

Safeguarding Policy

Section A: Policy Statement

Context

Name of organisation: KKCL

Location(s):

KKCL Harrow - KKCL, 103-105 Greenford Road, Harrow, HA1 3QF

KKCL St Dominic's Academic Centre - Mount Park Avenue, Harrow on the Hill, HA1 3HX (Summer Centre)

Ages of children: 7-17

Type of accommodation offered: Homestay, Hotel & Child Residence

Terminology

KKCL has a duty of care to "Safeguard and promote the welfare of children".

This means:

- Protecting children from maltreatment;
- Preventing impairment of children's health or development;
- Ensuring that children are growing up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

'Working Together to Safeguard Children'

Statement

We are committed to practices which safeguard children from harm. Staff in this organisation accept and recognise their responsibilities in respect to the issues which cause children harm and we are committed to raising awareness of safeguarding children and vulnerable adults at all times.

This will be achieved by:

- Adopting child protection guidelines through procedures and a staff code of conduct
- Following carefully the procedures for safer recruitment and selection of staff
- Having staff DBS checked or sign declarations of suitability to work with children and vulnerable adults, and to read and adhere to this policy
- Providing effective management for staff through supervision, support and training in issues relating to child protection
- Taking all reasonable steps to ensure the health, safety and welfare of any child or vulnerable adult in contact with KKCL
- Taking all reasonable steps to prevent any staff member, person working for us or member of the public from putting any child in a situation where there is unreasonable risk to their health and safety
- Taking all reasonable steps to prevent any staff member, person working for us or member of the public from physically, emotionally or sexually abusing any child or vulnerable adult at KKCL
- Reporting to the appropriate manager any evidence or reasonable suspicion that a child or vulnerable adult in contact with KKCL has been physically, emotionally or sexually abused
- Sharing information about good practice and child protection with children, parents and carers, staff and volunteers
- Sharing information about concerns with the relevant agencies and involving parents and children where appropriate
- Implementing this policy in conjunction with the health & safety and anti-bullying and anti-harassment policies

Aims

The aim of this policy is to promote good practice by:

- Providing children with appropriate safety and protection whilst in the care of KKCL
- Allowing all current staff to make informed and confident responses to specific child protection issues

Under 18's entitlement

Children are defined as anyone under the age of 18. This policy is for all, whatever race, gender etc ,and all children have an entitlement to be protected.

Adult's responsibilities

All adults have a legal 'Duty of Care' to safeguard students under 18. At KKCL we expect adults to carry out this duty of care to the same level that a caring and responsible UK parent would.

This will include:

- always acting in the best interests of the child
- following the KKCL safeguarding policy and Code of Conduct
- sharing KKCL's commitment to high level safeguarding
- undertaking training as required (see section D)
- being ready to report any concerns or suspicions
- knowing who to contact with those concerns or suspicions

Roles and responsibilities

KKCL have two DSLs (Designated Safeguarding Lead) and three DSPs (Designated Safeguarding Person); names and contact details shown here.

Nominated/ designated person

- Designated Safeguarding Lead (DSL): **Janice Cheung**
Job title: Director of Operations
Email: janice.cheung@kkcl.org.uk
Tel: 020 3880 5880
- Designated Safeguarding Lead (DSL): **Gabi Kotlubaj**
Job title: Director of Studies
Email: gabi.kotlubaj@kkcl.org.uk
Tel: 020 3880 6003
- Designated Safeguarding Person (DSP): **Alexandra Luchian**
Job title: Senior Operations Manager
Email: alexandra.luchian@kkcl.org.uk
Tel: 020 3880 9016
- Designated Safeguarding Person (DSP) : **Leah Charlton**
Job title: Activities Manager
Email: leah.charlton@kkcl.org.uk
Tel: 020 3880 7799
- Designated Safeguarding Person (DSP) : **Andy Conner**
Job title: Residential Centre Manager (KKCL Harrow School Boarding House)
Tel: 020 3880 8333

At least one DSL will always be available in person or by phone and at least one DSL or DSP will always be available in person at each KKCL locations.

The DSLs have lead responsibility for ensuring safeguarding happens effectively at KKCL, this includes:

- producing a fit-for-purpose policy and training
- developing a positive safeguarding ethos with all KKCL stakeholders
- ensuring safer recruitment practices are in place
- proper safeguarding records are kept
- being available to offer guidance to stakeholders on any safeguarding issues
- being ready to manage any concerns or serious incidents, contacting outside agencies if required.

The DSPs support the DSLs as directed, and are supported by the DSLs in their work to manage day to day safeguarding matters effectively. DSPs also know how to manage serious incidents and manage referrals in the event of a DSL not being available or if an accusation is made against a DSL.

Safeguarding Team Operation

The DSLs are in daily contact throughout the year and meet once a month year round (monthly meetings are minuted) and daily (or as required) during summer with DSPs to discuss safeguarding matters.

Safeguarding is included on staff and department meeting agendas and staff are encouraged to raise any safeguarding points with the Designated Team at any time.

Important Contacts

Organisation Name	Website	Tel	Email	Contact Name
Harrow Safeguarding Children Board	https://www.harrowscb.co.uk	Golden Number Tel: 020 8901 2690 Emergency Duty Team operates out of hours: 020 8424 0999	LSCB@harrow.gov.uk	-
Harrow Local Authority Designated Officer (LADO)	-	0208 736 6435	janice.miller@harrow.gov.uk	Janice Miller
Met Police – Brent & Harrow Child Abuse Investigation Team (CAIT)	-	020 8733 3530	-	-
NSPCC Helpline	http://www.nspcc.org.uk/	0808 8005000	help@nspcc.org.uk	
Childline	-	0800 1111	-	
Disclosure and Barring Service	https://www.gov.uk/government/organisations/disclosure-and-barring-service	03000 200 190	customerservices@dbs.gsi.gov.uk	

Associated Policies

Please also refer to Guidance for Homestay Hosts (Under 18s) and Group Leader Manual.

