

## Safeguarding Policy

(Updated June 2023)

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### A) Policy Statement

Elac Study Vacations is a British Council Accredited provider of English language and activity courses, as well as online courses, and is a member of English UK and of its special interest group for young learners. We maintain that it is unacceptable for a child or young person to experience abuse of any kind and recognise the paramount importance of safeguarding all children and young people (U18s) in our care. We aim to create a safe environment in which children and young people can thrive and adults can work with the security of clear guidance.

#### We undertake:

- To safeguard the welfare of all children and young people (U18s) who are enrolled on any of Elac's courses, whatever their nationality, race, gender or sexual orientation.
- To provide staff, group leaders, hosts and any adults from other organisations with clear guidance on procedures, and appropriate support and training, on how to deal with an allegation of, or concern about, any actual or suspected abuse. This information is in staff and group leader handbooks and "Information for Hosts".
- To encourage active responsibility amongst U18s to respect each other, look out for each other and raise concerns with adults if necessary.
- To raise awareness of mental health issues, and offer support to students and staff where appropriate
- To avoid making ourselves vulnerable to suspicion of any form of abuse.

#### We will seek to safeguard children and young people by:

- Ensuring that Elac practises **safer recruitment** (see section E in checking the suitability of all staff and group leaders).
- Ensuring that all adults agree to and adopt a **code of conduct** which includes having read the Safeguarding Policy (see attached).
- Ensuring that all U18s agree to and adopt a student **code of conduct** (see attached).
- Sharing information and acting promptly and professionally over any concerns.

#### When will the policy be reviewed?

We are committed to reviewing our policy and good practice annually or whenever an issue arises, to keep it as up to date as possible.

This policy applies to the relationship between students and staff before, during or after a course.

### Terminology

**Safeguarding:** umbrella term meaning "looking after"

**Child Protection:** protecting children from direct harmful behaviour

**DBS:** Data Barring Service (previously CRB)

**Child** – person under 18

**Student** – any person under 18 who a member of staff may come into contact with as a result of their employment in an educational establishment.

**Social contact** - the exchange of personal information between two or more people.

**Electronic contact** – the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment and computers. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.

**Safer recruitment:** recruitment procedures and practices which aim to prevent the appointment of people who may pose a risk to children.

**Prevent:** A government strategy to stop people becoming involved in violent extremism and/or supporting terrorism. Elac has a duty to have due regard to the need to prevent people from being drawn into terrorism.

### **Key Individual Roles and Levels of Responsibility**

All staff have responsibility for safeguarding U18s on Elac courses. They have undertaken an on-line Basic Awareness Training Safeguarding course.

However, there is also a named Centre Welfare Officer in each Elac centre who has undertaken Advanced Training for Designated Staff.

**Elaine Wickens (Welfare and Administration Director) in Head Office is Elac’s designated Welfare Officer and Prevent Lead and has undertaken Specialist Training for the Senior Designated Person and Prevent via English UK in April 2023. In the event that Elaine Wickens is unavailable, Kera Gustafson (0796 955 0160) should be contacted as Elac’s Deputy Designated Welfare and Prevent Officer (she has also undertaken Specialist Training for the Senior Designated Person and Prevent in April 2023). Both have also undertaken First Aid for Mental Health (FAMH).**

### **Documents used to write the policy**

Information has been taken from the English UK guide to writing a safeguarding policy; “Keeping Children Safe in Education 2022” (DoE); “Working Together to Safeguard Children” (HMG); “Information Sharing Advice for Practitioners”; “Sexual Violence and Sexual Harassment Between Children in Schools”; “Sharing Nudes and Semi Nudes Advice for Education Settings”; “When to Call the Police Guidance for Schools and Colleges”; and the following legal acts have been considered: Children Act 1989; Sexual Offences Act 2003; The Prevent Duty for schools and childcare providers; UK Law regarding seatbelts for under 12s; . “Recommended adult to child ratios for working with children” (NSPCC) November 2019; “Every Child Matters”(HMG); Children and Social Work Act 2017; “Keeping Children Safe in Education (DfE); Sexual Offences Act 2003.

## **B) Code of Conduct**

All adults and U18s are requested to follow an Elac Code of Conduct. This is to ensure that everyone has a positive experience within a safe environment based on mutual trust and respect. It is to protect students and adults alike, from any behaviours/actions which might be misconstrued. The Sexual Offences Act 2003 states that any person in a Position of Trust engaged in sexual activity of any sort with students under the age of 18 is breaking the law (even though the legal age of consent is 16). We expect our staff to help set standards by being excellent role models. Online teaching can feel more personal so it is important that all are aware of the codes of conduct and appropriate use of IT (see appendix 10)

### **Adult/U18 Interaction**

Please see the attached adult (staff and group leader) and student Codes of Conduct, which give boundaries and clear guidance about behaviour and actions in a variety of settings, including residential accommodation and online teaching.

### **Safe Working Practices for Staff and Home Stay Providers**

All members of staff and homestay providers should ensure that they avoid making themselves vulnerable to suspicion of any form of abuses by following the guidelines set out in this policy, and procedures set out in the Staff Handbook and “Information for Homestay Providers”.

## Electronic Contact with Children

- Staff must request permission from the employer for any electronic contact with a student before, during and after the course.
- In any electronic contact with students staff must pay particular attention to use neutral, un-emotive language that will not be misconstrued.
- Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.
- Staff must avoid the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.
- Staff must not publish photos, videos or any other information about students except with the express agreement of the employer.
- Staff should be aware that personal information about them may be available in various forms online. Staff should be particularly cautious about their public web profiles and privacy settings.
- Staff should attempt to find ways of setting up and maintaining separate personal and professional electronic profiles.
- Staff should remain in control of online lessons, using a secure school account and inviting students to the lesson. They should also be the last to leave the lesson.

## Appropriate social contact (electronic or otherwise)

- Staff must maintain neutral, friendly relationships with students while avoiding exclusivity or overfamiliarity.
- Staff must resist any attempt by a student to develop an overfamiliar or exclusive social relationship.
- If a student confides sensitive personal information staff have a duty to listen and respond in a professional manner in accordance with organisation guidelines.

