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Safeguarding & Welfare Policy

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1. Overview

This policy applies to all members of the Experio English community (including staff, students, volunteers, visitors, partners) who work both inside and outside of Experio English premises, and sets out how the school discharges its responsibilities relating to safeguarding and promoting the welfare of students at the school.

This policy will contribute to the safeguarding of pupils/students at Experio English by:

- Providing a clear plan for the provision of safeguarding.
- Reducing the potential risks pupils/students face of being exposed to abuse, extremism, radicalisation, exploitation or victimisation.
- Outlining responsibilities of all staff and specific roles.
- The establishment of a safe, resilient and robust safeguarding ethos in the school, built on mutual respect, and shared values.

Within this policy the following areas are covered:

- Safeguarding of children and vulnerable adults
- Courses and Age Ranges
- Supervision ratios
- IT policy
- Inappropriate behaviour
- Student attendance
- Care of ill junior students
- Prevent and British Values
- Safeguarding policy for the provision of online courses

2. Safeguarding

Experio English recognises its responsibility to safeguard and promote the welfare of children and vulnerable adults, and seeks to take every reasonable step to safeguard them by adopting child

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protection guidelines and following procedures for the vetting and training of people who work directly with children, young people and vulnerable adults.
Experio English accepts in loco parentis responsibility of children, as outlined by the school's Supervision Ratios Policy. Experio English recognises that it has a special duty of care towards children and young people under the age of 18, and vulnerable adults and as such, adheres to the following guidelines:

1. Any member of staff teaching, caring for or supervising a young person under the age of 18 or vulnerable adults, is vetted and subject to Disclosure and Barring Service (DBS) checks at the appropriate level.
2. Staff should avoid being alone with a child without another staff member being present. In situations where this is unavoidable, exit routes should be clearly visible and doors to the room or area left open.
3. Meetings between staff and students under the age of 18 outside of the normal teaching/activity programme environment should be avoided. Where unavoidable, another staff member should be informed that they are taking place.
4. Intimate or sexual relationships between staff and students under the age of 18 are an abuse of trust which may constitute a criminal offence.
5. Unnecessary physical contact with students should be avoided, even if well-intentioned, to avoid such acts being misinterpreted.
6. In the unlikely event that a staff member is required to restrain a child or young person in order to prevent self-injury, damage to property, or ensure the safety of others, only the minimum force necessary must be used.
7. Designated first aiders or other staff required to administer first aid should ensure that another member of staff is present, where possible, to avoid any necessary physical contact being misinterpreted.
8. Staff should be careful in their use of language/terminology and must not make unnecessary comments which could be interpreted as having a sexual connotation.
9. The personal telephone number, personal email or home address of any staff member should not be given to young students.
10. Staff should not attempt to resolve any complaints or disclosures of students alone; all allegations or suspicions of abuse should be reported to the Designated Safeguarding Lead and/or Directors. At all times, staff members should stay calm, listen, record information and seek support.

2.1. Roles and responsibilities

2.1.1. All staff should be made aware of their responsibility to maintain confidentially and be aware of their duties to report and record any safeguarding or child protection concerns they may have in accordance with schools safeguarding and child protection procedures.

2.1.2. All staff need to be aware of the systems within Experio English which support safeguarding and child protection – this forms part of the induction process but also on-going training which is regularly updated.

2.1.3. In addition, all staff should:

- Know the name of the Designated Safeguarding Lead (DSL), **Ben Whittaker** and how to contact him.
- Know who to contact in the DSL's abesence. The DSL's deputy is **Alison Cameron**.
- Know what to do if a child tells them they are being abused or neglected.
- Report concerns about a child/young person immediately or as soon as it is possible to the DSL. However, if a child is in immediate danger or is at risk of harm a referral should be made to the police or children's social care immediately.

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- Never promise a child that they will not tell anyone about an allegation- as this may ultimately not be in the best interests of the child.
- Be aware of signs of abuse or neglect.
- Be aware of whistleblowing procedures to the senior leadership team if they have concerns about safeguarding practices within the school.

2.1.4. Homestay hosts should:

- Know who to contact with any concerns relating to safeguarding.
- Report issues with under 18s to the school immediately. E.g. illness, absence, breaking of curfew.

2.1.5. The Designated Safeguarding Lead should:

- Undertake Specialist safeguarding for Designated Lead (formerly known as Level 3) training to ensure they have the knowledge and skills required to carry out the role.
- Manage referrals to other agencies such as the Local Authorities Social Care and Police.
- Together with the school directors, ensure that staff in the school have received appropriate child protection and safeguarding training.
- Be available for staff at the school to discuss any safeguarding concerns.
- Work in conjunction with Experio Summer DSLs in summer school matters.

