

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 Safeguarding Policy Introduction

This policy is designed to outline the responsibilities of everyone who works for, or provides services and support to, ALPADIA in relation to our students' wellbeing.

It is also designed to highlight key practices undertaken to protect our students, and signpost other key documents where relevant.

ALPADIA is committed to safeguarding the welfare of all of our students. ALPADIA expects all adults working with children to share the commitment.

ALPADIA will:

- Treat all children (defined as those under the age of 18) with care, respect and dignity.
- Treat all students equally, regardless of age, gender, race, disability, religion or sexual orientation and protects all students equally.
- Assess any potential risks to children as a result of all activities.
- Understand that ALPADIA staff are viewed by students as trusted adults.
- Communicate with students in a way that is open, clear and honest.
- Ensure we have a fully trained Designated Safeguarding Lead (currently Michael Glen-Kerr, UK Summer Camps Manager), who must be informed of any safeguarding issues or allegations and ensure these are investigated and reported wherever necessary.

2 ALPADIA's U.K. Locations

ALPADIA runs 3 summer residential camps for junior international students. The organization provides transfers, accommodation, board, tuition, activities and care at the following locations:

London Summer Centre

Will Wyatt Court 168, Pitfield Street, Hoxton London N1 6JP, UK.

Accommodation: Single ensuite accommodation in shared university block

Age range: 13-17

Local Safeguarding Unit: City and Hackney Safeguarding Children Board (CHSCB), 0208 356 6956, Fast@hackney.gov.uk, 0208 356 2710 (24HR)

LADO Contact: 0208 356 4569, LADO@hackney.gov.uk

PREVENT Contact: 020 8356 8104, prevent@hackney.gov.uk

University of Keele Summer Centre

Chancellors building, Staffordshire ST5 5BG, Keele, UK

Accommodation: Single ensuite accommodation in shared university block

Age range: 10-17

Local Safeguarding Unit: Staffordshire Safeguarding Children Board, 0800 1313 126, 0345 604 2886 (24HR)

LADO Contact: 0800 1313 126, 0345 604 2886 (24HR)

PREVENT Contact: prevent@staffordshire.pnn.police.uk, 01785 232054

Brighton Summer Centre

Roedean Way, Brighton BN2 5RQ, UK

Accommodation: Single standard accommodation in 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

3 Legal Framework

This policy has been written giving due regard to Accreditation 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)

4 ALPADIA Safeguarding Approach

ALPADIA recognizes both the importance of safeguarding (the wider umbrella term for looking after students) and child protection (protecting students from harmful behavior).

All of the students who come to ALPADIA UK's summer camps are under the age of 18 and the programme, and all rules surrounding it, have been designed specifically to promote the welfare of our students. Staff are made aware of the importance of their relations with our students and given specific instructions as appropriate on how to work with children.

ALPADIA recognises children are often impressionable and seeks to set the best possible example and clear guidelines to all of our students. Instances of bad language, in any language, are not tolerated and any staff member who swears within earshot of students may be subject to our disciplinary procedures.

ALPADIA extends our commitment to safeguarding children under 18 into all aspects of our summer camps, ensuring all material in EFL lessons and activities is suitable for children.

Through planning our trips and excursions with thorough risk assessments ALPADIA also aims to ensure students are protected from harm by all external agents and events, with a particular appreciation of typical examples of harm, which may affect minors.

ALPADIA exercises a zero tolerance approach to any member of staff who does not follow our guidelines on dealing with under 18s, or who socialises, or attempts to socialise, with under 18s outside of the Camp.

5 Staff Roles and Responsibilities

The Designated Safeguarding Lead has overall 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@alpadia.com, +44 (0) 7812 855 852).

The Camp Manager has responsibility for the day-to-day management and implementation of safeguarding practices at the local level as designated safeguarding staff.

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 protect students from harm and maximize their wellbeing. ALPADIA expects staff members to contribute to building a professional, positive atmosphere on campus at all times.

For the avoidance of doubt, 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 legal age of consent is 16).

6 Staff Training

The Designated Safeguarding Lead is trained to advanced level. Camp Managers and Welfare Managers are also trained to advanced level, suitable for their status as important local safeguarding staff. All staff members, including those mentioned above, must complete:

- A reading of Keeping Children Safe in Education Part 1
- Online safeguarding awareness training issued by Accreditation U.K or Kaplan
- Online PREVENT training issued by the Home Office
- An in person induction covering safeguarding, 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.

