.

7.4 Allegations against staff

In the event that a member of staff suspects that a student may have been abused by another member of staff, including the Safeguarding Officer, either at school or elsewhere, he/she must immediately inform:

- 1 The Principal or the DSL
- 2 In the absence of the Principal, it should be taken immediately to the CEO, Naeem Ahmad.
- 3 If necessary, external agent such as the LSCB or the police.

A record of the concerns must be made, including a note of anyone else who witnessed the incident or allegation.

The Principal/DSL will then instigate an investigation and assess the need to refer to the local Social Services or the local Safeguarding Children Board in accordance with procedures.

In the case that the allegation warrants further action, a referral should be made direct to the local Social Services team or NSPCC. If the allegation constitutes a serious criminal offence, the police should be informed from the outset and it will be necessary to contact Social Services before informing the member of staff. If it is decided that it is not necessary to refer to the Social Services, the Principal will consider whether there needs to be an internal investigation.

8 Safer Recruitment

The following procedures are in place to support our commitment to safer recruitment:

- 1 All staff working with under-18s are required on being offered a role to sign a declaration that they have no previous convictions and are suitable to work with under-18s.
- 2 All staff working with under-18s are required to undergo Enhanced DBS checks on appointment.
- 3 References confirming the applicant's suitability to work with children will be requested immediately on appointment.
- 4 All new staff appointed to work with under-18s will undergo Safeguarding training on appointment and will be required to read and familiarise themselves with the school policy on Safeguarding and sign all centre policies and procedures regarding child protection, staff conduct and health and safety prior to commencing work.
- 5 Staff are required to attend an induction prior to commencing work.
- 6 Staff responsible for First Aid must provide a valid First Aid certificate.
- 7 Please see our policy on Recruitment for further information.

8.1 Code of Conduct

The guidelines below are designed to protect both the staff and the children in our care.

- 1 Staff should maintain a professional relationship with students at all times. Avoid being over-attentive, friendly or showing favouritism to a single student and respect boundaries.
- 2 Staff must never share personal contact details with students under 18 nor communicate with them by email, phone, text or social network sites.
- 3 There should be no physical contact of any kind between teachers and students. If contact is required, eg giving assistance or comfort, staff should ensure that another member of staff is present.
- 5 Staff should never touch a student in any way unless it is associated and appropriate to an activity and within a group situation.
- 6 Staff should avoid being on their own with any student in a room with the door closed. This applies specially to under-18s. If there is a need to speak to a student alone, leave the door open and ensure that you are in view of others.
- 7 Staff who witness or are involved in any inappropriate accidental conduct should report this to the incident to the DSL as soon as possible.

- 8 Teachers are reminded to only use appropriate language and material in class and to select songs and videos accordingly. Staff are reminded not to not swear in front of students or teach swear words.
- 9 Any member of staff who feels that colleagues are behaving inappropriately are instructed to report this to the management team immediately.
- 10 Teachers with students under the age of 18 in their class should be aware of references to alcohol, drugs and sex in lessons and should exercise extreme caution when dealing with those subjects. Certificate 18 films must not be shown to students under the age of 18 and class parties / celebrations should not include alcohol.
- 11 No alcohol or drugs are permitted on site at any time.

8.2 Relationships with young people aged 16-18

The Sexual Offences (Amendment) Act 2000 makes it a criminal offence for a person to engage in any kind of sexual activity with a person under 18 where the adult is in apposition of trust.

8.3 Media

All students and parents may refuse permission for photographs, videos or other images to be made of their children. Consent to publish pictures of young people must be given by parents.

8.4 Dress Code

Mayfair School of English asks all staff to observe the following dress code:

- 1 Conventional and appropriate dress is expected at all times.
- 2 Professional appearance is expected and clothing must reflect professionalism.
- 3 Casual-smart clothing must be well presented and clean. Shirts with collars are expected for male employees
- 4 Not acceptable are: piercings, unshaven appearance, see through clothing, worn trainers / plimsolls or flip-flops; shorts, tattoos, bare midriff, faded or ripped jeans creased clothing, exposed cleavage, dirty untidy hair

9 Handling a disclosure

All staff are asked to familiarise themselves with the guidelines for dealing with a disclosure or an allegation as outlined below:

Listen

- Listen and remain calm. Respond to the student with calmness and kindness.
- Allow the student to talk about what has happened.
- Reassure the student that what happened was not okay, that you believe them and that they are not in trouble.