2.1.6. The School Directors should:

- Hold overall responsibility for the provision of safeguarding of staff, students and anyone else in the school, including teachers, non-teaching staff, students and visitors, (including contractors).

2.2. Abuse and neglect

2.2.1. Experio English provides guidelines for recognising potential abuse in line with the current laws and policy regulations surrounding child safety and safeguarding, noting that signs of abuse can be extremely difficult to identify and that there is no definitive list. A person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

2.2.2. Abuse may be physical, emotional, or sexual. Neglect is also classified as abuse. Indicators of abuse *may* include the following:

- Physical indicators – unexplained injuries, suspicious marks, bruises, burns, scalds and cuts, particularly on parts of the body not normally prone to such injury.
- Behavioural indicators – unexplained changes, becoming withdrawn, aggressive, clingy, emotional or erratic
- Inappropriate sexual awareness, sexually precocious behaviour or pregnancy
- Distrust of adults
- Self-harm, mutilation or suicide attempts
- Eating problems or disorders
- Depression and obsessive traits
- Becoming increasingly dirty or unkempt
- Drug and/or alcohol abuse
- Allegations or hints at disclosure
- School/peer/relationship problems

2.3. Safer Recruitment

2.3.1. Experio English recognises its responsibility to ensure that all staff recruited into positions where they may come into contact with children or vulnerable adults, has been suitably vetted. When recruiting new staff, Experio English will ensure the following:

- Verification of identity and academic or vocational qualifications.
- Previous employment history is checked
- Obtain at least one professional reference and one additional professional or character reference.

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- Undertake appropriate checks through the Disclosure and Barring Service (DBS) prior to employment commencing.

2.4. Delayed suitability checks

2.4.1. In the case of delayed suitability checks, staff will be unable to engage in regulated activities unsupervised.

2.4.2. Teaching staff:

- They will not be assigned to classes with under 18's in attendance
- They will not be assigned to teach one-to-one classes
- When teaching, the classroom door must be left open
- They will not be assigned to lead any extracurricular activities

2.4.3. Non-teaching staff:

- They will not hold any one-to-one meetings with students
- They will not supervise or attend extracurricular activities
- They will not make visits to accommodation/inspections

2.4.4. In addition, a separate Barred List check will be performed immediately.

2.4.5. Homestay providers

- We will not place students with a homestay host until a satisfactory DBS Check has been returned

2.4.6. Experio English recognises that students under the age of 18 may come into contact with other adults who are undertaking regulated activity according to the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012, including accommodation and transport providers. It is our policy to obtain declarations regarding a host's suitability to work with children, with copies of DBS numbers kept on file. Contractors working with Experio English on any junior programmes are required to provide a declaration stating that any staff members coming into contact with students under the age of 18 have the appropriate DBS checks in place. We also hold a copy of each contractor's liability insurance on file.

3. Course and Age Ranges

3.1.1. Experio English provides a range of courses for students aged from 5 years and over:

- Group stays (closed group classes, available year round) – ages 12+ (including adults)
- Bishop's Stortford College International Summer School – ages 8-17 years
- Summer School at Leighton Park – ages 8-17 years
- Online (closed group/private classes) – ages 5+ (including adults)

3.1.2. Outside of summer, students aged 12-17 are only accepted as part of our Group Stay courses, and therefore they do not travel to the UK unaccompanied but rather with their Group Leader.

3.1.3. At our summer schools (run in partnership with Experio Summer), students aged 8-17 are accepted as part of groups led by Group Leaders. Some students aged 13-17 are accepted on an individual basis – this means that they travel to the UK either with a parent/guardian, or if travelling unaccompanied, a trusted organisation (Airport Angel) is used to accompany the child through the airport and deliver them into Experio Summer's care.

3.1.4. Emergency contact details, local contact details and any relevant medical information are collected from every student as part of their enrolment process.

3.1.5. Students are supervised at all times whilst in school, including at break times, unless their group leaders have given permission for them to leave site during break. Supervision at break times can be by the group leaders if they are on site.

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3.2. Group Stays (Closed Groups)

3.2.1. Experio English provides courses for closed groups with a minimum age of 12 years. Students aged 12-17 years must travel to the UK with a group leader who takes responsibility for the students once the school day ends. There must be a ratio of 1 leader per 20 students, however we strongly recommend a ratio of at least 1 leader per 15 students and offer a free leader place per 10 students in an attempt to encourage this ratio. In addition to this minimum ratio, every group no matter how small must have at least 2 group leaders.

