

# SAFEGUARDING & WELFARE POLICY

Speak Up London, located at 139 Oxford Street, London W1D 2JA, believes that, in the interests of good practice, there should be a clear policy and associated practices to guide work with students under 18 who attend our school.

We believe that young people have rights as individuals and should be treated with dignity and respect. We will endeavour to provide a safe environment for all adults, especially those particularly vulnerable and any under 18s in our care while they are studying at our school.

## **Our policy will cover three groups:**

1. Safeguarding of **young people (16-17 year-olds)** who attend adult classes at Speak Up London;
2. Safeguarding of **under 18s** who are part of short-term closed groups that do not mix with adult students at Speak Up London or who attend our junior courses in international groups of under 18s.

## **TERMS & ROLES**

### **Abuse**

Abuse is any behaviour towards a person that deliberately or unknowingly causes harm, endangers life or violates their rights.

Abuse may be:

- Physical
- Sexual
- Psychological / emotional – repeatedly being made to feel unhappy, humiliated, afraid or devalued by others
- Financial or material – stealing or denying access to money or possessions
- Neglect
- Discriminatory – abuse motivated by discriminatory attitudes towards race, religion, gender, disability, sexuality or cultural background

**Adult:** Any person aged 18 or over

**Vulnerable adult:** any person aged 18 or over considered vulnerable (e.g. pregnancy)  
(Any member of staff across the school with concerns regarding an adult student whom they believe or know to be vulnerable must contact the DSO.)

**Young Adult:** any person aged 16 or 17 (in this case: attending adult courses)

**Staff:** Any person employed by Speak Up London

**Child:** Any person under the age of 16

**Safeguarding:** Umbrella term meaning “looking after”

**Child Protection:** Protecting children from direct or harmful behaviour

**Designated Safeguarding Officer (DSO):** Fred Gordon (Director of Studies) is responsible for day-to-day matters, training and recording systems and is involved in any major safeguarding or child protection decisions

**Designated Safeguarding Lead (DSL):** Katarzyna (Kat) Jeffries (Head of Operations) is responsible for overseeing the safeguarding procedures, liaising with authorities

**Welfare Officer:** Fred Gordon (Director of Studies) and Lina Fattukh (Assistant Director of Studies) are points of contact for any issues concerning the emotional or physical welfare of students and staff in the school.

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**LSCB:** Local Safeguarding Children Board  
**DoS:** Director of Studies – Fred Gordon  
**ADoS:** Assistant Director of Studies - Lina Fattukh  
**HoP:** Head of Operations - Kat Jeffries  
**SSM:** Student Services Manager - Lucas Wellner  
**Welfare Officer:** Fred Gordon and Lina Fattukh

The welfare of children, young people and vulnerable adults is of primary concern. All young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to safeguarding from abuse.

## STATEMENT OF AIMS

Speak Up London is a small, caring school where the welfare of students is our number one priority. Welfare is a very broad term, but our focus is to provide students with a safe and supportive learning environment, one where they are listened to and actively cared for.

## ESTABLISHING A CARING ENVIRONMENT

All staff are responsible for making the school a safe and caring environment for all, including young adults.

A caring environment is one:

- In which the health, safety and welfare of young adults has been assessed and catered for; in which staff are alive to the possibility of abuse and take measures to prevent that possibility.
- Where there is a sound and known reporting system for any incident and where staff take reasonable and practical precautions to avoid any suspicions of abuse being brought against them.

We have referred to the British Council Safeguarding Policy Guide, the Safeguarding Vulnerable Groups Act 2016, Working Together to Safeguard Children March 2023 and the NSPCC website. All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately. All personal data will be processed in accordance with the requirements of the Data Protection Act 1998.

## RESPONSIBILITY

It is everyone's responsibility to report any concerns about abuse to the Designated Safeguarding Officer (FG) and the Designated Safeguarding Lead (KJ), and the responsibility of the Social Services Department and the Police to conduct, where appropriate, a joint investigation.

