

# Elac

**STUDY VACATIONS**

## **ELAC Policy Handbook For Summer Staff 2019**

Accredited by the  
 **BRITISH  
COUNCIL**  
for the teaching  
of English in the UK



# **Contents**

## **Elac Study Vacations: About the company**

### **1) Policies relating to Student Welfare**

#### **1.1 Safeguarding Policy, including:**

- Code of Conduct
- Child Protection
- Training
- Safer Recruitment
- Welfare/Implementing Safeguarding
- Abusive Behaviour Policy
- Managing Behaviour and Acceptable Restraint Policy
- Prevent Duty
- Elac Study Vacations: Background
- Student Code of Conduct
- Staff Code of Conduct for Elac Courses
- Group Leaders Code of Conduct for Elac Courses
- Homestay Agreement
- Local Safeguarding Children Boards
- Elac Safeguarding Incident Referral Form
- Prevent Engagement Officers and Coordinators

### **2) Policies relating to Staff**

#### **2.1 Safer Recruitment Policy and Procedure**

#### **2.2 Grievance Procedures**

#### **2.3 Disciplinary Procedures**

#### **2.4 Staff Appraisal**

#### **2.5 Staff Pension Policy**

#### **2.6 Rest Breaks at Work**

#### **2.7 Staff Privacy Notice**

### **3) Policies relating to Elac Course Management**

#### **3.1 Student Enrolment Policy**

#### **3.2 Statement on Teaching Curriculum**

#### **3.3 Supervision Ratios & Arrangements**

#### **3.4 Student Absences**

#### **3.5 Student Discipline**

#### **3.6 Cover Arrangements**

#### **3.7 Policy on Continual Professional Development**

#### **3.8 Resources Policy**

#### **3.9 Emergency Action Plan**

## **4) Statutory Policies**

**4.1 Prevent Policy**

**4.2 Health & Safety at Work (including First Aid)**

**4.3 Equal Opportunities Policy**

**4.4 Whistle blowing Policy**

**4.5 Data Protection Policy – GDPR (to be updated)**

**4.6 Statutory Sick Pay Policy**

**4.7 Student Loan Policy**

**4.8 Statutory Paternity and Maternity Pay Policy (SPP & SMP), Sharing Parental Leave (SPL) and Adoption Leave**

## **5) Appendices**

**- Appendix 1: Grievance Procedure**

**- Appendix 2: Disciplinary Procedure**

**- Appendix 3: Unsatisfactory Performance Procedure**

**- Appendix 4: Statement to the Press**

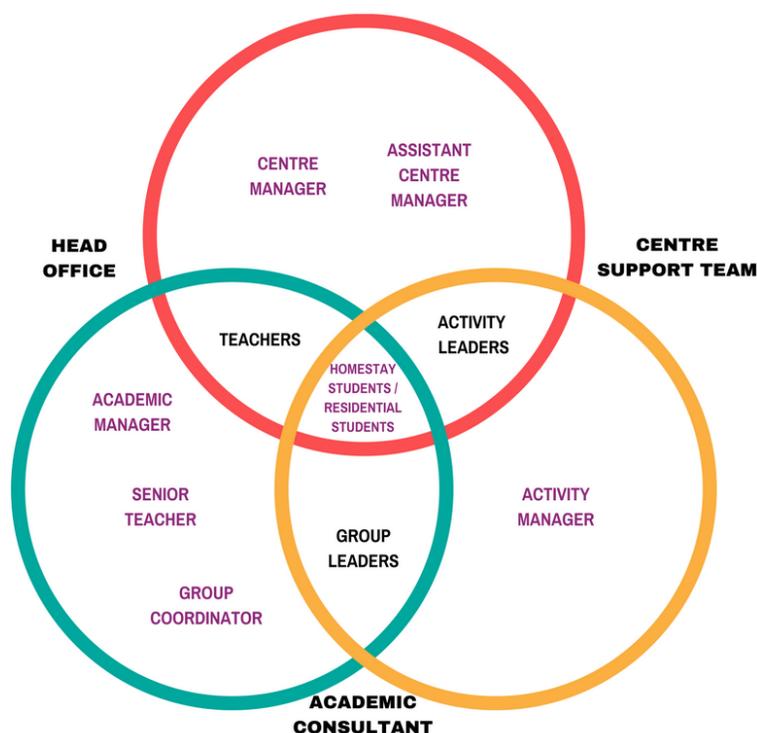
# Elac Study Vacations: Background

Elac is a small organisation compared with others in the EFL world (see organisation chart below), though it is one that has grown gradually and consistently over recent years. In 2019 we will be running five residential centres, one homestay centre and two mixed centres, welcoming over 4000 students between the beginning of July to the middle of August. We also have a Study Centre & Head Office located in Milsom Street, the prestigious main shopping street in the centre of Bath which offers short stay courses throughout the year.

Our Residential centres are: Mayfield School (Mayfield, East Sussex), Nottingham University (Nottingham), Christ's Hospital School (Horsham, West Sussex), Cardiff Metropolitan University (Cardiff, Wales) and Ardingly (Haywards Heath, East Sussex). Our Homestay Cent St Andrew's School (Eastbourne), and our mixed centres are Eastbourne College (Eastbourne, West Sussex) and Bath Spa University (Bath, Avon). Each of these centres has its own particular style and 'feel', but we hope that visitors to a number of our centres would also recognise a shared ethos and many common features. The purpose of this handbook is to try to convey something of those shared values and common practices.

## The Staff Team in Our Summer Centres

The diagram below shows the usual staffing structure in our summer centres. We have presented it in this way for two reasons. The first reason is that the organisation is a connected unity, structured around our first priority, our students. We have only shown the main rings of linked communication amongst our team members, so that the diagram is not too confusing, but imagine lines running from every point to every other point: communication in all direction is vital to the success of the course. The second reason is that this diagram puts the students at the centre of the organisation, rather than at the bottom of a typical top-down structure. It is a reminder of our goal to be student-centred.



# 1) POLICIES RELATING TO STUDENT WELFARE



## **Safeguarding Policy**

(Updated January 2019)

**Designated Welfare Officer and Prevent Lead: Elaine Wickens**  
**and**  
**Designated Deputy Welfare and Prevent Officer: Kera Gustafson**

**Tel. 01225 443261**

**Email: elaine@elac.co.uk**

**Email:kera@elac.co.uk**

### **A) Policy Statement**

Elac Study Vacations is a British Council Accredited provider of English language and activity courses, and 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 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 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).

## **2) POLICIES RELATING TO ELAC STAFF**

### **2.1 Safer Recruitment Policy and Procedure**

Elac Study Vacations is an equal opportunities employer. We operate a recruitment procedure that seeks to find the best employees, including appropriately qualified teachers, irrespective of their age, race, gender, religion, ability or disability. The nature of the summer school work does mean that we will look at the appointments we make in a holistic way: a varied range of strengths and abilities will have an impact in our recruitment decisions. We are also a safer recruitment employer.

There are some exceptions to this approach:

- a) Some of the centres we operate do not have suitable facilities for physically disabled people.
- b) Creating a gender balance in our staff team is an important goal and may affect recruitment decisions in certain centres at certain times.

#### **References**

It is Elac policy to follow up 2 professional references before an appointment is made, one of the references will be the candidate's previous employer. References will be taken either over the phone or in writing and will be followed up. If one or both references cannot be obtained from the details provided, the candidate will be asked to provide new details for other possible referees. In case one or both references cannot be obtained in the end, a clear DBS certificate will be checked, and if appropriate, the employer will accept and sign a document explaining the possible risks of hiring this candidate and the measures taken to ensure the safeguarding of students under 18.

#### **CVs**

Every applicant will provide an up-to-date CV written in English, including returning staff members. All gaps in CVs must be explained satisfactorily.

#### **Proof of Identity and professional qualifications**

Proof of identity will be required in the shape of two different ID documents: one showing the candidate's current address, and another one showing the candidate's picture.

They will also present evidence of their university degrees and teaching qualifications, in the case of teachers. Original copies of these documents will be seen and dated by the Centre Manager where based.

#### **Disclosure and Barring Service – DBS Check**

All new job candidates will be asked to obtain a new DBS Enhanced certificate for the children's workforce prior to the start of their employment, and may also be checked through the DBS children's Barred List if deemed necessary. ELAC Study Vacations will be responsible for the cost of these new DBS certificates.

In the instance when a candidate has been employed by ELAC Study Vacations previously and still holds a DBS certificate issued for the same workforce and similar position within the last three years, and without any recorded convictions or warnings, this certificate will be accepted as valid to work for our company. If any convictions or

warnings non-related to children safeguarding have been recorded on the certificate, the recruitment team will consider employing the candidate on a case-by-case basis.

For any job candidates who have lived outside the UK for longer than 6 months in the last 12 months, or for candidates who are European Economic Area citizens, or nationals from Switzerland, Iceland, Liechtenstein and Norway, they *may be asked* to obtain a Police Check or Certificate of Good Conduct from their country of origin prior to the start of their employment with ELAC Study Vacations, and only if their DBS check has not provided enough information.

There are therefore three occasions when ELAC may decide to employ staff members by completing a risk assessment and supervising the employee closely by a superior DBS checked member of staff:

1. If a new job candidate has not received the new DBS certificate or national Police Check before their employment start date, but two references have been obtained by then.
2. If a job candidate or returning employee have any recorded convictions or warnings on their current DBS certificate and the Head of Recruitment decides to employ the person based on these dates and two satisfactory references.
3. If a candidate holds a clean and current DBS certificate but one or both references haven't been received after asking for other possible referees and several attempts have been tried by HR.

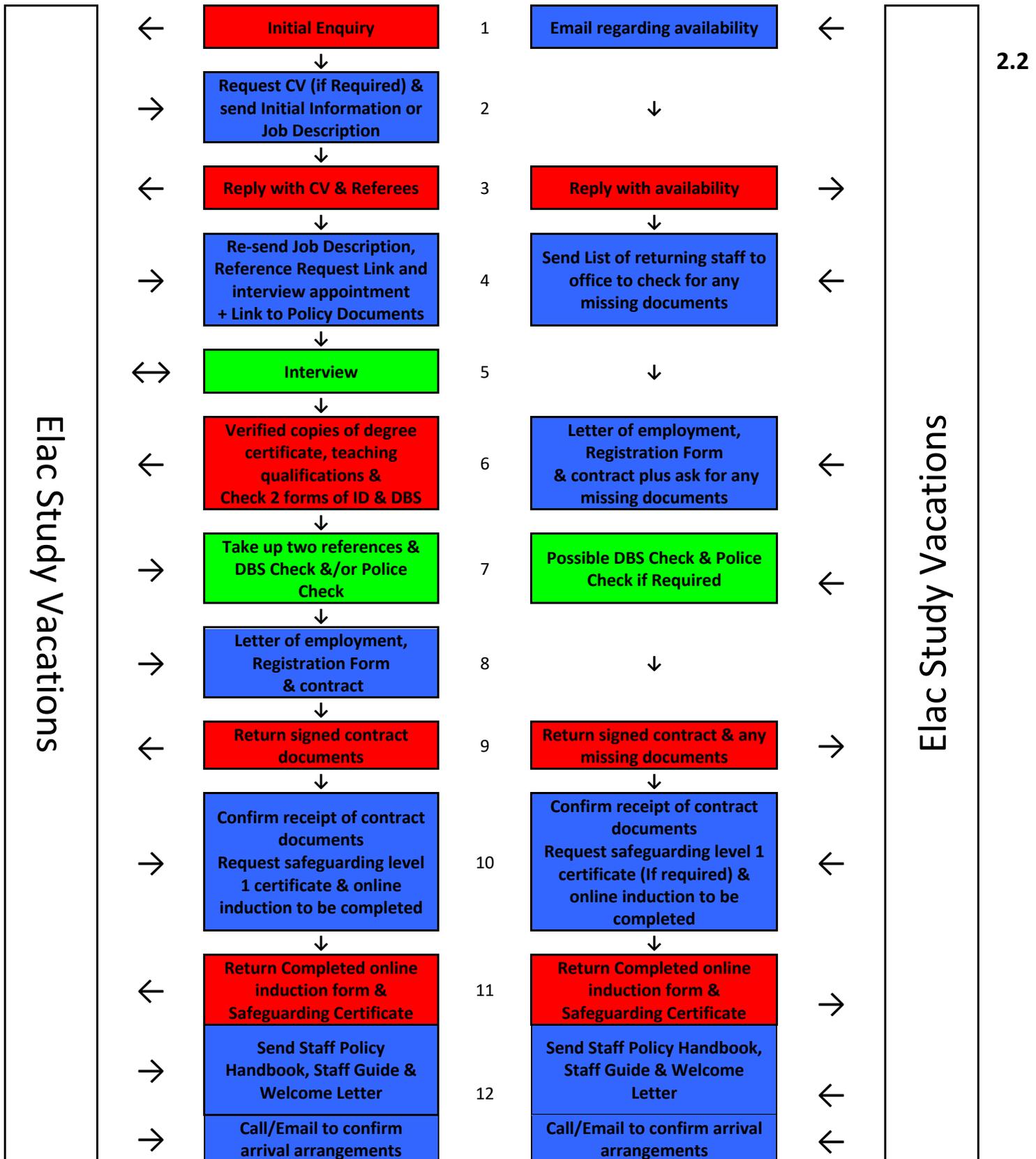
The original DBS certificates will be seen by a Centre Manager or member of the Recruitment or Human Resources team, and its issue date and number will be recorded on the Staff Database lawfully.