3.2.2. Where provided, Experio English Social Activity Coordinators (SACs) are not to be counted towards this minimum ratio; Group Leaders should ensure that they meet the minimum ratio of 1:20 without the SAC, and any Experio English SAC is an added extra.

3.2.3. Closed group students are usually accommodated in Homestay accommodation in twin or triple rooms. Accommodation can also be provided in a residential setting. In these cases, the Group Leader(s) must accept full responsibility for their students once the school day ends.

3.3. Summer Schools

3.3.1. Experio English provides summer courses at Bishop's Stortford College and Leighton Park School for students aged 8-17. Accommodation, activities and flight transfers are organised by our partner company, Experio Summer. Most students at the summer schools travel to the UK with a group leader who takes responsibility for the students outside of lesson times. Students aged 13-17 can also be accepted as individuals, ie without a group leader. Individuals travel to the UK either with family or as an unaccompanied minor (when travelling as an unaccompanied minor, an airport meet and greet service is used). Once at the summer school, the individuals are under the care of a dedicated Individuals manager and helper Student Experience Leaders, who act as a Group Leader would.

3.3.2. Students at the summer schools are accommodated in residential accommodation blocks on site with their group leaders and additional Experio Summer staff (eg Individuals Manager and Student Experience Leaders).

4. Supervision Ratios

4.1.1. Experio English supports the active involvement of staff in organising trips/ outings/ activities for students, viewing this as an enriching part of their learning experience. The following information is provided to assist staff in the planning and conduct of such activities and to ensure that such activities meet the necessary requirements of health, safety and welfare for all involved.

4.2. General information

4.2.1. The organisation, conduct and supervision of games, cultural activities, field trips and educational tours must be of a high standard. The school has an "in loco parentis" responsibility for the students for the duration of the outing. The following considerations must be kept in mind:

- The appropriateness of the activity;
- A minimum student/teacher ratio of 1:16 (for ages 8-17 years) must be observed at all times;
- The ratio for skilled people to students should be increased as the degree of difficulty or danger increases;
- Each student should have a card/form giving their personal details and school details in the event that they become separated from the group;
- Organisers should ensure that the insurance should indemnify the organisers of activities as well as the suppliers of service to the outings. It is advisable to check with the Directors prior to confirming any activities;
- Approval should be sought in advance from the Directors for any significant activity which involves the students travelling from the school;

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- No teacher(s) should take any student/group of students from the school without prior notification and authorisation and a complete list of students and the teachers taking them must be left with the management prior to departure;
- Students leaving on a day activity must have their attendance recorded on the register prior to departure;
- Parents should be made aware of all outings and a parental consent form should be completed authorising the student to travel and adhere to any rules and conditions. Only one consent form is required in the case of a series of outings (e.g. 2 weeks of afternoon social activities);
- Before any student is brought on any trip which involves travel of a considerable distance, written parental authorisation to get medical care should be sought (this is done as a matter of course for all Group Stay and summer courses). When seeking such permission, details of any ailments from which the student suffers or medication they may be taking must be requested;
- Mobile phone number(s) of teachers taking students on outings/tours must be left with the school to ensure possibility of contact should the need arise.

4.2.2. Parents must be informed of the details of the itinerary and proposed activities, and any requirements (clothing, finance, delivery and collection of student) particular to the Tour. Parents must also be informed of the behaviour expected of students. Students must be informed at the registration stage that final approval to travel rests with the School Management and that the School Management having consulted with the Activity Leader may, at any stage, revoke permission for a student to travel on the Tour. The Activity Leader and teachers travelling on the activity must assess the suitability of pupils applying to travel on the activity. Where there is uncertainty as to the behaviour/co-operation of a student, that student shall not be permitted to travel. It is the task of the Activity Leader to ascertain particular student requirements including food, health, special needs.

4.2.3. Safety is the single governing factor in considering, planning and conducting outings. Proper analysis of risk and the avoidance of any unnecessary risks is therefore essential.

5. IT Policy

5.1.1. The Experio English IT Policy applies to all students, teaching and support staff, as well as external contractors who use, have access to or maintain school and school related Internet, computer systems and mobile technologies internally and externally.

