



Safeguarding Policy

(Updated January 2019)

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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).
- Ensuring that all U18s agree to and adopt a student **code of conduct** (see attached).
- Sharing information and acting promptly and professionally over any concerns.

When will the policy be reviewed?

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

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

Enclosed with this Document:

Background to Elac Study Vacations
 Staff Code of Conduct
Student Code of Conduct
 Group Leader Code of Conduct
 Homestay Agreement
 Local Safeguarding Children's Boards
 Safeguarding/Welfare Incident Referral Form
 Prevent Engagement Officers
 Prevent Incident Referral Form

Terminology

Safeguarding: umbrella term meaning "looking after"

Child Protection: protecting children from direct harmful behaviour

DBS: Data Barring Service (previously CRB)

- **Child** – person under 18
- **Student** – any person under 18 who a member of staff may come into contact with as a result of their employment in an educational establishment.
- **Social contact** - the exchange of personal information between two or more people.
- **Electronic contact** – the communication or publication of information (including images) between two or more people using an electronic device. This may occur using (but is not limited to) landline and mobile phones, other handheld electronic devices, gaming equipment and computers. Electronic contact may include but is not limited to voice communication, text communication, instant messaging, email, social networking sites, blogs, photos and videos.

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

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

Key Individual Roles and Levels of Responsibility

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

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

Elaine Wickens (Welfare and Administration Director) in Head Office is Elac's designated Welfare Officer and Prevent Lead and has undertaken Specialist Training for the Senior Designated Person and Prevent Training (via English UK). In the event that Elaine Wickens is unavailable Kera Gustafson (0796 955 0160) should be contacted as Elac's Deputy designated Welfare and Prevent Officer.

Documents used to write the policy

Information has been taken from the English UK guide to writing a safeguarding policy, "Keeping Children Safe in Education" (DoE), "Working Together to Safeguard Children" (HMG), and the following legal acts have been considered: Children Act 1989, Sexual Offences Act 2003, The Prevent Duty for schools and childcare providers, UK Law regarding seatbelts for under 12s.

B) Code of Conduct

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

Adult/U18 Interaction

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

Safe Working Practices for Staff and Home Stay Providers

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

Electronic Contact with Children

- Staff must request permission from the employer for any electronic contact with a student before, during and after the course.
- In any electronic contact with students staff must pay particular attention to use neutral, unemotive language that will not be misconstrued.

- Staff must not exchange any information with a student that they would not be happy to share with the child's parent or carer.
- Staff must avoid the exchange of personal information, personal photos, virtual gifts or the use of any application that suggests or encourages the sharing of personal feelings.
- Staff must not publish photos, videos or any other information about students except with the express agreement of the employer.
- Staff should be aware that personal information about them may be available in various forms online. Staff should be particularly cautious about their public web profiles and privacy settings.
- Staff should attempt to find ways of setting up and maintaining separate personal and professional electronic profiles.

Appropriate social contact (electronic or otherwise)

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

Social Networking Sites

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

Data Protection

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

Transport

When using taxi/coach companies, we only use those that have been properly DBS checked. Hosts are also expected to ensure that their vehicles are safe and roadworthy, with age appropriate seatbelts and seats.

Whistleblowing

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

C) Child Protection

If you are concerned that a student might be at risk or is actually suffering abuse, you should tell the Centre Welfare Officer. If they are not available, contact Elaine Wickens, the main Elac designated welfare officer. In the event that Elaine Wickens is unavailable Kera Gustafson (0796 955 0160) should be

contacted as Elac's Deputy designated Welfare and Prevent Officer. If someone else tells you, you also need to respond and follow Elac's procedure (see below).

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

There are four main categories of abuse as follows:

- Physical: through hitting, shaking, squeezing, kicking, punching etc.
- Sexual: though inappropriate physical contact, the taking of indecent images of children, or the encouragement of sexual activity by children for the purpose of adult gratification.
- Emotional: through persistent lack of affection, unrealistic adult demands, verbal bullying including cyber bullying.
- Neglect: persistent lack of appropriate care of children, including safety, nourishment, warmth, education and medical attention.