Policy Review

KKCL is committed to reviewing our policy at regular intervals (annually), and following any changes in legislation, or in the event of a serious safeguarding incident.

Policy Availability & Formats

Full policy is available on our website. A condensed version would be sent to homestay hosts and group leaders in a way that they could easily understand.

Section B: Code of Conduct

Our Policy and Standards of Behaviour for Staff

KKCL Staff Code of Conduct will cover dress code, interaction with children and young people, time and attendance, behaviour, personal information and social media. If a staff member breaks the Staff Code of Conduct, KKCL may consider formal action.

1. It is paramount for the member of staff to distance themselves from any potentially inappropriate situation.
2. Childcare clients of KKCL. Staff should not attempt to instigate private contact with a child of any age during or after the course.
3. Staff must not give their personal email/postal addresses or telephone number to child, or ask for theirs, during or after the course.
4. Staff must not add any child to any social networking sites (e.g. Facebook, MySpace, etc), nor allow themselves to be added to any child's social networking site.
5. Staff must use common sense and professional judgement to avoid circumstances which could be perceived to be of an inappropriate nature.
6. Staff must not, by any means or in any circumstances, make, view or access illegal or inappropriate images of children.
7. Staff must not distribute (by any means) images or information about a child of any age. This includes the use of child images or details on blogs, social networking sites, messaging systems or any internet sites.

Being an Excellent Role Model

All KKCL staffs are role models and need to set the best example to our students in all ways. For instance:

- Be somebody children can trust (keep your word).
- Be appropriate dressed - On Duty staff must wear their staff T-shirts (for activities leaders and residential staff or ID badges at all times. Residential staff should also be extra sensitive around residential accommodation at night.
- Use appropriate language – swearing or making sexist, racist or blasphemous comment in front of other staff, group leaders or student is not acceptable.
- Be ready and be on time.
- Be fair and consistent (no favourites) – if staff receives gifts from students, you should inform your line manager of all gifts received.
- Be clear with information, so that children can understand.
- React and respond when necessary (don't pretend you didn't see something).
- Respect others.
- Challenge unacceptable behaviour and report all allegations/suspicious of abuse or bad behaviour (for instance, smoking, bullying, drug/alcohol/solvent abuse).
- Be positive.

Be Professional and Know the Boundaries

- Staff should avoid action or situations that could cause misinterpretation – innocent actions can sometimes be misinterpreted.
- Staff should never be alone 1:1 in a closed room with a student under aged 18 – for example if a student stays after class to ask a question, you should try to get one of their friend to stay with them, and ALWAYS keep the door open.
- Staff should never enter a student’s bedroom – if a student is sick, you should ask their Group Leader or another staff member (same gender preferably) to be present.
- Staff should never invite any student into their own bedroom nor staff kitchen, and must not use any bathroom / showers that are dedicated to junior students.
- Staff should not smoke in front of or in the company of students or group leaders.
- *Use of alcohol and drugs is forbidden!*

Physical Contact between Staff and Students

We advise against any physical contact with students, especially any type of ‘Positive Touch’ (everyday acts of communication by physical means to indicate approval or sympathy). KKCL recognise that there may be circumstance where physical contact with students is unavoidable and some exceptions exist – it is essential that staff only do so in appropriate ways to their professional roles:

- First Aid – should be undertaken by a person of the same gender as the student if possible, and ensure that there is open access to the area where you are, taking into consideration of the student’s requirement for privacy
- Negative Intervention – if a student is about to injure themselves or other people, you are obligated to intervene in order to protect the students from harm. You must also remain calm and should never give the impression of losing temper (see Discipline Procedure).

If you have to engage with students in any physical contact:

- You should ensure that you are in a public area with the student, for instance, never be alone in a closed room and always leave the door open or ask another staff member to be present.
- The physical contact should not involve more contact than is necessary for the purpose.
- You must remain conscious of the physical context of your actions.
- Be extra sensitive and vigilant with a person of the opposite gender.

Staff must not have inappropriate physical, verbal or sexual contact with children or young people.

Position of Trust (Sexual Offences Act 2003)

All stakeholders working with KKCL students under 18 are in a Position of Trust. It is against UK law for anyone to have any sexual contact, even touching of an intimate nature, with students under the age of 18, or to groom u18 students in preparation for sexual contact after they are 18.

Whistleblowing

That staff and stakeholders have duty to report (for staff it is a legal duty) to line managers or DSL/DSP if they become aware of other staff not following the Code of Conduct guidelines.

Advice for Personal Communications with a Child

Please be aware of the potential dangers of personal contact (i.e. contact beyond what is reasonably expected in performing your duties) with a child, and the following advice from child protection/teaching agencies:

If child does try to make contact with you on your personal email or phone, discourage this and inform your line manager.

Exercise extreme caution in connection with internet sites / messaging systems and avoid inappropriate communication with all individuals under 18, or others with whom you may be in a position of trust.

Take care to avoid becoming personally involved in a child's personal affairs.