The **Designated Safeguarding Officer** (Fred Gordon) is the senior member of staff responsible for safeguarding issues within the school. They can be contacted by email ([fred@speakuplondon.com](mailto:fred@speakuplondon.com)), by calling the school, or they can be contacted in person at 139 Oxford Street (Academic Office). They are responsible for overseeing any major decisions involving child protection or safeguarding.

Other responsibilities of the DSO include:

- To receive information about events that are planned in the school that may involve young adults, and plans that indicate how safeguarding will be covered.
- To receive information from any staff that have young adult/child safeguarding concerns and record it.
- To assess the information promptly and carefully, clarifying and obtaining more information about the matter as appropriate.
- To consult initially with a statutory child safeguarding agency to test out any doubts or uncertainty.
- To make a formal referral to a statutory child safeguarding agency or the police when necessary.
- To record statements from any member of staff who feels that a young person has indulged in inappropriate behaviour or made sexually suggestive comments or approaches.

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Katarzyna (Kat) Jeffries ([kat@speakuplondon.com](mailto:kat@speakuplondon.com)), Head of Operations and **Designated Safeguarding Lead**, acts as the Designated Safeguarding Officer in Fred's absence. Any concerns should first go to the Designated Safeguarding Officer before being escalated to Designated Safeguarding Lead. Farhan Quraishi, CEO ([farhan@speakuplondon.com](mailto:farhan@speakuplondon.com)), will deputise for Kat Jeffries in her absence.

Other responsibilities of the DSL include:

- Circulating information to staff
- Ensuring there is an internal support network available to staff if there are concerns or queries about Child protection
- Liaising with the Police
- Training
- Keeping records
- Policy writing and review

The following named persons are members of the committee who have deputising roles and reporting roles within the school: Fred Gordon and Farhan Quraishi.

All school staff are in a position of trust, in particular those staff who teach, support, guide or in any way interact with students. It is incumbent on all staff to be aware of this and to act accordingly at all times, including reporting any concerns or allegations to the Designated Safeguarding Officer.

The managerial responsibility for any programme or activity rests with the individual who is directing or organising the activity. This person is expected to ensure that the activity is planned, organised and delivered with Young Adults or children in mind and work with the DSO to complete a health and safety risk assessment.

## RESPONSIBILITY FOR YOUNG PEOPLE

Young People are encouraged to give feedback to the Designated Safeguarding Officer in their weekly meetings regarding how well they are being looked after at the school and how far their needs are being met. The Student Handbook contains a separate section for Young People, which explains specific rules and lets them know who to contact if they have any concerns.

## ASSOCIATED POLICIES

Please also see our E-safety Policy and Bullying, Harassment & Unacceptable Behaviour Policy for details of how we safeguard children's computer and internet use and tackle bullying.

## STAFF CODE OF CONDUCT WITH UNDER 18s

The purpose of having a code of conduct for staff working with under 18s is so that both children and adults can feel confident about their behaviour; Young People in particular can feel that the school is a safe environment and both adults and Young People can be protected from any actions which could be misconstrued.

It should be noted that whilst a Young Person can consent to sexual activity once they reach the age of 16, the Sexual Offences Act 2003 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 a position of trust.

## Adults must:

- set an example for young people through their good behaviour
- treat all young people with respect and care, regardless of race, religion, or sexual orientation
- be positive by giving praise and encouragement
- challenge unacceptable behaviour (e.g. use of alcohol or drugs, smoking, bullying) and report any incidences of concern

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## Adults must (cont.)

