

Policy Title:	ALPADIA U.K. Safeguarding Policy
Date:	April 2025
Previous Versions:	<p>June 2016          June 2017          May 2019          July 2019          February 2020          April 2021          August 2021          May 2022          May 2023          March 2024</p>
Other Relevant Documents:	<p>ALPADIA U.K. Health &amp; Safety Policy          ALPADIA Crisis Management Plan          ALPADIA U.K. Safer Recruitment Policy and Procedures          ALPADIA U.K. PREVENT Policy          ALPADIA U.K. Anti-Bullying Policy          ALPADIA Group Leader Guide          ALPADIA Staff Handbooks</p>
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## 1 Policy Statement

ALPADIA Language Schools is a summer language course provider with 5 residential camps for international under-18 students in the UK. The organisation provides transfers, accommodation, board, English language tuition, activities, excursions and pastoral care.

This policy applies to all students and employees at Alpadia UK Language Schools.

Both Kaplan and Alpadia Language Schools recognise our responsibility to safeguard and promote the welfare of Under 18's, within the UK legal framework and criteria of our educational oversight and accrediting bodies. We endeavour to ensure that we provide a safe, positive and pleasant study and home environment for all our students. All Alpadia Language School teams work hard to give all our students the most positive study experience they can have and we show an additional duty of care towards our students as they are legally minors. Whilst we cannot, and do not, aim to take the place of these students' parents, we monitor them more closely than other students and require all parents to sign a Consent Form.

Alpadia Language Schools understands that the safety of Under 18 students is paramount and we have put in place specific measures to ensure that students are in a safe environment. This policy applies to all students regardless as to their race, gender, religion, nationality, ethnicity etc.

This guidance is for the use of all staff, contractors, volunteers and visitors who come into contact with under 18's all of whom have a responsibility to safeguard them. Under 18's also have a responsibility to look after each other and raise concerns with adults if necessary. Adults have a responsibility to ensure that

- Students are listened to, valued and respected;
- Staff are aware of the need to be alert to the signs of abuse and know what to do with their concerns;
- All paid and unpaid staff are subject to rigorous recruitment procedures; and
- All paid and unpaid staff are given appropriate support and training.

It is the responsibility of all Adults to tell the Alpadia Language School Designated Safeguarding Lead or Local Safeguarding Staff at the School if there is a concern that a student might be at risk or is actually suffering abuse.

The current Designated Safeguarding Lead is Chris Baker ([christopher.baker@alpadia.com](mailto:christopher.baker@alpadia.com), +44 (0) 7709 989 013).

The names of the Local Safeguarding Staff can be found on posters throughout the Schools and within the induction materials. All Local Safeguarding Staff must undergo specific safeguarding training and be aware of all statutory guidance. It is the responsibility of the Local Safeguarding Staff to make themselves available for consultation by staff, volunteers, visitors and students. It is the responsibility of all Adults to act immediately upon all child protection concerns relating to students.

## 2 ALPADIA's U.K. Locations & Local Safeguarding Partnerships

### London-City Summer Centre (Goldsmiths)

Goldsmith's University, 8 Lewisham Way, New Cross, London SE14 6NW

Accommodation: Single ensuite accommodation in shared university blocks.

Age range: 14-17

Local Safeguarding Unit: Lewisham Safeguarding Children Partnership, 020 8314 6660, [mashagency@lewisham.gov.uk](mailto:mashagency@lewisham.gov.uk), 020 8314 6000 a (24HR)

LADO Contact: 020 8314 3114, [LewishamLADO@Lewisham.gov.uk](mailto:LewishamLADO@Lewisham.gov.uk)

PREVENT Contact: [prevent@lewisham.gov.uk](mailto:prevent@lewisham.gov.uk), 07710 387 930

#### **Brighton Summer Centre (Roedean School)**

Roedean Way, Brighton BN2 5RQ, UK

Accommodation: Single, twin triple standard accommodation in school boarding house Age range: 10-17

Local Safeguarding Unit: Brighton & Hove Safeguarding Children Partnership, [BHSCP@brighton-hove.gov.uk](mailto:BHSCP@brighton-hove.gov.uk), 01273 290 400, 01273 335905 (24HR)

LADO Contact: [darrel.clews@brighton-hove.gov.uk](mailto:darrel.clews@brighton-hove.gov.uk), 01273 295643