Recognising the symptoms of abuse

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

Below are some typical indicators to look for:

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

How to respond to concerns

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

How to react if a child chooses to talk to you

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

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

Allegations made against staff or other under 18s

Allegations can be made by U18s or other members of staff. Allegations can be made for a number of reasons. Some of the most common are:

- a) Abuse has actually taken place.
- b) Something happens to a student that reminds them of an event that happened in the past – the student is unable to recognize that the situation and the people are different.
- c) Some students know how powerful an allegation can be; if they are angry with you about something they can make an allegation as a way of hitting out.
- d) An allegation can be a way of seeking attention.

An allegation should be reported to the Welfare Officer (usually the Assistant Centre Manager), who will decide whether outside agencies, e.g. the police, the LCSB (Local Child Safeguarding Board) might be involved.

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

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

Keeping Records

An accurate record should be kept and should be signed by the person or people making the statement. The following details should be included:

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

- Name of person reporting on the concern, name and designation of the person to whom the concern was reported, date and time and their contact details.

All this information should be recorded on the Incident/Safeguarding Form held in the Welfare Folder.

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

Child Sexual Exploitation

Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Female Genital Mutilation

This is illegal in the UK and there is a legal duty to report if an adult finds out this has happened.

D) Training

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

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

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

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

E) Safer Recruitment

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

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

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

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

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

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

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

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

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

Safer recruitment of Hosts

All hosts will require an enhanced Disclosure and Barring Service (DBS) disclosure before they start hosting with us. All hosts will also require two suitable references, a current gas safe certificate, to have undertaken a fire safety risk assessment, and to undertake a journey risk assessment. All hosts are visited initially to ensure they are suitable and are re-visited every two years. Hosts sign an agreement that they are suitable to host, together with members of the household. Hosts also receive "Information for Hosts" and sign a Homestay Agreement (see Appendix) which confirms they have read Elac's safeguarding policy.

Safer recruitment of Group Leaders

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

Single Central Record

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

F) Welfare/implementing Safeguarding

Risk Assessments

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

Duty to report:

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

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

Failure to comply:

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

Abusive Behaviour

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

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

The sanctions that may be used include the offender:

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

All staff have a collective responsibility for ensuring:

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

If you are not sure whether something you've seen should be dealt with under this heading, please speak to the Centre Welfare Officer or Elaine Wickens, the Head Designated Welfare Officer. In the event that

Elaine Wickens is unavailable Kera Gustafson should be contacted as Elac's Deputy designated Welfare and Prevent Officer.

Procedure in the case of a Student abusing another student

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

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

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

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

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

Procedure in the case of an adult abusing a student

The Centre Welfare Officer will immediately notify the Centre Manager and Directors of Elac. All such instances of reported abuse between an adult and a student must be treated as serious, and need to be investigated without delay.

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

The Directors in consultation with the Centre Welfare Officer and Centre Manager will decide whether an outside agency needs to be involved at this stage.

If the incident is of a serious nature, the staff member may face summary dismissal. If the incident is of a less serious nature it will be dealt with through Elac's disciplinary procedures.

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 children 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 children are under 16, then this only happens on certain conditions:

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

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

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

Student Absences

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

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

Managing Behaviour and Acceptable Restraint

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

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

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

You cannot:

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

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

- All complaints should be thoroughly investigated.

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

Fire Safety

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

Prevent Duty

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

Elaine Wickens is the Prevent lead within Elac, but other key staff have also received Prevent training, Kera Gustafson is the Deputy Lead.

Signs that May Cause Concern

Students talking about exposure to extremist materials or views outside school
 Changes in behaviour, eg becoming isolated
 Fall in standard of work poor attendance, disengagement
 Changes in attitude, eg. intolerant of differences
 Attempts to impose own beliefs
 Use of extremist vocabulary to exclude others or incite violence
 Accessing extremist material online or via social network sites
 Over new religious practices
 Drawing or posters showing extremist ideology/views/symbols
 Students voicing concerns about anyone

How and When to React to Concerns

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

Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for

28 days or more. If a student on an Elac course is in a private fostering arrangement, then the local authority needs to be informed, at least six weeks before arrangement starts.

Elac Study Vacations: Background

Elac is a small organisation compared with others in the EFL world though it is one that has grown gradually and consistently over recent years. Elac has been operating for 26 years. In 2019 we will be running 8 residential centres and 2 homestay centres, welcoming over 3500 students between the middle of June and the beginning of August. We also have a Study Centre & Offices located in Milsom Street, the prestigious main shopping street in the centre of Bath.