Remember that your personal profiles can be viewed by anyone, and people working with children should be especially careful about their personal web presence. The legal responsibilities of people working with minors extend past the end of any contract they have with KKCL.

Risks to Students and Staff

Students may be able to find information about your personal life that may be inappropriate for minors, and may damage your working relationship with your students.

By allowing students access to friendship groups you may be inadvertently introducing them to a wider circle of adults, over which you have no control, and may facilitate inappropriate contacts.

Sexual predators and bullies are known to use information available on web pages and social networking sites to gain information about children, such as their interests, tastes and location. Staff who post information about students (e.g. photos of their summer holiday, names etc) on a personal web page may make them vulnerable to inappropriate attention.

Electronic and social media

Staff must exercise the same discretion and maintain the same professional distance in any electronic contact with children (anyone under 18) as they would in normal day-to-day life. Electronic contact includes telephone communications (including texting) and on-line environments.

In particular:

- Never initiate electronic contact with a child unless for clear pedagogical purposes that have been sanctioned by the school.
- If a child contacts you electronically, keep your tone friendly, professional and neutral.
- Avoid situations that involve the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.
- If a child seeks to develop an inappropriate personal relationship with you electronically, do nothing to encourage this; inform the school and send a copy of any relevant communications.
- If a child confides sensitive information to you electronically, such as details of abuse, record the details and send a copy of all relevant communications to the school.
- While the school may have good reason to create an online social community, social forums such as Facebook, Twitter, WhatsApp, Google+ and Snapchat, present particular risks. Staff should not initiate or accept 'friendship' requests from children, however innocent these requests may seem, as this provides access to photos and other intimate details of each other's personal lives. This extends to online gaming and media sharing sites such as YouTube.

Code of Practice for Homestay Providers

- Encourage your visitor to speak English as much as possible in your home (particularly if they are on a language course) but recognise that there will be times when your visitor needs to speak in his/her native language
- Encourage your visitor to feel at home and treat him/her as a member of the family rather than a lodger or paying guest.
- Never host more than one young person of the same native language unless by special agreement with the visitor and the placing organisation.
- Provide clean and comfortable accommodation.
- Provide a home environment in which it is possible, if appropriate, for the visitor to carry on his/her studies properly.
- Provide the visitor with a balanced and appropriate diet taking into consideration any special requirements.

- Always show due concern for the welfare, safety and security of the visitor during his/her stay.
- Give the visitor reasonable and regular access to bathroom facilities.
- Maintain a close liaison with the young person's placing organisation and so be in a position to help resolve any problems that they may encounter during their stay.
- Respect the visitor's different cultural background and be sensitive to their needs.

Residential staff guidance

- All residential staff is in a privileged position with regards to identifying signs of abuse and/or neglect, promoting the overall well-being of residential child and taking steps to prevent abuse in all its forms. Bullying is one obvious example and any sort of 'initiation rite' is expressly forbidden.
- Particular care is taken by KKCL in the recruitment of staff to a post in our residential accommodation and those who work with residential students in line with our Safer Recruitment Policy; the importance of our safeguarding procedures in the context of residence and how this may differ from the 'day' experience is stressed as part of the induction process of residential staff.

Section C – Child Protection

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgment about the appropriate action to take.

Abuse can occur within many situations including the home, school and other youth sector environments. Some individuals will actively seek employment or voluntary work with young people in order to harm them.

Safeguarding Team

- Designated Safeguarding Lead (DSL): **Janice Cheung**
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- Designated Safeguarding Lead (DSL): **Gabi Kotlubaj**
Job title: Director of Studies
Email: gabi.kotlubaj@kkcl.org.uk
Tel: 020 3880 6003
- Designated Safeguarding Person (DSP): **Alexandra Luchian**
Job title: Senior Operations Manager
Email: alexandra.luchian@kkcl.org.uk
Tel: 020 3880 9016
- Designated Safeguarding Person (DSP) : **Leah Charlton**
Job title: Activities Manager
Email: leah.charlton@kkcl.org.uk
Tel: 020 3880 7799
- Designated Safeguarding Person (DSP) : **Andy Conner**
Job title: Residential Centre Manager (KKCL Harrow School Boarding House)
Tel: 020 3880 8333

How to respond to concerns

If an adult has a safeguarding concern about a child or vulnerable adult, it is his/her duty to only report the issue, and not make a diagnosis. Once a concern is raised, it is the designated staff team's responsibility to respond. The response should be recorded. Responses will depend on the nature of the concern; they could include:

- Monitoring, perhaps on a regular basis;
- Investigating further and sensitively to gather more information;
- Discuss matter with group leader/parent/agent/homestay hosts/the designated staff team/management prior to any action.

Recognising symptoms of abuse

It is important to understand what types of behaviour constitute abuse and neglect.

Type of abuse and neglect

Abuse: a 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.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

'Keeping Children Safe in Education'

Secondary forms of abuse: This is not a major problem at KKCL; nevertheless the DSL is aware of specific areas such as Child Sexual Exploitation and Female Genital Mutilation (FGM). Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. You can also access broad government guidance on the issues listed below via the GOV.UK website:

Child Sexual Exploitation: <https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>

Female Genital Mutilation (FGM): <https://www.gov.uk/government/publications/female-genital-mutilation-multi-agency-practice-guidelines>

Peer-on-peer abuse: Under 18 students may abuse their peers, for example bullying or cyber bullying (see Anti-bullying policy), Teenage Relationship Abuse - where a relationship begins consensually but where one partner starts to manipulate and control the other, and Sexual Harassment and Sexual Violence - any acts such as using sexual language, joking, sexual touching even if 'accidental', up-skirting etc which demean or make somebody feel uncomfortable need to be addressed and must not be looked on as banter or typical adolescent male behaviour.