PREVENT Contact: [Channel.Prevent@brighton-hove.gov.uk](mailto:Channel.Prevent@brighton-hove.gov.uk), 01273 290 400

#### **Woldingham Summer Centre (Woldingham School)**

Marden Park, Woldingham, Caterham CR3 7YA

Accommodation: Single, twin triple and quad standard accommodation in school boarding house Age range: 10-17

Local Safeguarding Unit: Surrey Safeguarding Children Partnership, <https://www.surreyscp.org.uk/>, 0300 470 9100, 01483 517898 (out of hours)

LADO Contact: 0300 123 1650

PREVENT Contact: [preventreferrals@surrey.ppn.police.uk](mailto:preventreferrals@surrey.ppn.police.uk), 01865 555618

#### **London-Central Summer Centre (UCL)**

Campbell House East, 5-10 Taviton Street, London, WC1H 0BX

Accommodation: Single and twin rooms with shared bathrooms accommodation in shared university blocks.

Age range: 14-17

Local Safeguarding Unit: Camden Safeguarding Children Partnership

[Managing Allegations Against Staff and Volunteers & LADO - Camden Safeguarding Children Partnership CSCP](#)  
[LADO@camden.gov.uk](mailto:LADO@camden.gov.uk)

0207 974 6658, 0207 974 1276

LADO Contact: 0207 974 4556

PREVENT Contact: [LBCMASHadmin@camden.gov.uk](mailto:LBCMASHadmin@camden.gov.uk), 0207 974 4444

#### **Ardingly Summer Centre (Ardingly College)**

Ardingly College, College Road, Ardingly, Haywards Heath, RH17 6SQ

Accommodation: Single, twin, triple and quad standard accommodation in school boarding house Age range: 10-17

Local Safeguarding Unit: Brighton & Hove Safeguarding Children Partnership, [BHSCP@brighton-hove.gov.uk](mailto:BHSCP@brighton-hove.gov.uk), 01273 290 400, 01273 335905 (24HR)

LADO Contact: [darrel.clews@brighton-hove.gov.uk](mailto:darrel.clews@brighton-hove.gov.uk), 01273 295643

PREVENT Contact: [Channel.Prevent@brighton-hove.gov.uk](mailto:Channel.Prevent@brighton-hove.gov.uk), 01273 290 400

### **3 Legal Framework**

This policy has been written giving due regard to Accreditation UK guidance and relevant statutory

guidance including:

- Children Act 1989
- Children Act 2004
- Education Act 2002
- Safeguarding Vulnerable Groups Act 2006
- Education and Inspections Act 2006
- Children and Young Persons Act 2008
- Equality Act 2010
- Education Act 2011
- Protection of Freedoms Act 2012
- Police Act 1997
- Police Act 1997 (Criminal Records) Regulations 2002
- Police Act 1997 (Criminal Records) (No. 2) Regulations 2009.
- Prevent Strategy HM Government
- Counter Terrorism and Security Act 2015 (Prevent Duty)
- Children & Social Work Act 2017

#### **4 Staff Roles and Responsibilities**

The Designated Safeguarding Lead (DSL) has responsibility for the safeguarding of students within the UK portfolio, supported by other members of staff including those at ALPADIA Headquarters (Grand-Rue 42, CH-1820 Montreux, Switzerland). The current Designated Safeguarding Lead is Chris Baker ([christopher.baker@alpadia.com](mailto:christopher.baker@alpadia.com), +44 (0) 7709 989 013).

Oversight is provided by Sue Edwards, Director of Compliance and Accreditation UK & Ireland at Kaplan International ([sue.edwards@kaplan.com](mailto:sue.edwards@kaplan.com)) as well as Michael Glen-Kerr, the Global Camps Manager ([michael.glen-kerr@alpadia.com](mailto:michael.glen-kerr@alpadia.com)).

Furthermore, UK Manager and UK Regional Managers are all trained to an advanced level and can provide advice as required, or support in the DSL's absence.

In addition, there is a central Safeguarding Team comprising of the Director of Compliance, Global Camps Manager, UK Camps Manager and two UK Regional Managers who can be contacted using the email address [alpadiasafeguardingteam@kaplan.com](mailto:alpadiasafeguardingteam@kaplan.com). This group can be contacted regarding safeguarding concerns across all UK Alpadia camps. Once a concern is raised, the group meet, inviting the Local Safeguarding Lead (mentioned below) to discuss the case, formulating a plan of action including informing the LCSP or LADO (where appropriate). Support from this group is then on going and regular meetings are held to discuss updates until the case is closed. The group will also be informed of safeguarding concerns raised through the incident reporting system where appropriate.