- follow the Speak Up London dress code
- take action if they have concerns, no matter how small

## Adults must not:

- join in with any student's derogatory behaviour or make derogatory remarks about any student
- swear, blaspheme or make racist, sexist, homophobic or anti religious remarks
- socialise with under 18s outside school-run lessons or activities

## An Adult needs to respond and report if:

- they observe anything suspicious themselves
- they are told about an offence or suspicious behaviour by another person (adult or under 18)
- they are worried their own behaviour may have been misconstrued

## RECOGNISING SYMPTOMS OF ABUSE

Young people respond in different ways to abuse, but common signs to look out for are:

- changes to their usual behaviour
- becoming withdrawn, lacking in confidence and anxious
- obsessive behaviour
- being reluctant to socialise
- learning difficulties
- low educational achievement
- aggression and / or depression

## COMMUNICATION WITH UNDER 18s

### In person

- Ask a colleague to stay if a student wants to speak to you alone
- Move out of the classroom into a common area
- If you cannot move to a common area, ensure the classroom door is kept open
- Take care not to become involved in students' personal affairs

### By phone

- Do not give out personal phone numbers or allow students to text or call you

### Online

- Ensure that the relevant privacy settings are in place on social media platforms
- Do not give students access to your social media profiles
- Refrain from engaging in online gaming with students, or using any kind of online messaging

## SAFEGUARDING IN ACTION

### Taking Pictures

- Only the designated school photographer should take pictures of students
- Students' permission should always be asked prior to any pictures being taken and the intended use of these pictures made clear
- Avoid having your picture taken with under 18s in case the picture can be taken out of context, or if you have your picture taken, make sure you are not alone with a student
- Pictures of under 18s taken by the designated photographer may be added to the school's social media page unless they have expressly stated they do not give their permission. Once these have been uploaded/printed, they should be deleted from the camera
- Do not share any pictures of students from the school's social media page on your personal social media page
- Permission from parents is asked for in writing as part of the Parental Consent Form

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## Physical Contact

- Speak Up London advises against any kind of physical contact between staff and students of any age
- However staff should not be afraid to provide emergency first aid treatment if necessary, but this should preferably be done by a member of the same sex and in an open space where possible.
- Physical contact may be required in a situation in which a member of staff is forced to intervene when a student is threatening the safety of themselves or another student, or in a case where they are about to injure themselves

## Alcohol, Drugs & Smoking

- Adults must not smoke, drink alcohol or take drugs around young people
- Adults are prohibited from smoking in or near to the school
- Alcohol is not permitted on the school premises unless receiving prior permission from the DSO
- Rules about alcohol, drugs and smoking can be found in the student handbook
- Ages of students should be checked carefully by Speak Up London staff when they sign up for any social activities which take place in premises serving alcohol
- Staff who are found to be smoking or drinking alcohol around underage students or encouraging them to do so may be subject to disciplinary action

## Whistle-blowing

- If you have any concerns about another Adult's behaviour because they are not acting in accordance with the school's Code of Conduct, Safeguarding & Welfare Policy, and Bullying, Harassment & Unacceptable Behaviour Policy; you must inform the Designated Safeguarding Officer
- If you become aware of any allegations of abuse, these should never be dealt with personally – always inform the Designated Safeguarding Officer, who will decide upon the best course of action in collaboration with the DSL.
- If the allegation concerns the DSO, you should approach the DSL with your concerns, and vice versa.
- You do not have to wait until you are certain to report misconduct or abuse – it is up to the DSO / DSL to investigate
- Staff will not be penalised for reporting suspicions and the report created will remain confidential.

## CHILD PROTECTION

### Principles

Speak Up London fully recognises the contribution it can make to protect children and support pupils in this school.

There are three main elements:

- **Prevention** - by promoting a positive school atmosphere both in and out of the classroom , through teaching , pastoral care and support to our school community
- **Protection** - by following agreed procedures, through staff training and support to enable us to respond appropriately and sensitively to Child Protection concerns.
- **Support** - by providing support to pupils and staff.

Speak Up London meets its child protection responsibilities by:

- taking all suspicions and allegations of abuse seriously and responding swiftly and appropriately
- putting all prospective staff with significant access to students through a safer recruitment process
- making clear to all staff (paid and unpaid) their responsibility to report concerns to the DSO
- making paid Basic Safeguarding training compulsory for all staff
- ensuring all adults who work with our under 18s have had police checks, even if they are not directly employed by Speak Up London; or provide a valid DBS check
- having included in every job description a responsibility to monitor the welfare or behaviour of our students.