A child telling an adult

Responding to a child making an allegation of abuse

- Stay calm.
- Listen carefully to what is said.
- Find an appropriate early opportunity to explain it is likely that the information will need to be shared with others – do not promise to keep any secrets.
- Allow the child to continue at their own pace.
- Ask questions for clarification only and always avoid asking leading questions (questions that suggest a particular answer). Do not make assumptions or offer explanations.
- Remember that an allegation of child abuse may lead to a criminal investigation, so **do not attempt to personally investigate any allegations** of abuse.
- Even allegations that appear less serious must be taken seriously and followed up according to procedure.
- Reassure the child that they have done the right thing in telling you.
- Tell them what you will do next and with whom the information will be shared.
- **Do not** ask the child to make a written statement.
- Record in writing everything that was said as soon as possible using the child's own words.
- Note date, time, and names of persons to whom the information was given.
- Ensure that the record is signed and dated by these persons.
- Report immediately to the DSP/DSL.
- **Do not** confront any person against whom an allegation has been made.

Keeping Records

Confidentiality

Any information about potential or actual child abuse is confidential and can only be shared with KKCLs designated staff or with relevant outside agencies, e.g. police, social services. The confidentiality applies to both the victim and the accused abuser.

Recording process

All KKCL Stakeholders must use the 'Safeguarding Incident Reporting Form' to record any concern or incident. The completed form should be signed and submitted to the DSP immediately. Once you have reported and submitted the record, the DSP will ensure the form is signed and dated by the appropriate person. The DSP will take over, record their response and any action taken (see below). It will also be reported to the KKCL Safeguarding Team. You should not confront any person against whom an allegation has been made.

Any records relating to child protection issues will be kept securely, only accessible to the designated safeguarding staff and relevant authorities.

Incidents that must be Reported / Recorded

If any of the following occur you should report this immediately to an appropriate member of KKCL staff and record the incident.

- If you accidentally hurt a child or young person
- If he/she seems distressed in any manner
- If a child or young person appears to be sexually aroused by your actions
- If a child or young person misunderstands or misinterprets something you have done

If a child has an accident which does not require hospital treatment:

- Management should be notified and monitor the individual
- The child's parent should be notified of the incident at an appropriate time
- The accident/incident should be completed
- A member of KKCL staff should be informed immediately

If an adult is accused

If an allegation is made, this may be made directly to the DSP or to any other adult and passed to the DSP:

- Make sure the child is safe and supported / reassured.
- Remain calm.
- Inform the DSP / DSL immediately.
- If/when safe and appropriate, try to return the child to their normal routine.
- Ensure that a clear written record has been made (using Safeguarding Incident Reporting Form), signed and dated by the person who made the allegation / heard the allegation from a child.
- If the allegation refers to the senior manager, inform a fellow DSP or contact another senior manager. The senior manager or DSP must contact the LSCB immediately.
- No decisions must be made without referring to the LSCB.

The LSCB's role is to provide advice and guidance to KKCL dealing with allegations and, if necessary, to liaise with the police and other agencies and to monitor the progress of cases to ensure they are dealt with quickly and consistently.

KKCL will provide adequate support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

Initial discussion

There will be an initial discussion between the DSP/senior manager and the LSCB, at which some actions will be agreed:

- Immediate action to protect child.
- When and what parents should be told.
- What should be said to adult facing the allegation and should s/he be suspended.
- If the disclosure of abuse is about somebody in the child's home country, the same procedure is followed. The LSCB may decide to inform the relevant authorities in that country. It is the LSCB, often the LADO (Local Area Designated Officer) who have the professional knowledge and experience to decide what steps need to be taken

Possible Suspension

Suspension is not an automatic response and should only be considered where children are at risk of serious harm or the concern is so serious it would result in immediate dismissal. If the person is suspended, the reason must be communicated to them within one day.

If allegation is unsubstantiated, unfounded or malicious, we will support the member of staff on return to work, especially if they have been suspended.

If a child is accused

A child against whom an allegation of abuse has been made may be suspended from KKCL and the School's policy on behaviour and discipline will apply. KKCL will take advice from the Local Authority Designated Officer (LADO) on such allegations and will take all appropriate action to ensure the safety and welfare of all children involved, including the child or child accused of abuse. If it is necessary for a child to be interviewed by the police in relation to allegations of abuse, KKCL will ensure that, subject to the advice of the LADO, parents are informed as soon as possible and that the child is supported during the interview by an appropriate adult. In the case of a child whose parents are abroad, the child's Education Guardian will be requested to provide support to the child and to accommodate him/her if it is necessary to suspend him/her.

Section D – Training

Levels of training

DSLs are trained in Specialist Safeguarding (old Level 3), DSPs are trained in Advanced Safeguarding (old Level 2), all stakeholders are trained in Basic Awareness (old Level 1).

Responsibility

DSP and DSL are responsible for ensuring all staff and other adults working with under 18s receive sufficient, appropriate and regular safeguarding training.

How Training is Delivered

Staff and adults (e.g. homestay host, group leaders / visitors) receive a copy of our Safeguarding policy (simplified version for non-staff adults). Visitors will be given our 'Information for Visitors & Contractors'. Basic Awareness training is available online and in face to face training delivered by DSP / DSL. Advanced Safeguarding and Specialising Safeguarding training are both available online and regular face to face training delivered by English UK or KKCL DSL's.