The Camp Manager has responsibility for the day-to-day management and implementation of safeguarding practices at the local level as Designated Safeguarding Staff (DSS).

In some centres the Camp Manager is assisted with the implementation and monitoring of safeguarding practices by a Welfare Manager, also Designated Safeguarding Staff.

All staff members have a duty of care to safeguard students and maximise their wellbeing. ALPADIA expects staff members to contribute to building a professional, positive atmosphere on campus at all times. All staff should be aware to maintain an attitude of "it could happen here".

## 5 Staff Training

The Designated Safeguarding Lead is trained to a specialist level (formally level 3). Camp Managers and Welfare Managers are also trained to an advanced level (formally level 2), suitable for their status as important local safeguarding staff and points of contact. All staff members, including those mentioned above, must complete:

- A reading of Keeping Children Safe in Education Part 1
- Online safeguarding awareness training
- An in-person induction covering safeguarding awareness, PREVENT and Health & Safety
  - o At the management training event or
  - o At the local staff induction

This training is to be completed at the start of each summer cycle.

The Camp will also have a number of trained first aiders as per the First Aid Needs Analysis. The completion of the staff training record is the responsibility of the Camp Manager.

## 6 Child Protection Policies and Practices

### 6.1 Definition of Abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. Abuse could be:

- Physical Abuse: actual or likely injury or failure to prevent.
- Sexual Abuse: actual or likely sexual exploitation.
- Emotional Abuse: severe or persistent emotional ill treatment and/or rejection.
- Neglect: severe or persistent neglect and/or failure to protect from danger.

### 6.2 Recognising abuse

ALPADIA staff members should be alert to signs of abuse, which could manifest itself in a range of ways:

- Become aggressive.
- Become withdrawn and/or too attached.
- Demonstrate a changeable personality.
- Show fear of being in certain situations or environments.
- Exhibit injuries (for example bruising).
- Behave in an inappropriate sexualised manner.
- Display other forms of inappropriate or unexpected behaviour.

If abuse is suspected, this should be discussed with the DSL (or DSS in their absence) immediately. When concerns are raised these may be reported to the appropriate agency, notably the local authority's partners mentioned in section 2. Referrals to social care should generally be made with the consent, or the knowledge of, the parents/child. However where there is an immediate risk of harm, or where the parents are implicated, a referral may be made without the knowledge or consent of the parents or child'. All incidents of recognising abuse should be reported via the incident reporting

system.

### **6.3 Managing Disclosures & Confidentiality**

Any disclosures must be treated with the utmost seriousness. If alleged abuse is disclosed to staff they should:

- Not interrogate the child or ask leading questions.
- Not promise the child it will be kept secret, as serious allegations must be passed on.
- Record what the child has said as soon as possible with the exact language the child uses.
- Not make any assumptions, recording only what the child has said.
- Inform the Safeguarding Lead immediately after the disclosure and the record have been made.

The welfare of the child is always the paramount consideration. Confidentiality cannot be maintained if doing so impacts on the child's welfare. Any information recorded will be kept secure with access limited only to those stakeholders it is strictly relevant to. 'The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

All incidents of disclosures should be reported via the incident reporting system.

### **6.4 Allegations against staff members & whistleblowing**

If any staff member suspects or observes any other member of staff of behaving in such a way as to harm, commit an offence against or in relation to a child, or behave in an inappropriate manner towards a child, the following steps should be taken:

- Staff should record their concerns.
- Staff should immediately report the issue to the DSL, who will inform senior members of ALPADIA's management structure as appropriate. If deemed appropriate the staff member at the centre of suspicion may be suspended.
- The Safeguarding Lead will contact the Local Authority Designated Officer to get advice on how to proceed and follow their advice thereafter.
- Necessary support will be provided to the member of staff, whilst cooperating fully with any agencies who pursue any investigation.

ALPADIA will also ensure any staff member who reports genuine concerns will not subsequently be dealt with unfairly and their disclosure kept confidential.

For the avoidance of doubt; ALPADIA fully recognises the Sexual Offences Act 2003, which 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 legal age of consent is 16).