## Social Networking Sites

- If schools or classes set up social networking forums like Facebook for students they should be closed groups
- Staff and students must not share the same social networking group, other than those adults necessary to monitor and administer the group.
- Staff who monitor or administer social networking sites for students should use professional accounts that are as far as possible devoid of personal information
- Staff must not initiate or agree to friendship requests or similar with students that will result in the sharing of personal information, photos etc.

## Data Protection

Elac Study Vacations takes data protection and privacy issues seriously, and we are committed to keeping any data we collect safe. A copy of our company Privacy Policy is on our website, [www.elac.co.uk](http://www.elac.co.uk).

## Transport

When using taxi/coach companies, we only use those that have been properly DBS checked. Hosts are also expected to ensure that their vehicles are safe and roadworthy, with age appropriate seatbelts and seats. Parents and agents are aware that students will travel unaccompanied on public transport.

## Whistleblowing

Staff have a legal obligation to information management of any concerns about colleagues not following the Code of Conduct. Staff who report this will not be penalised and their report will remain confidential.

## Reporting Low-Level Concerns

A separate policy exists for this. A low-level concern is where something happens which makes you uncomfortable, or strikes you as odd behaviour. If there is any doubt that the behaviour meets the threshold of harm, then please treat as a safeguarding concern and follow the procedure discussed in this policy.

## C) Child Protection

If you are concerned that a student might be at risk or is actually suffering abuse, you should tell the Centre Welfare Officer. If they are not available, contact Elaine Wickens, the main Elac designated welfare officer. In the event that Elaine Wickens is unavailable Kera Gustafson (0796 955 0160) should be contacted as Elac's Deputy designated Welfare and Prevent Officer. If someone else tells you, you also need to respond and follow Elac's procedure (see below). In the case of online teaching, concerns should be made directly to Elaine Wickens, Kera Gustafson, or a named person if these two are not available.

**Child Abuse** is described by the World Health Organisation as: *"all forms of physical and/or emotional ill-treatment, sexual abuse, neglect or negligent treatment or commercial or other exploitation, resulting in actual or potential harm to the child's health, survival, development or dignity in the context of a relationship or responsibility, trust or power"*

**There are four main categories of abuse as follows:**

- Physical: through hitting, shaking, squeezing, kicking, punching etc.
- Sexual: through inappropriate physical contact, the taking of indecent images of children, or the encouragement of sexual activity by children for the purpose of adult gratification. This is often done over a period of time, when an adult gains the trust of a child. This is known as "grooming".
- Emotional: through persistent lack of affection, unrealistic adult demands, verbal bullying including cyber bullying.
- Neglect: persistent lack of appropriate care of children, including safety, nourishment, warmth, education and medical attention.

## Other types of abuse

Abuse does not always fit into just one of the four main types; for example, sexual abuse will usually include elements of emotional abuse. As well as the four main categories, there are other types of abuse. Apart from bullying, you are less likely to encounter some of these, but you also need to be aware of them.

**Bullying** - In some countries, bullying is not always identified as a form of abuse, and some examples of bullying are accepted as part of 'growing up' or one child 'just having a joke' at the expense of another. However, in the UK bullying is not acceptable.

Bullying is the deliberate and repeated act of hurting somebody or making them unhappy. The bully is 'stronger' in some way than the person who is bullied. It can take many forms, including physical and emotional abuse.

Bullying includes:

- physical harm or threats of harm
- calling somebody insulting names, making fun of them, racist or sexual harassment
- cyber – sending repeated and unkind comments via email, text or social networking sites. Cyber bullying can be very powerful because it can continue 24x7 and be anonymous. Staff need to be aware of this on particular during online teaching.

## Signs of bullying

The child:

- becomes unhappy and withdrawn
- looks sad or upset when reading an online message
- is apart and alone from others, particularly if they had previously belonged to a group
- is often absent or doesn't pay attention in lessons
- avoids certain people or doesn't want to spend time with them.

**Child Sexual Exploitation (CSE)** - A form of sexual abuse where a child is forced by an adult to take part in sexual activity in return for something the child needs.

This can start with the adult showing interest and giving time or friendly affection which then progresses to gifts, money, alcohol, drugs or giving the child a special status. The adult abuser has a kind of power over the child and at some point will only continue giving in return for sexual activity. In extreme examples, the sexual exploitation is carried out by a gang of adults so the child is involved in multiple sexual activities.

### Signs of child sexual exploitation (CSE)

The child:

- has a much older boy-/girlfriend
- appears with unexplained gifts
- is often absent from lessons
- shows other signs similar to sexual abuse.

**Child Trafficking** - This is where children are taken from home, moved or transported and then exploited, forced to work or sold for sexual exploitation or benefit fraud. Trafficked children experience multiple forms of abuse and neglect. Physical, sexual and emotional violence are often used to control victims of trafficking. Children are also likely to be physically and emotionally neglected.

Study travel could be used as a way to obtain a visa to bring a child into the country. Language centres protect children by making sure that study is the real reason for their travel and ensuring they attend their classes.

### Signs of child trafficking

The child:

- spends a lot of time doing household chores
- rarely leaves their house, has no freedom of movement and no time for playing
- lives in substandard accommodation
- isn't sure which country, city or town they're in
- is unable or reluctant to give details of accommodation or personal details
- has no access to their parents or guardians
- is seen in inappropriate places
- possesses unaccounted for money or goods.

### Female Genital Mutilation (FGM) -

This is when a girl's external genitals are cut or changed and there is no medical reason for it. It is illegal if done in the UK or if a UK child is taken outside the UK to have it done. It can cause severe pain and long-lasting harm.

### Signs of Female Genital Mutilation (FGM)

The child:

- has a long absence from the course, followed by unusual behaviour
- has difficulty walking, standing or sitting
- is withdrawn, anxious or depressed
- asks for help without being explicit.

In the UK, any cases of FGM must be reported to the police.