All new, returning and permanent staff members are highly encouraged to subscribe to the DBS Update Service (<https://www.gov.uk/dbs-update-service>), which allows individuals to reuse their existing certificate while the employer can check online whether this is still up-to-date. The cost for the Update Service is around £13 per annum and employees who opt for this service will be responsible for paying it yearly.

### **Unsuccessful Candidates**

Elac will give positive and constructive feedback to unsuccessful candidates to help in their search for future employment, when requested.

## SAFER RECRUITMENT FLOW CHART



## **Grievance Procedures**

### **What is a Grievance?**

If you have a concern, problem or complaint about your work, workplace or someone you work with, you might want to take this up with someone in the Elac Management Team. This is called raising a grievance. You might want to raise a grievance about:

- things you are being asked to do as part of your job
- the terms and conditions of your employment contract, for example, your pay
- the way you're being treated at work, for example, if you're not given a promotion when you think you should be
- discrimination at work. For example, you might think your work colleagues are bullying you because you because of your race, age, disability or sexuality.

It may be possible to sort out your complaint by simply talking to someone informally. However, you may want to take out a formal grievance or complaint (see Appendix 1).

### **Informal Procedure**

Often the best way to sort out a problem is to talk to someone informally. You should ask for a meeting with your Centre Manager to explain your concerns. You might find it helpful to suggest what you would like them to do to resolve the problem. If you don't feel you can talk to your Centre Manager, you could speak to someone else within Elac in a position of authority.

Where possible, you should always try and sort the problem out informally first before taking any further action.

### **Formal Procedure**

If you do decide to take out a formal grievance, there is an Elac Procedure to follow. This will involve the following:

Step 1: You must provide a written statement/letter of the grievance to the Centre Manager.

Step 2: The Centre Manager will investigate the issues

Step 3: The Centre Manager will invite you to a meeting, at which you may bring a work colleague, to discuss the grievance.

Step 4: After the meeting, the Centre Manager will write to inform you of the decision and of your right to appeal.

Step 5: You may appeal against the outcome and this must be stated in written form.

Step 6: You together with the Centre Manager will attend an Appeal Meeting (you may bring a colleague).

Step 7: The final step will again provide the outcome of the grievance Appeal Meeting in writing.

## 2.3 Disciplinary Procedures

### When would a Disciplinary Procedure take place?

If we are not happy with your performance in some way, a complaint has been made, or an allegation for a minor misconduct has taken place for example then there are certain Procedures that will take place. No disciplinary penalty will be imposed against an Employee until the matter has been fully investigated. In the event that the complaint is felt to be unjustified, there will be no further action (see Appendix 2).

### Disciplinary Procedures

#### Informal Procedure

Most often a Senior Staff Member will have a private conversation with you to raise our concerns and seek to address them. However in some situations Elac may wish to deal with the situation through a more formal procedure.

#### Formal Procedure

A Formal Disciplinary Procedure will involve the following:

Step 1: You will be notified in writing by the Centre Manager of a meeting to discuss a possible disciplinary point. The note will state what area of performance the Centre Manager is concerned about. The note will also inform you that you are entitled to be accompanied by a colleague.

Step 2: Following the meeting, the Centre Manager will inform you in writing of the outcome and also inform you of your right to Appeal that outcome.

Step 3: There will be a possible further meeting to Appeal the decision which must be requested by you.

Step 4: The Staff Member and the CM will attend an Appeal Meeting. You are entitled to be accompanied by a colleague.

#### Disciplinary Outcomes

In the case of the complaint against a member of staff being upheld there will be a Disciplinary Outcome. There are potentially 4 stages in the disciplinary process:

Stage 1: In cases of complaints of unsatisfactory performance or alleged minor misconduct a **verbal warning** may be given by the Centre Manager. A note will be placed on the Employee's file to this effect.

Stage 2: If further complaints arise, or there are allegations of more serious misconduct a **written warning** may be given by the Centre Manager. A copy shall be placed in the Employee's file.

Stage 3: If further complaints arise or in cases of serious alleged misconduct a **final written warning** will be given by the Summer School Director. A copy shall be placed on the Employee's file.

Step 4: Any further misconduct may lead to dismissal.

In cases of very serious misconduct or very poor performance, the stages of the disciplinary process may follow each other in a short space of time, and some may be omitted.

### **Instant Dismissal**

Any instances of Gross misconduct, such as taking drugs or inappropriate conduct towards children will usually result in instant dismissal.

### **Unsatisfactory performance**

Students have bought a place on our course expecting to benefit from a professional teaching approach, and we have a duty to deliver it. If, however, it comes to our attention, either through feedback from students or through our observation, that your teaching is sub-standard, then we will need to take action according to the disciplinary procedure above. However, we will also seek to assist you to improve by following the steps outlined on Appendix 3, summarised below:

Step 1: The Academic Manager or the Senior Teacher will speak with you about the concerns we have, and will offer support in planning and with suggestions.

Step 2: This will be followed quickly by further lesson observations, and if necessary other interventions (team teaching, an opportunity for you to observe other staff).

Step 3: If there is an improvement, then no further action will be taken, although monitoring may continue. If there is no improvement, then dismissal will follow.

It is important to understand that these steps can follow each other quickly. Owing to the short nature of the course, we would be looking to see improvements by the end of the next day.

Step 4: If there is no improvement then dismissal will follow.

## 2.4 Staff Appraisal

Teaching & Activity staff will be appraised by a member of the Centre Management team Appraiser in the last week of their contract. The appraisal will follow the pattern below:

- Staff will be given a form for them to carry out a self-appraisal ahead of the appraisal meeting
- This self-appraisal form will be handed to the Appraiser before the appraisal meeting.
- The Appraiser will liaise with other members of the Management Team before the meeting to gain an overall view of the staff member's contribution to the course.
- The appraisal meeting will last up to 30 minutes
- The Appraiser and staff member will agree the headings for discussion at the beginning of the meeting.
- During the meeting, the appraiser will make notes in the appraisal template. This will be signed by both the appraiser and appraisee at the end of the meeting, as a record of the discussion.

Members of the Centre Management Team will be appraised by one of the Senior Management Team and the appraisal will follow the same format as above.

## 2.5 Staff Pension Policy

### Elac Study Vacations - Statement of Obligation

Elac Study Vacations will make a retirement provision for all eligible staff by way of a pension scheme. This complies with the current legal requirements.

### Who will receive the new State Pension?

The State Pension scheme introduced in 2016 is for people who reached State Pension age on or after 6 April 2016. You'll be able to claim the new State Pension if you're:

- a man born on or after 6 April 1951
- a woman born on or after 6 April 1953 (i.e., aged 65 for a woman)

### Procedures – summer/temporary staff

Both Elac Study Vacations as an employer and temporary short term staff members together contribute to the **compulsory**, basic State Pension, through National Insurance Contributions. The following payroll elements count as total pensionable pay; gross basic annual salary, sick pay and maternity pay.

The **optional** company Pension scheme is available to all temporary staff who meet the criteria. However, Elac has chosen to postpone enrolment for all short term staff for up to three months. However, for all staff who meet the criteria and choose to enroll for automatic enrolment Elac Study Vacations will also contribute to the pension on your behalf. Elac Study Vacations is not obliged to contribute if an employee earns less than £112 a week.

## 2.6 Rest Breaks at Work

### Who is entitled to a rest break at work?

Employees are entitled to daily and weekly rest breaks, and rest breaks during the course of the working day. Whether you are paid or not for these breaks will depend on what your employment contract says.

### What rest breaks can you take?

#### **Rest breaks during the working day**

If you are aged 18 or over, and your working day is more than 6 hours, you have the right to an uninterrupted rest break of at least 20 minutes unless:

- you are in a particular sort of work, where special rules apply, or
- you are in a particular sort of work which means you have the right to a compensatory rest break.

Your contract of employment may be more generous than this. The law does not say when this break should be taken but government guidelines say that the break should be taken during the day rather than at the beginning or the end. You are entitled to spend your break away from your workstation. Lunch breaks count as rest breaks

#### **Daily rest breaks**

If you are aged 18 or over, you are entitled to 11 hours' rest in a row between each working day.

#### **Weekly rest breaks**

If you are aged 18 or over, you are entitled to take one day's rest in each working week. This may be averaged over a two week period, for example, you would be entitled to two days' rest over a fortnight. A week runs from midnight on Sunday to midnight the following Sunday.

### If you have missed a rest break

If you've missed a rest break to which you are entitled, Elac must make sure that there's no risk to your health and safety.

### Rest breaks for young workers

If you are over school leaving age but under 18, the law says that you cannot usually work more than eight hours per day or more than 40 hours per week. You must have 12 hours rest between each working day and two rest days per week. You are also entitled to a 30 minute rest break if you work for longer than four and a half hours. You cannot usually work between 10pm and 6am.

## 2.7 Staff Privacy Notice

### 1. Data Controller and Data Protection Lead:

When referring to personal data gathered directly from our employees, ELAC Study Vacations will act as the data controller. For any enquiries, data breach notifications or subject access requests (SARs) please contact our Data Protection Lead, Sara Liras on saraliras@elac.co.uk .

### 2. Purposes and legal basis for processing employees' data:

1. It's necessary in order to comply with a legal obligation (HMRC and UK employment law).
2. It's necessary to process the data in order to fulfil a contract.
3. It's necessary to protect the vital interests of the data subject or another person (only in case of an emergency when Safeguarding trumps Data Protection).

### 3. Categories of employees' personal data collected and processed:

- First name and Surname.
- Date of birth.
- Permanent home address.
- Passport number and expiry date.
- Mobile number.
- E-mail address.
- CV.
- University degree certificates and English teaching certificates.
- Tax codes, Student Loan notifications and P45s.
- Bank account details.
- Disclosure and Barring Services certificate's issue dates and numbers or international criminal records police checks.
- Next of kin's name and contact details.
- Professional references and referee's names and contact details.
- Children safeguarding and first aid training certificates.
- Allergies or dietary requirements.
- Medical fitness for work declaration.

### 4. Main recipients or users of employees' personal data:

- Permanent ELAC Study Vacations Head Office employees.
- Summer Centres' employees: centre managers, academic managers, activity managers and same-level colleagues.
- Payroll System: Brightpay
- Her Majesty's Revenue and Customs (HMRC)
- British Council

- Contracted homestay coordinators in Bath and Eastbourne.
- International business partners and clients (our Agents).
- Contracted transport service providers (coach drivers).
- Activity venues' bookings representative.

**5. Data safeguards:**

ELAC Study Vacations keeps its staff data, gathered as the data controller, in UK territory, and within the EU. Staff data will be collected and safely stored on password-protected folders within the company's private computer server, only to be accessed by the directors and the relevant recruitment and human resources personnel.

ELAC Study Vacations carries out regular Privacy Police, CCTV Police and data location and retention period checks for all our partnered summer schools. We ask them to keep any of our staff data within EU territory and for it to be securely disposed of after a maximum period of 28 days.

**6. Employees' data retention period:**

ELAC Study Vacations is under the legal requirement to keep employees' income and tax information for at least 3 tax years. Our decision is to keep employees' income and tax details, together with any other personal data gathered, for a maximum period of 3 tax years, after which the data will be permanently erased from our internal server by professional IT technicians.