1. **St Andrew's School, Eastbourne**
Homestay for students
(minimum age 13, maximum age 18)
2. **Eastbourne College, Eastbourne**
Residential and Homestay for students
(minimum age 11 (Residential) 13 (Homestay), maximum age 17)
3. **Christ's Hospital School, Horsham**
Residential for students
(minimum age 11, maximum age 17)
4. **St Leonards School, Mayfield**
Residential for students
(minimum age 9, maximum age 15)
5. **University of Nottingham**
Residential for students
(minimum age 11, maximum age 17)
6. **Cardiff Metropolitan University**
Residential for students
(minimum age 11, maximum age 17)
7. **Bath Spa University, Bath**
Residential for students
(minimum age 11, maximum age 17)
8. **Ardingly College, Haywards heath**
Residential for students
(minimum age 11, maximum age 17 years)
9. **Elac Study Centre, Bath**
Short stay Homestay for students (minimum age 13, maximum age 18) and Adult Courses

STUDENT CODE OF CONDUCT FOR ELAC COURSES

We want you to enjoy our English course language course in the UK. We will do everything we can to make the course a big success for everyone, and we want you to help us to do this too.

These rules tell you about **examples of behaviour which we will not accept**, and also **examples of behaviour we want to encourage**. Please read it carefully – if there are some words you do not understand, ask your teacher to help you. When you have read it, please sign it to say you understand. These rules apply to all students on our Junior Vacation Courses, including those who are 18 years old or over before or during the course.

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

Examples of **GOOD** behaviour

- 1. We want you to work hard and participate in your English classes.
- 2. We want you to listen to your teachers, the activity leaders and the other students.
- 3. We want you to listen to your Elac leader and to follow their instructions on the excursions
- 4. We want you to make friends with people from different groups
- 5. We want you to let us know if you or your friends are unhappy.
- 6. We want you to be punctual for lessons and activities.
- 7. We want you to be friendly, polite and respectful and to accept other students' faith and beliefs.
- 8. We want you to participate in the activities and to include everyone.
- 9. We want you to speak English all the time.
- 10. We want you to try different foods.
- 11. We want you to respect the school and the campus where you are studying.
- 12. We want you to stay safe online, and be careful with whom you share information.

Examples of **UNACCEPTABLE** behaviour

- 1. You **must not** buy or drink alcohol.
- 2. You **must not** smoke on the school/college campus or in any buildings (or e-cigarettes).
- 3. You **must not** buy or take any illegal drugs (including legal highs).
- 4. You **must not** steal from other students, shops or the school.
- 5. You **must not** carry any weapons, for example a knife or imitation gun.
- 6. You **must not** threaten or be violent towards other people.
- 7. You **must not** make too much noise at your host's house or in your residence, especially late at night.
- 8. You **must not** drop rubbish in the streets or at school or write graffiti anywhere.
- 9. You **must not** enter other people's bedrooms without permission.
- 10. You **must not** leave your host's house or the residence in the evening without permission.
- 11. You **must not** bully other people, both at school or online (this includes things you say and do as well as physical bullying).
- 12. You **must not** create, transmit, display or publish any inappropriate or extremist material online, or share inappropriate photos or information without permission.

What happens if I break the rules?

We take student behaviour very seriously and there will be consequences.

1. First we will talk to you and your Group Leader. If there is anyone else involved, we will talk to them as well.
2. We will make a record of the incident.
3. Elac will then make a decision about the consequences. You will usually have an opportunity to improve your behaviour, however if it is a serious situation (for example: drinking alcohol, taking drugs, bullying another student, stealing) you may be sent home.
4. If we make a decision about your situation and you do not agree, you can ask us to think about it again. However, after considering this, our decision will be final.
5. If you are sent home, then your parents will have to pay the cost.

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

- Cleaning up around the campus if you have been making a mess.
- Doing some extra English work if you have not been working hard in class.
- Missing an excursion if you have gone somewhere without permission.

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

The police have the power to arrest you if they suspect you have committed an offence. If you are arrested, contact Elac immediately using the number on the Emergency Contact Card, and we will provide immediate support.

What do I do if I have a problem or want to make a complaint?