Training Records

The DSL has the responsibility for keeping safeguarding training records as part of the Continuing Professional Development records including details of the training, name of trainers and attendees.

Section E – Safer Recruitment

KKCL is committed to safer recruitment; we do our utmost to employ 'safe' staff by following the guidance in Keeping Children Safe in Education and KKCL's Recruitment and Selection Policy.

Recruitment materials

Recruitment materials for all roles will include reference to KKCL's commitment to safeguarding and inform applicants that:

- References will be followed up.
- All gaps in CVs must be explained satisfactorily.
- Proof of identity and qualifications will be required.
- Reference requests will ask specifically whether there is any reason that they should not be engaged in situations where they have responsibility for, or substantial access to persons under 18s.

- Staff and volunteers cannot be accepted if they live at the same address as somebody who is disqualified from working the children. We ascertain this through the declaration of disqualification by association.
- All KKCL staff in immediate and/or prolonged contact with persons under the age of 18 and vulnerable adults go through the enhanced DBS check.

Recruitment Selection Process

Appropriate selection procedures must be used for each post. Procedures may vary, at its simplest this may involve:

- a straightforward interview and skills test for administrative staff
- a group interview where certain remedial skills are required to function in the role and a large number of similar candidates have applied
- an interview with a sample lesson plan for General English teachers, and possible sample lesson observation, if the appointing manager believes it is required
- for senior posts a series of individual interviews on various topics may be included.

The application forms received by the closing date will be forwarded to the appointing manager for shortlisting. Applicants **must** be chosen against the Person Specification. Once the application has been shortlisted, the appointing manager will invite the candidates for interview, and make the necessary housekeeping arrangements for the interview. This will include timetabling the interviews and arranging any pre-employment checks needed.

If an interview panel is required, at least 24 hours prior to the interview each panellist will receive an interview pack containing:

- copies of application forms / CV's
- a copy of the job advertisement
- a copy of the job description
- a copy of the person specification if needed.

The appointing manager will:

- Decide on the interview format and determine which areas to concentrate on with the questioning
- Decide on who will chair the Interview Panel (if being used)
- Receive the references and pre-employment checks for candidates from HR Office, and be responsible for ensuring the confidentiality of these, and for their safe return to the HR Office for disposal.

At the interview, the appointing manager will ensure that Equal Opportunities legislation is strictly adhered to, with no discrimination shown on any grounds.

When all candidates have been interviewed, the interviewer(s) will decide on the most suitable person for the post. The appointing manager will arrange to inform the successful candidate as soon as possible, agreeing a commencement date and starting salary.

Upon making the final decision, the interviewer will:

- Offer the post in writing, with the provision that satisfactory reference and pre-employment checks have been received, and subject to the receipt of copies of qualifications and proof of identity.
- Initiate a personnel file and Adminsys entry for the new member of staff

- Notify the Manager if the appointee refuses the offer, or if there are any other details to be cleared
- Deal with any requirements for removals or the finding of temporary accommodation for the appointee.

References

Two professional or character references must be provided. These will always be obtained directly from the referee. The reference request will include a specific reference to suitability to work with children and/or vulnerable adults. We also asked any discrepancies or anomalies will be followed up.

PROCEDURE	RESPONSIBLE	REMARKS
1. Advertise vacancy in appropriate medium with hourly rate/salary indicated.	Management	Inform recruits that only short-listed applicants will be contacted.
2. Scrutinize CV's and shortlist candidates for interview → brief initial telephone interview for screening.	Management	Highlight the key points on the CV, and put short notes if candidates have any special attributes, qualifications or experience. Account for gaps in CV.
3. Contact the short-listed candidates to confirm the particular interview date and time.	Administrator	If someone cannot be reached twice, return to supervisor for exchange with another candidate.
4. Send candidates an email regarding the confirmed interview date and time, and attach the Job Description.	Administrator	Candidate is requested to complete job application form prior to the scheduled interview.
5. Arrange interviews - possible group interview for admin staff, sales and activity leaders.	Management	Allow approximately 60 - 90 minutes
6. Formal interviews + check original qualifications and confirm formal reference follow-up (+ enhanced DBS or Police Check).	Management	Post-interview feedback meeting to determine suitability.
7. Offer of appointment (subject to checks) and agreed start date.	Management	Senior management – within a week of interview approx.
8. Ensure Staff Details is completed by successful candidates via AdminSys portal	Administrator	Cross -match application with CV.
9. Staff induction (see induction policy)	Management	Adhere to induction policy

All new members of staff will undergo an induction that includes familiarisation with KKCL's safeguarding policy and identification of their Child Protection training needs. All staff will complete 'Basic Awareness Training in Child Protection' online as part of staff induction.

Sample interview questions that ask about a candidate's attitude to working with under 18s

- What attracted you to teaching / this post / this school?
- Give an example of how you dealt with bullying behaviour between children. What did you do? What made it successful? How could you have done it better?
- Young people can develop 'crushes'. How would you deal with that?
- What would you do if you were concerned about a colleague's behaviour towards children?
- What motivates you to work with young people?
- Give an example of how you've managed poor child behaviour.
- How do you define an appropriate teacher (or administrator/whatever job) – child relationship?

- When do you think it is appropriate to physically intervene in a situation involving child? How would you go about doing that?
- Give examples of what you would consider appropriate and inappropriate staff behaviour around our child.