All incidents of allegations should be reported via the incident reporting system or HR reporting system, as



appropriate.

## **6.5 Allegations against students & Child on Child Abuse**

If any staff member suspects or observes any student of behaving in such a way as to harm, commit an offence against or in relation to another child, or behave in an inappropriate manner towards another child, they should immediately report the issue to the Local DSS and DSL. Child on Child abuse includes:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- upskirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sexting (also known as youth produced sexual imagery)
- initiation/hazing type violence and rituals.

The DSL and Designated Safeguarding Staff may impose disciplinary sanctions or escalate the matter to the police in the case of criminal offence.

All incidents concerning child on child abuse should be reported via the incident reporting system.

## **6.6 Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE) & Serious Crime**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Staff should be aware of the possibility that students may be victim of CSE or CCE and be aware of possible indicators in addition to those stated in 7.2, such as unexplained gifts, periods of unexplained absence, or drugs and alcohol misuse. In the event a student is identified as possibly being a victim of CCE or CSE, this must be referred to the Designated Safeguarding Lead who will refer the situation to the appropriate services.

Staff should also be aware of the risk that students can become involved in serious organised crime. Such concerns should be reported to the DSL and will be escalated to the relevant authorities if deemed necessary.

## **6.7 Female Genital Mutilation (FGM)**

ALPADIA is committed to ensuring that female students are safeguarded against Female Genital Mutilation (FGM). Staff who suspect that FGM has been carried out must report these concerns to the DSL who will immediately seek further advice from the child protection services. In the event that that a student has been observed to have undergone FGM or the student informs staff that this has happened, the Police will be notified immediately.

## **6.8 Prevent – Awareness and Referral**

Prevent is part of a Government initiative to develop a robust counter terrorism strategy. ALPADIA recognises it has a role to play in the PREVENT strategy. The Designated Safeguarding Lead acts as the organisation's PREVENT lead. ALPADIA has completed a PREVENT risk assessment, has a PREVENT Policy, and trains staff on PREVENT awareness and referral.

## **6.9 IT, E-Safety and Social Media**

ALPADIA recognises that the Internet and social media are places where abuse can take place, or children may be vulnerable.

ALPADIA takes all reasonable steps to safeguard our students on the internet via the site risk assessment. Parents are provided with pre-arrival instructions regarding e-safety and securing their students' mobile devices. Student inductions and codes of conduct cover numerous e-safety topics in order to educate and protect them. Staff members are inducted and informed about online contact with students. For the avoidance of doubt, staff members should not become online friends or acquaintances with students inside or outside of summer camps.

### **6.10 Contractors**

ALPADIA uses a number of third parties to provide services during our summer courses including host accommodation providers, coach providers, taxi providers and activity providers. All such persons involved in the provision of such services will have undergone suitability checks, or a risk assessment will be in place to ensure persons are not in regulated activity. Provider arrangement service level agreements are also in place.

## **7 Recruitment**

ALPADIA recognises that safer recruitment practices are a vital tool in safeguarding our students.

Full details of the ALPADIA's U.K. recruitment policy and practice is available in the ALPADIA U.K. Safer Recruitment Policy and Procedures (please email [info@alpdadia.com](mailto:info@alpdadia.com) to request a copy).

## **8 Wider Safeguarding Practices**

### **8.1 Crisis Management Plan**

The Crisis Management Plan (CMP) is a reference tool for our local teams and headquarters for managing, coordinating and communicating internally and externally during crisis events. This includes missing students and fire emergencies, the latter of which is also addressed by the Health & Safety Policy.

The CMP provides key information to everyone involved in a crisis management situation. It does not replace any guidance from local authorities that needs to be respected first. A copy of the CMP is available at centre.

### **8.2 Group Leaders**

ALPADIA recognises that Group Leaders (adults at the school who travel and attend the course with a group of specific international students) are valuable partners who can help maximise the wellbeing of students. In addition, ALPADIA also recognises that Group Leaders are not employees yet have substantial access to students. As a result, ALPADIA requires confirmation and documentation of relevant suitability checks, undertaken before they arrive at centre. ALPADIA also requires a Group Agreement Form, issues a Group Leader Guide, and includes a Group Leader Code of Conduct. These are available by contacting [info@alpadia.com](mailto:info@alpadia.com)

### **8.3 Staff Code of Conduct**

The staff code of conduct sets the expectations and rules which ALPADIA places on team members. The Staff Code of Conduct is acknowledged by staff during the recruitment and onboarding process. It is also present in each role handbook. In summary:

