

Organisation name	EF Brighton
Inspection date	10 October 2018
Current accreditation status	Accredited
Reason for spot check	Unsignalled: following a complaint

### Recommendation

We recommend continued accreditation. The next inspection falls due in 2021; there are no grounds for bringing this forward.

### Changes to the summary statement

The need for improvement in the area of accommodation can now be removed.  
An area of strength can be added for safeguarding under 18s.

### New summary statement

The British Council inspected and accredited EF Brighton in August 2017 and October 2018. The Accreditation Scheme assesses the standards of management, resources and premises, teaching, welfare, and safeguarding under 18s and accredits organisations which meet the overall standard in each area inspected (see [www.britishcouncil.org/education/accreditation](http://www.britishcouncil.org/education/accreditation) for details).

This large private language school offers courses in general and professional English for adults (16+).

Strengths were noted in the areas of staff management, student administration, quality assurance, premises and facilities, learning resources, academic management, course design, learner management, care of students, leisure opportunities and safeguarding under 18s.

The inspection report stated that the organisation met the standards of the Scheme.

### Organisation profile

Inspection history	Dates/details
First inspection	2005
Last full inspection	2017
Subsequent spot check(s) (if applicable)	N/a
Subsequent supplementary check(s) (if applicable)	N/a
Subsequent interim visit(s) (if applicable)	N/a
Other related non-accredited activities (in brief) at this centre	N/a
Other related accredited schools/centres/affiliates	Accredited EF International Language centres in Bristol, Bournemouth, Cambridge, Eastbourne, London, Manchester and Oxford.
Other related non-accredited schools/centres/affiliates	Worldwide network of language schools, international boarding schools and business schools.

Student and staff profile	At inspection	In peak week: July
Total ELT/ESOL student numbers (FT + PT)	471	1021
Minimum age (including closed group or vacation)	16	16
Typical age range	16–63	16+
Typical length of stay	19 weeks	6 weeks
Predominant nationalities	French, Swiss, Spanish	Swiss, French, Spanish
Total number of teachers on eligible ELT courses	22	41

Total number of managers including academic	10	10
Total number of administrative/ancillary staff	4–5	12–13

Premises profile	
Address of main site	1–2 Sussex Square, Brighton BN2 1FJ
Additional sites in use	N/a
Additional sites not in use	The British and Irish Modern Music Institute (BIMM), 38–42 Brunswick Street, Hove BN3 1EL
Sites inspected	1–2 Sussex Square

## Introduction

### Background

The aim of the inspection was to investigate concerns referred by the Local Authority. Concerns related to the lack of DBS checks for staff and homestay hosts, recruitment practices and lack of training in relation to the delivery of a course for 13–17 year olds in July. In Brighton in the summer, the inspector was informed of two EF operations – the accredited school, which has a minimum age of 16, and an unaccredited operation for juniors run by a separate company bearing the EF name. It was not clear to the Local Authority which operation the complaint referred to, and the purpose of this inspection was to establish whether it related to the accredited school.

### Preparation

The inspector was sent copies of recent reports and related correspondence, and reviewed the publicity of the accredited school on the website. No warning was given of a spot check. The inspector was given no details of the unaccredited course (location, publicity etc).

### Programme and persons present

The inspector arrived at 11.10 and explained the purpose of the visit. The school was given a list of the people to be seen and the documents that needed to be checked, and was allowed an hour to prepare a programme. The inspector had meetings with the Senior Operations Manager (covering for the school principal who was on leave), safeguarding and welfare staff, customer support staff, the homestay manager, the director of studies, and the activities manager; he also spoke over the phone with the director of accreditation and compliance. Meetings were held with three students and three teachers present in July. The following were examined: student lists (with ages), homestay records, staff files, minutes of meetings, and student and staff feedback. The inspector departed at 16.50.

## Findings

### Significant changes since the last inspection

#### Management

There have been several changes at management level including changes to the school director, director of studies, homestay manager, and the customer support manager.

#### Premises and resources

The summer premises at Brighton College are no longer used. Alternative premises at The British and Irish Modern Music Institute have been used since summer 2018.

#### Safeguarding under 18s

The safeguarding policy was updated in June 2018. Increased levels of safeguarding training have been provided to key staff.