We will investigate appropriate attitudes to relationships with children as a necessary skill for all staff and also homestay hosts.

Police Checks Policy

KKCL believes in good practice of safeguarding and safer employment procedure, and as part of which we have the following in place:

- All our employees sign a declaration stating they are suitable to work with children and vulnerable adults and agree to be DBS checked.
- All prospective employees sign the declaration as part of the pre-employment checks process.
- All KKCL staff in immediate and/or prolonged contact with persons under the age of 18 and vulnerable adults go through the enhanced DBS check, funded by KKCL.

Staff Police Checks

For new staff

- All staff who have resided or worked in UK will have a DBS check, unless they are already on the update service.
- All staff who have resided or worked in a country for more than 6 months in the last 3 years will have to supply a police check from the relevant country.
- If a police check cannot be obtained (for example because the person has already left the country), one additional written references will be collected from the country, which will be followed up verbally. The references will ideally be obtained from people who have seen the candidate with under 18s.

For returning staff

- Returning UK resident staff who have worked for KKCL the previous year must provide a reference from their most recent employer (if different from the reference given when originally recruited) and a separate Children's Barred List check (also known as List 99) will be done.
- Returning staff from overseas must provide a new police check.

Accepting DBS Certificates from other Roles

We are able to accept a DBS certificate obtained for another employer, provided:

- We must check the applicant's identity matches the details on the certificate.
- We must see the original certificate
- The certificate is the right level and type for the role (Enhanced DBS with barred lists)
- If they are signed up to the Update Service, then we can check their status online and accept the certificate if the update shows "no change".
- If not signed up to the Update Service, then we can accept a certificate for a similar role dated within the last 3 months, and a separate Children's Barred List check will be done.

Delayed DBS checks

If an applicant's DBS check has been applied for but not yet returned, a special risk assessment will be done and the applicant will be taken out of 'regulated activity' using various measures (see Risk Assessment – Using Staff in School with U18s When DBS

Not Yet Returned), for example staff working residentially may need to be accommodated off-campus. A separate Barred List check will be done.

Homestay Police Checks

All adults in the homestay will have police checks, either individual DBS checks for every person residing in the home, or by the main carer indicating on their application form that the work is carried out in the home. Evidence of this will be kept.

NB: Delayed DBS checks do not apply to homestay adults.

Criminal Records Check Renewals

Unless the employee signed up to the Update Service, then a new DBS should be carried out every 3 years. If the person did sign up to the Update Service, an update should be run once a year by the HR Office. Home-based checks and the Updated Services are not compatible, so checks need to be renewed every three years.

Group Leader Police Checks

Agents sending group leaders confirm in writing that current police checks are in place and that they are clear (see Group Leader Safeguarding & Suitability Check form). KKCL reserves the right to view the police check.

Storing Criminal Records Checks

The Line managers need to see the original DBS certificate. However, they must not keep a copy. They should confirm that they have seen the original certificate, and update the date of the check and the certificate number on AdminSys.

Safeguarding Declaration

KKCL asked all staff members and homestay hosts, to confirm with a declaration: I am fit to be working with student under the age of 18 or vulnerable adults.

Childcare Act Disclosure

We also ask them to confirm the followings regarding situations involving looking after children which would not appear on a DBS check but would be areas of concern for us:

- Have you ever had a child placed under a Care Order?
- Have you ever had a Childcare Registration cancelled?
- Have you ever been convicted of any offence against a child?

In the event of someone answering “yes”, the Safeguarding Team will review the case and risk assess whether it would be suitable to employ the person. If not, any job offer made would be withdrawn.

Disqualification by Association

KKCL also require that all staff members and homestay hosts, to confirm with a declaration: I hereby declare that I do not ‘live or work in the same household’ as someone who is barred from working with children or young people.

Recruitment of Homestays

When recruiting new homestays who will be hosting U18s, KKCL require them to complete a DBS application, which will include all adults in who live in the house. DBS Checks are renewed every three years, or earlier if another adult moves into the home. Our Homestay Manager regularly checks on the make-up of the household to ensure whether the homestay profiles are up to date and whether a main host’s DBS needs to be redo to include any extra adults. For people with existing DBS checks from

other providers, we will only accept these under the same conditions as described in 'Accepting DBS Certificates from other Roles' Section.

We require two references for each new host, using the 'Homestay Host Reference Request Form' which asks the referee to confirm that they know the host personally and consider the host being of good character. They are also asked to confirm if they think the hosts are suitable for accommodating international students, including under 18s.

Police Checks showing the Applicant has Convictions

If a DBS is returned with evidence of convictions, a decision about employing that staff member or using the homestay will be made following the KKCL Recruitment of Ex-Offenders policy.

Recruitment records

A single central record is kept for all staff recruitment and another for all homestay recruitment. All necessary recruitment documentation is in place.

Section F – Welfare / Implementing Safeguarding

Supervision ratios for junior courses

KKCL operates with a staff to child ratio of at least 1:15 for junior leisure activities.

If we have less than fifteen junior students on an excursion or leisure event, a minimum of two responsible adults (one activities leader and one group leader, or two activities leaders) are still required to ensure that in an emergency situation one responsible adult can remain with the main group of students at all times. Group leaders and other adults travelling with students under 18 will be responsible only for students in their own group.

While inside residential accommodation, supervising adults to child ratio of at least 1:20 is operated for child aged 12–17. The original 1:15 ratio is used for students under 12.