5.1.2. Experio English makes reasonable use of relevant legislation and guidelines to affect positive behaviour regarding ICT and Internet usage both on and off the school site. This will include imposing sanctions for inappropriate behaviour – as defined as regulation of student behaviour under the Education and Inspections Act 2006. 'In Loco Parentis' provision under the Children Act 1989 also allows the school to report and act on instances of cyber bullying, abuse, harassment (including sexual harassment), malicious communication and grossly offensive material; including reporting to the police, social media websites, and hosting providers on behalf of Students.

5.1.3. The IT policy covers the use of:

- School based ICT systems and equipment
- School based intranet and networking
- School related external Internet, including but not exclusively, blogs and social media websites
- External access to internal school networking, such as remote email, file-serving (document folders) and printing.
- Tablets, mobile phones, devices and laptops when used on the school site.

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5.2. Responsibilities

5.2.1. The school has a designated Online Safety Officer, who also acts as the DSL and reports to the School Directors, and coordinates Online Safety provision across the school. The Online Safety Officer responsibilities include:

- Overseeing Online Safety issues on a day to day basis.
- Maintaining a log of submitted Online Safety reports and incidents.

5.2.2. Teaching and teaching support staff need to ensure:

- That they are aware of the current school IT policy, practices and associated procedures for reporting Online Safety incidents.
- They follow the school's social media guidance (Staff Handbook) and conduct on Internet school messaging or communication platforms, for example email and the school website.
- Be aware of online propaganda and help students with critical evaluation of online materials.

5.2.3. Students are requested to:

- Use school Internet and computer systems in agreement with the terms specified in this policy
- Report the misuse by any person of internet and computer systems to the Online Safety Officer, including misuse of social media.

5.3. Permitted and prohibited uses of computer systems – staff

5.3.1. Staff may use the Company's World Wide Web access for business use subject to the rules in this Policy. Staff may also use the Company's World Wide Web access for personal use provided that such use is kept to a reasonable level, does not interfere with your job and does not otherwise breach this policy. However, staff must not under any circumstances use any chat lines or bulletin boards on the Internet.

5.3.2. Where permitted by local law, the Company reserves the right to monitor personal use against compliance with this code and the law generally.

5.4. Monitoring – staff

5.4.1. Experio English gives staff notice that, wherever permitted by local law, it reserves the right to monitor and inspect staff's Internet usage and any E-mails sent using the Company's E-mail system including personal messages at any time. Such monitoring is intended to ensure that this Policy is being adhered to and is effective and that the Company and its employees are acting lawfully.

5.4.2. All "connections" to the Internet from the Company are monitored and recorded in log files. Such monitoring of Internet usage is solely to ensure that this policy is being adhered to and that the Company and its employees are acting lawfully. These files record information of which site has been accessed and by whom. They are liable to be checked on a regular basis.

5.5. Offensive material – staff & students

5.5.1. Staff and/or students must not under any circumstances use the Company's E-mail system or Internet access to access, download, send, receive or view any materials that;

a. Go against the policies of the government's Prevent scheme
b. Could cause offence to any person, for example by reason of:
    - Any sexually explicit content
    - Any sexist or racist remarks/jokes
    - Remarks relating to a person's sexual orientation, religion, disability or age
c. That are known to be illegal

6. Harassment and Bullying

6.1.1. Harassment is defined as unwanted conduct (including failures to act) by an individual (or group of) student/teacher(s) directed towards a fellow student/teacher (or group of students/teachers) which

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creates a work environment that is intimidating, hostile or offensive. It is most typically associated with sex, race, ethnic background or disability.

6.1.2. It is not the intention of the perpetrator that is of primary consideration in deciding whether harassment has occurred, it is the fact that the conduct is regarded by the recipient as unwelcome and offensive which can constitute harassment. Harassment can be cumulative from a pattern of behaviour or from an isolated incident.

6.1.3. In the event that harassment does occur, the Company will deal with complaints in a serious, timely, sensitive and confidential manner and will adopt appropriate measures to ensure that it does not re-occur. Students, teachers or employees found guilty of harassment may be subject to disciplinary measures. In serious cases this could lead to expulsion or dismissal.

6.1.4. The Company insists that all students, employees, and all others with whom students or employees may come into contact by reason of their enrolment/employment, are treated with dignity and respect.

6.2. Forms of harassment

6.2.1. The following are types of behaviour which are unacceptable and may constitute harassment:

- Unwelcome physical contact
- Unwelcome verbal or non verbal conduct including offensive personal remarks or bad language
- Sexual attention which the individual finds intimidating, offensive or which causes them discomfort
- Conduct which shows lack of respect for individuals, such as display of pornographic or suggestive material
- Bullying/intimidation or Victimisation

6.3. Procedure

6.3.1. All students, teachers and employees are encouraged to report incidents which they believe may constitute harassment to the Director. The Company will take steps to deal seriously with any victimisation or retaliation as a result of making a complaint. The Company considers it to be a disciplinary offence to victimise or retaliate against another student/teacher/employee for bringing a complaint of harassment in good faith. However, any complaint which is found to have been made maliciously (rather than through honest mistake) may result in disciplinary action being taken against the person who made the complaint.