### Child-on-child abuse

- Abuse is not only done by adults against children. Under 18s, notably teens, abuse their peers
- Gang violence, gender-based violence – particularly against girls, hate and revenge crimes, bullying in all its forms are often done by children to each other.
- Sending Nudes (previously called sexting) is illegal and children must be made aware of this.
- Upskirting is also illegal and children must be made aware of this.
- Staff will be trained to understand peer-on-peer abuse; how it may manifest itself and signs to notice/look for.

### Teenage relationship abuse

- Typically starts with two teens in a consensual close relationship.
- However, if one is very needy and the other starts to dominate and manipulate their needy partner, it becomes an abusive relationship
- Signs may be: repeated insults/put downs, stopping partner from seeing friends/family, checking partner all the time (texts/social media), forced sexual activity, physical violence, taking money, controlling what partner wears.

- The dominant partner uses threats, humiliation and intimidation to harm or ‘punish’ the other one.

### **Recognising the symptoms of abuse**

It can be difficult to identify child abuse as it has various forms. The signs listed in this document are only indicators and many can have reasonable explanations.

Below are some typical indicators to look for:

- Unexplained injuries
- A child describing an abusive act that has happened to them
- Another child telling you of their concern about a friend/ fellow student
- Sexually explicit behaviour in games/ activities
- Serious distrust of adults
- Difficulty in making friends/ socialising with other children.
- Eating disorders; obsessive behaviours
- Self-harming; suicide attempts

### **How to respond to concerns**

- If you notice any physical or behavioural signs, tell the Designated Welfare Officer.
- If you suspect an adult is a threat to a child in some way tell the Designated Welfare Officer and continue to monitor the situation (see low level concerns and whistle blowing section).
- If a child/young person makes any comment that gives cause for concern react calmly and act accordingly as outlined below.
- Make a note of what was said and who was present and inform the Designated Welfare Officer. He/she will take appropriate action which may involve external agencies and contacting parents/guardians.
- Make sure that the student in question is safe and away from the alleged abuser.

### **Importance of early help**

- Staff are in good position, seeing students regularly and building strong relationships with them, to notice signs of a safeguarding concern at an early stage.
- Staff have a responsibility to notice when early help might be necessary, identifying emerging problems, and sharing concerns with the Designated Safeguarding team who can follow up.
- Early help in many cases leads to positive outcomes from potentially harmful situations.
- Early help is particularly important for vulnerable students

### **How to react if a child chooses to talk to you**

A child may choose any adult to talk to; therefore all adults need to know the right way to respond:

- Stay calm, accessible and receptive.
- Listen, hear and believe.
- Communicate with the child in a way that is appropriate to their age, understanding and preference – this is very important for children whose first language is not English.
- Be aware of the non-verbal messages you are giving.
- Acknowledge their courage and reassure them that they are right to tell.
- Don’t probe for more information. Questioning the participant may affect how the participant’s disclosure is received at a later date.
- Don’t promise confidentiality to keep the information a secret.
- Don’t deal with this yourself, act in accordance with the procedure in this policy.
- Keep a written record of the incident, if possible on the “Safeguarding/Welfare incident referral form” (attached in appendix).

### **Vulnerable students**

- Staff have a responsibility to be aware of groups of students who could be vulnerable, and to help identify individuals. Some vulnerable groups include:
  - I. Students with Special Educational Needs and Disability (SEND)

- II. Students with existing emotional/behavioural/mental health difficulties
- III. Children from homes with ongoing domestic violence or alcohol/drug misuse

## **D) Training**

A senior designated person (currently Elaine Wickens, Welfare and Administration Director) has undertaken appropriate training ((Specialist Safeguarding) Kera Gustafson is the Deputy Officer and has also undertaken appropriate training.(Specialist Safeguarding).

All staff undertake online child protection training (Basic Safeguarding) to ensure that they recognise the symptoms of possible abuse and how they should respond to suspicions of abuse.

All Centre Welfare Officers undertake Advanced Training for Designated Staff. These individuals can change yearly so will be updated on annual staff lists and all staff informed.

Safeguarding is always a topic at Elac's annual senior staff meeting when staff are briefed about recent updates.

## **E) Safer Recruitment**

The application of rigorous procedures for the recruitment of any staff who are likely to come into contact with students can reduce the likelihood of allegations of abuse being made. At Elac, the following procedures are followed:

All prospective employees complete an application form which asks for details of their previous employment and for the names of two relevant referees. Elac follows up with both. All gaps in CVs are questioned during interview.

A statement about our commitment to safeguarding appears in our recruitment material.

All potential employees will be interviewed by two qualified senior staff to establish previous experience in working in an environment where there is contact with students and asked about their perceptions of acceptable behaviour.

All staff will have an Enhanced Disclosure and Barring Service (DBS) Disclosure before they start employment with us. If not, until such time as the DBS is received, they will be closely monitored and not left on their own with U18s. References must also be received before the person starts work.

If an applicant's DBS has a criminal record, their suitability will be judged on a case by case basis by at least two people, (based on the criteria provided in "Guidance for ELT providers – FAQ section C5) and the decision recorded.

Employees recruited from abroad will provide a Police Check or Certificate of Good Conduct from the foreign country where they reside, as long as they have lived there for six months or longer. If that's not the case, they will need to obtain a new DBS certificate.

All original relevant documentation (proof of identity, qualifications) will be seen by the centre manager prior to the member of staff commencing employment.

Staff are asked to sign a self-declaration statement confirming that they have no convictions for any offence involving any type of harm to a child or children, and should declare anything that may affect their suitability to work with children. They also need to sign a Medical Fitness declaration form.

### **Safer recruitment of Hosts**

All hosts will require an enhanced Disclosure and Barring Service (DBS) disclosure before they start hosting with us, and all over 18s in the house will also be checked. All hosts will also require two suitable references, a current gas safe certificate, to have undertaken a fire safety risk assessment, and to undertake a journey risk assessment. All hosts are visited initially to ensure they are suitable and are re-visited every two years. Hosts also receive training in safeguarding, either by reading our training documents or completing the BC on-line training, then sending the certificate through to Elac. Hosts also receive "Information for Hosts" and sign a Homestay Agreement (see Appendix) which confirms they have read Elac's safeguarding policy.