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## Responsible for Child Protection

The DSO and the DSL are both trained to Safeguarding Level 2 and 3 respectively, and all staff are trained to safeguarding level 1. During school opening hours, one of them is usually available in person or remotely.

## Reporting & Record Keeping Procedures

All members of staff working closely with Young Adults or Children have to be alert to possibilities of abuse and any concerns about the behaviour of any adult with respect to that person should be reported to the DSO who will decide what further action to take in collaboration with the DSL.

It is the duty of staff to inform only - not to investigate – this is the role of the DSO, DSL, Police and Social Services.

If staff, in the course of their work at the school, have a safeguarding issue brought to their notice, this must be treated as a priority over all other work.

## General Guidance

If a young person approaches you directly to talk about an allegation of abuse:

- stay calm
- take the student to a quiet place which is visible to others
- listen to everything they have to say
- do not attempt to interview them, but do ask clarifying questions to ensure you understand what has happened
- do not promise confidentiality – although you can say this information will only be shared with those who need to know
- let the student know they have done the right thing in speaking to you
- tell them with whom you will share this information and what will happen next
- ensure you make a written record immediately afterwards in the student's own words
- report to the DSO
- DSO reports to the DSL; and DSL reports to LSCB team if necessary

## Victoria Harris

LSCB Business Support Officer

Telephone: +44 (0) 7739 315388

Email: Victoria.Harris@rbkc.gov.uk

Guidance with regard to a specific incident may be obtained from the Designated Safeguarding Lead.

**An oral, and then written report should be** provided to the DSL who will keep a confidential record of any such incidents.

Consideration will be given as to whether the situation falls within the definition of abuse (see above). All written records will be held online and access to those files is limited to the DSO, DSL and a LSCB representative if deemed necessary.

Written records of safeguarding concerns submitted to the DSO which after consideration do not constitute allegations should be kept on file for no longer than 6 months after the young person ceases to use our services.

Allegations which the DSO and DSL decide to report to Social Services should be kept on record for 6 years after the young person ceases to use our services.

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If a member of staff is accused of inappropriate behaviour or abuse:

- the accusation is discussed by the DSO and the DSL and they will decide together if a referral should be made to the LSCB
- the DSO or the DSL may choose to speak to the accused member of staff directly
- the accused member of staff may be suspended pending an internal or external (directed by the LSCB and the police) investigation

If an allegation is made against a Speak Up London student, whether an adult or a Young Person:

- Speak Up London has a duty of care for both parties
- the DSL contacts the LSCB and the police
- the DSO ensures that both parties, particularly if either are under 18, do not have further contact and that the alleged victim is kept safe
- confidentiality is maintained for both parties
- no member of Speak Up London staff will take any further action until they have consulted with the authorities
- the individual(s) may be suspended pending an external (directed by the LSCB and the police) investigation

## Child Sexual Exploitation

- Staff are trained to pay special attention to under 18s in the school
- Through online safeguarding training, staff are made aware of their duty to report any signs of grooming or potentially exploitative relationships which they witness between students or between staff and students

## FGM

- All staff are aware that Female Genital Mutilation is illegal in the UK and that they have a legal responsibility to report any incidences they are told about to the DSO or DSL, who will then contact the police

## Training

The DSL is responsible for ensuring all Speak Up London staff are trained to at least the level of Safeguarding Basic Awareness (Level 1). The DSO and the DSL are both trained to Safeguarding Level 2 and Level 3 respectively, and the Director of Studies (if different) is trained to Safeguarding Level 2.

All new starters will be required to complete Basic Safeguarding Awareness (Level 1) online and this should be renewed every two years. Regular in-house refresher sessions are led by the DSL. This Safeguarding Policy is updated annually. The DSL attends any updates in Safeguarding training run by English UK and passes any developments on to the Speak Up London team.

## SAFER RECRUITMENT

Speak Up London recognises the importance of creating a safe environment for young people, and therefore takes its responsibility to recruit trustworthy, professional and supportive staff extremely seriously.