If you have any problem, it is really important that you tell somebody about it so we can deal with it. The person who will help you with the problem is our Welfare officer, however, in the first instance, you may prefer to tell a friend, a teacher/activity leader or your Group Leader – they can then help you to bring the problem to us.

If you have a complaint about any member of staff, another student, your classes, your Homestay placement, activities, excursions or the school, please tell us as soon as possible. We will take your complaint seriously, we will investigate and then we will tell you whether we agree with you and what we can do.

Who should I speak to?

In the first place speak with the person who can easily solve your problem: if it is about your homestay, talk to the host; if it is about lessons, talk to your teacher; if it is about another student or staff member, talk to your Welfare Officer. If talking to that person doesn't solve the problem, you may want to make a complaint to our management. There is a way for you to do this and it will involve having a meeting with the Welfare Officer. You can take a friend or your group leader to that meeting you help you.

The procedure for making a complaint is on the office noticeboard and your Group Leader will also have a copy.

Personal Safety and Care of Valuables

Always be aware of your surroundings and use your common sense. Cross roads safely, remember that vehicles drive on the left in the UK, so traffic will be coming towards you from the right. Avoid walking alone and keep to well-lit, busy streets. Keep your wallet, phone, keys and other valuables with you at all times, and out of sight in busy, public places.

I have read and understood what is expected of me on the Elac course (please tick)

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

SIGNED: _____ DATE: _____

FIRST NAME: _____ SURNAME: _____

NAME OF GROUP: _____

Staff Code of Conduct for Elac Courses

We expect all staff employed by Elac to conduct themselves in a way that will reflect well on our organisation and ensure the safety of our students.

Invariably, this is the case, and we recognise that our staff are a great advertisement for our organisation as well as a role model to our students. Nonetheless, it is important that we are absolutely clear about what is expected from staff.

Drugs, Alcohol, Smoking, Weapons

Our staff will not possess, use or be under the influence of drugs (including legal highs) while in our employment.

Staff will not consume alcohol while on duty, nor will they be under the influence of alcohol while on duty. It is also unacceptable to come to work suffering from the effects of alcohol – the students deserve better. Staff will observe the laws regarding smoking on site (including e-cigarettes). Staff will not smoke while engaged in activities with the students. The breaking of these rules will lead to disciplinary procedures. Please do not carry any weapons, e.g. knives.

Social Media and Mobile Phones

Use of your personal mobile is permitted for work purposes while on duty. However you are not permitted to take or exchange personal photos. Staff must avoid the exchange of personal information and must not be in any electronic contact with students after an Elac course or agree to ‘friendship’ requests with students. Please refer to our safeguarding policy for more details.

Online Safety and Appropriate Use of the Internet

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

Relationships

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

Adult – U18 Interaction

A relationship between staff/student is unacceptable, even where it is not illegal. Generally in relating to students, staff have to exercise caution, without distancing themselves entirely. As a general principle:

- Avoid situations where you are alone with a student. If the situation is unavoidable try to ensure that the door is not closed and that you don't position yourself between the student and a door.
- Respect the privacy of students regarding bedrooms, bathrooms, etc. in residential accommodation.
- Physical contact is not acceptable.
- If you are concerned in anyway about the nature of a relationship with a student talk about it with the student welfare officer.

HOWEVER

- Do take an interest in the students; using praise and being positive.
- Do join them in activities and events.
- Do speak with them as often as possible outside the class as well as inside.

Prevent Duty

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

Professional Duties

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

Absences

We understand that from time to time staff may be unwell and unable to teach. They may also have an important commitment that prevents them from teaching. We will be very supportive of all genuine absences. However, we need as much notice as possible. If it is an appointment then we would expect at least a week's notice, or if a longstanding arrangement, then notice of your unavailability prior to the course. In cases of sickness, we would ask you to use your discretion: if you are affected by something that others may catch then you must not come in to work; if it is something less serious (a headache or cold), please discuss with the Academic Manager.

All staff should be familiar with and follow Elac's policies, particularly the Safeguarding Policy, which can be found in the Elac Handbook.

