

Policies related to Student Welfare

Safeguarding Policy

(updated January 2026)

Designated Safeguarding Lead (DSL) and Prevent Lead:

Kera Gustafson, kera@elac.co.uk

Deputy Designated Safeguarding Leads (DDSL) and Prevent Lead

Zoë Harris, zoe@elac.co.uk

Andrew McPhee (from May 2026), andrew@elac.co.uk

Tel. 01225 443261

A) Policy Statement

Elac Study Vacations is an 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 and after a course.

Terminology

Safeguarding: Umbrella term meaning “looking after”

Child Protection: Protecting children from direct harmful behaviour

DBS: Disclosure and 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 the online British Council Accreditation UK Safeguarding Training.

However, there is also a named Welfare and Communications Manager in each Elac summer centre who has undertaken Advanced Training for Designated Staff (Formerly Level 2)

- Kera Gustafson, Vice Principal
 - Designated Safeguarding Lead (DSL) and Prevent Lead
 - Head of Elac Welfare team
 - Based in Bath Head Office (Peripatetic role in summer)
 - Has undertaken updated training: Specialist safeguarding for designated lead in ELT (formerly Level 3) February 2025 (Expires Feb 2027)
 - FAA Level 2 First Aid for Mental Health (RQF) May 2023
- Zoë Harris, Head of Homestay and Short-Stay Manager
 - Deputy Designated Safeguarding Lead (DDSL) and Deputy Prevent Lead
 - Member of Elac Welfare team
 - Based in Eastbourne

- Has undertaken updated training: Specialist safeguarding for designated lead in ELT (formerly Level 3) November 2024 (Expires Nov 2026)
- FAA Level 2 First Aid for Mental Health (RQF) May 2023

- Andrew McPhee, Principal
 - Deputy Designated Safeguarding Lead (DDSL) and Deputy Prevent Lead (from May 2026)
 - Member of Elac Welfare team
 - Based in Bath

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 edited February 2024); "Information Sharing Advice for Practitioners"; "Sexual Violence and Sexual Harassment Between Children in Schools"; "Sharing Nudes and Semi Nudes Advice for Education Settings updated March 2024"; "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. "Keeping Children Safe in Education 2025. "After school clubs, community activities and tuition updated September 2023"

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; please refer to the Safeguarding and Online Teaching Policy on our website <https://elac.co.uk/policies/>.

Adult/U18 Interaction

Please refer Staff, 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 Homestay 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.

Online Safety

- Elac will take all appropriate steps to safeguard and promote the welfare of children and provide them with a safe environment in which to learn by doing all they reasonably can to limit children's exposure to the online risks from the school or college's IT system.
- Elac will check that, where possible, appropriate filtering and monitoring systems are in place and regularly review their effectiveness.
- They will ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

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 <https://elac.co.uk/policies/>.

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 inform 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. See the Whistleblowing Policy on our website <https://elac.co.uk/policies/>.

Reporting Low-Level Concerns

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 Low-Level Concerns policy which you can access via the website <https://elac.co.uk/policies/>.

C) Child Protection

If someone is concerned that a student might be at risk or is suffering abuse, they should tell the Welfare and Communications Manager in summer. If unavailable, the DSL or DDSL should be contacted; contact details are at the front of this document. In the case of online teaching, concerns should be made directly to DSL, or DDSL.

Child Abuse (maltreatment) 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 when an adult gains the trust of a child. This is known as "grooming."
- Emotional (or psychological or mental): 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, staff are less likely to encounter some of these, but they also need to be aware of them.

Bullying and Cyber-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 like 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 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.

Harmful Sexual Behaviour (HSB)

Children and young people typically display a range of sexualised behaviours as they grow up. However, some may display problematic or abusive sexualised behaviour. This is harmful to the children who display it, as well as the people it's directed towards.

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 child on child 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.

The following types of abuse are less relevant to our students/staff, but further information can be found on the NSPCC Website <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/>

- Criminal Exploitation and Gangs
- Domestic Abuse
- Grooming
- Non-Recent Abuse
- Online Abuse

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 appropriate person (Welfare and Communications Manager in summer, or DSL/DDSL.)
- If you suspect an adult is a threat to a child in some way, tell the appropriate person (Welfare and Communications Manager in summer, or DSL/DDSL.) 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 a 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 later.
- Don't promise to keep the information secret or confidential. You can say that the information will be handled sensitively and only shared with those who need to know.
- Don't deal with this yourself, act in accordance with the procedure in this policy.
- Keep a written record of the incident; record it on the "Safeguarding/Welfare incident referral form." (QR code and link available to all staff)
- Make sure you inform the appropriate person (a member of the welfare team, Welfare and Communications Manager in summer, or DSL/DDSL.) as well as keeping a written record.