Accept what the student says

- Don't put words into your child's mouth. Ask general questions only (e.g. tell me about that?) and don't ask them for more details than they are ready to give.
- Don't question in a way that will introduce new words, phrases into their minds.
- Don't challenge, confront, or criticise your child's information even if the information seems unlikely or there are obvious errors.
- Try to get the message across that talking is OK.

Keep a written record

- Accurately write down what the student has told you, what you said, and the date. This may be used as part of your statement or as evidence in court.

Talking to others

- It is important to respect your child's right to privacy while balancing this with the need to discuss their disclosure with other adults.
- It is important not to continue to keep the alleged abuse secret. Gently explain that what they have said needs to be shared by you with another trusted adult.

Get help

- Discuss your concerns, fears, or doubts about your child's statements with the DSL or childcare professional. Remember – where there is an urgent and immediate need to protect a child, dial 999 to contact the Police. Otherwise for all other children who may be at risk of significant harm, contact the relevant Local Authority, Children's Social Care Service as soon as possible

10 Prevent Duty

Since 1 July 2015 schools have been subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

- Our employees working with young people may be required to undergo Prevent training which is intended to help employees think about what they can do to protect children from the risk of radicalisation. It is essential that staff are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. General safeguarding principles apply to keeping children safe from the risk of radicalisation as set out below.

How to Prevent

- Build students’ resilience to radicalisation by promoting fundamental British values
- Provide a safe space in which young people can understand the risks associated with terrorism and develop the knowledge and skills to be able to challenge extremist arguments.
- Make staff alert to changes in children’s behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views.

Channel is a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

http://course.ncalt.com/Channel_General_Awareness/01/index.html

11 Online Safety

As part of our Safeguarding duty, all staff are required to be aware of the types of online activity that may put the safety of young people at risk and for which they may require support. The school can support pupils and staff facing online safety issues through awareness of:

- A What the main risks are
- B How to deal with any online-related incidents

11.1 There are broadly five main categories of online activity which young people can be exposed to and that put them at risk.

- **Child Sexual Exploitation (CSE)**

This is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection in return for performing **sexual** activities or others performing sexual activities on them. The signs and symptoms range from going missing from school, having older friends, including boyfriends or girlfriends and physical symptoms that are typical of sexual abuse. For further information on this type of abuse, follow the NSPCC link below:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/child-sexual-exploitation/>

- **Grooming**

Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.

- **Sexting**

Typically, this involves posting or sending explicit or provocative materials or revenge porn online. Note that any indecent or sexually explicit image of a person under the age of 18 (a child) is ILLEGAL. If an unsuitable image is posted online, it should be reported immediately to the DSL or you can contact the Internet Watch Foundation or Childline on 0800 1111

- **Radicalisation**

Prevent Duty is designed to help children being taken in or influenced by extremists. If staff identify children at risk, this should be reported immediately to the DSL or to the police. Teachers are encouraged to challenge extremist ideas if they are expressed in lessons. Teachers are reminded to promote tolerance and respect for different religious beliefs and values and also to be aware of core British values.

- **Online Bullying**

Also known as cyber bullying, this can take many forms, commonly as abusive text messages or comments on social media. This is not one-off behaviour, but will take place several times with malicious intent. Note the acronym: STOP = several times on purpose.

If you have any concerns about bullying online (posts on social media for example) staff should take the same steps as they would if reporting a disclosure and, if possible, ask the student to take screenshots of the evidence. Staff can report any such incidents to the DSL or contact:

POSH (Professionals Online Safety Helpline) 0844 381 4772

Further advice can be found at www.saferinternet.org.

11.2 Social Media

Students must be a minimum of 13 years old to use Facebook or Twitter, and 16 to use WhatsApp. They need to be 18 to have a YouTube account/channel (although you can be 13 with parental permission).

It is not for the school to determine whether the child should have accounts on such websites, only that we have a duty of care to lessen the risks presented to them by doing so. Students are encouraged to exercise caution when using social media platforms. The following guidelines are published in the safety section of the Student Handbook:

- Be careful what personal information you post about yourself online.
- Only post appropriate pictures and ensure you have the correct permissions to post pictures of others.
- Think critically; don't believe everything you read - just because it's on the internet doesn't mean it's the truth.
- Never share passwords with anyone.
- Don't arrange to meet up with anyone you meet on the internet - you don't know who they really are.
- If you receive any messages or see anything hurtful or hateful, tell your parents or a trusted adult.
- Use a nickname when online. This will help not to reveal your full name when online.
- When using new apps or online services, have a good understanding of the privacy, security and reporting features.
- Learn what security settings are available, learn how to use them, and then use them.
- Stay alert – anyone can be targeted by outsiders.