6.3.2. It is the Company's view that those who make a complaint ought, if the complaint is made honestly, to have nothing to fear in making it; those against whom it is made ought to have nothing to fear if there has been no harassment.

6.4. Responsibilities

6.4.1. In any case of alleged harassment, the relevant Director will assist and support line management (or other appropriate management) in conducting any investigation. The Director should ensure that the investigation is conducted fairly, confidentially, sensitively and in as timely a fashion as possible.

6.4.2. Informal Resolution

If appropriate, students, teachers and employees should be encouraged initially to try to resolve a situation of harassment by approaching the harasser and explaining that the behaviour is unwelcome. The student/employee may wish to be accompanied by a fellow classmate or colleague when making the approach or may want somebody to do it on their behalf.

6.4.3. Where the student/teacher/employee believes that attempts at informal resolution are inappropriate, or where informal resolution has not been successful the student/teacher/employee should make a formal complaint under the Company's grievance procedure. The Company will undertake confidential, thorough investigation of the complaint as quickly as possible.

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6.4.4. Formal Action

A student/teacher/employee formally accused of harassment will be informed of the complaint by one of the Directors or another member of the Management Team. The alleged harasser will be given full details of the complaint and an opportunity to respond to the allegation. During the formal investigation, the alleged harasser will be given the opportunity to put forward his or her side of the story and may be accompanied by a fellow classmate or colleague (negotiated employees may be accompanied by a trade union representative) during any grievance procedure meeting.

6.4.5. Throughout the investigation the student/teacher/employee complaining of harassment will be given the opportunity where practicable to be moved away from studying or working near the alleged harasser or consideration will be given to the alleged harasser being transferred away from the complainant's study/work area. Where necessary and in serious cases the alleged harasser and / or the complainant may be suspended (on full pay for employees) pending the outcome of the investigation.

6.4.6. If harassment is found to have occurred the harasser may be required to undergo a course of counselling or may be subjected to disciplinary action under the Company's disciplinary Code, which allows for dismissal in a serious case.

6.4.7. If a complaint is not upheld but the complaint has irretrievably damaged the study/working relationship, alternative study times or a refund of fees may be appropriate.

6.4.8. The Directors will monitor the progress of implementing the conclusions arising from the investigation. If a claim is made against a student or employee maliciously, the person making the complaint may be subject to disciplinary action.

6.5. External assistance

6.5.1. If a student/teacher/employee requires independent help in dealing with circumstances of alleged or actual harassment, the Directors may arrange for a confidential counsellor to be involved. There are also a wide range of registered charities and support groups who may be able to help.

6.6. Timescales

6.6.1. In all cases, attempts will be made to undertake and conclude the investigation within as short a period from the initial complaint being received as is commensurate with a thorough investigation. If the complainant or alleged harasser is dissatisfied with the outcome of the investigation or way in which the investigations were conducted, an appeal should be made in accordance with the Company's grievance or disciplinary procedure as appropriate.

6.7. Documentation

6.7.1. The Directors in association with the investigating manager will keep a record of all meetings and interviews conducted throughout the investigation. These will be used to help in deciding what action should be taken.

7. Attendance Policy

7.1. Aims

7.1.1. Experio English is committed to creating a supportive, safe, and engaging environment in which all students can thrive. This policy is designed to:

- Encourage students to participate fully in their short course experience.
- Promote good attendance as a key component of academic success and personal development.
- Provide a consistent and effective response when students are absent or late.
- Ensure compliance with safeguarding responsibilities and visa regulations where applicable.

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7.2. Key Principles

7.2.1. Regular attendance is essential to benefit fully from the educational and social aspects of the course.

7.2.2. Students are expected to attend all scheduled learning sessions unless there is a valid reason.

7.2.3. Attendance is monitored closely and followed up immediately to safeguard student wellbeing.

7.2.4. Group Leaders, Experio Summer (in summer) and Experio English staff work collaboratively to ensure students are supported and accounted for.

7.3. Monitoring and Follow-Up During Group Stay Courses

7.3.1. Attendance is taken at the start of each lesson.

7.3.2. If a student is not present within 10 minutes of the session beginning, Experio English staff will immediately contact the Group Leader.