This decision is justified by the fact that most of our staff members are seasonal and do not return to work for us ever again, therefore we believe once their employment with us is finished, it is unnecessary, and a bigger threat to their data, to keep their high-risk personal information on our system for any time longer than that stipulated by the current UK law.

**7. Our employees' data rights:**

1. Right to be informed.
2. Right to access.
3. Right to rectification.
4. Right to erasure.
5. Right to restriction of processing.
6. Right to data portability.
7. Right to object.
8. Right not to be subject to a decision based solely on automated processing, including profiling.

Our employees also have the right to withdraw any previously-given consent at any time, and they have the right to lodge a complaint with the ICO (supervisory authority):

Information Commissioner's Office (ICO): <https://ico.org.uk/concerns/>

Telephone: +44(0)3031231113 3

**8. Our employees' statutory and contractual obligations:**

Since the personal data we collect is used for the main purposes of fulfilling a legal requirement and their contracts with us, failing to provide their requested details may result in a contract breach and job dismissal, salary retention or late salary payment, or any other appropriate penalising decisions made by the company Directors if necessary, on a case by case basis.

To read our full Privacy Policy, please go to [www.elac.co.uk](http://www.elac.co.uk) .

## 3) POLICIES RELATING TO COURSE MANAGEMENT

### 3.1 Student Enrolment Policy

In accordance with our Equal Opportunities Policy, we will not discriminate against students wishing to enrol on our courses where we feel we are able to meet any specific needs they have. Some of the centres we operate in are not accessible to wheelchair users and so we might have to offer an alternative centre in such cases. We can accept students with sight or hearing problems, as long as they have a helper who can assist them in class and around the campus. Our courses are accessible for students who have minor learning disabilities and generally function unsupported in mainstream education in their own country; however, if they require more individual or specialised attention, then our courses would not be suitable as our staff are not trained in Special Needs provision.

Students enrolling on Elac Summer courses need to have had some language training prior to attending our course, as we cannot cater for students at A0 (Beginner Level). Classes will start from A1 Level.

### 3.2 Statement on Teaching Curriculum

Elac summer language courses typically offer 15 hours of classroom tuition per week in classes of a maximum size of 15 students. Students are in the age range 12 – 17 (though in some circumstances we will accept a small number of students outside this age range, if they are travelling as part of a group). Classes are usually multi-lingual and involve students from Europe, the Middle East, Asia and South America.

The aims of the summer programme are:

- 1) Acquisition of new skills and language items
- 2) Consolidation of previous learning
- 3) Activation of productive (especially oral) abilities

In addition to these specific language goals, we recognise that we have an overarching responsibility to foster international understanding and harmony through education.

All students on our programmes are tested on arrival and placed in suitable classes based on their language ability and other factors such as age and nationality. High levels of commitment and discipline are expected from our students, and attendance is mandatory, with any absence being immediately followed up. Students are expected to keep a folder of work covered as well as completing several tasks in the student workbook: prizes are given for the best examples. Students are encouraged to make the most of the language-rich environment in order to foster their learner-independence and advice is given on internet-based resources for those keen to work independently.

Teachers employed by Elac have a minimum of TEFLi qualifications, or where they don't there are compelling reasons why we have chosen to employ them. The staff are provided with a framework syllabus and example weekly programmes and are guided by our academic management team to put together a weekly programme of study for their classes. This involves a certain number of pre-prepared lessons. The programmes are overseen by our Academic Manager or Senior Teacher, and the performance of the teachers in delivering these programmes is monitored through observation and feedback.

### **3.3 - Student 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 no more than 1:25. 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 no more than 1:15. If there are students under 12 in the group, then the ratio will be 1:10. 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 students 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;

Students who are 10 years old will remain with an adult throughout the excursion.

Elac staff and Group Leaders share responsibility on the excursion. The Elac staff members have the overall responsibility for the safety of the students 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.

### **3.4 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.

### **3.5 Student Discipline**

Our students are here to work constructively and in doing so, have a great time. The maintenance of discipline is an essential element in achieving these two aims. We must be sensitive yet firm, and instil in our students a sense

of responsibility towards themselves and others. A “quiet word” is always preferable, but if this falls on deaf ears then further action will be required.

Elac reserves the right to ask students who do not abide by our Student Code of Conduct to leave the course and return home. The cost of the student returning will be borne by the student or the student’s family. In cases of minor or repeated misbehaviour, we will attempt to address the unacceptable behaviour through informal conversations, and - if time permits - more formal meetings with agreed conditions, sanctions and deadlines. The student will have the opportunity to bring a friend or a Group Leader to this meeting for support.

In cases of serious bad behaviour or illegal activity the student will automatically forfeit their right to remain on the course and Elac will decide whether to ask the student to leave immediately or whether to continue through a process of remediation.

### 3.6 Cover Arrangements

We have a duty to provide the students on our courses with the lessons that they have booked, and we hope that our teachers will show flexibility in helping us to fulfil these obligations when a colleague is absent.

In the event of cover being required, we would first of all ask a teacher who is free to take the class. If the teacher has not yet taught their full quota of lessons for that week, then we would ask them to teach the class on a substitution basis, and if necessary we would free them up from further teaching later in the week, or else pay the cover teaching at our individual lesson rate.

If we needed to ask a teacher who had already taught their full quota of lessons in that week, then we would pay the cover at the individual lesson rate. We would respect the wishes of the teacher, if they preferred not to take on the extra work. However, we must repeat that flexibility and collegiality are important features of a successful school.

In the event of another teacher not being able to cover the lesson, we would ask the Academic Manager or Senior teacher to cover the class.

In circumstances where several teachers are unavailable, the Academic Manager (AM) would implement short term emergencies measures, including involving activity staff in monitoring and supervising activities set up and co-ordinated by the Academic Manager.

### 3.7 Policy on Continual Professional Development

Most staff are only employed with Elac Study Vacations for 4 – 6 weeks. Therefore the CPD opportunities that we can offer are limited to some extent. Nonetheless, we hope that all staff who work with us will leave enriched by the experience and better equipped for their next post.

What we do:

- A. **Teacher Support.** Elac employs a full-time Academic Consultant in the summer months, a major part of whose job description is to provide formal and informal opportunities for teachers, especially less experienced teachers, to seek help and advice and encouragement. These opportunities with the Academic Consultant will be at certain fixed times, i.e. around the initial staff briefing, or following the lesson observation. The Academic Manager/Senior Teacher on the other hand will be much more readily available.

They will publicise times when they will be available in the staff room for assistance in lesson planning or to discuss aspects of classroom management.

- B. **Teaching input.** The teachers will have a fair degree of autonomy, working with our materials and towards our goals, to use the range of their expertise. However, the Senior Teacher will also guide the teaching staff through a series of brief prompts, 'Thoughts for the Day', that will act as a checklist for teachers to help them to ensure that their teaching is covering the full breadth of the language work. They will also discuss their weekly teaching plan on a 1:1 basis with the AM/Senior Teacher.
- C. **Observed Lessons.** All new teachers and most returning teachers will be observed teaching a full lesson at least once during their contract. The observer will be either the Academic Consultant or the AM in the centre. The purpose of the observation is to inform ourselves about our students and about our teachers, and to gauge the effectiveness of our curriculum and its implementation. The observer will meet with the teacher afterwards to give verbal feedback and will also follow-up with written feedback. The aim of the feedback is to recognise successes in the lesson and point up ways of developing and improving.
- D. **Appraisal.** At the end of your contract teachers will have an appraisal meeting with the AM to discuss how they have managed the course, to give an opportunity to offer feedback, and to map a way forward, inside and outside Elac.
- E. **Teacher Development Sessions.** The Academic Consultant will run a series of workshops over the summer that focus on practical teaching advice. These workshops will be held on an evening and attendance at least one workshop is compulsory for teachers.
- F. **Key Staff Meetings.** Each year, we get as many of our managers as possible together for a weekend prior to the start of the courses. This is an opportunity for us to discuss programmes, and materials, and also share experience.
- G. **Development with Elac.** As an organisation we have grown steadily over the last few years, and have done so successfully by offering opportunities to our staff to take on new roles within our centres, as Senior Teachers, Assistant Centre Managers, Activity Managers and even Centre Managers. We have also given help in the form of loans and grants to staff who are interested in taking further courses, especially the Cambridge Delta. The Academic Consultant is also happy to offer advice and guidance to staff embarking on these courses.

### 3.8 Resources Policy

Elac Study Vacations provides a range of teaching materials which are used during our summer programmes. These materials include published English as a Foreign Language (EFL) course books and additional materials, lesson plans linked to Elac centres, excursions, and activities, as well as an Elac work book which is given to all students during the summer programme.

No specific course book is set for the teaching groups, nor is there an individual EFL course book given to each individual student in the group. Instead, teachers make an informed choice, based on the proficiency level, ages, interests, and needs of the groups of students, from the range of materials provided in the centre. They can then plan appropriate lessons using a variety of different materials.

Each year, Elac teaching resources are reviewed; new resources may be added, older resources removed, and Elac materials changed. These decisions are based on staff and student feedback, and whether the publications may be viewed as out-dated.

We feel that allowing teachers a degree of autonomy in the choice of teaching material within our framework, is essential in order to fully benefit from their individual creativity and personalities. However, we recognise that some of our teachers are relatively inexperienced and it is therefore essential to provide a level of support and continuing professional development (CPD).

**Elac seeks to help teachers use the available resources and choose appropriate materials by:**

- providing a 'Teacher Material Guide' which links appropriate topics and language for a particular proficiency language level to a specific page of the course books and additional materials.
- providing a syllabus with sample weekly plans for each proficiency level.
- providing lesson plans, appropriate for different proficiency levels, to accompany the Elac workbook. These are available at the centre, and via the Elac teaching website [www.eleducation.com](http://www.eleducation.com).
- providing lesson plans, appropriate for different proficiency levels, linked to centres, excursions and activities. These are available at the centre, and via the Elac teaching website [www.eleducation.com](http://www.eleducation.com).
- running a workshop on the induction day to help new teachers to Elac familiarise themselves with the Elac teaching resources.

**Examples of some of the resources available at centres:**

Published General English EFL student and teacher books, and accompanying CDs or DVD:

Clockwise Series, Oxford University Press.  
Language to Go Series, Longman.  
English in Mind Series, Cambridge University Press.  
English Result Series, Oxford University Press.  
(New) English File Series, Oxford University Press.  
New Inspiration Series, Macmillan Education.  
Speak Out Series, Pearson Longman.

Other published EFL resources:

Communication Games, Nelson.  
Discussions A-Z, Cambridge University Press.  
A Way with Words, Cambridge University Press.  
Inside Out Resource Pack, Macmillan Education.  
Reward Resource Pack, Macmillan Education.  
Play Games with English, Macmillan Education.

### 3.9 Emergency Action Plan

The Elac Emergency Action Plan is intended to assist agents, students, parents and staff to understand our procedure during an emergency situation, especially if there are any injuries or a centre is closed due to extenuating circumstances, such as disasters, either natural (e.g. hurricane), or man-made (e.g. terrorism). Please note that this procedure is intended as a guideline only, as every situation is different and may require a different response.

#### Responsibilities of Key staff

##### Centre Manager/Assistant Centre Manager:

- To coordinate emergency response and liaise closely with other key staff members.
- To inform and update Elac Head Office as the situation develops.
- To ensure at all times that they maintain a record of contact phone numbers and email addresses of all HQ administrative staff and management to contact in the event of the emergency. (This information should be kept in The Centre Manager's File and The Duty Manager's File).
- To maintain a list of all centre staff contact details.
- To contact all current students and update them on the nature of the emergency and how it affects the school including whether we are running classes and whether the building is safe to use and accessible.
- To pass on to the Directors emergency contact information of any students who are unaccounted for.

##### Academic Manager/Activity Manager:

- To contact all academic/Activity staff and instruct them accordingly, considering such issues as when or if to return to work and whether the centre buildings are safe to use and accessible.
- To liaise with Student Welfare Officer to establish the well-being of existing students.

##### Directors:

- To contact agents, and wherever possible the students' families and/or prospective students who may be affected by the emergency and keep them informed about our response and the well-being of their students.
- To contact agents or emergency contacts of students who remain unaccounted for.

##### Accommodation – Homestay Co-Ordinator/Assistant Centre Manager:

- To contact and update host families and residences about the emergency and the way we are dealing with it.
- To liaise with Centre Manager to establish the well-being of existing students.
- To advise on whether and when it is safe to return to the school for classes.