Ask staff to ensure:

- Are always respectful to students, staff and Alpadia stakeholders
- Conduct yourself in a professional manner with students, colleagues and the organisation's stakeholders
- In no way behave in a manner that could bring the organisation into disrepute
- Complete all reasonable tasks assigned to you by the organisation fully and diligently
- Follow the policies and procedures of the organisation, especially those concerning safeguarding, health and safety.
- Do not drink alcohol or smoke in front of the students, their leaders or parents
- Do not attend work under the influence of non-prescribed drugs or alcohol
- Do not use foul or inappropriate language in front of our students, leaders, parents or hosts.
- Avoid personal relationships with students that could be construed in anyway as unprofessional. For the avoidance of doubt; sexual relationships with students are illegal.
- Do not engage with students on social media before, during or after the course
- Avoid being alone with students at any time
- Do not argue with your colleagues in front of students or their Leaders
- Do not joke about sexual or personal matters with students
- Under no circumstances may staff members ridicule students, make racist comments towards students or discriminate against students in anyway
- Report any welfare, safeguarding, health and safety incidents or concerns to the management team, even if these are low level concerns
- Do not discuss ALPADIA or anything relating to the school – other staff members, students, Group Leaders etc. – in a negative way
- Do not engage in physical contact with students unless it absolutely necessary to prevent significant damage to property, themselves, or others.

And we **expect**:

- Work as a team
- Make good use of the materials that are given to you
- Keep a positive attitude even if something goes wrong
- Make students and Group Leaders understand the importance of being punctual at all times
- Be careful of your body language, and to always think what your behaviour could look like someone else
- Inform the Camp Manager if you have a problem with a student or if anything comes to light that is important
- Remember to prioritise student safety over all other considerations – the physical nature of most activities means staff need always to be aware of potential hazards, planning accordingly to reduce

risk.

- Always set a good example, remembering course is designed for the students' enjoyment over your own. Show enthusiasm and the students will respond.
- Staff should be careful to ensure all stages of the activity are age and level appropriate, bearing in mind cultural sensitivities. It is particularly important to ensure the sessions are accessible to all students, bearing in mind varying ability levels.
- Use different ways of ensuring good order in activities without resorting to shouting – which is considered very inappropriate in many cultures. Try whispering, raising your arm in the air, saying nothing until there is silence etc.
- It is vital to adapt (grade) your language in activities so your instructions are understood. Avoid slang or colloquialisms and speak in clear, standard language.
- Students may occasionally seek inappropriate physical or sexual contact with staff members. Staff members should always sensitively deter children from this at all times, reinforcing the necessary boundaries. Any such issues should be reported to the Camp Manager. It should be noted any sexual or suggestive behaviour towards any of the students, who are all children, is both inappropriate and illegal.

The staff handbook also highlights appropriate dress code for staff members at ALPADIA. Further examples of misconduct and gross misconduct are also available in Kaplan's HR policies.

#### **8.4 Arrival and Departure Transfers**

ALPADIA recognises that arrival and departure transfers are a time where risks are present to students' safety and wellbeing. ALPADIA recommends that parents book transfers with ALPADIA. These transfers are risk assessed, resourced with ALPADIA staff at major transfer hubs, and use reputable contractors. Students under the age of 16 must be collected from camp if no transfer is booked. Students who are 16 or 17 years old may only depart alone with parental consent.

#### **8.5 Student Attendance Policy, Sickness and Medical Procedure**

Students should not be absent from any part of ALPADIA's programme without good reason. Good reason primarily includes illness, although the Camp Manager may decide otherwise in consultation with the DSL, regional managers, agents or parents. Students are expected to attend:

- All English Language classes
- All afternoon activities and Premium + activities when enrolled
- All evening activities
- All mealtimes
- At curfew

There may be occasions where students wish to skip parts of the programme for reasons other than sickness. ALPADIA staff will be sensitive to any personal issues students may experience but expect and require all students to be present at each stage of the programme. In any case of doubt, ALPADIA staff should consult the DSS or DSL.

Any student who is sick is considered within a four-stage sickness process (see the pre-arrival Info Pack). Students who are sick are checked regularly, depending on severity, with all checks recorded via a sickness check form.