Additional Online awareness for young learners

- The student induction and safety section of the student handbook is used to promote online safety through teaching students how to stay safe, how to protect themselves from harm and how to take responsibility for their own and others safety.
- A recognised Internet Service Provider has age-related filtering that is actively monitored.

For further information:

Guidance for schools is available from the CEOP (Child Exploitation and Online Protection) and reports about suspicious behaviour towards children and young people in an online environment should be made to the CEOP:

www.ceop.police.uk

In the UK, if you come across illegal (or suspected illegal) websites or content these should be reported to the Internet Watch Foundation

www.iwf.org.uk

UKCCIS (UK Council for Child Internet Safety) provides guidelines on internet safety.

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

Childline is available 24/7 on 0800 1111

12 Glossary of terms

Abuse

Abuse is any form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. For details of types of abuse see page 20.

Allegation

An allegation is a claim about someone who has behaved in a way that has harmed **or** may have harmed a child **or** possibly committed a criminal offence against **or** related to a child **or** behaved towards a child or children in a way that indicates they may pose a risk of harm to children. Any allegations about those who work with children should be passed to the DSL without delay.

Bullying

Bullying is seen as a form of abuse by mental, physical or verbal actions, by either individuals or groups, which are intended to exploit or intimidate others and which, by a reasonable person, would be seen as unacceptable behaviour.

Child Protection:

Child Protection involves the protection of individual children from significant harm as a result of abuse or neglect and identifying those at risk. It involves all measures undertaken to prevent harm to children. The term child applies to all students who have not yet reached their 18th birthday.

DSL

The School Designated Safeguarding Lead (DSL) is the first point of contact for any member of the school staff who has a concern about the safety and wellbeing of a pupil.

Duty of Care:

This is the overall legal responsibility adults have towards the children in their care or under their supervision to ensure their safety and wellbeing both within and outside the school.

LSCB (London Safeguarding Children Board)

This organisation provides advice and clear guidelines for dealing with children's welfare in accordance with the government ***Working Together to Safeguard Children*** policy on safeguarding.

Safeguarding

Safeguarding and promoting the welfare of children can be defined as:

Protecting children against anything that may be detrimental to their well-being, health and development. It also involves ensuring that children are safely and effectively cared for.

This includes a broad range of issues as follows:

Provision within the school:

Health and safety, school security, educational visits, e-safety, meeting the needs of pupils with special or medical needs, provision of first aid.

Protection against a range of potential issues such as:

Abuse, bullying, cyberbullying, racism, homophobia, transphobia, radicalisation, child sexual exploitation and grooming, substance misuse, female genital mutilation, forced marriage, domestic violence.

Safer Recruitment

Mayfair School is committed to the recruitment of professional, suitably experienced/qualified staff to all roles in the organisation through a rigorous recruitment policy. The aim of the policy is to prevent the recruitment of people who are unsuited to working with students.

By having appropriate procedures for appointing staff, roles requiring DBS (criminal background) checks include but are not limited to teachers, social programme organisers, activity supervisors, welfare officers, homestay providers and residential staff.

Below are guidelines which all recruiting managers should consider before during and after the recruitment process to ensure our safer recruitment aims and objectives are met.

Vulnerable Adults

Vulnerable adults (over-18s) are also at much greater risk of abuse for a variety of reasons, which may include: physical disability, learning difficulties, mental illness or other such issues. Vulnerable adults are entitled to protection against exploitation and significant harm in the same way that children are.

Working Together to Safeguard Children

This government policy provides a guide to inter-agency working to safeguard and promote the welfare of children.

13 Addendum

- 1 Under-18s will be guided in their induction at the school to look out for each other and raise any concerns they have with a member of staff if necessary.
- 2 A Code of Conduct is included with recommendations for behaviour in school for teachers and staff working with children.
- 3 We remind all employees to be role models for young students and to avoid using materials that are not age-appropriate in their lessons that include under-18s.
- 5 All staff should be aware that the internet should be used with guidance for prescribed activities either during lessons, and where applicable, outside lessons.
- 6 Key information on the law in the UK to be made very clear to young learners.
- 7 Detailed risk assessments will need to be drawn up where under-18s are involved in social activities, including supervision ratios, suitability of activities and medical care.
- 8 For issues relating to bullying or racism, please refer to the school policy on the same.
- 9 All students and parents may refuse permission for photographs, videos or other images to be made of their children.

1st March 2019