Any recruitment materials posted by Speak Up London contain the following deterrent:

*Speak Up London is committed to the safeguarding of our learners and all staff will be required to complete an Enhanced DBS check. References will be followed up and we will ask whether there is any reason why you should not work with under 18s. You must provide proof of identity and qualifications before the interview and all gaps in your CV must be explained. Finally, appropriate suitability checks will be required prior to confirmation of appointment.*

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## Recruitment Procedure

1. All recruitment material notifies applicants of Speak Up London's Safer Recruitment procedure.
2. All candidates are required to declare that there is no reason for them not to work with under 18s.
3. Proof of identity and qualifications are required.
4. Two references are taken for each candidate. Each referee will be asked if the candidate is suited to work with under 18s and also for comments about their suitability for the role. Neither referee should be a relative or solely a friend.
5. All gaps in CVs will be investigated.
6. A full job description is provided.
7. All applicants are required to complete an Employment Application form, in which they must state their education and employment history, and their suitability for the role.
8. New student-facing staff members are required to complete an Enhanced DBS check prior to their start date.
9. If there is not enough time for an Enhanced DBS check to be completed before such as, for example, in peak periods, a third reference will be taken pending the check being completed and/or a declaration will need to be signed until DBS has been returned. The new staff member will not be left alone with a young person.
10. New staff members are required to complete Basic Awareness Safeguarding Level 1 training.

## DBS Checks

The school will undertake enhanced DBS checks on all staff if they are in regular contact with Young Adults or Children. Should an employee already have a DBS check carried out by another institution, the original will need to be provided for a DBS update service check.

A 'satisfactory' check is defined as having no criminal convictions (including cautions, reprimands and final warnings) relevant to the post. The fact that a person has a criminal record does not automatically make him or her unsuitable to work with children. The DSL and the DSO, after taking advice from the LSCB, will make a decision based on the nature of the offence(s) as to whether the candidate is employable. All staff or student helpers employed to look after children must report any subsequent criminal convictions. Failure to do so will result in disciplinary action being taken.

## Group Leaders & Other International Applicants

In the case of group leaders who reside in another country or other international applicants, where performing a DBS check is not possible, the school will request a police certificate of good conduct if the leader is to mix with students who do not belong to their group. If the documents are not in English it is up to the agent or the group leaders to have them translated (officially) with the original being given to the school. If any international applicants are British citizens returning to the UK, the school will request a full enhanced DBS check. The school will also take special care in checking identity documents and questioning employment history.

## WELFARE & SAFEGUARDING IMPLEMENTATION

### Use of Risk Assessments

Risk assessments are used in assessing the building, health & safety, and for excursions. Main risks and preventative measures related to the building and health & safety are communicated to students in the student handbook. Risk assessments for excursions cover road safety, transport, accidents, theft and students getting lost. These risks are communicated to students by the excursion leader and a risk assessment is given to group leaders for them to sign.

Staff members complete a face-to-face health & safety induction in the recruitment period so that they are equipped to supervise students in an emergency and can act appropriately. The Speak Up London Emergency Action Plan has been created to assist all adults connected with Speak Up London in evacuating the premises and keeping students calm in an emergency situation such as terrorism or a natural event or disaster. All staff are required to read the Emergency Action Plan.

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## Closed Groups

Speak Up London may occasionally accept closed groups of Young Adults/children. It is compulsory that group leaders must accompany them at all times, this includes toilet breaks and leaving and arriving at the school. Supervision ratios for these groups must be one group leader to every 10 students. Measures such as staggering break times, allocating such groups to floors where no adult classes are held and thorough student and group leader inductions will take place to ensure student safety.

## Individual Classes

Speak Up London may occasionally agree to arrange individual classes for under 18s on school premises or online.

In the case of classes taking place on site, the DSO will ensure that the following safety measures are taken:

- the student will be accompanied to the classroom and collected from their classroom by their parent/guardian
- the parent/guardian will be responsible for looking after the under 18 at break times and accompanying them to the toilet
- the teacher will be DBS-checked and the lessons will take place in a room with CCTV cameras so that welfare staff can keep an eye on what is going on in the classroom at all times (doors cannot remain open due to them all being fire doors, however, each classroom door has a built-in window, which can be used for additional monitoring)

In the case of online classes, Speak Up London's online platform will be used, as it offers the possibility for welfare staff to join in every session without warning and stored recordings of sessions on the system for parents/guardians to watch.