## 8.6 Accommodation Allocation

At Alpadia, student wellbeing and safety are central to all accommodation decisions. We take great care to allocate students in a manner that promotes their welfare and mitigates risk.

Accommodation allocations prioritise:

- **Privacy and appropriate separation** between students of different sexes, especially in sleeping areas and bathroom facilities.
- **Age-appropriate groupings**, ensuring students are placed with peers of a similar age. Significant age gaps (e.g., under-14s with 17-year-olds) are avoided to ensure comfort, safety, and age-appropriate interactions.
- **Accommodation requests**, such as sharing with friends, are considered when the above criteria are met in the overall rooming plan.
- **In order to ensure immersion**, we also consider the mother tongue of students where possible to maximise students' international interaction.

To further support students:

- **Staff are present in accommodation areas** to offer support, respond to concerns, and assist in emergencies.
- **Night supervision is in place** at all camps, with staff actively monitoring residences after curfew hours.
- **Site-specific risk assessments** and related control measures are implemented to ensure accommodation environments are secure and safe.

## 8.7 Supervision and Supervision ratios

Supervision is present throughout the period of a student's stay at ALPADIA (with the notable exception of free time when parental consent has been given, as detailed below).

Each ALPADIA site is risk assessed in order to determine what level of supervision should be present around camp, outside of scheduled lessons, activity and dining times. As a minimum there must be residential staff ratio of 1:20, continuous supervision shifts from 07:30 – 22:30, and night supervision shifts from 22:30 until the early hours of the morning.

ALPADIA determines the minimum number of staff required during activities based upon a risk assessment.

## 8.8 Authorisation, Consent & Sortie Libre

consent for various elements of student care is obtained in advance. This includes medical consent, consent to travel, and consent for free time.

Alpadia provides 24/7 supervision, with some exceptions, as per our marketing material. However, free time authorisation ('sortie libre') is available for students that are a minimum of 14 years old. If parents do not send authorisation, the same rules will be applied as for a student with a negative authorisation form. Supervision will be in place for students with no free time authorization at all times. Students with authorisation will be allowed periods of free time, such as after activities or during excursions.

## 8.9 Registers, head counts and Missing Students

ALPADIA undertakes regular registers and head counts throughout the day. Any instances of students

not being present for register or during head count counts must be followed as per the CMP. Registers or head counts are taken. Attendance is recorded for all checks via a QR code scan, except curfew in order to preserve the privacy of students and boundaries for staff:

- At each meal, a register with the name of all students is completed.
- Registers are taken at the start of each session or activity, both in the afternoon and evening
- All students are checked in their rooms at the time of the curfew.
- During visits and excursions, head counts should be completed before getting on the coach or onto other transport and when the group is getting off.
- During visits and excursions, head counts should be taken at regular stages throughout the trips and when moving by foot from place to place.

### **8.10 The Student Card**

Each student receives a student card upon arrival at the camp. Various details are indicated on the card such as emergency numbers and allergies. Students must carry the card at all times and are not allowed to begin class, activities or catering without it. The student card contains a QR code in order to record attendance.

### **8.11 Student Code of Conduct, Student Discipline and Exclusions**

The Student Code of Conduct stipulates unacceptable behaviors and associated sanctions. The student code of conduct is agreed upon in advance of arrival by students and their parents / guardians. The student code of conduct reads:

“The camp staff do their best to ensure your safety and wellbeing during your language course abroad. However, in the interests of the group, a few rules must be respected. We shall not tolerate:

- Disrespectful behaviour to staff, hosts or other students
- Visits to rooms of the other sex by day or by night
- Students leaving the campus, or meeting people from outside of camp, without giving prior notice to the Camp Manager and having received parental consent via Alpadia Customer Care.
- Persistent lateness or absence without good reason
- Persistent failure to wear an ID card
- Use of tobacco or vaping
- Verbal abuse or bullying, including online
- Vandalism or intentional damage
- Swimming without prior permission from a staff member
- Failure to observe curfew times
- Use of substances such as stimulants, energy drinks or CBD products
- Failure to observe any other local rules presented in the ALPADIA induction
- Accessing or sharing inappropriate content online, including taking images of other students without consent
- Engage in inappropriate behaviours, such as overly public or serious intimate activities
- Disrespectful or immodest clothing, or clothing unsuitable for camp activities

In the event of a violation of the camp rules, you will receive a first warning and your parents or legal guardians will be informed. In the event of a second violation, you will receive a final written warning which will also be sent to your parents or legal guardians. You will be expelled if a third violation of the camp rules takes place. In case of serious behavioural issues you may receive an immediate final written warning or be expelled without prior warnings.