7 Child Protection Policies and Practices

7.1 Definition of Abuse

ALPADIA recognises abuse as defined by the 1989 Children's Act, acknowledging it 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.

It is also important to note that if a child discloses any abuse of an historical nature that this is treated in exactly the same way.

7.2 Recognising abuse

ALPADIA staff members should be alert to signs of abuse, which could manifest itself in a range of ways. Although as stated above it is important to always keep an open mind and understand the following behaviour may not indicate abuse, all staff should be alert to children who:

- Become overly 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 behaviour.

If abuse is suspected, this should be discussed with the Safeguarding Lead immediately. When concerns are raised these may be reported to the appropriate agency, which could be the local children's Social Care Referral and Assessment Team.

7.3 Managing Disclosures & Confidentiality

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

- Not promise the child it will be kept secret, as serious allegations must be passed on.
- Reassure the child that anybody who needs to be informed will be sensitive and kind to the child.

- Reassure the child they have done the right thing by disclosing.
- Record what the child has told you as soon as possible with the exact language the child uses.
- Not make any assumptions of your own, recording only what the child tells you.
- Not interrogate the child or ask leading questions.
- Inform the Safeguarding Lead immediately after the disclosure and your record is made.
- Keep the child informed as to what happens, or will happen, next, reassuring them constantly.

The welfare of the child is always the paramount consideration. The law dictates that confidentiality cannot be maintained if doing so impacts on the child's welfare. Any information disclosed will be kept locked and secure with access limited only to those stakeholders it is strictly relevant to.

7.4 Allegations against staff members

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. He/she should also ensure the staff members concerns have been raised towards does not work alone with any children for the remainder of the day.
- The Safeguarding Lead will contact the Local Authority Designated Office to get advice on how to proceed, following the advice on the allegation.
- Necessary support should be provided to the member of staff, although ALPADIA will cooperate fully with any agencies who pursue any investigation.

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).

ALPADIA places an obligation on staff members to blow the whistle by informing the DSL of concerns about staff members. ALPADIA also ensures any staff member doing so will not subsequently be dealt with unfairly and their disclosure kept confidential.

7.5 Allegations against students

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 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. He/she should also ensure the staff members concerns have been raised towards does not work alone with any children for the remainder of the day.

- The Safeguarding Lead will contact the Local Authority Designated Office to get advice on how to proceed, following the advice on the allegation.

7.6 Child Sexual Exploitation

In the event a student is identified as possibly being a victim of child sexual exploitation, this must be referred to the Designated Safeguarding Lead who will refer the student to the appropriate services.

7.7 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.

7.8 Prevent – Awareness and Referral

Prevent is part of a Government initiative to develop a robust counter terrorism strategy. ALPADIA recognizes it has a role to play in the PREVENT strategy. ALPADIA has completed a PREVENT risk assessment, has a PREVENT Policy, and trains staff on PREVENT awareness and referral.

7.9 IT, E-Safety and Social Media

ALPADIA recognises that the Internet and other IT forums are potentially a place 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 by our partner agencies, to ensure students are made aware of their responsibilities and given specific logon codes if necessary to monitor their interaction online.

ALPADIA forbids staff members from becoming online friends or acquaintances with students inside and outside of summer camps.

7.10 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.

8 Recruitment

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

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

9 Wider Safeguarding Practices

9.1 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 local statement proposed by local authorities that need to be respected first. A copy of the CMP is available at centre.

9.2 Anti-Bullying

ALPADIA is committed to providing a caring, friendly atmosphere and a safe environment for all of our students. Bullying of any kind is unacceptable and will not be tolerated. ALPADIA has a stand alone Anti-Bullying Policy, includes Anti-Bullying in inductions and handbooks, and the student Code of Conduct.

9.3 Group Leaders

ALPADIA recognizes 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 maximize the wellbeing of students. In addition, ALPADIA also recognizes that Group Leaders present risks to students, as any adult potentially. As a result ALPADIA requires confirmation that relevant suitability checks have been undertaken before they arrive at centre. ALPADIA also issues a Group Leader Guide that includes a Code of Conduct.