## Management

Publicity	Met
M22 All publicity and information is accurate, and gives rise to realistic expectations about the premises, location, and the extent and availability of the services and resources.	Met
M23 All publicity and information about the provider and the services it offers is in clear, accurate and accessible English.	Met
M24 Publicity gives clear, accurate and easy-to-find information on the courses.	Not met
M25 Publicity includes clear, accurate and easy-to-find information on costs.	Met
M26 Publicity or other information made available before enrolment gives an accurate	Met

description of the level of care and support given to any students under 18.	
M27 Publicity gives an accurate description of any accommodation offered.	Met
M28 Descriptions of staff qualifications are accurate.	Met
M29 Claims to accreditation are in line with Scheme requirements.	Met

#### Comments

The main medium of publicity is the brochure, which is prepared centrally. This is used by overseas sales offices to advise and talk through bookings with customers and is sent out in response to enquiries. For the most part, the brochure contains information relevant to all EF schools in the UK; two pages are devoted specifically to the Brighton school. More limited information is also available online through the EF UK website, which has a link to the website for the Brighton school. The unaccredited courses are a separate product; they are sold locally in each country in the local language and do not form part of the school publicity.

M24 Minimum enrolment age is correctly stated. However, it is insufficiently visible because it is only given on the enrolment information page, which is in very small print.

### Welfare and student services

Care of students	Area of strength
W1 Providers ensure the safety and security of students on their premises by measures appropriate to their age and background, and the location.	Strength
W2 There is a comprehensive plan to respond to any emergency. This plan is known to all staff, and relevant elements are known to students.	Strength
W3 Students receive pastoral care appropriate to their age, background and circumstances. All staff and students know the name(s) of the person or people who deal with students' personal problems.	Strength
W4 There are policies to promote tolerance and respect, and procedures for dealing with any abusive behaviour. All staff and students are aware of these.	Strength
W5 Where relevant, students receive a 24-hour emergency contact number for the provider, in writing.	Met
W6 Students receive in advance information on the most appropriate forms of transport between the point of entry to the UK and the provider or accommodation, including approximate costs.	Strength
W7 Students receive advice on relevant aspects of life in the UK.	Strength
W8 Students have access to adequate health care provision.	Met

#### Comments

W1 There are clearly expressed organisation-wide policies on fire evacuation, first aid and health and safety. Training for staff takes place on a regular basis. All significant risks are addressed in the risk assessments for premises, and full records of routine checks are in place. There is only one entrance to the building, which is open but covered by CCTV. The reception desk, which is close to the entrance, is always staffed and all visitors sign in and wear lanyards, as do the staff. Fire drills are carried out every six weeks and students are informed of fire safety measures. There are 12 trained fire marshals. Evacuation procedures are drawn up on a case-by-case basis for disabled students. Safety and security is mentioned in the job description of the school director and safety and in that of the residence manager.

W2 The school has a major incident management plan and two drills have been carried out involving all students enrolled with the school at the time.

W3 The school has an ethos of pastoral care with all staff encouraged to be aware of students' potential needs. The availability of pastoral care is made clear to students at induction, in the student handbook and on noticeboards. All students have a mentor, there is a pastoral dimension to tutorials, and students can be referred to external specialist agencies if necessary. The photographs and names of mentors for different age-groups are displayed; during the summer there are three named mentors who cover 16–17 year olds on both sites. Named members of staff also have special responsibility for under 18s in the residences.

W4 The clear policies and procedures for dealing with abusive behaviour are made known to students and staff during inductions, in handbooks, and on posters highlighting British core values. The student handbook defines bullying, including cyber bullying, in accessible language. A Prevent risk assessment has been drawn up, and the school is addressing its responsibilities under the Prevent strategy in respect of awareness-raising for students and homestay hosts. All new staff do online Prevent training as part of induction, and updating workshops are organised for other staff on an annual basis.

W6 Information about public transport between the point of entry to the UK and Brighton, together with approximate costs, is provided in pre-departure information. Details on how to travel to the accommodation in Brighton

(residence or homestay) are on the portal MyEF, which students have access to before departure. Students in focus groups confirmed that transfers arranged by the central team had been well organised. W7 Comprehensive information is available on all the areas listed in this criterion in pre-departure information and the centrally-produced handbook, and repeated at induction. A list of places of worship is displayed on school noticeboards. Students are given assistance if they are required to register with the police.