##### Head office

- To update group website with a special notice on the homepage providing information or contact details in event of emergency.
- To provide email and telephone responses with an update on the latest information we have.
- To liaise with local centre management to ensure we have the latest information.

## **Information for Staff**

All efforts will be made to keep staff updated on the status of the emergency and staff should check emails regularly for the latest information. Where there is a breakdown in communication staff should follow official advice on TV and radio as to whether or not it is safe to travel. At all times, staff should exercise discretion and not travel if they feel it is unsafe to do so.

### **Contacting Existing Students, Their Agents, and Their Emergency Contacts**

Our students are typically far from home and Elac has a duty of care to keep their families fully informed about their welfare. Therefore, it is essential that accurate information about the emergency, and those affected, is passed on to agents and/or emergency contacts at the very earliest opportunity. Those contacted will need to know the nature of the emergency, how the students are affected, if the school is open or when to expect the school to reopen, and how to contact the school.

### **Additional Measures**

Statement to the press: see Appendix 4.

### **Publicity**

The Centre Manager will keep Head Office updated and messages will be posted on the Elac website, Facebook and Twitter page. Head Office may also take additional steps as necessary to inform/contact students and their agents.

### **Important Note**

In the event of an emergency, the Centre Director/Principal and other key staff members are able to access the CLASS database remotely to access student information. However, the effective implementation of this procedure requires up-to-date information on students and staff. Therefore it is vital that details of current students are checked carefully following intake of new students.

## 4) POLICIES RELATING TO STATUTORY LAW

### 4.1 Prevent Policy

<b>No.</b>	<b>Policy</b>	<b>Involving</b>
1	<p><b>Statement</b></p> <p>Elac understands its responsibilities under the Counter Terrorism &amp; Security Act 2015 to reduce the likelihood of people of all ages being radicalised or drawn into terrorism and seeks to meet its obligations in the ways shown below, after setting the context.</p>	Everyone
2	<p><b>Context</b></p> <ul style="list-style-type: none"> <li>- Elac accepts students aged from 9 throughout the year and from many different countries around the world. Children under 18 are accepted in up to 9 Summer Centres as well as various short term courses throughout the year.</li> <li>- In our busiest weeks we may have 700 students, 100 staff and work with 200 homestay providers.</li> <li>- The schools have always promoted a multi</li> <li>- Cultural environment where respect for and tolerance of others beliefs is required.</li> <li>- The group of schools is located in seven urban or suburban areas of Bath, Brighton, Cardiff, Eastbourne, Horsham, Nottingham and Mayfield.</li> </ul>	
3	<p><b>Strong Leadership - Responsibility for ensuring Prevent Duty is met by the Centre Manager of each specific school</b></p> <ul style="list-style-type: none"> <li>- Responsibility for the Prevent risk assessment/action plan (see point 4 below) and policy lies with Elaine Wickens (Lead), who is also the Designated Welfare Officer, and Kera Gustafson (second) along with the Centre Manager of each specific school.</li> <li>- Their duties are to ensure delivery of an effective risk assessment/action plan and policy as outlined here.</li> </ul>	Lead person, Second and Centre Managers
4	<p><b>Risk Assessment of current situation and Action Plan for future</b></p> <ul style="list-style-type: none"> <li>- A risk assessment/action plan has been produced showing what is already being done and what still needs to be done; it will be reviewed and updated at least annually.</li> </ul>	Lead person
5	<p><b>Working with local partners</b></p> <ul style="list-style-type: none"> <li>- Contact has been made with the local police/local authority Prevent coordinator to understand their role and the support available, (e.g. via the Channel process)</li> <li>Our main contact is Salam Arabi-Katbi, South West Prevent Co-ordinator</li> <li>- We also have a list of Prevent Engagement officers local to our centres.</li> </ul> <p>Please see Safeguarding Policy for contact details.</p>	Lead person
6	<p><b>Understanding terminology</b></p> <ul style="list-style-type: none"> <li>- <b>Radicalisation:</b> act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.</li> <li>- <b>Extremism *:</b> holding extreme political or religious views which may deny right to any group or individual. Can be expressed in vocal or active opposition to</li> <li>- <b>Core British values:</b> including (i) democracy, (ii) the rule of law, (iii) individual liberty (iv) respectful tolerance of different faiths or beliefs.</li> </ul> <p>* <b>NB: extremism</b> can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as any religious extremism.</p>	To be explained to staff, students, homestays, group leaders & any other adults
7	<p><b>Understanding risk of extremism</b></p> <ul style="list-style-type: none"> <li>- Staff, students &amp; other adults (group leaders, homestays etc.) may arrive at school already holding extremist views</li> <li>- Or, whilst part of the school, they may be influenced by a range of factors: global events, peer pressure, media, family views, and extremist materials via hardcopy or online, inspirational speakers, friends or relatives being harmed, social networks.</li> <li>- People who are vulnerable are more likely to be influenced.</li> </ul>	To be transmitted to staff at training sessions/online training

	<ul style="list-style-type: none"> <li>- Their vulnerability could stem from a range of causes: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, and victim of hate crime or discrimination, bereavement.</li> </ul>	
8	<p><b>Ways to counteract risks</b></p> <ul style="list-style-type: none"> <li>- Elac will promote a safe and supportive international environment via clear expectations of accepted behaviours and those, including extremism that will not be tolerated.</li> <li>- We will exemplify core British values through documents given to students, notices around school, via stand-alone classes on British culture &amp; traditions on arrival and via curriculum. Our approach is to educate that this is how things are in UK, which may be different to the student's country.</li> <li>- Where possible, we will develop critical awareness and thought to counter accepting extremism without question, especially of online material.</li> <li>- We will challenge radical or extremist views in any context (formal or informal) via stated procedures. In most situations this would require an immediate response, referring to international environment of school, and tolerance expected, then reporting concerns (see section 10).</li> <li>- We will be ready to react when world or local events (e.g. Paris attacks) cause upset and the likelihood of conflicting feelings are expressed. The Prevent lead will take the initiative in these situations.</li> <li>- Elac will have (strong) filters on IT equipment and clear rules on accessing extremist / terrorist websites / uses of social networks to exchange extremist / terrorist views.</li> <li>- Elac will ensure that extremist speakers do not use premises to distribute material or expound views; and have a system for vetting any visiting speakers / presenters.</li> <li>- Elac staff and homestays will get to know students, their home circumstances and friendship groups. Through knowing students well, it is easier to spot changes in behaviour.</li> <li>- Staff and homestays will be observant and vigilant in noticing any signs of radical or extremist behaviour.</li> <li>- Welfare and all staff and homestays to work hard supporting any students identified as vulnerable.</li> </ul>	Lead person to ensure (a) training for all staff, students, homestays, group leaders, subcontractors so that (b) delivery is effective
9	<p><b>Training</b></p> <ul style="list-style-type: none"> <li>- Online, documents &amp; face to face training will ensure staff understand this policy, i.e. <ul style="list-style-type: none"> <li>i) understand context and expectations of Prevent</li> <li>ii) their duty to implement the policy</li> <li>iii) understand terminology and risks associated with radicalisation and extremism</li> <li>iv) how to identify and support vulnerable students</li> <li>v) ways the school will counteract the risks,</li> <li>vi) signs to notice that may cause concern</li> <li>vii) know the lead Prevent person and procedures for communicating concerns</li> <li>viii) know the importance of their own behaviour and professionalism in (a) being exemplars of British values and (b) not expounding their personal views to students on sensitive matters (Code of Conduct)</li> </ul> </li> <li>- Materials are provided to homestays to ensure that they understand the sections of the policy they need to be aware of.</li> <li>- Students and group leaders must be made aware of key parts of the policy <ul style="list-style-type: none"> <li>a) understanding terminology</li> <li>b) importance of maintaining a supportive and tolerant society within school</li> <li>c) what core British values are and why they are considered important</li> <li>d) any changes to school rules, particularly those regarding IT</li> <li>e) that they must report any concerns / incidents and procedure for that (d) group leaders (e) subcontractors</li> </ul> </li> </ul>	Lead person to prepare materials to suit each group being trained; (a) all staff (including cleaners etc.) (b) students (c) homestays (d) group leaders (e) subcontractors
10	<p><b>Signs that may cause concern</b></p> <ul style="list-style-type: none"> <li>- Students talking about exposure to extremist materials or views outside school</li> <li>- Changes in behaviour, e.g. becoming isolated</li> <li>- Fall in standard of work, poor attendance, disengagement</li> <li>- Changes in attitude, e.g. intolerant of differences / having closed mind</li> <li>- Asking questions about certain topics (e.g. connected to extremism)</li> <li>- Offering opinions that appear to have come from extremist ideologies</li> <li>- Attempts to impose own views / beliefs on others</li> <li>- Use of extremist vocabulary to exclude others or incite violence</li> <li>- Accessing extremist material online or via social network sites</li> </ul>	Lead person to ensure all other adults are aware of signs

	<ul style="list-style-type: none"> <li>- Drawings or posters (e.g. in accommodation) showing extremist ideology / views / symbols</li> <li>- Students voicing concerns about anyone</li> </ul> <p><b>NB: Any concerns relating to a person under 18 are safeguarding issues and should be dealt with by safeguarding staff and, where necessary, the LSCB contacted</b></p>	
11	<p><b>How and when to react to concerns</b></p> <ul style="list-style-type: none"> <li>- Everyone given name of who to contact (Prevent Lead), how to contact them (email, phone etc.) and contact details</li> <li>- Confidentiality assured for the person reporting a concern</li> <li>- Everyone told to report any concern or incident, however small.</li> <li>- Reassurance that all will be dealt with sensitively and carefully</li> </ul>	Lead person to ensure everyone has info.
12	<b>Policy preparation and review</b>	Lead person(s)
	Policy prepared by Elaine Wickens in 2016 after consultation with staff and associated outside agencies. Policy reviewed in January 2017 by Sara Liras.	

## 4.2 Health & Safety at Work (including First Aid)

### Policy Statement:

1. Elac Study Vacations believes that one of its most important functions is the prevention of accidents and ill health. We do not wish any of our employees or any other person to suffer as the result of our activities or work processes. To this end, we intend to comply rigorously with all Health and Safety legislation, Codes of Practice, best guidance and work methods available, in accordance with the Health and Safety at Work Act 1974.
2. Risk Assessments we have prepared indicate the ways in which we intend to meet with legal requirements.
3. Legislation requires that, as an employer, we prepare a statement of General Policy with respect to the Health and Safety of our employees together with details of the organisation and arrangements that we have set up to carry out that policy.
4. Therefore, we provide, as far as is reasonably practicable:
  - provide adequate control of the health and safety risks arising from our work activities;
  - consult with our employees on matters affecting their health and safety;
  - provide and maintain safe equipment;
  - ensure safe handling and use of substances;
  - provide information, instruction and supervision for employees;
  - ensure all employees are competent to do their tasks, and to give them adequate training;
  - prevent accidents and cases of work-related ill health;
  - maintain safe and healthy working conditions; and
  - review and revise this policy as necessary at regular intervals.

5. We also ensure, so far as is reasonably practicable, that the way we carry out our work does not affect the Health and Safety of persons who are not our employees.
6. We remind you, our employees, of our duty to look after your own Health and Safety to ensure that you do not endanger others and that you must co-operate with us, as your employer, in meeting our legal obligations.

## **Health & Safety Policy Procedure**

### **Responsibilities:**

The overall and final responsibility for health and safety rests with the Directors of Elac Study Vacations.

### **Employees' Responsibility**

It is the duty of all employees to take all reasonable care for the health and safety of themselves, colleagues and students. They must also co-operate with senior members of staff and other employees in fulfilling our objectives and statutory duties by:

- Familiarising themselves with the Health and Safety Policy and the practices appropriate to their place of work.
- Co-operate with their line managers and the Centre Manager on health and safety matters.
- Not interfere or remove anything that has been provided to safeguard their health and safety.
- Report all health and safety concerns to the Centre Manager or to Elac Head Office.

### **Students' Responsibility**

It is the responsibility of our students to cooperate with the staff and management of the school to achieve a safe learning and working environment and to take reasonable care of themselves and others.

- If a student notices a health and safety problem they should inform the Centre Manager.

### **Risk Assessments**

Risk Assessments are carried out by Elac Study Vacations and are located in ***Centre Welfare Folder***.