9.4 Staff Code of Conduct

The Staff Code of Conduct is present in each role handbook. In summary, staff:

- Are always courteous and polite at all times with everyone
- Do not argue with your colleagues in front of students or their Leaders
- Do not delegate your duties to other people
- Work as a team
- Make good use of the materials that are given to you
- Use your common sense to solve unforeseeable problems
- Do not drink alcohol or smoke in front of the students
- Keep a positive attitude even if something goes wrong
- Make students and Group Leaders understand the importance of being punctual at all times
- Do not joke about sexual or personal matters with students
- Be careful of your body language, and to always think what your behaviour could look like to a suspicious adult
- Inform the Camp Manager if you have a problem with a student or if anything comes to light that is important
- Do not enter a student's room unless it is strictly necessary (in this event tell them to keep

the door open), or even better, have another member of staff with you.

- 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.
- Under no circumstances may staff members ridicule students, make racist comments towards students or discriminate against students in any way.
- Staff should never swear within earshot of students.
- Always set a good example, remembering course is designed for the students' enjoyment over your own. Show enthusiasm and the students will respond.
- Staff members should not discuss ALPADIA or anything relating to the school – other staff members, students, Group Leaders etc. – in a negative way within earshot of students/Group Leaders/Monitors/Agents or parents.
- 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.
- Physical contact with students is generally to be avoided, although a total ban is not always practical. It is essential that any contact is based on sound professional judgment and common sense – remember most things can be taught to the students by demonstrating yourself what they are going to do. It is particularly important for activity leader / teachers to be sensitive to any students feeling uncomfortable. Staff may intervene in extreme instances, for example of students' fighting with one another or vandalizing school property. In any such cases contact should be proportional and reported to the Camp Manager as soon as possible.
- Students may occasionally seek inappropriate physical or sexual contact with staff members. Activity leader / teachers 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.

9.5 Arrival and Departure Transfers

ALPADIA recognizes 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 at major transfer hubs, and use reputable third party providers.

9.6 Student Attendance Policy

Students should not be absent from any part of ALPADIA's programme without good reason. Any student who is sick should see a doctor as soon as possible. Students are expected to attend:

- All English Language classes from 8.30am to 11.45am or 12.30pm
- All afternoon activities or Premium + activities from 2pm to 6.30pm
- All evening activities between 7.30pm and 10pm
- All mealtimes in the Camp specific timetables

Except in the cases of verifiable sickness or other personal issues, there should be no reason for students to miss any parts of the program listed above. ALPADIA ensures all students are present at each stage through taking registers and ensuring any absent students are followed up on to ensure their presence thereafter.

There may be occasions where students wish to skip parts of the programme for reasons other than sickness. ALPADIA staff should be sensitive to any 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 Camp Manager, who will make the ultimate judgement on whether the student should be excused or not.

9.7 Supervision and Supervision ratios

Supervision should be present throughout the period of a student's stay at ALPADIA (with the notable exception of free time when parental consent is present, 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 and activities. 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 also determines the minimum number of staff required during activities based upon a risk assessment.

9.8 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 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. An Activity Leader will accompany the students with a negative authorisation form during free time, whenever away from the centre.

9.9 Registers/Head counts

ALPADIA undertakes regular registers and head counts throughout the day. Any instances of students being unable to attend classes, or other parts of programme must be followed as per the CMP

- At each meal, a register with the name of all students is completed. Students should attend each mealtime and any absences are followed up immediately.
- 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.
- It is particularly important to ensure all students are accounted for during their free time periods.
- 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. These should also be conducted at regular stages throughout the trips and when moving by foot from place to place.

9.10 The Student Card

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

9.11 Student Code of Conduct, Student Discipline and Exclusions

The Student Code of Conduct stipulates unacceptable behaviors and associated sanctions:

- 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 authorization 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, you and your parents or legal guardians will receive a final warning. 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 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

9.12 Feedback

After the first week of their stay and on the last Friday of their stay students fill in a feedback form. Student feedback and required action is a standing agenda item for the local management's team's weekly meeting.

9.13 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. Further details are contained within the normal Terms & Conditions of booking.

9.14 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.

9.15 Risk Assessments

ALPADIA has produced thorough risk assessments for each centre and all 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.

9.16 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.

9.17 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.

10 Distribution

The policy summary will be displayed in the staff office and student noticeboards. A policy summary will be emailed to all staff during the recruitment process, or after update, and displayed on the staff noticeboard. The policy will be made available on the company website.

11 Policy history and future changes

This policy was produced in June 2015 and is subsequently reviewed each year on an annual basis to ensure it remains fit for purpose. The policy may be reviewed sooner in the event of

relevant changes to guidance, incidents and feedback. The policy review will give due consideration to the course feedback from students, clients, staff, parents and agents.