<b>Accommodation</b> (W9–W22 as applicable)	Met
<i>All accommodation</i>	
W9 Students have a comfortable living environment throughout their stay.	Met
W10 Arrangements for cleaning and laundry are satisfactory.	Met
W11 A responsible representative inspects all accommodation (for safety and suitability) before students are placed, and at least every two years after that.	Strength
W12 Students receive written confirmation of accommodation booked, giving clear and accurate information.	Met
W13 There are effective procedures for identifying and resolving any problems students have with their accommodation.	Met
W14 Accommodation providers receive written confirmation of the rules, terms and conditions applied by the provider with respect to the provision of accommodation services.	Met
W15 Students receive meals as agreed; these offer a well-balanced diet, taking into account any reasonable dietary requirements students may have.	Met

#### Comments

W11 The policy is to inspect each homestay at least once every 12 months, which exceeds Scheme requirements, and checklists are used for initial visits and re-visits. Records of re-visits show that checks are made that a valid Gas Safe certificate is in place and that a fire risk assessment has been carried out.

#### Safeguarding under 18s

<b>Safeguarding under 18s</b>	Area of strength
S1 There is a safeguarding policy which specifies procedures to ensure the safety and well-being of all students under the age of 18. A named member of staff is responsible for implementing this policy and responding to child protection allegations.	Strength
S2 The provider makes the policy known to all adults in contact with under 18s through their role with the organisation, and provides guidance or training relevant to its effective implementation.	Strength
S3 The provider has written parental/guardian consent reflecting the level of care and support given to students under 18, including medical consent.	Met
S4 Recruitment procedures for all roles involving responsibility for or substantial access to under 18s are in line with safer recruitment good practice and the organisation's safeguarding policy.	Met
S5 There are suitable arrangements for the supervision and safety of students during scheduled lessons and activities.	Strength
S6 There are suitable arrangements for the supervision and safety of students outside the scheduled programme.	Strength
S7 There are suitable arrangements for the accommodation of students.	Met
S8 There are suitable arrangements to ensure contact between the provider and parents, legal guardians or their nominated representatives concerning the welfare of students.	Met

#### Comments

At the time of this inspection there were 80 students aged 16–17.

S1 There is a clear and comprehensive safeguarding policy, which includes all the required information and was last reviewed in June 2018. A named member of staff is identified as responsible for implementing the policy and for dealing with any allegations of child abuse. The policy states that if a DBS check has not been completed before a member of staff likely to have significant contact with/access to under 18s begins work then the duties/responsibilities of this person will be restricted.

S2 There are four staff trained to specialist level, and one to advanced level. All members of staff complete an online basic safeguarding awareness course and attend in-house update sessions, which are organised as required by the central management team. Homestay hosts receive information and guidance in the homestay handbook

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and the annual homestay providers' agreement, which they sign. The policy is included in packs for group leaders and is discussed with them at their induction. The relevant points are also made known to students of all ages during their inductions.

S3 Parents sign a liability waiver to confirm that they have understood that students are not supervised outside class lesson/scheduled activity times, but a detailed risk assessment has been drawn up to cover unsupervised time. However, parental consent forms are written in complex English.

S5 A number of measures are in place to ensure that students under 18 on adult courses are provided with appropriate supervision while on school premises: they have a separate induction, their ages are shown on registers, and they have to sign in and out at reception each day, which allows staff to monitor their welfare and to follow up immediately in the case of any absences; they are also asked to wear wristbands at all times. The optional leisure programme for all students indicates which activities are suitable for under 18s.

S6 Rules for what students can and cannot do are included in handbooks and reiterated during inductions. Additional rules, with clearly stated sanctions, apply to students in residences. There are curfew times for all under 18s and these are enforced by homestay hosts and staff in residences. All homestay hosts are invited to periodic events and receive a newsletter; those hosting under 18s receive additional information. Group leaders have a detailed handbook.

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## Action taken on points to be addressed

### Points which must be addressed within three months

#### Welfare and student services

W10 (2018: W11) Records indicated that although up-to-date Gas Safe certificates had not been produced by a number of active homestay hosts students had been placed in these homestays.