Examples include:

- Theft
- Use of alcohol, drugs or other illegal substances
- Physical abuse or assault of others
- Any violation of the applicable laws of the country

In case of an expulsion, your parents or legal guardians will be contacted, and arrangements will be made to send you back to your country or region as soon as possible, at your parents' expense. From then, ALPADIA declines all liability concerning your person and no refund can be requested."

### **8.12 Students with additional needs**

Clients are primarily responsible for ensuring their students are capable of attending the programme. Where a student has additional needs, for whatever reason, these are consulted on with the operations team in advance of arrival. The operations team strives to make all reasonable adjustments to the programme in order to accept students with additional needs.

### **8.13 Feedback**

Each week students fill in a feedback form. Student feedback covers all elements of the programme; lessons, activities, accommodation, catering, staff and general satisfaction. Student feedback and subsequent action required is a standing agenda item for the local management team's weekly meeting. Feedback follow up is also a standing agenda item for the daily staff meeting. An annual review of UK student feedback is taken at the end of season by the DSL and Global Summer Camps Manager.

### **8.14 Complaints**

If for any reason students are unhappy with a part of their stay, ALPADIA encourages them to speak directly to staff present at the camp. If they are unable to resolve the issue, they can inform the Camp Manager. Ultimately the complaint can be taken to the Swiss Head Office or ultimately English UK. Further details are contained within the normal Terms & Conditions of booking available at [www.alpadia.com](http://www.alpadia.com).

### **8.15 Health and Safety**

ALPADIA is strongly committed to ensuring the health and safety of its employees, clients and all other relevant stakeholders as far as is reasonably possible.

ALPADIA requests and requires of all staff full cooperation in all health and safety matters. In addition to reading any ALPADIA, camp and venue risk assessments, all staff should be proactive in improving our ability to mitigate risk – providing the safest possible environment for both staff and students and reporting any practices which do not meet requirements directly to the Camp Manager.

ALPADIA is also committed to reviewing our Health and Safety procedures on a regular basis to ensure they are fit for purpose, providing training as necessary to staff and monitoring how staff's health and safety duties are discharged.

For further details, please refer to the Health & Safety Policy (available via [info@alpadia.com](mailto:info@alpadia.com)).

### **8.16 Risk Assessments**

ALPADIA has produced risk assessments for each centre and planned activities. These are consulted, amended and appended at the local level as a result of reviews, changes in circumstance, and in light of new information or incidents. Risk assessments are also reviewed annually, before each summer cycle.

### **8.17 First-Aid Policy**

ALPADIA adheres to the Health and Safety (First Aid) Regulations 1981, meaning there are always adequate and appropriate provisions for first aid within our Camps. The minimum First Aid requirements are based on a needs analysis which is stored with the Risk Assessments.

### **8.18 Private Fostering**

ALPADIA recognises that if a student aged under 16 (under 18 if disabled) is staying with a family who is not his/her own immediate family for more than 27 nights then they can be considered in Private Fostering Arrangement. In this case it will be reported to the local authority, usually social care, at least six weeks before arrangement starts.

### **8.18 Day Campers**

Upon request, ALPADIA may accept booking requests for day campers with approval from the regional manager. When booked as a day-camper, students have the option to attend any or all day-time events including: breakfast, lessons, lunch, activities/excursions/premiums, dinner & evening activities. The types of sessions required should be established at time of booking. The regional or area managers are required to ensure that pick up and drop off arrangements are clear, that a responsible adult is identified for pick up and drop off, and that emergency contact details are known to staff.

## **9 Distribution of Policy**

The policy summary will be displayed in the staff office and student noticeboards. A policy summary is emailed to all staff during the recruitment process, or after update, and displayed on the staff noticeboard. The policy is shared with host institutions and key contractors before each season. The policy is available on the company website.

## **10 Policy history and future changes**

This policy was introduced in June 2015 and is subsequently reviewed at least each year in order to ensure it remains fit for purpose by the Designated Safeguarding Lead. The policy may be reviewed sooner in the event of changes to accreditation/statutory guidance, incidents and feedback. The policy review will give due consideration to the course feedback from students, clients, staff, parents and agents.