I have read Elac's policies and agree to abide by the Code of Conduct:

Signed _____ Date _____

Group Leaders Code of Conduct for Elac Courses

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

Drugs, Alcohol, Smoking, Weapons

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

Social Media and Mobile Phones

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

Online Safety and Appropriate Use of the Internet

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

Relationships

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

Adult – U18 Interaction

A relationship between adults/U18s is unacceptable, even where it is not illegal. Generally in relating to student, adults have to exercise caution, without distancing themselves entirely. As a general principle:

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

HOWEVER

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

Prevent Duty

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

Professional Duties

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

Absences

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

All staff should be familiar with and follow Elac's policies, particularly the Safeguarding Policy, which can be found in the Elac Handbook.

I have read Elac's policies and agree to abide by the Code of Conduct:

Signed _____ Date _____

Group Name:



Homestay Agreement

(Updated January 2018)

I, have read, understood and will comply with the following terms, as required by the British Council and as described in Elac's 'Information for Hosts 2018':

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

I confirm that I have read and understood Elac's Safeguarding Policy including information on Prevent.

Signed:

Date:

.....

.....

Local Safeguarding Children Boards (LSCBs)

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

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

Local Authority Designated Officer Contact Numbers

Eastbourne – Eastbourne College, St Andrew’s School and St Leonards, Mayfield

LADO for East Sussex - Amanda Glover or Helen Marshall:

Tel: 01323 466620, Mob: 07825 782793

E-mail: Amanda.Glover@eastsussex.gov.uk

Horsham – Christ’s Hospital School

West Sussex Council’s LADO: Lindsey Tunbridge-Adams, 0330 222 3339

West Sussex Council’s Assistant LADO: Claire Coles, 0330 222 3339

Nottingham – Nottingham University

Nottingham City Council’s LADO: Lynne Wilson, 0115 876 2672

Bath – Bath Study Centre, Prior Park College and Bath Spa University

Bath and North East Somerset LADO: Jackie Deas, 01225 396810

Cardiff – Cardiff Metropolitan University

Children’s Access Point: 02920536490 (Sandra Cornwall)

Chalfont St Giles - Newland Park

Bucks County Council LADO Maria Thompson, 01296 382070

Elac Safeguarding/Welfare Incident Referral Form

STUDENT DETAILS

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

DETAILS

DETAILS		
Time:		
Details of Incident:		
Does the student understand what is happening?		YES
		NO
Details of Exact Conversation:		

.....continued

Please continue overleaf....

Any others involved?**Action Taken*****Signed:******Date:*****Please take/send this completed form to the Designated Safeguarding Officer (usually the ACM).**

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

Signed:***Safeguarding Officer***

Prevent Engagement Officers (PEOs) and Prevent Coordinators

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

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

If you are concerned about any aspect of extremism, including students at risk of radicalisation or students being drawn into terrorism at your ELAC centre, you should first contact Elaine Wickens (the Prevent Lead) via her confidential email address, elaine@elac.co.uk. She will then contact the relevant designated Prevent officer, as listed below. In the event of Elaine being unavailable Kera Gustafson (0796 955 0160) should be contacted.

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

Telephone: 020 7340 7263 (Monday – Friday from 9:00am to 6:00pm)

Email: counter.extremism@education.gsi.gov.uk

Prevent Engagement Officers contact details

- **Eastbourne** (Eastbourne College, St Andrew's School and St. Leonard's Mayfield School):
DS Steve Boyle, Sussex Prevent Coordinator
Telephone: 101, ext. 531279
Mobile 07768 467917
Email: steve.boyle@sussex.pnn.police.uk
- **Horsham** (Christ's Hospital School):
Sussex Police Prevent Team: 101, ext. 531335
- **Nottingham** (Jubilee Campus Nottingham University):
Sam Slack, FE/HE Prevent Coordinator (East Midlands),
01332643054 or 07812301215
- **Bath** (Bath Study Centre, Prior Park College and Bath Spa University):
Salam Arabi-Katbi, FE/HE Prevent Coordinator (South West),
01179455533 or 07824083307
Or confidential Anti-terrorist hotline: 0800 789 321
- **Cardiff** (Cardiff Metropolitan University):
Barrie Phillips, FE/HE Prevent Coordinator (Wales),
02920873281 or 07800711318
Or South Wales Anti-Terrorist Hotline: 0800 789 321
- **Newland Park** (Chalfont St Giles)
cypfirstresponse@buckscc.gov.uk
0845 460 0001

Elac Prevent Incident Referral Form

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

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

Any others involved?
Action Taken

Signed:

Date:

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

Signed:

Safeguarding Officer