Missing child

See paragraph below; 'Missing Child Procedure'

Rules and follow-up Procedure for Under 18s

Students on our junior courses are expected to attend all lessons and activities unless otherwise specified by their parents or guardians. Students should register their arrival at reception every morning and their departure when leaving in the afternoon or evening. Any students who wishes to be excused from any lesson or activity needs to provide written permission in advance from their parent or guardian. Written notes handed in by students will be verified by phone.

Attendance registers will be taken at every lesson and activity and any absences will be followed up and investigated.

If a child does not arrive at school for a scheduled lesson or activity, KKCL will make every effort to contact the child and/or their parent or guardian or host family to ascertain the reason.

Students who wish to travel unaccompanied on public transport to and from school need to have written permission from their parent or guardian. We provide the 'KKCL London Public Transportation Guide' to all juniors students including guidance on staying safe on public transport, guidance on how to use the local transportation (e.g. underground and buses), printed maps between homestay/residential accommodation and KKCL centres, checking students have school emergency number both on their phone and on Student ID card (in case phone is stolen, lost or runs out of battery).

Failure to collect a child

If a child is “not collected” from the school by a responsible adult, the following steps will be taken:

- If a child is not collected at the end of a school day, our staff will phone the next of kin / homestay host.

Missing Child Procedure

On-site

Any child who has failed to register without giving prior notice will be flagged up via front desk and the front office will contact group leaders / homestay hosts / next of kin. If, after an hour, group leaders / homestay hosts / next of kin / parents cannot be contacted then the matter should be referred to the Director of Studies, or if they are not directly contactable, report to the DSL or DSPs and the police will be contacted if no further reassurance as to the whereabouts of the child has been obtained.

If a child is reported missing during the school day, the following procedures will be observed:

- check register;
- alert Director of Studies; alert DSL or DSP;
- speak to friends, class teachers, group leaders for any information that might be relevant, but this must not delay the process of looking for the child in question;
- search school premises;
- check CCTV.

If, after following the above procedures, a child cannot be traced within an hour of his or her being reported missing, parents or guardians should be contacted; if they cannot be contacted then it should be referred to the police by the DSL and in their absence, by the DSP / Senior Management. Even if the parents are contactable, the police should be always be contacted if the child has not returned, or their whereabouts is unknown.

If it transpires that the child has decided to “run away”, then the matter will be fully investigated and the DSL will assess the situation. It may be necessary to liaise with the DSL, and particularly for repeated occasions, as a child going missing can be a sign of abuse.

Off-site

If a child is “missing” from activity / excursions, the following steps will be taken:

- We will immediately raise the alarm, inform Senior Management on KKCL emergency line and involve all available staff to enlist help to look for them.
- We will provide everyone involved in the search with a description of the child.
- We will then alert the police and provide a full description of the missing child and inform the parents/emergency contact of the situation.
- We will continue to search and take advice from the police on their arrival.

Failure to return to homestays at curfew time

If a child fails to return to homestays at curfew time, the following steps will be taken:

- The homestay host will immediately raise the alarm, inform our staff on KKCL emergency line.
- We will call the child’s mobile to track down his/her location. Ask the child to remain at the same location.
- Once his/her location is found, we will ask the homestay host to pick up the missing child. If the homestay host is not available, we will make the necessary arrangement to pick up the child.

- In the meantime, we will ask the homestay host to inform us as soon as there is any update from their end.
- We will then alert the police and provide a full description of the missing child and inform the parents/emergency contact of the situation.
- We will continue to search and take advice from the police on their arrival.

If a residential child is missing whilst you are on duty

- All residential students must be presumed to be present in the residence unless they have been given specific permission to be absent. 18
- Whilst you are on duty, there are specific occasions when the whereabouts of child must be checked, e.g. Roll Calls, Evening Sign In and bedtimes. Random checks are also undertaken, especially at the weekends when there are longer periods of 'free time' (e.g. Saturday and Sunday evenings).
- If students are not where they should be at a particular time, the following procedure should be followed:
- Check the duty file for details of authorised absences.
- Ask other students if they are aware of any reason for the absence - though their information should only be taken as a guide to be followed up, and certainly not as the only evidence.
- If there are any other staff in residence, ask if they know any reason for absence.
- Begin a search of the residence - other rooms, showers and lavatories.
- Ask duty staff in other areas to check their areas and ask their students for any information.
- Check other areas of the residence, e.g. outside in the grounds - use senior students to assist as and where appropriate; check CCTV at security office.
- If none of this produces any information, group leader should be informed if the missing child is accompanied by a group leader, otherwise parents or next of kin should be contacted. However, it is preferable that this should be done by the most senior member of the duty staff in residence. If you are the most senior staff in residence, you should now report the matter to the Senior Management on KKCL emergency line. The police should be contacted if the child has not returned, or their whereabouts is unknown.

