

Policy Title:	ALPADIA U.K. Safeguarding Policy
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Other Relevant Documents:	<p>ALPADIA U.K. Health & 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 3 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 Michael Glen-Kerr (michael.glen-kerr@alpadia.com, +44 (0) 7812 855 852).

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 Summer Centre

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

Accommodation: Single ensuite accommodation in shared university block

Age range: 13-17

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

LADO Contact: 020 8314 3114, LewishamLADO@Lewisham.gov.uk

PREVENT Contact: prevent@lewisham.gov.uk, 07710 387 930

Brighton Summer Centre

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, 01273 290 400, 01273 335905 (24HR)

LADO Contact: darrel.clews@brighton-hove.gov.uk, 01273 295643

PREVENT Contact: Channel.Prevent@brighton-hove.gov.uk, 01273 290 400

Woldingham Summer Centre

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, 01865 555618

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) and the Global Summer Camp Manager, Mattias Ysebie. (mattias.ysebie@alpadia.com).

The current Designated Safeguarding Lead is Michael Glen-Kerr (michael.glen-kerr@alpadia.com, +44

(0) 7812 855 852).

Oversight is provided by Sue Edwards, Director of Compliance and Accreditation UK & Ireland at Kaplan International (sue.edwards@kaplan.com).

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 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
- Online PREVENT 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

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'.

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.

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 maybe 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).

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.

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 and, where internet access is not restricted or monitored by our partner agencies, to ensure students are made aware of their responsibilities and online safety.

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.

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 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.

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 issues a Group Leader Guide and induction that includes a Code of Conduct. This is available by contacting info@alpdadia.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.

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.

8.5 Student Attendance Policy

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, agents and parents. Any student who is sick should be seen by a DSS and a doctor if necessary. Students are expected to attend:

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

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.

8.6 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.

8.7 Authorisation, Consent & Sortie Libre

Parental consent for various elements of student care is obtained in advance. This includes medical consent, consent to travel, and consent for free time. Free time authorisation (“sortie libre”) is only valid for students that are a minimum of 14 years old. If the parents did not send the authorisation form, 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 during free time whenever outside of centre.

8.8 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:

- 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.

8.9 The Student Card

Each student receives a student card upon arrival at the camp. Various emergency numbers are indicated on the card. Students must carry the card at all times.

8.10 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.

- Visits to rooms of the opposite sex by day or by night
- Students leaving the campus without giving prior notice to the Camp Manager (even when the parents have signed the authorisation form to leave the campus)
- Persistent rudeness to staff and hosts
- Persistent lateness or absence without good reason
- Persistent failure to wear an ID card
- Use of tobacco or vaping
- Verbal abuse or bullying
- Vandalism or intentional damage
- Failure to observe curfew times
- Failure to observe any other local rules presented in the ALPADIA induction

In the event of a second violation of the camp rules, the students and parents or legal guardians will receive a final warning. Students can be expelled if a third violation of the camp rules takes place. In case of serious behavioral issues students may receive an immediate final 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

8.11 Feedback

During the first week of their stay and on the last Friday of their course 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 managements 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.

8.12 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.

8.13 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).

8.14 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.

8.15 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 and stored with the Risk Assessments.

8.16 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.

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.