Any actions required to remove or control the identified risk are agreed by Elac Study Vacations Directors and should be implemented in a timely manner.

Risk assessments are reviewed annually or when the work activity or work location changes whichever is soonest. If any machinery, equipment or substance could potentially harm anyone on the premises, a risk assessment will be carried out and clear procedures laid down for the use of the item. The manufacturer's guidance should be followed at all times. All potential hazards should be brought to the attention of anyone who may come into contact with them.

All employees are responsible for highlighting and solving potential health and safety risks. If anyone spots anything that they believe poses a risk to an employee or student they must contact the Centre Manager or Elac Head Office as soon as possible.

## **Accidents, Incidents and First Aid**

### **First Aid Policy/Procedures**

#### **Aims**

It is Elac Study Vacations policy to ensure that the School has adequate, safe and effective First Aid provision in order for every student, member of staff and visitor to be well looked after in the event of any illness, accident or injury, no matter how major or minor. This policy complies with the Health and Safety (First Aid) Regulations 1981.

It is our policy to have at least 2/3 trained first aiders in our summer schools and 2 trained first aiders in the Elac Study Centre. Legally there is no set limit for the number of first aiders that are required but based on the nature and size of the school, the level of risk present in the school, we aim to have at least one first aider present at all times in each school building allowing us to fulfil our First Aid policy.

All staff should read and be aware of this policy, know who to contact in the event of any illness, accident or injury and ensure this policy is followed in relation to the administration of First Aid.

All staff will use their best endeavours, at all times, to secure the welfare of the students.

Qualified First Aiders are able to recognise and manage any immediately life-threatening conditions. If the First Aider feels that further medical assistance is required, they will arrange for an ambulance to be called. All first aiders have attended an approved first aid course and undertake refresher courses, when required.

#### **Review**

This policy is reviewed on an annual basis or as when necessary.

#### **First Aid Boxes**

Each First Aid Box is kept in the Centre Office and Elac Head Office. For the larger centres there are additional First Aid Holdalls that can be taken onto the sports field. All First Aid Boxes are stocked according to BS8599-1. On the inside of the First Aid boxes there is a contents sheet.

The boxes are fully stocked prior to the start of the Elac Summer Centre. All qualified First Aiders are responsible for replenishing the First Aid boxes and ensuring that it contains all necessary equipment.

All new staff are provided with information at induction on how to obtain first aid assistance and who the qualified first aiders are. First aid notices naming the qualified first aiders are on display in the Centre Office.

#### **Giving First Aid**

Nothing in this policy should affect the ability of any person to contact the emergency services in the event of a medical emergency. For the avoidance of doubt, staff should dial 999 for the emergency services in the event of a medical emergency before implementing the terms of this policy.

If someone is injured, becomes unwell and needs help, the nearest first aider should be contacted, and asked to attend. The first aider will assess the situation, provide help, request assistance from other first aiders if necessary, and stay with the casualty until they are recovered or make arrangements for further medical assistance if they deem this necessary.

In the rare case that no first aiders are available, the casualty will be assisted in getting to the nearest hospital A&E department. If in any doubt always seek medical advice.

### **Procedure in the event of illness**

#### ***Teachers: What to do if a student is unwell***

If a student is unwell and is unable to attend class, you will be informed during the morning meeting for teachers (if we have the information at that time), or when an ELAC staff member comes to your class to check that all students are present.

If a student feels unwell during the lesson, the teacher should consult a member of the Elac office staff immediately. ***Please refer to your Teacher Folder – What to do if a student is unwell.***

#### ***Activity Leaders: What to do if a student is unwell***

If a student feels unwell during an activity session, the leader should contact a member of the Elac office staff immediately. ***Please refer to the Activity Leader Clipboard – What to do if a student is unwell***

**All Local Medical Facilities are listed in the Welfare Folder and Night Duty Folder for each Elac Summer Centre and the Elac Study Centre.**

### **Procedure in the event of an accident or injury**

If an accident occurs, then the member of staff in charge should be consulted. That person will assess the situation and decide on the next course of action, which may involve calling immediately for an ambulance. First Aiders will also be called for.

In the event that the First Aider does not consider that they can adequately deal with the presenting condition by the administration of First Aid, then they should arrange for the injured person to access appropriate medical treatment without delay. The First Aider should refer to the ***Decision Making Matrix in the front of the red Incident/Accident Log.***

**Ambulances:** If an ambulance is called then the First Aider in charge should make arrangements for the ambulance to have access to the accident site. Arrangements should be made to ensure that any students is accompanied in the ambulance if necessary, or followed to the hospital, by a member of staff while the school tries to contact the designated emergency contact person.

When appropriate or if asked to by the casualty, we will contact their next of kin. Emergency contacts for students are recorded in the Centre Welfare Folder or a staff member in the Staff Document Folder in Centre Office or Elac Study Centre Head Office.

**Please see the individual Welfare/Night Duty Folder for details of “What to do if a student is ill”. This gives details of all local Accident and Emergency hospitals.**

### **First aid offsite**

Offsite: When students travel offsite for organised activities, they will be accompanied by a member of staff who will take first aid equipment from the Reception. Any incident of first aid treatment must be reported and entered into the Incident/Accident log on return to the school.

### **Information on students**

The Centre Manager will be responsible for reviewing students' confidential medical records and providing essential medical information regarding allergies, recent accidents or illnesses, or other medical conditions which may affect a student's functioning to First Aiders on a "need to know" basis. This information should be kept confidential but may be disclosed to the relevant professionals if it is necessary to safeguard or promote the welfare of a student or other members of the School.

### **Procedure in the event of contact with blood or other bodily fluids**

Elac Study Vacations provides single use spill kits for clearing up bodily fluids. However the following precautions should be carried out to avoid the risk of infection:

1. Cover any cuts and grazes on their own skin with a waterproof dressing;
2. Wear suitable disposable gloves when dealing with blood or other bodily fluids;
3. Use suitable eye protection and a disposable apron where splashing may occur;
4. Use devices such as face shields, where appropriate, when giving mouth to mouth resuscitation;
5. Wash hands after every procedure.

If the First Aider suspects that they or any other person may have been contaminated with blood and other bodily fluids which are not their own, the following actions should be taken without delay:

1. Wash splashes off skin with soap and running water;
2. Wash splashes out of eyes with tap water or an eye wash bottle;
3. Wash splashes out of nose or mouth with tap water, taking care not to swallow the water;

### **Reporting Accidents and Illness**

The First Aider should complete a record of first aid provision in the Incident/Accident Log.

All injuries, accidents and illnesses, however minor, must be reported to the Centre Manager and they are responsible for ensuring that the incident/accident logs are filled in correctly and that parents and HSE are kept informed as necessary. What happened to the injured or ill person immediately afterwards should also be recorded.

### **Incident/Accident report form**

The First Aider will fill in an accident report form for every accident/illness that occurs on or off the school site if in connection with the school. All incidents must be logged in the incident/accident report form, which is located in Centre Office. The following details must be logged: the name of the injured person, the type of injury, when the injury occurred and how, the name of the person in charge at the time of the injury and the treatment given. This will be kept confidentially by Elac Head Office. Records should be stored for at least three years or if the person injured is a minor (under 18), until they are 21.

## **Reporting to Parents**

In the event of accident or injury parents must be informed as soon as practicable (for students under the age of 18). The member of staff in charge at the time will decide how and when this information should be communicated, in consultation with the Centre Manager.

Emergency contacts for students are recorded in the Centre Welfare Folder or a staff member in the Staff Document Folder in Centre Office or Elac Study Centre Head Office.

## **Reporting to the Health and Safety Executive**

The School is legally required under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) please see [www.hse.gov.uk/report/report/report.htm#online](http://www.hse.gov.uk/report/report/report.htm#online). Fatal and specified injuries can be reported on 0845 300 9923 (Monday to Friday 8.30am and 5pm).

## **Specified injuries to workers**

The list of specified injuries in RIDDOR 2013 (regulation 4) includes:

- A fracture, other than to fingers, thumbs and toes;
- Amputation of an arm, hand, finger, thumb, leg, foot or toe;
- Permanent loss of sight or reduction of sight;
- Crush injuries leading to internal organ damage;
- Serious burns (covering more than 10% of the body, or damaging the eyes, respiratory system or other vital organs);
- Scalpings (separation of skin from the head) which require hospital treatment;
- Unconsciousness caused by head injury or asphyxia;
- Any other injury arising from working in an enclosed space, which leads to hypothermia, heat-induced illness or requires resuscitation or admittance to hospital for more than 24 hours.

## **General Fire Safety**

### **Procedures**

All Elac classrooms and public areas have clear notices describing the correct action to take in the event of a fire. Site plans, floor plans and fire evacuation procedures for each Summer Centre are held within the Night Duty Folder

In the event of a fire, the fire alarm must be sounded and the fire brigade called. The Centre Manager and Assistant Centre Manager will assume the role of Fire Marshall in the Elac Summer Centres at this time if the designated Fire Officer is absent. The premises must be evacuated as quickly as possible via the pre-planned escape routes. Teachers are responsible for their own students, and should escort all students as quickly as possible to the designated assembly point. Once safely outside, the teacher of each class must check the register to ensure all students have been evacuated. The teachers must report their findings to the Fire Officer.

The Fire Marshall is responsible for checking that all staff are present and safe. The Fire Marshall is also responsible for noting that all areas of the building are clear following reports by designated members of staff.

## **Fire Escape Routes**

Access to escape routes should be kept clear and unobstructed at all times. All staff are responsible for maintaining escape routes and reporting any defects or obstructions.

## **Raising the Alarm**

If you should discover a fire – please take the following action. This should be discussed with staff/students and leaders at the Welcome talk:

- If a student discovers a fire he or she should raise the alarm and alert the nearest member of staff he alarm by operating the nearest fire alarm, and follow the procedures outlined below.
- If you should discover a fire raise the alarm immediately by operating the nearest fire alarm call point and by shouting, 'FIRE'.
- Call the Fire Brigade by dialling 999.
- Only if it is safe to do so and you are not putting yourself at risk and keeping your exit clear use a fire extinguisher.

## **Evacuation Procedure**

### **On Hearing the Alarm:**

Leave the building immediately.

- Do not stop to collect personal possessions.
- Walk do not run.
- Exit the building silently.
- If you are the last to leave a room, close all windows and doors behind you.

Teachers in charge of classrooms will ensure:

- That the students remain in his/her presence during the evacuation and assembly.
- That their areas are cleared of staff and students. They will also check the toilet areas on the floor that they are teaching.
- Ensure that they have the class registers.
- All staff will usher students out of the building and assemble at the muster point.
- A roll call will be then be taken.

## **Routes of Escape**

If the fire alarm sounds, all staff and students should leave the building via the nearest exit.

## **Roll call arrangements**

At the assembly point, teachers in charge of students will take a roll call of all students as soon as possible. Report any absentees to the Fire Marshal who will liaise with the fire service. Any missing people will be identified at this point.

## **Fire Fighting Equipment**

Extinguishers are located throughout the building:

## **Signage**

Know where the fire action notices are in the building and make sure you know what they say.

## **Visitors**

If a staff member is in the company of a visitor at the time of the alarm it is the responsibility of that staff member to ensure the safe evacuation of that individual from the building. All visitors are required to sign in at reception.

## **Fire Drills**

Fire drills must be carried out on a regular basis. These are carried out regularly and recorded in a logbook. The situation has to be treated as a real fire, and the premises have to be evacuated promptly. The Fire Marshall is in charge of ensuring that this is done.

## **Students, Contractors and Visitors to the Premises**

The safety of our clients must always be of the highest importance. All students should be made aware of the existence of the Safety Policy and the Fire Procedures on arrival. This should be either in written form, in the welcome pack or in verbal form during the welcome speech.

All visitors and contractors on the premises should be made aware of any particular hazards at the time they are on the premises and should be informed of any particular precautions that they should take.

Contractors should carry out their work on the premises at agreed times. Dangerous tools, equipment and machinery should not be left unattended. Jeanette Mitchell is in charge of ensuring that is done.

## **Housekeeping and Premises**

Elac is responsible for ensuring all of the following is carried out, via contractors.

### **Cleanliness:**

All floors and stairs must be kept clean and not slippery.

The premises, furniture and fittings (e.g. lights) should be cleaned regularly; and all dirt, dust, refuse and trade waste regularly removed.