## Safer recruitment of Group Leaders

All agents must complete a document confirming that their staff have a Certificates of Good Conduct, or Group Leaders can send a Certificate of Good Conduct in advance and then bring it with them. They are also required to sign an Elac Code of Conduct which shows that they have read the Safeguarding Policy.

## Single Central Record

A record is kept to ensure that all necessary pre-appointment checks have been done for staff, hosts and group leaders.

## F) Welfare/implementing Safeguarding

### Risk Assessments

Risk assessments are produced for all centres and all members of staff will be asked to sign them, using a QR code. They cover both on campus and off campus situations including excursions. They are conveyed to students during their induction session and reiterated frequently if they have a daily impact, e.g. crossing of roads, keeping together in groups on excursions, etc. Online teaching sessions are also risk-assessed, as are one-to-one sessions.

### Duty to report

All members of staff/homestay providers are required to report to the Centre Welfare Officer any concern or allegations about Elac practices or the behaviour of colleagues which are likely to put children/young people at risk of abuse or other serious harm.

- Staff have a duty to report to the employer any actual or perceived inappropriate development of the relationship between student and staff, electronic or otherwise.
- Any sensitive information communicated by a student to a member of staff, electronic or otherwise, must be reported to the employer.

### Failure to comply

- Non-compliance with the above policy will result in disciplinary procedures.
- Employers have a duty to remove an individual from regulated activity where there is risk of harm to children.
- Employers have a 'duty to refer' to external authorities\* any suspicion or allegation of inappropriate contact by an individual engaged in regulated activity where there is risk of harm to children. (\*ISA, police, local child protection authorities).

### Abusive Behaviour

Elac Study Vacations will not accept any form of abusive behaviour towards our students from other students or adults on the course. This kind of behaviour may involve (not a comprehensive list):

- **Verbal abuse: name-calling, racist or sexist comments, threatening language**
- **Physical/sexual abuse: touching, striking, spitting**
- **Emotional abuse: ostracising, neglecting, humiliating, intimidating**

The sanctions that may be used include the offender:

- **Being asked to make an apology**
- **Doing some community work (e.g. tidy up mess around the college)**
- **Being taken out of class and given some supervised work to do**
- **Not being allowed to leave the college**



- *Missing activities and excursions*
- *Being sent home*
- *Being referred to another agency*

All staff have a collective responsibility for ensuring:

- that abusive behaviour does not go unnoticed
- that abusive behaviour is reported promptly

If you are not sure whether something you've seen should be dealt with under this heading, please speak to the Centre Welfare Officer or Elaine Wickens, the DSL. In the event that Elaine Wickens is unavailable Kera Gustafson should be contacted as Elac's Deputy DSL.

#### **Procedure in the case of an under 18 abusing another under 18**

In the event of an incident being reported to the Assistant Centre Manager, the student concerned will usually be asked to go to the Centre Manager's office where they will remain while the Assistant Centre Manager consults rapidly to verify the circumstances and gather any additional information.

The student(s) will then be spoken to by the Assistant Centre Manager, together with (as necessary) the Centre Manager and Group Leader. They will be told that they can bring a friend/supporter with them to the meeting.

If the staff involved are content that the incident is not of the most serious sort, and that the student(s) concerned is unlikely to repeat the action, then the student will be given a warning as to his conduct and an appropriate sanction. The student may also be obliged to meet with any other affected student(s) to offer an apology.

Depending on the seriousness of the incident, a letter may be sent both to the agent with whom the student travelled, and to his/her parents/guardians.

In more serious cases of abuse, the student would be returned home at their own expense. In the most serious cases, relevant outside agencies may be involved.

#### **Procedure in the case of an adult abusing, or alleging, abuse of another adult or under 18.**

All allegations should be taken seriously.

**All information should be recorded on the Safeguarding/Welfare Incident Referral Form held in the Welfare Folder OR on the Digital version, which is only accessed by the DSL.**

The following details should be included:

- Date and time of incident/disclosure.
- Parties involved, including any witnesses to an event.
- What was said or done and by whom.
- Any further action taken by Elac to look into the matter.
- Any further action taken beyond Elac.
- Where relevant, the reasons why a decision was taken not to refer those concerns to a statutory agency.
- Any interpretation/inference drawn from what was observed, said or alleged should be clearly recorded as such.
- Name of person reporting on the concern, name and designation of the person to whom the concern was reported, date and time and their contact details.

If there is evidence of abuse taking place, then the Assistant Centre Manager will immediately notify the Centre Manager, the DSL and the Directors of Elac. All such instances of reported abuse between an adult and a student must be treated as serious, and need to be investigated without delay.

All documentation is to be kept secure in the relevant centre within the lockable A4 cabinet, and then forwarded to the Head Office to be kept securely for up to 6 years depending on the severity of the allegation.

Irrespective of any investigation by social workers or the police, you should follow appropriate disciplinary procedure: common practice is for the alleged abuser to be suspended from work until the outcome of any investigation is clear.

All incidents should be investigated internally after any external investigation has finished, reviewing organisational practice and putting in place any additional measures to prevent a similar thing happening again.

Depending on the exact circumstances of the incident, and the role of the staff member, he or she may be temporarily removed from their position.

The DLS and Directors, in consultation with the Centre Welfare Officer and Centre Manager, will decide whether an outside agency needs to be involved at this stage. This could be the police (if over 18) or LGSP (if under 18).

### **Supervision ratios and arrangements**

Students are expected to participate in all aspects of our courses. Outside of lesson times, there is a programme of sports and activities, and during this time, students will be supervised in a ratio of 1:25 for 12 – 18 year olds and 1:15 for students from 7 - 11. Students who are not participating in the organised activities do not have permission to return to their houses, or to leave the campus, unless they have been given permission by their group leader, who will then take on the supervisory role.

All students will be registered three times each day: in classes (am or pm) at the pre-activity meeting (am or pm) and in their accommodation in the evening. Teachers will take the register in the first class of the day. Group leaders will be responsible for taking the roll call before activities and at in-house time.