7.3.3. Group Leaders are typically on-site during registration time and will make contact with the student to confirm their location and wellbeing.

7.3.4. If the Group Leader is unavailable, Experio English will contact the student directly using the mobile number on file.

7.3.5. Staff (either directly or via the group leader) will remain in contact with the student until they arrive safely at class and ensure they are met and welcomed on arrival.

7.4. Monitoring and Follow-Up During Summer Courses

7.4.1. Attendance is taken at the start of each lesson.

7.4.2. If a student is not present within 10 minutes of the session beginning, Experio English staff will immediately contact the Experio Summer team.

7.4.3. Experio Summer always have a presence on site with managers on duty, and will make contact with the student and/or their Group Leader to confirm the student's location and wellbeing. Group Leaders are typically also on-site during registration time and when contacted will make contact with the student to confirm their location and wellbeing.

7.4.4. Staff continue to monitor the situation until the student has arrived in class or it has been confirmed that they are missing class and have adequate supervision.

7.5. Valid Absences

7.5.1. Absences are only considered valid if they are due to:

- Illness
- Personal or family emergencies
- Pre-approved events

7.5.2. In all cases, Experio English must be notified as early as possible. Experio Summer (in summer school), Group Leaders, parents, or guardians are expected to communicate the reason for absence promptly.

7.6. Illness and Welfare

7.6.1. If a student is unable to attend due to illness or any other valid reason, Experio English, Experio Summer (in summer courses) and/or the Group Leader will maintain contact with the student.

7.6.2. Contact may be made by phone, video call, or in-person welfare visits, depending on the situation and student needs.

7.6.3. This welfare follow-up is carried out for every absence, regardless of the length of time involved, to ensure the student's wellbeing and safe return to class.

7.7. Pre-approved Absences

7.7.1. Students are expected to attend all scheduled classes during their short course.

7.7.2. Planned absences during the course must be approved in advance.

7.7.3. Unnotified absences will be followed up in line with safeguarding procedures.

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7.8. Punctuality

7.8.1. Students must arrive on time for all lessons.

7.8.2. Lateness disrupts the learning experience for the group and will be addressed promptly with the student and/or their Group Leader.

7.9. Certificates and Attendance Thresholds

7.9.1. Experio English expects full attendance throughout the course.

7.9.2. Students must attend at least 85% of lessons to be eligible for an end-of-course attendance certificate, unless exceptional circumstances apply.

7.10. Responsibility

7.10.1. Students are responsible for attending on time and reporting any issues affecting their attendance to their group leaders.

7.10.2. Group Leaders are responsible for supporting students' punctuality and reporting absences or concerns.

7.10.3. Experio English staff are responsible for tracking attendance, ensuring student safety, and maintaining communication with Experio Summer (in summer courses), Group Leaders and families as needed.

8. Junior Students

8.1. Reporting illness

8.1.1. Experio English encourages its staff, host families, students and the group leaders of the students to notify Experio English or Experio Summer (during summer courses) at the earliest opportunity if a student becomes unwell. Experio English operates an emergency phone line which is manned 24 hours a day, 7 days a week when courses are running.

8.1.2. At the beginning of each class, a register is taken by the class teacher. If the student has not arrived within 10 minutes of the lesson start time, the class teacher will report the students' absence to the main office. All absences are followed up – this is usually in person with the Group Leader or with Experio Summer (in summer courses).

8.2. Assessment

8.2.1. On being notified that a student is unwell, Experio English staff make an assessment as to how to deal with the situation. The following actions may take place:

- The student is taken to speak to a local pharmacist for advice on medication
- NHS helpline, 111, is called for advice
- Student is taken to see a doctor/dentist
- Student taken to A&E at the hospital
- Ambulance called

8.3. Supervision

8.3.1. If the student is travelling as part of a group, then the group leaders are expected to travel with the student to the pharmacy, doctors' surgery, dentist or Hospital. In the event that a group leader is not available, then a member of Experio English staff will attend travel with the student.

8.3.2. In the event that medical attention is not required, and the student remains at their accommodation, group leaders, are encouraged to visit the student. If the group leader is unable to visit the student, then a member of Experio English staff will visit the student. In addition, the host family, if available, is expected to supervise the student.

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9. Prevent

9.1.1. The Prevent strategic objective is to stop people from becoming or supporting terrorists or radicalisation and challenge all forms of terrorism, including the influence from far-right extremist groups. The Prevent duty is to protect people from all streams of extremist activity and not solely aimed at one specific group.