**Addressed. New procedures have been put in place to ensure compliance. Homestays sampled indicated that Gas Safe certificates had been produced.**

#### Care of under 18s (2018 Safeguarding under 18s)

C4 (2018: S4) Recruitment materials for teachers do not make it clear that applicants will be asked to explain any gaps in CVs or that referees will be asked to comment on their suitability to work with under 18s. A small number of testimonials for teachers had been accepted; and these did not comment on the suitability of the individual to work with under 18s. The small sample of references for homestays checked had been supplied by close family members. Students under the age of 18 had been placed with a number of hosts before DBS checks had been completed.

**Addressed. Academic managers had been retrained on the school's safer recruitment policy; the newly appointed accommodation manager has received specialist safeguarding training; there is a new homestay placement policy, and an improved document tracker system on the school database.**

C7 (2018: S7) In International House (IH), the high proportion of under 18s at the time of the inspection was placing pressure on bathrooms at peak times. One student aged under 18 had been living with a relative since the start of his course, but the parental consent form was dated four weeks after the start of his course. A second student aged under 18 was living in a guest house with no adult supervision outside class hours.

**Addressed. The refurbishment project at IH is completed, with all bathrooms reopened; 'own accommodation' for under 18s is no longer accepted unless students are staying with parents/legal guardian and documented accordingly; customer support and accommodation staff have been retrained on document compliance; the customer support manager and accommodation manager have now received specialist training.**

### Other points to be addressed

#### Management

M6 (2018: S4) Not all references addressed the issue of working with under 18s.

**Addressed. All references ask the question regarding suitability to host children under the age of 18.**

M22 (2018: M22) The 360-degree tour of the Brighton school shows the premises prior to the school's refurbishment. A reference on a video on the general information pages to the availability of 'hundreds' of special interest classes seems to be an exaggeration.

**Addressed. The new EF Brighton video recorded post-refurbishment has been added to the website.**

M23 (2018: M24) The cross reference to these pages from the Brighton school pages is insufficiently clear. The exact number of the individual EFEKTA components for each course type is not included on the website.

**Not yet addressed.**

M24 (2018: M24) Information is not always easily accessible or it is only contained in the enrolment information, which is in very small print. iLab language sessions which are supervised rather than taught, and therefore effectively constitute guided self-study, are included in the number of lessons. Times of classes are indicated in very general terms. Maximum class size is hard to find because not on the course options pages, which describe course types. Moreover, information on class size is stated in the following terms: 'We always limit general language class sizes to 12 to 15 students (max 17)', where the maximum is higher than the range indicated. There

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also appears to be an implication here that a different maximum number might apply to other than general language classes. A number of iLab sessions seen during the inspection had over 17 students with one teacher. In respect of school closures, the brochure states that 'some lessons may not take place on December 26 th 2016'. This is insufficiently clear.

**Partially addressed. iLab classes are now project and teacher-led classes; the text regarding Christmas classes has been changed in the brochure. The text about class size has been changed to 'an average of 15 students (max 17)'. However, the inspector discovered that some classes for short periods of time in the summer exceeded the maximum by one or two students. Also, information about minimum age is in very small print at the back of the brochure under 'Enrolment Information'.**

M25 (2018: M25) Information on costs other than fees is either difficult to find or less concretely specified. Course materials are listed on the London page under 'Additional features available', which suggests they are optional, and as costing 'From £35', which is very general. No examination entry fee is shown for IELTS. Costs for activities are very approximate.

**Addressed. The cost of course materials is now included on the Brighton school page; all exam fees are now available in the brochure.**

### **Resources and environment**

R4 (2018: P3) At Brighton College there is no dedicated inside space to relax and consume food. The siting of the marquee café requires students to go outside to be served, even during wet weather. There were no hot drinks available.

**Addressed. Brighton College is no longer used. In summer 2018 alternative premises in BIMM offered dedicated inside space for students to relax. Hot drinks were available.**

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## **Conclusions**

No evidence was found to support the complaint that in the EF Brighton year-round school there were insufficient safeguarding controls for under 16s in July. No under 16s had been enrolled. Despite the large number of 16/17 year olds enrolled in July (200-260 depending on the week) safeguarding procedures for 16/17 year olds were very good overall and no major incidents had been reported. The UK accreditation and compliance director visits the school once a year for face-to-face safeguarding training. Homestay revisits are now made every 12 months which exceeds Scheme requirements. The inspector was also assured that there are no links with the unaccredited EF company operating in Brighton in the summer. If any homestay providers used by that company are subsequently used by the EF school, they are required to reapply as a new homestay and appropriate checks are made.

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