All spillages should be cleaned up promptly.

Special arrangements must be made for the disposal of sanitary waste.

All waste paper bins should be emptied daily and the rubbish stored safely until collection. Rubbish should not be stored on the street (it could cause inconvenience and be a potential hazard to the health of the general public).

Toilet supplies of paper, soap and towels should be maintained and regularly checked.

**Safe Stacking and Storage:**

All materials and objects should be stored and stacked so that they are not likely to fall and cause injury. Heavy boxes of paper are stored under the machines in the office, and are not stacked dangerously high. On arrival, deliveries of supplies and equipment should be stored safely away from public areas. The reception staff are responsible for storing away delivered items.

**Exits, Corridors and Stairways:**

All exits, corridors and stairways must be kept clear at all times.

**Lighting:**

All light bulbs and fluorescent tubes should be replaced as necessary in order to ensure adequate lighting at all times. In the Elac Summer Centre, the Centre Manager should contact the Maintenance team on site and report any issues. In the Elac Study Centre, please contact Nicky Matthews.

**Comfortable Conditions**

A reasonable working temperature must be provided at all times. The temperature must be at least 16 degrees Centigrade.

**Flooring**

Carpets and floors must provide even surfaces to walk on. Carpets should not be worn through or frayed and the floorboards should not be broken. Any broken tiles on the ceiling or on the floor must be replaced immediately.

**Electrical Equipment****Routine Inspection and Procedures**

An independent contractor must check all electrical equipment annually.

The Safety Representative and the Directors of Elac Study Vacation should make an annual inspection tour of the premises and arrange for replacement of any frayed or damaged cables, broken plugs, sockets or any other electrical appliances that are not functioning properly.

All appliances must be unplugged before cleaning or making adjustments. All electrical equipment used for teaching must be switched off after use. Extension leads may be used with portable electrical equipment for teaching purposes. No leads are to be left where they could pose a threat to teachers, students or other staff.

All suspect or faulty equipment should be immediately removed from use and labelled 'Do Not Use'. It should be kept in a secure place until such time when a qualified person can check it.

Electric sockets in the classrooms are to be located in the most appropriate place for easy access by the teacher and to avoid trailing wires on the classroom floor.

All staff must report any electrical problems to the Centre Manager immediately or Nicky Matthews at Elac Head Office.

**Photocopiers**

Regular servicing should be arranged.

All staff should take care when removing miss-fed paper from the machines and be careful not to touch the hazardous areas of the machines.

Toner cartons should be stored safely. The toner cartridges can be found in the bookstore, or in the case of the teacher's photocopier, in the storage compartment located in the front of the machine.

### **VDUs**

The workstations of employees must be regularly assessed to ensure that they meet the minimum requirements of the Health and Safety (Display Screen Equipment) Regulations 1992.

All staff using VDUs should plan their work so there are 10 minute breaks after each 50 minutes of constant use.

On request, eye and eyesight tests must be arranged and special spectacles provided, if required, to all staff who habitually use VDUs for a significant part of their normal work.

## **4.3 Equal Opportunities Policy**

### **A) Policy Statement**

1. Elac Study Vacations recognises that we live in a society where discrimination still operates to the disadvantage of many groups in society.
2. Elac Study Vacations believes that all persons should have equal rights to recognition of their human dignity, and to have equal opportunities to be educated, to work, receive services and to participate in society.
3. Elac Study Vacations is committed to the promotion of equal opportunities within Elac Study Vacations, through the way we manage the organisation and provide services to the community. In order to express this commitment, we develop, promote and maintain policies that will be conducive to the principles of fairness and equality in the workplace. For that reason, Elac is committed to make reasonable adjustments to make sure employees with disabilities, or physical or mental health conditions, aren't substantially disadvantaged when applying for or doing their jobs.
4. The objective of this policy is that no person should suffer or experience less favourable treatment, discrimination or lack of opportunities on the grounds of gender, race, colour, nationality, ethnic origin, religious or philosophical beliefs, health status, HIV status, age, marital status, parental status, sexual orientation, political beliefs or trade union membership, class, responsibility for dependents, physical attributes, ex-offender status as defined by the Rehabilitation of Offenders Act 1974, lack of formal qualifications where such qualifications are not formally required, or any other grounds which cannot be shown to be justifiable within the context of this policy.
5. This policy will influence and affect every aspect of activities carried out at Elac Study Vacations i.e. promotional work, educational services, casework and other functions linked to Elac Study Vacations, as determined by the Directors.

6. In the provision of services and the employment of staff, Elac Study Vacations is committed to promoting equal opportunities for everyone. Throughout its activities, Elac Study Vacations will treat all people equally whether they are:

- Seeking or using our services.
- Applying for a job or already employed by us.
- Trainee workers and students on work experience or placements.
- Volunteer workers.

### **B) How the policy will be implemented and who is responsible?**

The Directors have specific responsibility for the effective implementation of this policy. Each Centre Manager also has responsibilities and we expect all our employees to abide by the policy and help create the equality environment which is its objective.

In order to implement this policy we shall:

- Communicate the policy to employees, job applicants, volunteers and relevant others.
- Incorporate specific and appropriate duties in respect of implementing the equal opportunities policy into job descriptions and work objectives of all staff.
- Ensure that those who are involved in assessing candidates for recruitment or promotion will be trained in non-discriminatory selection techniques.
- Incorporate equal opportunity notices into general communications practices.
- Ensure that adequate resources are made available to fulfill the objectives of the policy.

### **General conduct and standards of behaviour**

All staff and volunteers are expected to conduct themselves in a professional and considerate manner at all times. Elac Study Vacations will not tolerate behaviour such as:

- making threats
- physical violence
- shouting
- swearing at others
- persistent rudeness
- isolating, ignoring or refusing to work with certain people
- telling offensive jokes or name calling
- displaying offensive material such as pornography or sexist / racist cartoons, or the distribution of such material via email / text message or any other format
- any other forms of harassment or victimisation

The items on the above list of unacceptable behaviours are considered to be disciplinary offences within Elac Study Vacations and can lead to disciplinary action being taken. Elac Study Vacations does, however, encourage staff to resolve misunderstandings and problems informally wherever possible, depending on the circumstances. However, whether dealt with informally or formally, it is important for staff who may have caused offence to understand that it is no defence to say that they did not intend to do so, or to blame individuals for being over sensitive. It is the

impact of the behaviour, rather than the intent, that counts, and that should shape the solution found both to the immediate problem and to preventing further similar problems in the future.

### **Complaints of discrimination**

Elac Study Vacations will treat seriously all complaints of unlawful discrimination on any forbidden grounds made by employees, trustees, clients or other third parties and will take action where appropriate.

All complaints will be investigated in accordance with the organisation's grievance, complaints or disciplinary procedure, as appropriate and the complainant will be informed of the outcome in line with these procedures.

We will also monitor the number and outcomes of complaints of discrimination made by staff, volunteers, clients and other third parties.

### **C) Legal Obligations**

#### **Equal Opportunities and Discrimination (Equality Act 2010)**

The Equality Act came into force in October 2010 and replaces all previous equality legislation in England, Scotland and Wales. Its protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief sex and sexual orientation.

In valuing diversity Elac Study Vacations is committed to go beyond the legal minimum regarding equality.

The **Equality Act 2010** harmonises and strengthens and replaces most previous equality legislation. The following legislation is still relevant:

- The Human Rights Act 1998.
- The Work and Families Act 2006.
- Employment Equal Treatment Framework Directive 2000 (as amended).

### **D) Recruitment and Selection**

1. The recruitment and selection process is crucially important to any equal opportunities policy. We will endeavour through appropriate training to ensure that employees, making selection and recruitment decisions will not discriminate, whether consciously or unconsciously, in making these decisions.

2. Promotion and advancement will be made on merit and all decisions relating to this will be made within the overall framework and principles of this policy.

3. Job descriptions, where used, will be revised to ensure that they are in line with our equal opportunities policy. Job requirements will be reflected accurately in any personnel specifications.

4. We will adopt a consistent, non-discriminatory approach to the advertising of vacancies.

5. All applicants who apply for jobs with us will receive fair treatment and will be considered solely on their ability to do their job.

6. Short-listing and interviewing will be carried out by more than one person where possible.

7. Interview questions will be related to the requirements of the job and will not be of a discriminatory nature.

8. Selection decisions will not be influenced by any perceived prejudices of other staff.

## E) Monitoring

1. We will maintain and review the employment records of all employees in order to monitor the progress of this policy. Monitoring may involve:

- The collection and classification of information regarding the race in terms of ethnic/national origin and sex of all applications and current employees;
- The examination by ethnic/national origin and sex of the distribution of employees and the success rate of the applicants; and
- Recording recruitment, training and promotional records of all employees, the decisions reached and the reason for those decisions.

2. The results of any monitoring procedure will be reviewed at regular intervals to assess the effectiveness of the implementation of this policy. Consideration will be given, if necessary, to adjusting this policy to afford greater equality of opportunities to all applicants and staff.

Elac Study Vacations will revise and review this policy regularly.

## 4.4 Whistle Blowing Policy

Elac is committed to delivering high quality services to its students and expects high standards from its employees. In order to maintain those high standards a culture of openness and accountability is vitally important. The purpose of this policy is:

- to encourage you to raise concerns about malpractice within the organisation without fear of reprisal;
- to reassure you that your concerns will be taken seriously; and
- to provide information about how to raise your concerns.

This policy applies to all employees.

### What is whistle blowing?

In practical terms, whistle blowing occurs when a concern is raised about danger or illegality that affects others, e.g. clients, members of the public, or the school. As the person “blowing the whistle” you would not usually be directly affected by the danger or illegality. Consequently you would rarely have a personal interest in the outcome of any investigation into your concerns. This is different from a complaint or grievance. If you make a complaint or lodge a grievance, you are saying that you personally have been poorly treated. This poor treatment could involve a breach of your individual employment rights or bullying and you are entitled to seek redress for yourself.

Examples of whistle blowing concerns are:

- fraud in, on or by the school;
- offering, taking or soliciting bribes;
- financial maladministration;

- the physical, emotional or sexual abuse of students/clients;
- failure to comply with legal obligations;
- endangering of an individual's health and safety;
- damage to the environment;
- a criminal offence;
- or neglect of people in care.

This Policy does not replace the school's complaints or grievance procedures.

### **Who should I contact?**

Having considered this Policy, an employee, or any other person covered by the The Public Interest Disclosure Act, who has serious concerns about any aspect of the school's conduct, should in the first instance raise their concerns using one of the following methods:

#### **Line Manager**

In many cases, raising concerns with the immediate Line Manager is the most appropriate route for an employee. The line manager should inform the Principal of the disclosure and an appropriate course of action will be agreed.

#### **Principal**

If this is not a suitable option (for example because the issue may implicate the manager or if the concern has been raised but remains unaddressed) the concern should be raised directly with the Principal.

#### **Child Protection Officer**

If the matter to be raised is of a Child Protection nature, then it would be most appropriate to raise it with the Child Protection Officer, either directly or via the Welfare Officer in the centre.

#### **Legal Protection**

The Public Interest Disclosure Act (PIDA) 1998 sets out a framework of protection against victimisation or dismissal for workers who blow the whistle ("disclosure") on criminal behaviour and other specified forms of malpractice.

It applies to making a 'protected' disclosure in respect of specific types of malpractice, which are:

- that a criminal offence has been committed, is being committed or is likely to be committed;
- that a person has failed, is failing or is likely to fail to comply with any legal obligation to which he is subject;
- that a miscarriage of justice has occurred, is occurring or is likely to occur;
- that the health or safety of any individual has been, is being or is likely to be endangered;
- that the environment has been, is being or is likely to be damaged; or
- that information tending to show any matter falling within any one of the preceding paragraphs has been, is being or is likely to be deliberately concealed.

Allegations that are malicious, or allegations made for personal gain, may result in action against the person making them. If an allegation is made in good faith, but is not confirmed by an investigation, no action will be taken against the person who raised the concern.

It is preferable that a whistle blowing concern be raised as soon as there is reasonable suspicion. Employees are not expected to investigate the matter themselves or prove that their concern is well-founded.

The school recognises that the decision to report a concern can be difficult. If you report the concern in good faith, the school will not tolerate any harassment or victimisation against you. Any employee who is found to have victimised or harassed an employee who raised a concern will face disciplinary action.