9.1.2. The Prevent strategy has 3 key objectives and will specifically:

- Respond to the ideological challenge of terrorism and the threat we face from those who promote it
- Prevent people from being drawn into terrorism and ensure that they are given appropriate advice & support
- Work with sectors and institutions where there is a risk of radicalisation which we need to address

9.1.3. Prevent is part of safeguarding learners and all EFL providers have a duty to safeguard their learners from all aspects of abuse, exploitation and radicalisation. The Prevent Duty is intended to safeguard providers, learners & staff from being exposed to exploitation or radicalisation and to support the discussion and understanding of complex and controversial issues.

9.1.4. Experio English will provide all staff with the support they need to implement the Prevent Duty. This will include the arranging of training for staff & management, developing teaching & support materials, sharing good practice from the sector, and ensuring communication is frequent and open.

9.2. Staff responsibilities under the Prevent Duty – management

- Actively engage with partners, including the police & Prevent coordinators
- Undertake appropriate training and development in Prevent Duty
- Ensure appropriate training of all staff in Prevent and that training is repeated every three years
- Ensure clear, visible policies and procedures are in place for managing whistleblowing & complaints
- Ensure policies are in place for learners using IT equipment safely, legally and securely
- Exemplify British Values
- Set the schools strategy for Prevent
- Must ensure that providers challenge racism, islamophobia, tackle hate & prejudice based bullying, harassment and intimidation as part of their commitment to exemplification of British Values
- Need to appreciate the sensitivity of the subject and the need to approach the issues carefully with all learners and communities
- Responsible for ensuring that the Duty and its requirements are communicated to all levels of the organisation – management, teaching staff, support staff and learners

9.3. All other staff under the Prevent Duty

- To undertake Prevent training
- To be aware of all policies and procedures relating to Prevent including but not limited to the school's IT Policy and Safeguarding Policy.
- To report any instances relating to these policies to Management

9.4. Prevent & British Values

9.4.1. In order to comply with the Prevent Duty, Experio English exemplifies British Values in their management, teaching practice & general behaviours. British Values are defined as:

- Rule of Law
- Individual Liberty

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- Mutual respect & tolerance of those from other backgrounds, religions, beliefs,
- Democracy
- Compliance with the Equality Act & those protected by it

9.4.2. The protected characteristics in the Equality Act are:

- Age
- Gender reassignment
- Disability
- Marriage & civil partnership
- Pregnancy & maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

9.4.3. Academic management and teachers will be expected to understand & embed British Values into their courses to ensure learners are aware of them, can evidence & exemplify them & understand what it means to be a successful learner & take part in life & Britain today.

9.4.4. Learners will also be required to understand how to keep themselves protected from risks associated with radicalisation, extremism, forms of abuse, grooming, bullying & staying safe online.

9.4.5. Academic management and teachers must have an open culture which allows freedom of speech and exploration of issues that affect learners locally, nationally & internationally.

10. Emergency Action Plan – Terrorism

10.1.1. Experio English has the responsibility to provide a safe learning environment for all students and staff. Our policy is to provide and maintain a safe learning and working environment, and provide information, training and supervision as needed for that purpose.

10.1.2. Terrorism and the threat of Terrorist Attacks are on the increase in many parts of the UK. The Company endeavours through this document to provide the school with a proactive set of procedures to minimise the effect of a terror attack on Experio English.

10.1.3. The policy will be kept up to date, particularly as the organisation changes in size and nature. To ensure this, the policy and the way in which it has operated will be reviewed regularly, usually annually, but always in the case of increased terrorist activity.

10.1.4. The allocation of duties for safety matters and the particular arrangements which we will make to implement the policy are set out below.

10.2. Statement of Responsibilities

10.2.1. Overall responsibilities

Overall responsibility for the safety of both staff and students rests with the Directors.

10.2.2. Local Responsibility

Ben Whittaker or his designate is responsible for this policy being carried out at premises used by Experio English, whether rented or owned.

10.2.3. Employees' Responsibility

By law, all employees have the responsibility to co-operate with supervisors and managers to achieve a safe workplace and to take reasonable care of themselves and others.

Whenever an employee, manager or student notices a potential threat to theirs or others safety, they must immediately inform Ben Whittaker or their designate.

10.2.4. Students' Responsibility

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It is the responsibility of our students to co-operate with staff and the management of the school to achieve a safe learning and working environment.

10.2.5. Site Responsibility

Experio English operates within sites managed by third parties. It is the responsibility of site owners to reasonably assist in the safety of all Experio English's staff and students on site. Experio English ensures that any premises hired meets or exceeds the criteria and procedures within this policy.