Vulnerable Children

Staff have a responsibility to be aware of groups of children who could be vulnerable, and to help identify individuals. Some vulnerable groups include:

- I. Children with Special Educational Needs and Disability (SEND)
- II. Children with existing emotional/behavioural/mental health difficulties
- III. Children from homes with ongoing domestic violence or alcohol/drug misuse

LGBTQ+ Children

- Elac also recognises the importance of providing LGBTQ+ children with a safe space for them to speak or share their concerns with a member of staff

D) Training

The Safeguarding Lead (DSL) and Designated Safeguarding Lead (DDSL) have undertaken Specialist Safeguarding (formerly Level 3.)

All staff undertake the online British Council Accreditation UK Safeguarding Training to ensure that they recognise the symptoms of abuse and how they should respond to suspicions of abuse. On completion, they must send Elac the safeguarding certificate they receive in their British Council Accreditation UK portal.

All Welfare and Communications Managers undertake Advanced Training for Designated Staff (formerly Level 2.). 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

It is a criminal offence for any person who is barred from working with children to attempt to apply to be a staff member at Elac.

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

All new staff are requested to send an up-to-date CV which asks for details of their previous employment, which forms part of their application. They are required to complete a personnel form and referee request form which asks for the names of two relevant referees, one of which must be from their previous employer; these are sent together with the conditional contract. Elac follows up with both references. All gaps in CVs are questioned during interview.

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

Staff are interviewed online by 1 member of staff. All interviews are recorded and can be reviewed by a second person. Management staff, who are new to us, attend two interviews.

All new staff will have an Enhanced Disclosure and Barring Service (DBS) Disclosure including Barred List for working with children or Police Check certificate before they start employment with us. If not, until such time as the DBS is received, they will wear a different coloured lanyard and will be regularly monitored. Two professional references will be sought, ideally one from their most recent employer. If the staff member has worked in a state school, a prohibited list check will also be done.

If it is a returning staff member from the previous summer or short stay, and if the DBS is not on the update service, a Barred List check will be performed and a reference from the most recent employer will be requested. For staff members who live overseas, they will be required to provide a Police Check certificate each year they work with us.

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, if 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, right to work, and qualifications) will be seen by the Office Administrator during induction and 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

It is a criminal offence for any person who is barred from working with children to attempt to apply to be a host.

All hosts will require an enhanced Disclosure and Barring Service (DBS) disclosure including barred lists for working with children 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 revisited every two years. Hosts must also complete the online British Council Accreditation UK Safeguarding Training and send Elac the safeguarding certificate they receive in their British Council Accreditation UK portal. 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 Certificate of Good Conduct. Group Leaders also send a Certificate of Good Conduct in advance or bring it with them. They are also required to sign an Elac Code of Conduct which shows that they have read the Safeguarding Policy.

Safeguarding Records from External Agencies

All adults who visit our centres or who are based at our centres must have had appropriate DBS checks and organisations they work for should provide Elac with a copy, or a document signed to this effect.

Single Central Record

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

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 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.

Reporting takes place using an electronic form. This will be shared with staff during induction.

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 staff are unsure whether something they've seen should be dealt with under this heading, they must speak to the Welfare and Communications Manager in summer or the DSL/DDSL.

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

In the event of an incident being reported, the student concerned will usually be asked to go to the office where they will remain while the appropriate person (Welfare and Communication Manager/DSL/DDSL) consults rapidly to verify the circumstances and gather any additional information.

The student(s) will then be spoken to by the Welfare and Communications 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 via the online safeguarding form, which is accessed by the welfare team.

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 investigate 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 the abuse taking place, then the Welfare and Communications 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 written documentation is to be kept secure in the relevant centre and then forwarded to 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, Elac will 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 DL and Directors, in consultation with the relevant staff e.g., Centre Manager and Welfare and Communications 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 various ratios for on-site daytime activities, on-site evening activities, and excursions. Please refer to our 'Statement on Supervision and Ratios' via our website <https://elac.co.uk/policies/>

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.

Students will always be supervised, 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 students are in groups of at least 3 and remain together.
- The students 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 students (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 and off site.

Student Absences

The vast majority of Elac students come as part of an organised group. 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, a member of the Elac office team will check for absentees. For activity sessions, Activity Leaders attend the activity meetings which happen morning, afternoon, and evening. Group Leaders are asked in that meeting if all

their students are there. If not, Group Leaders are to go and get the missing students and ensure they are in their activities.

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 students 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 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' via our website <https://elac.co.uk/policies/>. We work closely with our centres to ensure that fire regulations are adhered to and that staff are briefed accordingly.

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. Our Prevent Lead is our DSL, and our DDSL is our Deputy lead; both have received appropriate training.

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 there is a concern, contact the Welfare and Communications Manager in summer, Prevent Lead or Deputy Prevent Lead. 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
4. Group Leader Code of Conduct
5. Homestay Agreement
6. Local Safeguarding Children's Partnerships
7. Prevent Engagement Officers
8. Safeguarding and Teaching Online

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