On excursions, students will be supervised by Elac staff and group leaders together in a ratio of 1:15 for the older group and 1:10 for the younger group. Students will be supervised at all times, with one exception - when the group have completed their excursion visit, the students may be given some free time. However, if the children are under 16, then this only happens on certain conditions:

- The children are in groups of at least 3 and remain together;
- The children all have their Elac Emergency Contact Cards with them;
- The teachers have a mobile contact number for each group of children (and vice-versa);
- A meeting point and time are clearly established;
- Safety reminders are repeated to the children (roads, strangers);
- Clear limits are put on the area where they can go independently;

Elac staff and Group Leaders share responsibility on the excursion. The Elac staff members have the overall responsibility for the safety of the children on the excursion and for the itinerary. Group leaders have responsibility for ensuring that all the members of the group are present and accounted for.

For certain higher risk activities, swimming, archery etc., we use qualified staff for supervision, both on site or off site.

### **Student Absences**

The vast majority of Elac students come as part of an organised groups. While in the UK, all students on Elac courses are expected to attend 100% on the programme, including activities and excursion, unless the child is ill. Registers are taken several times a day and any absences immediately followed up and dealt with.

Within the first 20 minutes of a lesson or activity, an office administrator or Academic Manager will check for absentees.

## Managing Behaviour and Acceptable Restraint

*(This has been formulated in accordance with Department for Education – Use of Reasonable Force 2011)*

Physical contact with students must be appropriate for the age, understanding and sex of the child and must never threaten or be sexually inappropriate. In some cases physical contact may be appropriate:

- To remove disruptive students from the classroom where they have refused to follow an instruction to do so;
- Prevent a student behaving in a way that disrupts a school event or a school trip;
- Prevent a student leaving the classroom where allowing the students to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- Prevent a student from attacking a member of staff or another or to stop a fight;
- Restrain a student at risk of harming themselves through physical outburst.

You cannot:

- Use force as a punishment – it is unlawful to use force as a punishment.

What happens if a student complains if force is used on them?

- All complaints should be thoroughly investigated.
- Where a member of staff has acted within the law – that is, they have used reasonable force in order to prevent injury, damage to property or disorder – this will provide a defence to any criminal prosecution or other civil or public law action.
- Elac must consider carefully whether the circumstances of the case warrant a person being suspended until the allegation is resolved or whether alternative arrangements are more appropriate.
- If a decision is taken to suspend a member of staff Elac will ensure that the member of staff has access to a named contact who can provide support.

## Fire Safety

Fire safety is a legal requirement for all students. Please refer to our Health and Safety Policy. We work closely with our centres to ensure that fire regulations are adhered to and that staff are briefed regarding what to do in the event of a fire.

## Prevent Duty

Elac is committed to the government strategy to stop people becoming involved in violent extremism and/or in supporting terrorism. Anyone may be vulnerable to extremist exploitation. Our aim is to provide an environment on our courses where everyone feels safe and supported, and where there is a clear process of referral of concerns for staff, students and homestay providers. We will do this via documents, eg. our codes of conduct (see appendix), appropriate training, and promoting core British values where possible. These are: **democracy, the rule of law, individual liberty, and respectful tolerance of different faiths or beliefs**. Elaine Wickens is the Prevent lead within Elac, but other key staff have also received Prevent training, Kera Gustafson is the Deputy Lead. Andrew McPhee is also an acting Deputy Lead.

### Signs that May Cause Concern

Students talking about exposure to extremist materials or views outside school

Changes in behaviour, eg becoming isolated

Fall in standard of work poor attendance, disengagement

Changes in attitude, eg. intolerant of differences

Attempts to impose own beliefs

Use of extremist vocabulary to exclude others or incite violence

Accessing extremist material online or via social network sites

Over new religious practices

Drawing or posters showing extremist ideology/views/symbols

Students voicing concerns about anyone

### How and When to React to Concerns

If you are concerned, contact the Assistant Centre Manager at your centre, or the Prevent lead (Elaine Wickens) at head office. We will discuss the issue, take advice if necessary, and then make a referral to the relevant authorities if necessary. Please report any concern or incident, however small. All will be dealt with sensitively and carefully.

## **Private Fostering**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. If a student on an Elac course is in a private fostering arrangement, then the local authority needs to be informed, at least six weeks before arrangement starts.

## **APPENDICES**

1. Background to Elac Study Vacations
2. Staff Code of Conduct
3. Student Code of Conduct
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## Background to Elac Study Vacations

Elac was set up in 1991 in Eastbourne and has grown consistently over recent years. The head office moved to Bath in 2006. In 2023 we will be running 7 residential centres and 2 homestay centres, welcoming students from around the world between the middle of June and the beginning of August. We also have a Study Centre in Milsom Street, Bath, where we offer short stay courses all year round.

### 1. **Eastbourne College, Eastbourne**

Residential and Homestay

minimum age 10 (Residential) 13 (Homestay), maximum age 17

### 2. **Christ's Hospital School, Horsham**

Residential

minimum age 11, maximum age 17

### 3. **University of Nottingham**

Residential

minimum age 11, maximum age 17

### 4. **Bath Spa University, Bath**

Residential

minimum age 10 (Residential) 13 (Homestay), maximum age 17

### 5. **Prior Park College, Bath**

Residential and Homestay

minimum age 10 (Residential) 13 (Homestay), maximum age 17

### 6. **Ardingly College, Haywards Heath**

Residential

minimum age 7, maximum age 17 years

### 7. **Royal Agricultural College, Cirencester**

Residential

minimum age 7, maximum age 17 years

### 8. **Elac Study Centre, Bath**

Short stay Homestay for Students (ages flexible) and Adult Courses

## STAFF CODE OF CONDUCT (updated June 2023)

We expect all staff employed by Elac to conduct themselves in a way that will ensure the wellbeing of students and other adults, as well as reflecting well on our organisation.

### Drugs, Alcohol, Smoking, Vaping

Staff will not possess, use or be under the influence of illegal drugs while in our employment. Staff will not consume alcohol while on duty, nor will they be under the influence of alcohol while on duty. It is also unacceptable to come to work suffering from the effects of alcohol. Staff will observe the laws regarding smoking on site. Staff will not smoke or vape while engaged in activities with the students.