Welfare provision

Welfare in the Classroom

- ↗ Equality and fairness, teaching and learning inclusive of all children
- ↗ Positive attitude and mutual respect
- ↗ High expectations from all but differentiated instruction and individual pace taken into account
- ↗ Attention to disabilities, cultural issues and other individual or group elements
- ↗ Teaching materials for a variety of learning styles
- ↗ Valuing individual differences
- ↗ Working together and supporting each other – peer support and peer learning
- ↗ Class/group and individual feedback on homework and performance in tests
- ↗ Getting to know the child(child information form, class profile and informal discussions)
- ↗ Some differentiated materials and support, attention to pairing students in order to enhance learning
- ↗ Study skills support
- ↗ Guidance on self-study outside the classroom
- ↗ No age or disabilities discrimination but attention to these issues in terms of approach to pair work and class activities that involve moving and mingling
- ↗ Planning solutions for possible problems or difficulties (lesson plan), including child levels, personalities and learning styles

Pastoral Care

- Monitoring attendance and performance (both in terms of results and of involvement in class activities and doing homework) and following up on any possible issues in this order: teacher, welfare officer, DOS.
- Informal discussion with student before the class, during the break and after the break.
- Inclusion of suggestions for learning and development on ILPs (can include notes on possible child problems, although these are usually noted in the database – absences, illnesses etc).
- Tutorials – group and individual discussions with the student following progress tests.
- Opportunity to provide feedback (feedback questionnaires, suggestions forms, complaints forms) or discuss personal or class problems, e.g. with the teacher or in drop-in sessions.

First Aid & Medical

First aid facilities and an appropriately trained member of staff will be available at all times, together with an arrangement with a local doctor in case of emergencies.

All Activity Leaders and Residential Staff are required to do an online Welfare and Safeguarding course in advance of starting work in KKCL. Staff with First Aid training are specifically sought out during recruitment.

Under 18s Behaviour & Discipline

Please refer to Discipline System and the Discipline Procedure.

Airport transfer

Please refer to KKCL Juniors Pre-departure Information.

E Safety

Most of our students will use mobile phones and computers at some time. They are a source of fun, entertainment, communication and education. However, we know that some men, women and young people will use these technologies to harm children. Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour. The harm might range from sending hurtful or abusive texts and emails, to enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. The school's **electronic and social media** policy explains how we try to keep children safe in school. Cyber-bullying by child, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures.

Radicalisation & Extremism Prevention

We educate our students about acceptance and tolerance of a range of views, that people think differently and believe different things. As part of our child induction, we remind all our students that we are a **multi-cultural** school in a **multi-cultural country!** Please refer to Student Induction Juniors document.

GDPR & Safeguarding

GDPR: Keeping Children Safe in Education (2018); para 75 – “The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.”

Resources on Safeguarding

Organisation Name	Website	Tel	Email	Contact Name
Coram Children's Legal Centre	www.protectingchildren.org.uk	Child Protection Project Advice Line for	cpp@essex.ac.uk	Catherine Williams

		Practitioners: 0207 636 1245		
Department for Education (CWDC)	http://www.education.gov.uk/e-learning			
Harrow Local Safeguarding Children Board	http://www.harrowlscb.co.uk/	020 8424 1147	lscb@harrow.gov.uk	
Child-Safe	http://www.child-safe.org.uk/	+44 (0) 1275 816133		

Policy last reviewed: June 2019
Next review date: January 2020

Appendix

Different types of course and age-range

KKCL Harrow

Type of courses: All year around English courses for juniors and adults (Go Create! English, General English, IELTS Preparation, Tailor-made English programmes)

Age range: 7 to 17 for junior and 16+ for adults

Type of accommodation offered: Homestay and Hotel

Procedure for junior students:

- Junior students' classrooms are allocated on the ground floor, with dedicated bathrooms for juniors.
- Breaks are staggered to separate adult students and junior students, and all breaks are supervised with KKCL staff patrolling around the building.
- All junior students are required to wear their Student ID with orange lanyard at all time.
- Student Helpdesk is located at the school's reception.

KKCL St Dominic's

Type of courses: KKCL Junior Summer School Programme

Ages of child: 7--17

Type of accommodation offered: Homestay, Hotel & Child Residence

Procedure for junior students:

- Junior students' classrooms are allocated on the first and second floor at Catherine Building, with dedicated bathrooms for junior students and adults onsite.
- All breaks are supervised with KKCL staff patrolling around.
- All junior students are required to wear their Student ID with orange lanyard at all time.
- Student Helpdesk is located at the school's library.

Difference in safeguarding personnel

KKCL Harrow (September to June)

➤ Designated Safeguarding Lead (DSL): **Janice Cheung**

Job title: Director of Operations

Email: janice.cheung@kkcl.org.uk

Tel: 020 3880 5880

➤ Designated Safeguarding Lead (DSL): **Gabi Kotlubaj**

Job title: Director of Studies

Email: gabi.kotlubaj@kkcl.org.uk

Tel: 020 3880 6003

➤ Designated Safeguarding Person (DSP): **Alexandra Luchian**

Job title: Senior Operations Manager

Email: alexandra.luchian@kkcl.org.uk

Tel: 020 3880 9016

➤ Designated Safeguarding Person (DSP) : **Leah Charlton**

Job title: Activities Manager

Email: leah.charlton@kkcl.org.uk

Tel: 020 3880 7799

KKCL St Dominic's & Harrow School Boarding House (July and August)

➤ Designated Safeguarding Lead (DSL): **Gabi Kotlubaj**

Job title: Director of Studies

Email: gabi.kotlubaj@kkcl.org.uk

Tel: 020 3880 6003

➤ Designated Safeguarding Person (DSP) : **Leah Charlton**

Job title: Activities Manager

Email: leah.charlton@kkcl.org.uk

Tel: 020 3880 7799

➤ Designated Safeguarding Lead (DSL): **Janice Cheung**

Job title: Director of Operations (Harrow School Boarding House)

Email: janice.cheung@kkcl.org.uk

Tel: 020 3880 5880

➤ Designated Safeguarding Person (DSP) : **Andy Conner**

Job title: Residential Centre Manager (Harrow School Boarding House)

Tel: 020 3880 8333