### **How will Elac respond?**

The action taken by the school will depend on the nature of the concern. The matters raised may:

- be investigated internally
- be referred to the Police;

Feedback on the outcome of the concern will be given to the person raising the concern. This feedback may be limited due to legal obligations of confidentiality (i.e. if disciplinary action is taken against an Elac employee).

## **4.6 Data Protection Policy**

### **Introduction**

When handling information, Elac Study Vacations, and all staff or others who process or use any personal information, must comply with the Data Protection Principles which are set out in the Data Protection Act 1998 (the Act). **This policy will be updated before May 2018 to comply with the new GDPR regulations.**

In summary these state that personal data shall:

- be processed fairly and lawfully,
- be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with the purpose,
- be adequate, relevant and not excessive for the purpose
- be accurate and up-to-date,
- not be kept for longer than necessary for the purpose,
- be processed in accordance with the data subject's rights,
- be kept safe from unauthorised processing, and accidental loss, damage or destruction,
- not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data, except in specified circumstances.

### **Definitions**

- "Staff", "employees" and "other data subjects" may include past, present and potential members of those groups.

- "Other data subjects" and "third parties" may include patients, contractors, suppliers, contacts, referees, friends or family members.

- "Processing" refers to any action involving personal information, including obtaining, viewing, copying, amending, adding, deleting, extracting, storing, disclosing or destroying information.

### **Notification of Data Held**

Elac shall notify all staff, clients and other relevant data subjects of the types of data held and processed by Elac concerning them, and the reasons for which it is processed. The information which is currently held by Elac and the

purposes for which it is processed are set out in this Policy. When processing for a new or different purpose is introduced the individuals affected by that change will be informed and processing information will be amended.

### **Staff Responsibilities**

All staff shall ensure that all personal information which they provide to the ELAC in connection with their employment is accurate and up-to-date; inform ELAC of any changes to information, for example, changes of address; check the information which ELAC shall make available from time to time, in written or automated form, and inform ELAC of any errors or, where appropriate, follow procedures for up-dating entries on computer forms. ELAC shall not be held responsible for errors of which it has not been informed.

When staff hold or process information about clients, colleagues or other data subjects (for example, all personal details, or details of personal circumstances), they should comply with the Data Protection Policy.

Staff shall ensure that all personal information is kept securely; personal information is not disclosed either orally or in writing, accidentally or otherwise to any unauthorised third party. Unauthorised disclosure may be a disciplinary matter, and may be considered gross misconduct in some cases.

When staff, supervise new employees doing work which involves the processing of personal information, they must ensure that those new employees are aware of the Data Protection Principles, in particular, the requirement to obtain the data subject's consent where appropriate.

### **Rights to Access Information**

Staff, clients and other data subjects in ELAC have the right to access any personal data that is being kept about them either on computer or in structured and accessible manual files. Any person may exercise this right by submitting a request in writing.

ELAC aim to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 40 days unless there is good reason for delay. In such cases, the reason for the delay will be explained in writing to the data subject making the request.

### **Subject Consent**

In some cases, such as the handling of sensitive information, ELAC is entitled to process personal data only with the consent of the individual.

### **Sensitive Information**

ELAC may process sensitive information about a person's, race or ethnic origin, or trade union membership. ELAC may require such information for the administration of the sick pay policy, the absence policy or the equal opportunities policy, or for academic assessment.

### **The Data Controller and the Designated Data Controllers**

ELAC is the data controller under the Act, and members of our Head office staff are ultimately responsible for implementation, day to day matters and information and advice about the holding and processing of personal information.

## **Retention of Data**

ELAC will keep different types of information for differing lengths of time, depending on legal, academic and operational requirements.

## **Compliance**

Compliance with the Act is the responsibility of all members of staff. Any deliberate or reckless breach of this Policy may lead to disciplinary, and where appropriate, legal proceedings. Any questions or concerns about the interpretation or operation of this policy should be taken up with the directors.

Any individual, who considers that the policy has not been followed in respect of personal data about him- or herself, should raise the matter with the Director initially. If the matter is not resolved it should be referred to the company complaints procedure.

## **4.6 Statutory Sick Pay Policy**

### **What is sick pay?**

If you are off sick from work, you will receive Statutory Sick Pay (SSP). This is money paid by law that most employees are entitled to if they are off sick.

If you are off sick from work, you may get Statutory Sick Pay (SSP). SSP is paid by Elac for up to 28 weeks. SSP is treated like earnings for the purposes of income tax and forms part of your taxable income.

To get SSP, you must earn more than the weekly amount specified by the British government (please check annual weekly amounts online). It does not matter whether you are working full-time or part-time. Agency workers and workers on a fixed-term contract qualify for SSP.

### **How much is Statutory Sick Pay?**

Statutory Sick Pay (SSP) is paid at a fixed weekly rate defined every year by the UK government. If you need to work out how much Statutory Sick Pay you will get, go to the calculator on the HM Revenue and Customs website at: [www.hmrc.gov.uk](http://www.hmrc.gov.uk).

### **How long is Statutory Sick Pay paid for?**

You will not get Statutory Sick Pay (SSP) for the first three days that you can't work, unless you were receiving it within the last eight weeks. If you were off sick and getting SSP within the last eight weeks, you will receive it again from your first day off work without having to wait for three days. The employee has to be sick for 4 or more days in a row (including non-working days).

If your employment ends while you are on SSP, your sick pay will stop too. SSP does not stop if you go into hospital while you are off work.

When SSP runs out or you stop being employed, you may be able to claim Employment and Support Allowance.

## **Telling Elac you are off sick**

You should tell Elac straight away that you are ill and unable to go to work. You may lose sick pay if you don't tell Elac straight away, unless you have a good reason. If you do not inform Elac of your sickness with 7 days Elac is not obliged to pay unless there is good reason.

Elac shall require the following information if you are off work sick:

- phone in by ..... of day to tell them you are sick.
- provide a medical certificate if you are off sick for more than 7 days.
- phone in more than once a week when you are off sick.
- if you are unable to phone in yourself ask someone else to do it on your behalf.

However, if you do not follow these procedures you will be breaking the terms of your employment contract and eventually this could lead to you losing your job.

## **Self-certification of sickness and SSP**

During your first seven days off sick, Elac will not ask you for a medical certificate. However, Elac may ask for confirmation that you are sick and you must provide evidence otherwise you may not get any SSP. Elac may ask for either:

- a handwritten note from you saying what is wrong, or
- a SC2 form which must be completed.

## **Medical certificates - fit notes**

Medical certificates can also be known as fit notes. On a medical certificate, your doctor can say that you're:

- not fit for work
- may be fit for work.

Your doctor can also recommend that Elac makes some adjustments at your workplace. These adjustments might be things like:

- a change to your working hours
- a change to your duties
- a phased return to work. This means that you would start coming back to work gradually
- adaptations to your working environment.

It will be between Elac and you to agree what adjustments could be made.

If Elac refuses to make the changes recommended by your doctor, you will still be considered unfit for work and can continue to get Statutory Sick Pay.

If you recover sooner than expected you can return to work before the end date on your medical certificate if Elac agrees to this. However, it may be insisted that you obtain a new certificate from your GP to confirm that you are fit to return to work.

Your GP may produce a computer-completed fit note for you to give to Elac, much in the same way as they produce a prescription. This fit note will be considered to have the same information as a handwritten note.

### **If you are off sick because of a disability**

If you are disabled and Elac refuses to give you sick pay when you are off sick for a reason connected with your disability, they could be breaking the law. You may be able to make a complaint to an employment tribunal for disability discrimination. You should in the first instance raise a written grievance with Elac first.

If you have been discriminated against, you will need specialist advice. A Citizens Advice Bureau can help you find a specialist adviser.

## **4.7 Student Loan Policy**

The Summer Staff Registration Form that every of our employees need to complete every year contains the two types of Student Loans employees may have: Plan 1 and Plan 2.

- Plan 1 refers to those who took their loan out before September 2012.
- Plan 2 refers to those who took their loan out after September 2012.

Even with the presentation of a P45 each member of staff needs to complete the Registration Form. You only start to pay back your student loan in the April after graduating.

## **4.8 Statutory Paternity Pay (SPP) and Statutory Maternity Pay (SMP) Policy**

1. Rights of working parents
2. Paternity Leave
3. Maternity Leave
4. Sharing Parental Leave (SPL) and Statutory Shared Parental Pay (ShPP)
5. Adoption Leave
6. The Right to Ask for Flexible Working

### **1. Rights of working parents**

Working parents have the following legal rights:

- paid and unpaid maternity leave
- paid paternity leave
- paid and unpaid adoption leave

- request flexible working hours
- unpaid parental leave for parents of children under 18
- unpaid time off to deal with unexpected problems with the care of dependants
- to shared leave and pay

These rights apply to parents in same-sex as well as in opposite-sex relationships.

## 2. **Paternity Leave**

If you are a working father, you are entitled to one or two weeks' paternity leave when you and your partner have a child. You can also qualify for paternity leave when you adopt a child. Most fathers will be entitled to statutory paternity pay for their paternity leave. Statutory Paternity Pay is paid at the same rate as Statutory Maternity Pay.

To qualify for **paternity leave for a birth**, you must:

- have been employed by Elac for at least 26 weeks by the end of the 15th week before the expected week of childbirth; and
- be the biological father of the child, or be married to or be the partner of the baby's mother (this includes same-sex partners, whether or not they are registered civil partners); and
- have responsibility for the child's upbringing and wish to take time off to care for the child or support the mother. This responsibility for the upbringing of the child may be shared with the child's mother; and
- have given Elac the correct notice to take paternity leave.

To qualify for **paternity leave for an adoption**, you must:

- be employed for at least 26 weeks by the time you are matched with your child for adoption. (You will not be entitled to paternity leave or pay if you already know the child, for example, if it's your stepchild).
- not be taking adoption leave (where you and a partner are adopting a child, one of you can take adoption leave and one paternity leave).
- have responsibility for the child's upbringing and wish to take time off to care for the child or support the mother. This responsibility for the upbringing of the child may be shared with the child's mother.
- have given Elac the correct notice to take paternity leave.

### **When can you take paternity leave?**

If you are taking paternity leave for a birth, the leave can start either on the day the baby is born or on a date that has been agreed in advance with Elac. Your paternity leave cannot start before the baby is born, and, if you are agreeing a date later than the birth of your baby, it must be completed within 56 of days of the birth.

If you are taking paternity leave for an adoption, the leave can start either on the day that the child is placed with you, or on a date that has been agreed in advance with your Elac. If you are agreeing a later leave date later than the date your child was placed with you, the leave must be completed within 56 days of the adoption date.

## **Telling Elac about your paternity leave**

You need to be able to show Elac that you are entitled to paternity leave. To do this you must give the following information in writing:

- your name
- the date the baby is due or the date of the birth. If you are adopting a child you should give the date that you were matched with your child or the date the child is placed with you
- the date when you would like your paternity leave (and pay) to start
- whether you are taking one or two week's paternity leave
- a declaration that you are entitled to paternity leave
- a declaration that you are taking leave to support the mother or care for the child.

You must give notice 15 weeks before the baby is due or, as soon as possible once you know you want to take leave. If you are adopting a child, you must give notice no later than seven days after the date you are matched with your child for adoption. If this is not practical you must give notice as soon as possible once you know you want to take paternity leave.

If you change your mind about when you want to take paternity leave you can, but you should give Elac 28 days' notice of the changed date.

### **3. Maternity Leave**

There are a number of rights for pregnant women given by the law. These are known as statutory rights:-

- the right of all pregnant women to take time off work for ante-natal
- the right of all pregnant women to work in a safe environment
- the right of all pregnant women to claim discrimination and unfair dismissal if dismissed because of pregnancy or maternity leave, see under heading
- the right to take up to 52 weeks' maternity leave
- the right of some pregnant women to Statutory Maternity Pay (SMP)
- the right to return to work after you have had the baby

### **Time off for ante-natal care**

#### **Who qualifies?**

Any woman who is working and pregnant will qualify, regardless of how long they have worked for Elac, and regardless of how many hours per week they work.

#### **The right to paid time off**

You can have time off for appointments for ante-natal care if your doctor, midwife or health visitor advises that it is needed. Elac will pay your usual wage for the time off, as long as you only have a reasonable amount of time off. However, if you take a lot of time off, you may be treated as if you are off sick, and will only get paid if your contract of employment allows for you to be paid sick pay. If you are off sick, you may qualify for Statutory Sick Pay.