### Relationships

A staff/staff or staff/group leader relationship is your own affair, except where it has a negative impact on your performance of your job, or where it reflects badly on our organisation. Discretion is required.

A relationship between staff/student is **unacceptable as well as being illegal**. In relating to students, staff must exercise caution and awareness. As a general principle:

- Avoid situations where you are alone with a student.
- Avoid physical contact
- If you are concerned in any way about the nature of a relationship with a student talk about it with the Centre Manager or Designated Safeguarding Lead.

**However,**

- Do take an interest in the students and join them in activities and events;
- Do interact with them as often as possible both inside and outside the classroom.

### Professional Duties

We expect you to fulfil your duties to the best of your ability and to be professional in all you do. This includes: being on time, learning the students' names, dressing appropriately. Please be conscious of cultural sensitivities. Also be polite and respectful towards your colleagues and any adults accompanying the students.

### Absences

We understand that from time to time staff may be unwell and unable to teach, or may also have a commitment that prevents them from teaching. We will be supportive of all genuine absences. However, we need as much notice as possible, in order to plan around this. In cases of sickness, please use your discretion: if you are contagious then you must not come in to work; if it is something less serious (a headache or cold), please discuss with the Centre Manager.

**I have read Elac's Safeguarding Policy and agree to abide by the Staff Code of Conduct:**

Name \_\_\_\_\_

Signed \_\_\_\_\_

Date \_\_\_\_\_



### 3. STUDENT CODE OF CONDUCT

updated June 2023

We want you to enjoy your English language course. We will do everything we can to make the course a big success for everyone, but to do this we need your help.

**Please read it carefully** – if there are some words you do not understand, ask your teacher.

Tick each box  below to show us that you understand what the sentences mean.

#### WE EXPECT YOU TO:

- 1. Speak English at all times in class and during activities.
- 2. Work hard and participate fully in your English lessons and activities.
- 3. Listen to your teachers, group leaders, activity leaders and other students.
- 4. Be on time for all lessons and activities.
- 5. Respect other students' opinions and religious beliefs.
- 6. Be polite and friendly to everyone.
- 7. Respect the rooms, furniture and equipment.
- 8. Stay safe online and be careful about sharing information.
- 9. Speak to us if you or your friends are unhappy.

#### UNACCEPTABLE BEHAVIOUR:

- 1. Alcohol, smoking, vaping, taking illegal drugs, buying or carrying weapons are all **FORBIDDEN**
- 2. DO NOT drop rubbish or write graffiti anywhere.
- 3. DO NOT steal from other students, from shops, the school or hosts.
- 4. DO NOT bully, threaten or be violent towards other people.
- 5. DO NOT make lots of noise at your host's house or in your room, especially late at night.
- 6. DO NOT enter other people's bedrooms without permission.
- 7. DO NOT leave your host's house or your room in the evening without permission.
- 8. DO NOT create or share any inappropriate or extremist material online.
- 9. DO NOT take or share photos/videos of anyone without their permission.

#### What happens if I break the CODE OF CONDUCT?

We will talk to you and your Group Leader. If anyone else is involved, we will talk to them as well.

We will make a record of the incident and make a decision about action to be taken.

You will have the opportunity to improve your behaviour.

It is a more serious matter, you may be sent home and your parents will have to pay.

Some **consequences for less serious** situations could be:

- Cleaning up around the campus if you have been making a mess.

- Doing some extra English work if you have not been working hard in class.
- Missing an excursion if you have gone somewhere without permission.
- Writing a letter of apology to the people you have upset.

For the **most serious bad behaviour** which involves breaking the laws in the UK the police may be called.

### **If you have a problem or want to make a complaint:**

It is really important that you tell a teacher, an activity leader or your Group Leader – so we can help.

If you have a complaint about any member of staff, another student, your classes, your accommodation, activities, excursions or the school, please tell us as soon as possible. We will take your complaint seriously, investigate and decide what might be done.

### **To make a formal complaint, speak to your Group Leader.**

### **PERSONAL SAFETY and CARE OF VALUABLES**

- Always be aware of your surroundings and use your common sense.
- Cross roads safely, remember that vehicles drive on the left in the UK, so look carefully before crossing.
- Avoid walking alone, stay in groups of two or three and stay on well-lit, busy streets.
- Keep your money, mobile phone, keys and other valuables safe and out of sight in public places.
- Label your possessions with your name.
- Keep your emergency contact card with you at all times.

I have read, fully understood and agree to the STUDENT CODE OF CONDUCT

(If in Homestay) My host has explained my journey to and from the centre, including any risks when travelling.

SIGNED: \_\_\_\_\_ DATE: \_\_\_\_\_

FIRST NAME: \_\_\_\_\_ SURNAME: \_\_\_\_\_

NAME OF GROUP: \_\_\_\_\_



## 4. Group Leader Code of Conduct

(Updated January 2023)

We expect all adults involved with our courses to conduct themselves in a way that reflects well on our organisation and ensures the safety of our students. This will entail complying with UK laws and regulations which may well differ from those in your own country.

### **Drugs, Alcohol, Smoking, Weapons**

Group Leaders will not possess, use, or be under the influence of drugs while on our course. They will not consume or be under the influence of alcohol while on duty. Adults will observe the laws regarding smoking on site, and will not smoke while engaged in activities with the students. This includes the use of E-Cigarettes/vaping. The breaking of these rules will lead to disciplinary procedures. Carrying weapons is illegal in the UK, so please do not bring or carry any weapons with you.

### **Social Media and Mobile Phones**

Adults are not permitted to take or exchange personal photos with student while on our course. Please refer to our safeguarding policy for more details.

### **Relationships**

An adult /adult relationship is your own affair, except where it has a negative impact on your performance of your job, or where it reflects badly on our organisation. Discretion is required.

### **Online Safety and Appropriate Use of the Internet**

Whilst working on an Elac course you will need to be responsible with your use of the Internet. Our wifi on-site is provided by the schools and universities we work with to deliver our courses. These institutions have strict codes of conduct with regards to access to adult material online. If you are suspected of attempting to visit inappropriate or illegal websites or are found to have accessed or downloaded inappropriate or illegal online material you may forfeit your role on the course and be made to leave the site. The police or other authorities may also be called to investigate such use.