Parents/guardians will also be encouraged to be in the same room as the student during online lessons.

## Accommodation & Transport

Speak Up London works with British Council or English UK registered accommodation agencies and with an airport transfer company which regularly performs DBS checks on its drivers as per PCO licensing laws. The school additionally ensures that all external suppliers (bus drivers for excursions etc) who are in regular or significant occasional contact with 16/17 year olds will have a valid DBS check in place. We believe that our responsibility towards young people studying at our school extends much further than the school building.

The UKVI requires 16/17-year-olds to be met by a designated responsible adult at their point of arrival in the UK. The school can arrange a transfer service from any UK port of entry, and we will always advise parents to make use of this service, if they choose to arrange their own responsible adult the parents/guardians must sign a Consent Form prior to confirmation of the student's booking. This Consent Form will include permission for the student to be in an adult school and travel freely to and from the school without supervision.

In the case of 14-15 year-olds, where the parent/legal guardian has requested that they travel to and from the school on their own, an individual risk assessment will be performed and the decision taken by the HoP after assessing the maturity of the student and any associated risks.

All under 14s are required to travel to and from the school accompanied by an adult.

## The role of the class teacher

The class teacher is the person who bears the primary pastoral responsibility for the under 18s in their own class. The class teacher will register the students during the first 10 minutes of the lesson and report any absences to the reception staff immediately, who will then contact the student and/or guardian; or accommodation provider if arranged through the school.

## Collection of information

The class teacher works closely with the DSO following the induction procedure to ensure that relevant information is available to relevant people for each student. The class teacher has a responsibility to consider the confidentiality of this information. Any sensitive information is shared appropriately.

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## Welfare Responsibilities

The DSO on the school site has daily responsibility for the welfare of the students. In their absence the DSL will deputise as the appointed person.

The class teacher is the key person in the welfare structure for the student. In addition, students need to be made aware that if they have a problem they can also talk to the Welfare Officer (if different to DSO). The same structure is appropriate for complaints by the students about the school or its programme. On induction, students are also given the Emergency Number and the English UK number in the student handbook (complaints procedure) should they wish to complain about the school or report a problem.

## GENERAL WELFARE ISSUES

### Induction

On their first day, students are given information on health and safety issues, including illness, accidents, safety on the streets, alcohol, drugs and driving in the U.K. Under 18s are advised what is/is not permissible for them.

### Absence Policy

For Under 18 year olds, the school will check any absences, which are not reported by parents or guardians or host families on a daily basis.

If an Under 18 year old student needs to leave school early this must be confirmed by their guardian. Teachers are required to report any information about a student's absence to the school office immediately.

## PROCEDURES

Concerns are not only monitored within the classroom environment but also within the wider school setting, both formally and informally. We recognise that for young adults, high self esteem, confidence, supportive friends and clear lines of communication with a trusted adult helps to protect young adults.

### Our school will therefore:

- Establish and maintain an ethos where young adults feel secure and are encouraged to talk, and are listened to
- Ensure that young adults know that there are adults in the school who they can approach if they are worried or in difficulty
- Ensure that wherever possible every effort will be made to establish effective working relationships with parents, colleagues and other appropriate agencies

## CONFIDENTIALITY

- Staff must ensure that every person working with the young adults in or associated with the school understands the need for confidentiality
- Staff must never guarantee confidentiality to the young adult and inform them how the information may be shared with others.
- Staff need to know who should and should not be contacted

## ACCOMMODATION

All accommodation for under 18 students is booked through agencies who are registered with the British Council and/or English UK. Their duty is to provide the school with all relevant information such as emergency contact numbers and addresses. All under 18s accommodation will need to be booked by the school, unless parental consent has been given stating otherwise.