10.2.6. Consultation Procedure

Consultation between management and employees is provided by regular meetings between Ben Whittaker (Director), the operations team and academic team representative.

10.3. Potential threats

10.3.1. The UK government in conjunction with MI5 have a system for measuring terrorist threats:

- LOW – Means an attack is unlikely
- MODERATE – Means an attack is possible, but not likely
- SUBSTANTIAL – Means an attack is a strong possibility
- SEVERE – Means at attack is highly likely
- CRITICAL – Means an attack is expected imminently

10.3.2. Potential threats of terror can come in various forms:

- Improvised Explosive Devices (IED) – person borne, placed or vehicle
- Firearms and weapons attack

10.3.3. Minimalising and dealing with threats is further outlined below.

10.4. Prevention

10.4.1. Site Management

Experio English operates within sites managed by third parties. Overall responsibility for site security lies with the third party. Experio English communicates with the third party about security arrangements, including but not limited to everyday security and changes in times of heightened risk.

10.4.2. Site Security

- Main doors to the building are only accessible with a key, key code or access card
- Emergency evacuation doors cannot be opened from the outside without a key or code, and are kept secure at all times
- All changes in site security are communicated to all staff and students

10.4.3. Reporting

- All students and staff are to report any suspicious behaviour and/or people on site
- All students and staff are to report any suspicious items such as unattended baggage
- All students and staff are to report any issues regarding the security of the site

10.4.4. Emergency Evacuation

- Staff and students are walked through the emergency evacuation routes on their first day
- All exits, corridors and stairways must be kept clear at all times
- Meeting point for terror threats is a separate location to the fire evacuation assembly points
- Students aged 15 and under are supervised at all times whilst under Experio English's duty of care and will be escorted as appropriate in any evacuation

10.4.5. Additional measures will be put in place and training given in accordance with changes to threat levels and following advice from consultant specialists.

11. Emergency Action Plan – Fire

11.1.1. Please see separate Health & Safety Policy.

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12. Safeguarding Policy for the Provision of Online Courses

12.1.1. Experio English offers private online courses for individuals and private groups.

12.1.2. Online courses are provided on a learning platform called *Moodle* with a virtual classroom provided by *Big Blue Button*.

12.2. Course access – students

12.2.1. In order to access Moodle, a username and password is required. Credentials are provided to the student or their guardian once the booking is confirmed as part of their booking confirmation. Access to the Moodle learning platform is only provided externally to students taking a course with Experio English.

12.2.2. Within Moodle, classes have their own independent access rights. Only students assigned to a class can enter the learning space for that class, preventing people without the correct credentials from entering a class.

12.3. Course access – staff

12.3.1. Internally, access to Moodle and its classrooms is only given to the following members of staff:

- Academic Manager – teaching, lesson observations and for management purposes e.g. checking class materials
- Class teacher – for teaching purposes. Can only access class areas for which they are teaching.
- Operations Officer – creates and manages the classes, assists with technical difficulties.
- Managing Director (DSL) - Creates and manages the classes, assist with technical difficulties, but only in the absence of the Operations Officer. Regulate online safety provision.

12.3.2. Only the Operations Officer and Managing Director have full admin rights and the ability to change access rights of other staff/students.

12.4. Safeguarding requirements – staff

12.4.1. Whilst teaching online, all staff adhere to the following safeguarding rules:

1. Staff must wear suitable clothing, as must anyone else in their household.
2. Any computers used must be in appropriate areas and where possible against a neutral background.
3. Language used must be appropriate, including anyone else in the household.
4. Staff must have their camera on at all times. Staff can move off screen if necessary but must leave their camera on.

12.4.2. In addition to these terms, specific conditions apply to staff teaching under 18's:

5. Lessons must not be recorded by members of staff unless specifically instructed by the Academic Manager for lesson observation purposes.
6. Staff must not take screenshots using the device or other devices.

12.5. Safeguarding requirements – students

12.5.1. Whilst attending classes, all students are required to adhere to the following guidance:

1. Students must wear suitable clothing, as must anyone else in their household.
2. Any computers used must be in appropriate areas and where possible against a neutral background.
3. Language used must be appropriate, including anyone else in the household.
4. Lessons must not be recorded by parents, carers or children.
5. Screenshots cannot be taken using the device or other devices.

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12.5.2. In addition to these terms, specific conditions apply to students aged under 18:

6. Students must have their camera on at all times. Students can choose not to appear on screen but must leave their camera on.

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