### **Adult – U18 Interaction**

A sexual relationship between a staff member and a student on our course (regardless of their age) is an 'abuse of trust' and is a criminal act which will be reported to the authorities. Generally, in relating to students, staff should be aware of our Safeguarding Policy and should exercise caution, without distancing themselves entirely. As a general principle:

- Avoid situations where you are alone with a student. If the situation is unavoidable try to ensure that the door is not closed and that you don't position yourself between the student and a door.
- Respect the privacy of students regarding bedrooms, bathrooms etc. in residential accommodation.
- Physical contact is only acceptable in certain circumstances where there is a specific need (comforting, warning etc.) and in public rather than private.
- If you are concerned in anyway about the nature of a relationship with a student talk about it with the Elac Welfare Officer.

### **HOWEVER**

- Do take an interest in the students; using praise and being positive.
- Do join them in activities and events.

**Prevent Duty**

Prevent is a government strategy to stop people becoming involved in violent extremism and/or in supporting terrorism. We have a legal duty to identify and safeguard children who may be vulnerable to radicalisation, and to challenge extreme views, whilst promoting the core British values of democracy, the rule of law, individual liberty, and respectful tolerance of different faiths and beliefs. We expect you to be observant and vigilant in noticing any signs of radical or extremist behaviour, and to report any concerns to the Centre Welfare Officer.

**Professional Duties**

We expect you to fulfil your duties to the best of your ability and to be professional in all you do. This includes; being on time, learning the students' names, and dressing appropriately. It also includes being polite and respectful towards colleagues.

**Homestay Accommodation**

If you are staying with a host, please show them your certificate of good conduct (you would have already sent a copy to us at [info@elac.co.uk](mailto:info@elac.co.uk) before the start of the summer).

**Absences**

If you are unwell it may be very difficult for you to carry out your duties. If it is a minor problem, we would appreciate it if you could continue as far as possible in your role with support and help from our team. If, however, you are ill and even contagious, then we would expect you to remain away from the students and alternative care provision will be put in place.

All staff should be familiar with Elac's Safeguarding Policy and Low-Level Concerns Policy (there is a copy in your Group Leader pack). More information about our policies can be found in the Elac Handbook and Guide (both of which are available to read and download on [www.elaceducation.com/resources/](http://www.elaceducation.com/resources/)).

**I agree to abide by the Elac Group Leader Code of Conduct:**

Name \_\_\_\_\_

Signed \_\_\_\_\_ Date \_\_\_\_\_

Group Name \_\_\_\_\_

## 5. Homestay Agreement (Eastbourne)

Updated January 2023

I have read, understood and will comply with the following terms, as required by the British Council and as described in the Elac document Information for Hosts:

- Not to host more than **four** students at any one time
- Not to host more than **two** students in the same bedroom (unless this has been specifically agreed with Elac)
- Not to host more than one student of the same nationality or mother tongue (unless this has been specifically agreed with Elac)
- Not to host students aged below 16 with students over 18
- Not to mix genders of students
- To inform Elac if there are any adult lodgers in the house.
- To provide accommodation in a proper state of cleanliness and repair
- To provide a sufficiently spacious bedroom with natural light, a good sized bed (no inflatable mattress or futons) and adequate hanging and draw space for clothes
- To ensure access to baths or showers daily
- To provide a change of towels and bed linen each week and an adequate supply of duvets, blankets and pillows
- To provide a weekly laundry service (especially in the case of under -16s) or clearly explained laundry arrangements
- To provide meals as agreed that will offer a well balanced diet, taking into account any reasonable requirements expressed by students
- To converse in English to students and encourage their speaking in English
- To keep my car in a safe and roadworthy condition

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**Please tick the relevant points then tear off and return to Zoë Harris, – keep the rest of the document for your information**

- I confirm that I have read and understood Elac’s Homestay Agreement and Safeguarding Policy (including information on Prevent).
- I have read and understood the Safeguarding Training information  
OR
- I have completed the online safeguarding training and have sent a copy of my certificate to Elac.

Name: ..... Signed: .....

## 6. Local Safeguarding Children Partnerships (LSCPs) (updated May 2023)

Local Safeguarding Children Partnerships (LSCPs) were established by the Children Act 2004 which gives a statutory responsibility to each locality to have this mechanism in place. LSCPs are now the key system in every locality of the country for organizations to come together to agree on how they will cooperate with one another to safeguard and promote the welfare of children. The purpose of this partnership working is to hold each other to account and to ensure safeguarding children remains high on the agenda across their region.

The Designated Officer (LADO) is a local authority role responsible for managing and overseeing concerns, allegations or offences relating to staff and volunteers in any organisation across a local authority area.

### **Local Authority Designated Officer Contact Numbers**

#### **Eastbourne – Eastbourne College**

Single Point of Advice (SPoA) Mon-Thurs 8.30am-5pm and Fri 8.30am-4.30pm.

Tel 01323 464222

Out of Hours Social Care Service - Children's services: tel 01273 335905/6

#### **West Sussex (Horsham and Ardingly) – Christ's Hospital School and Ardingly**

Miriam Williams and Donna Tomlinson, tel 0330 222 6450 or 01403 229900

#### **Bath and North East Somerset (BANES) Bath – Bath Spa and Prior Park, Short Stays**

Nicola Bennett, tel 01225 396974

#### **Nottingham University**

Lisa Hurst, Schools and Education Safeguarding Co-ordinator, tel 0115 8762042

#### **Cirencester (Royal Agricultural University)**

Gloucestershire MASH, 01452 426565.