## **Right to accompany to ante-natal appointments**

If you're the husband or partner of a pregnant woman, you will be able to accompany her to up to two ante-natal appointments. You will also be entitled to do so if you're surrogate parents who meet the conditions for, and intend to apply for, a parental order for the child born through a surrogacy arrangement.

You will be able to take unpaid leave for up to two of the woman's ante-natal appointments, with a maximum of 6 hours and 30 minutes for each appointment. This right applies to employees from the first day of their employment and to some agency workers.

## **Maternity leave**

Most women employees have the right to take up to one year's (52 weeks') maternity leave. This does not depend on how long you have worked for Elac.

You can claim Statutory Maternity Pay (SMP) if you have worked for Elac for 26 weeks continuously into the 15th week before your baby is due and you are pregnant at, or have had the baby by, the 11th week before the week the baby is due and you have average weekly earnings of at least the national insurance lower earnings limit. This is worked out on the average earnings that you actually receive in the eight weeks up to the 14th week before your baby is due. Earnings means gross pay, overtime and bonus payments, back pay, SMP and holiday pay. They all count if they are made during this time.

## **When is SMP paid**

Statutory Maternity Pay (SMP) is paid for up to 39 weeks. You get:

- 90% of your average weekly earnings (before tax) for the first 6 weeks
- £139.58 or 90% of your average weekly earnings (whichever is lower) for the next 33 weeks

SMP is paid in the same way as your wages (eg monthly or weekly). Tax and National Insurance will be deducted.

The earliest that you can start your maternity leave and therefore start getting SMP is the 11th week before the baby is due. The latest you can start your maternity leave and therefore start getting SMP is the week after the week when the baby is born. You can choose when you want your SMP to start within this period, unless you are sick.

If you are sick with a pregnancy-related illness in the four weeks before your baby is due, your SMP will start the day following the first complete day you become sick. If you are sick with a non-pregnancy related illness, you can claim Statutory Sick Pay (SSP) until the week the baby is due or until the date you have chosen your SMP to start.

## **How to claim SMP**

To claim SMP, you must tell Elac, 28 days before you decide to start maternity leave, that you are pregnant and will be off work because of the birth. Elac will want to see a medical certificate (a MATB1).

## **What happens to your SMP if you stop working for Elac?**

Provided you worked for Elac during the qualifying week, you will still be entitled to SMP and will continue to be entitled to SMP if you leave work or your job ends. SMP should be paid during your maternity pay period, provided you meet the usual employment and earnings tests.

You will continue to be entitled to SMP even if you have no intention of returning to work after your child is born, or if Elac goes out of business. There is an exception if you go to work for another employer after your baby is born but before the end of your maternity pay period.

Elac cannot try to recover any SMP paid to you if you decide not to return to work after your maternity leave.

## **4. Sharing Parental Leave (SPL) and Statutory Shared Parental Pay (ShPP)**

You may be able to get Shared Parental Leave (SPL) and Statutory Shared Parental Pay (ShPP) if your baby is due on or after 5 April 2015 or you adopt a child on or after 5 April 2015.

### **Eligibility**

Each parent qualifies separately for Shared Parental Leave (SPL) and Statutory Shared Parental Pay (ShPP).

If you're eligible you can start SPL and take leave in separate blocks, instead of taking it all in one go like maternity or adoption leave. You can also share the leave between you if you're both eligible.

### **Shared Parental Leave**

To qualify for SPL, you must share responsibility for the child with your husband, wife, civil partner or joint adopter and you or your partner must be eligible for maternity pay or leave, adoption pay or leave or Maternity Allowance.

You must also have been employed continuously by Elac for at least 26 weeks by the end of the 15th week before the due date (or by the date you're matched with your adopted child) and stay with Elac while you take SPL

During the 66 weeks before the week the baby's due (or the week you're matched with your adopted child) your partner must have been working for at least 26 weeks (they don't need to be in a row) and have earned at least £390 in total in 13 of the 66 weeks (add up the highest paying weeks, they don't need to be in a row)

This can be as an employee, worker or self-employed person. Your partner doesn't have to be working at the date of birth or when you start SPL or ShPP.

### **Statutory Shared Parental Pay**

You can get ShPP if you're an employee and you're eligible for Statutory Maternity Pay (SMP) or Statutory Adoption Pay (SAP) or you're eligible for Statutory Paternity Pay (SPP) and your partner is eligible for SMP, Maternity Allowance (MA) or SAP.

## **When you can start**

You can only start SPL or ShPP once the child has been born or placed for adoption. The mother (or the person getting adoption leave or pay) must do one of the following:

- end any maternity or adoption leave by returning to work
- give Elac 'binding notice' (a decision that can't normally be changed) of the date when they plan to end any maternity or adoption leave

You must also end any maternity pay, Maternity Allowance or adoption pay. The mother or adopter must give at least 8 weeks' notice to Elac.

You can start SPL or ShPP while your partner is still on maternity or adoption leave and pay as long as they've given binding notice to end it.

A mother can't return to work before the end of the compulsory 2 weeks of maternity leave following the birth. If you're adopting the person claiming adoption pay must take at least 2 weeks of adoption leave.

## **Cancelling the decision to end maternity or adoption leave**

The mother or adopter may be able to change their decision to end maternity or adoption leave early if both the planned end date hasn't passed or they haven't already returned to work

One of the following must also apply:

- you find out during the 8-week notice period that neither of you is eligible for SPL or ShPP
- the mother or adopter's partner has died
- the mother tells Elac less than 6 weeks after the birth (and she gave notice before the birth)

## **What you'll get**

If you're eligible and you or your partner end maternity or adoption leave and pay (or Maternity Allowance) early, then you can:

- take the rest of the 52 weeks of maternity or adoption leave as Shared Parental Leave (SPL)
- take the rest of the 39 weeks of maternity or adoption pay (or Maternity Allowance) as Statutory Shared Parental Pay (ShPP)

## **How much pay you'll get**

ShPP is paid at the rate of £139.58 a week or 90% of your average weekly earnings, whichever is lower.

This is the same as Statutory Maternity Pay (SMP) except that during the first 6 weeks SMP is paid at 90% of whatever you earn (with no maximum).

## **Booking blocks of leave**

You can book up to 3 separate blocks of Shared Parental Leave (SPL) instead of taking it all in one go, even if you aren't sharing the leave with your partner.

If your partner is also eligible for SPL, you can take up to 3 blocks of leave each. You can take leave at different times or both at the same time.

You must tell Elac about your plans for leave when you apply for SPL. You can change these plans later but you must give Elac at least 8 weeks' notice before you want to begin a block of leave.

## **5. Adoption Leave**

If you are a working parent who has been matched with a child for adoption or if you have had a child placed with you for adoption, you may be entitled to adoption leave.

If you adopt a child from overseas there are different rules. In this case you must have worked for Elac for at least 26 weeks by the end of the week in which you receive official notification, or from the day you started working with Elac.

The rights outlined here apply only to employees who have been matched with a child through an adoption agency or, in the case of an overseas adoption, received official notification. They do not apply to private adoptions.

Adoptive parents are entitled to up to 52 weeks' adoption leave.

Most parents will be entitled to Statutory Adoption Pay (SAP). This is paid at 90 per cent of the adopter's average gross weekly earnings for the first six weeks and then at a flat rate of £139.58 or 90 per cent of your normal weekly earnings, whichever is lower. You get SAP for 39 weeks.

You may also be entitled to some adoption pay under your employment contract.

Where a couple adopts a child, only one parent is entitled to take adoption leave. The other parent may be able to take paternity leave (see under heading [Paternity leave](#)) or [shared parental leave](#). This includes same-sex couples.

## **Telling Elac about your adoption leave**

You must notify Elac that you want to take adoption leave no more than seven days after you have been notified that you have been matched with a child for adoption, or as soon as is practical after this. You must tell Elac the date on which you expect the child to be placed with you and the date on which you want your statutory adoption leave to start.

The partner of a person who adopts, or in a couple the person who is not taking adoption leave, may be entitled to paternity leave and pay.

## **6. The right to ask for flexible working**

If you are the parent of a child, you have the right to ask for flexible working if your child is under 17 or under 18 and disabled.

You must also have worked for Elac for at least 26 weeks and must be responsible for your child on a day to day basis.

If you are caring for an adult, you also have the right to ask for flexible working.

Flexible working can include working part time, working school hours, working flexitime, home working, job sharing, shift working, staggering hours and compressing hours (where you work your total number of agreed hours over a shorter period).

Although you have the right to ask to work flexibly, Elac doesn't have to agree to it. However, they must give your request serious consideration and have a good business reason if they decide not to agree.

You can make one request to work flexibly each year. This must be in writing. You should say how you think the change in your working pattern will affect Elac.

## Grievance Procedure – Appendix 1

If a staff member is not happy about something and has a complaint about their work or workplace or about someone they work with then the following Procedure will follow;

### Informal Procedure

#### Step 1

Informal discussion with Senior Staff to try & resolve situation. If further action required then formal grievance procedure begins

### Formal Procedure

#### Step 1

Staff member to write a formal letter of grievance to Centre Manager.

#### Step 2

CM will investigate issues.

#### Step 3

Staff to meet with CM & another member of staff (colleague can attend).

#### Step 4

CM will write to let staff member know the outcome.

#### Step 5

Staff has right to appeal against outcome. Staff member to write stating why.

#### Step 6

Staff member & CM attend Appeal meeting (colleague can attend).

#### Step 7

CM to provide outcome of grievance appeal meeting in writing

No further course of action required.

## Discipline Procedure – Appendix 2

A Discipline Procedure will begin if we are not happy with your performance in some way.

These are the following procedures that may take place; Informal Procedure, Formal Procedure and Disciplinary Outcomes. No disciplinary penalty will be imposed against an employee until the matter has been fully investigated.

### Informal Procedure

#### Step 1

Informal discussion with a member of Senior Staff to raise concerns & address them. A more formal procedure may in some situations be necessary

### Formal Procedure

#### Step 1

Centre Manager will write to staff member & request meeting to discuss a possible disciplinary point. A colleague can attend.

#### Step 2

CM will write to you with outcome of meeting and right to Appeal that outcome

#### Step 3

Staff member to write stating why they would like to appeal against outcome

#### Step 4

Staff member & CM attend Appeal meeting (colleague can attend).

### Disciplinary Outcomes

#### Step 1

In cases of complaints a verbal warning may be given by the CM. A note will be placed on your file

#### Step 2

If further complaints arise or allegations of more serious allegations a written warning may be given. A copy will be placed in file.

#### Step 3

If further complaints arise or serious alleged misconduct a final written warning will be given by the Elac Director. A copy in the staff file.

#### Step 4

Any further misconduct may lead to dismissal.

### Instant Dismissal

Any instances of gross misconduct, such as taking drugs or inappropriate conduct towards children will usually result in instant dismissal.

## Unsatisfactory Performance Procedure – Appendix 3

This Procedure will begin if it comes to the attention of Senior Staff, through feedback of observation that teaching is sub-standard.

### Step 1

AM/ST will speak with staff member about concerns. Support offered in planning & suggestions

### Step 2

Further lesson observations will follow and if necessary other interventions

### Step 3

If there is improvement no further action will follow

OR

### Step 3

If there is no improvement then dismissal will follow

## **Appendix 4 – Statements to the Press**

### **Dealing with the Press**

If contacted by the press or other media representative, the initial response is to acknowledge that an incident has occurred and that Elac will issue a press statement as soon as possible once it knows the facts.

You may also give them details of the Elac Website and how to contact Elac HQ. Direct statements and interviews are to be avoided unless authorised. Remember any interview you give may well be seen or heard by those involved and next of kin.

If it becomes necessary to give an interview, it is better to prepare and read one of the following statements, depending on the circumstances:

#### **1) If the next of kin has been informed:**

e.g. 'Elac regret to announce the death or injury of a student/member of staff (Who, What, When, Where). We extend our deepest sympathy to the relatives and friends of (named individual). We will publish a full statement (Where, how?) as soon as the full facts are known. In the meantime, we would like to thank the emergency services for their support.'

#### **2) If the next of kin has not been informed:**

e.g. 'Elac regret to announce the death or injury of a student/member of staff (When, Where). We will publish a full statement (Where, how?) as soon as the full facts are known and next of kin have been informed. In the meantime, we would like to thank the emergency services for their support.'