## 7 Elac Safeguarding/Welfare Incident Referral Form

STUDENT DETAILS			
<b>Student Name:</b>		<b>Agent Group Name:</b>	
<b>DOB:</b>		<b>Age:</b>	
PERSON REPORTING			
<b>The Person Reporting:</b>		<b>Position:</b>	
<b>Name of anyone else who witnessed the incident:</b>			
<b>I am expressing my concerns</b> <i>(Please tick appropriate box)</i>		<b>I am expressing someone else's concerns</b> <i>(If this box is ticked please complete name below)</i>	
<b>Name of Person</b>		<b>Position</b>	

DETAILS		
<b>Date and Time:</b>		
<b>Details of Incident:</b>		
<b>Does the student understand what is happening?</b>		<b>YES</b>
<b>What was said and by whom:</b>		<b>NO</b>
<div style="display: flex; justify-content: space-between;"> <span>.....continued</span> <span>Please continue overleaf....</span> </div>		

**Any others involved?**

**Action taken immediately**

**Any further action taken**

**Signed:**

**Date:**

**Please take/send this completed form to the Designated Safeguarding Officer (usually the ACM).**

This disclosure can only be discussed between the reporting staff member and the designated safeguarding officer, or the DSL.

**Signed.....**

**Safeguarding Officer**

## 8. Prevent Engagement Officers (PEOs) and Prevent Coordinators (updated January 2023)

The threat to the UK from international terrorism is relevant. The Counter-Terrorism and Security Act 2015 contains a duty on specified authorities, including language schools, to have due regard to the need to prevent people from being drawn into terrorism. This is also known as the Prevent duty.

To carry out this Prevent duty, the UK has appointed specialised police units in every region of the country, under the title of Prevent Engagement Officer (PEO). Some regional institutions and councils may also have their own Prevent Coordinators.

If you are concerned about any aspect of extremism, including students at risk of radicalisation or students being drawn into terrorism at your ELAC centre, you should first contact Elaine Wickens (the Prevent Lead) via her confidential email address, [elaine@elac.co.uk](mailto:elaine@elac.co.uk). She will then contact the relevant designated Prevent officer, as listed below. In the event of Elaine being unavailable Kera Gustafson ([kera@elac.co.uk](mailto:kera@elac.co.uk)) should be contacted.

Alternatively, contact the Preventing extremism in schools and children's services:

Telephone: 020 7340 7264 (Monday – Friday from 9:00am to 6:00pm)

Email: [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

### Prevent Engagement Officers contact details

- Eastbourne (Eastbourne College)  
Beverly Knight: Team Manager – Vulnerable individuals  
[Beverly.knight@westsussex.gov.uk](mailto:Beverly.knight@westsussex.gov.uk)
- Horsham (Christ's Hospital School):  
Contact Anti-Terrorism Hotline 0800789321 OR  
Go online <https://www.sussex.police.uk/advice/advice-and-information/t/terrorism-in-the-uk/>
- Nottingham (Jubilee Campus Nottingham University):  
Email [prevent@nottinghamshire.pnn.police.uk](mailto:prevent@nottinghamshire.pnn.police.uk) OR  
Call 101 ext 800 2963/2965 or ask to speak to the Prevent Team
- Bath (Bath Study Centre and Bath Spa University):  
Red Button on the website  
<https://www.bathnes.gov.uk/services/neighbourhoods-and-community-safety/crime-prevention-and-community-safety/prevent>  
Police Prevent Team  
Phone 01278 647466 – Monday to Friday, 8am to 4pm. For out of hours advice, phone 101  
Email [channelsw@avonandsomerset.pnn.police.uk](mailto:channelsw@avonandsomerset.pnn.police.uk)
- Cirencester (Royal Agricultural University):  
[Prevent@gloucestershire.police.uk](mailto:Prevent@gloucestershire.police.uk)

## 9. Elac Prevent Incident Referral Form

STUDENT DETAILS			
<b>Student Name:</b>	<b>Agent Group Name:</b>		
<b>DOB:</b>	<b>Age:</b>		
PERSON REPORTING			
<b>The Person Reporting:</b>	<b>Position:</b>		
<b>Name of anyone witnessing the incident:</b>			
<b>I am expressing my concerns</b> <i>(Please tick appropriate box)</i>		<b>I am expressing someone's concerns</b> <i>(If this box is ticked please complete name below)</i>	
<b>Name of Person</b>	<b>Position</b>		

DETAILS		
<b>Time:</b>		
<b>Details of Incident:</b>		
<b>Does the student understand what is happening?</b>	<b>YES</b>	<b>NO</b>
<b>Details of Exact Conversation:</b>		
.....continued	Please continue overleaf....	



**Any others involved?**

**Action Taken Immediately**

**Any Further Action Taken**

**Signed:**

**Date:**

Please take/send this completed form to the Designated Safeguarding Officer (usually the ACM).who will forward it to the Prevent Lead (Elaine Wickens at head office). This disclosure can only be discussed between the reporting staff member and the designated safeguarding officer.

**Signed:..... Safeguarding Officer**

## 10. SAFEGUARDING AND ONLINE TEACHING

Please read this in conjunction with the main Safeguarding Policy

When online, students need to be protected from the increased risks of:

- Online grooming and sexual exploitation
- Online radicalisation
- Access to harmful content
- Online bullying including peer on peer abuse
- Mental health issues for staff and students

A “creeping informality” is to be guarded against through training and the use of our policies, structures and practices. Online teaching can feel more personal so it is important that all are aware of the codes of conduct and appropriate use of IT.

Elac has created a Student Code of Conduct and a Staff Code of Conduct which are to be signed and returned to Elac. These are attached below and give guidance to everyone regarding behaviour. Parents are also expected to sign the Student Code of Conduct.

### Staff Recruitment and Training

Safer Recruitment procedures still apply. During the pandemic the DBS will accept documents via Skype etc until such time as originals can be seen. All staff involved in online delivery have an induction and training session which covers the technical aspects of the platform (Zoom), how to keep themselves and their students safe, the features of the material to be taught and tips for online delivery.

Staff also need to be aware of their own and students’ mental health, by taking and encouraging appropriate breaks. They also need to warn students about cyber bullying, which can continue after lessons and be anonymous.

### Monitoring of Lessons

Elac will monitor some lessons, by checking in during a session. They will also record a selection of lessons, in particular those where there is one-to-one teaching. Students and parents will have given their permission for this. Students will also be monitored in break-out rooms.