Policies and Procedures

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POLICIES AND PROCEDURES APPLY TO ALL CURRENT AND FUTURE BRANCHES



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REGARDING THE SCHOOL

Abusive Behaviour Bullying and Harassment Policy and Procedure Statement

Way Language Course is committed to maintaining a safe and healthy environment for all staff and students, and this policy explicitly acknowledges that all forms of bullying, harassment, violent or abusive behaviour are unacceptable.

All staff and students have measures in place to report and/or respond to observed reported bullying and harassment. Employees and students taking part in bullying or harassing behaviour will be subject to disciplinary action.

Way Language Course will ensure that all staff and students are aware of the behavioural expectations when attending or working at the Way Language Course and its associated activities.

Bullying

Bullying can include, but is not limited to:

- 1. emotional being unfriendly, excluding, tormenting
- 2. physical pushing, kicking, hitting or any use of violence, damage to personal property
- 3. racist racial taunts, gestures
- 4. sexual unwanted physical contact or sexually abusive comments
- 5. homophobic because of, or focusing on the issue of sexuality
- 6. discriminatory about disability, gender, age or other differences
- 7. verbal name-calling, sarcasm, spreading rumours, teasing
- 8. cyber all areas of internet, such as email and internet chat room issues
- 9. mobile threats by text messaging and calls
- 10. misuse of associated technology e.g. camera and video facilities

Harassment

Harassment related to sex, gender reassignment, race, disability, religion/belief, sexual orientation and age, along with sexual harassment, is explicitly prohibited in employment and vocational training.

Harassment is defined as any unwanted conduct related to race, age, etc that has the purpose or effect of either:

- 1. violating the dignity of an individual
- 2. creating an intimidating, hostile, degrading, humiliating or offensive atmosphere for an individual

If a member of staff suspects peer-on-peer abuse/bullying/harassment or if a student feels uncomfortable with the way someone is treating them, they should be encouraged to talk to the school director. If bullying/harassment is suspected of taking place by/towards a member of staff, please speak to the school director.

The director will decide the appropriate course of action on all cases. The action taken will depend on the seriousness of the situation.

If there is the possibility of some form of reconciliation and subject to the agreement of the victim, the following steps may be taken:

- 1. When appropriate and with the director, explain to the person acting unkindly that their actions are unacceptable and tell them the effect it has had on another/others.
- 2. Ask them to consider an appropriate way of putting things right and, if necessary support them in carrying out an apology.
- 3. Ensure that any apology/reconciliation is done with a director present so that it can be accurately recorded.

Alternatively, bring both parties (bully and bullied) together for a "no blame" meeting. The aim is to clarify the situation through discussion and allow both sides to work out a solution that is satisfactory to them both.

If the bullying continues, then it must be seen as deliberate or that the perpetrator (for example if suffering from fits of anger) is unable to control him/herself. The director will take immediate action to protect the bullied person and will begin procedures to restrict the activities of the bully. In the case of staff, any further incidents of bullying by the same person the disciplinary procedure will be implemented, which may result in dismissal.

Recording Incidents

Any incidents are recorded on the student administration system or/and on the personal record of the staff member.

Other Policies

The school will take regard to bullying or harassing behaviour when developing other policies.

Disability Statement of Procedure

Way Language Course would like to provide more support for physically disabled students and is aware of the Special Educational Needs and Disabilities Act that came into force in September 2005.

Way Language Course is committed to making 'reasonable adjustments' to providing access for disabled students and will take into account such factors as:

- 1. the effectiveness of the change
- 2. the extent to which it is practical
- 3. the cost and disruption
- 4. financial resources

Wheelchair users

The premises that the school occupies makes this provision limited. Way Language Course rents the premises and cannot make any structural alterations to the building (such as lifts or ramps). This is made known to any physically disabled enquirers.

The only means of access to the school is via a flat ground level main entrance. Students may press the bell to summon assistance.

Classrooms, student rooms, kitchen and toilets can all be found on one level. The building has no accessible toilets.

A member of staff would guide the student to the nearest exit in the event of a fire alarm.

Visually impaired students

Way Language Course would be happy to accept students who are visually impaired, although recognises that this would present a challenge, depending on the severity of the disability.

Classrooms and student areas have been painted with good colour contrast. Natural lighting is good and artificial lighting is kept bright.

A member of staff would guide the student to the nearest exit in the event of a fire alarm, make sure that there were appropriate power connections for braille readers, computer equipment and tell the locations to the student.

The class teachers would modify their worksheets to include font no smaller than 16pt and enlarge photocopies when possible and suitably locate the student in the class for ease of hearing /limited vision

Many of the books used by Way Language Course cannot be adapted or modified.

Hearing impaired students

Way Language Course would be happy to accept students who are hearing impaired, although recognises that this would present a challenge, depending on the severity of the disability.

Background noise, such as TVs and music in student areas is limited.

A member of staff would guide the student to the nearest exit in the event of a fire alarm, make sure that there were appropriate power connections for headphones, audio recorders and computer equipment and tell the locations to the student.

The class teachers would arrange with the student to record the lesson for use with voice recognition software according to the copyright terms of the individual resources used, include transcripts of listening texts, suitably locate the student in the classroom for ease of lip reading and pair work.

Students with other disabilities

Way Language Course has accepted students with a variety of disabilities and special educational needs.

We request that students disclose any disability they feel will affect their study experience. However, this information is only passed to the teacher, and other relevant staff if the student gives permission.

Equality and Diversity Policy and Procedure Statement

Way Language Course is committed to equality and diversity by providing an environment in which all students and staff feel comfortable, where they are listened to and their views respected.

Way Language Course does not tolerate any form of discrimination in relation to beliefs, ethnicity, gender, disability, age or sexual orientation. Any form of discrimination, where identified, will be dealt with in accordance with the Way Language Course Bullying and Harassment Policy and Procedure, Student Behaviour Policy, Staff Code of Conduct and Staff Grievance and Disciplinary Procedures.

In addition to the above policies the Way Language Course director offers direct support for personal and social problems to all students and staff.

Health and Safety Policy Statement

It is the policy of Way Language Course to provide and maintain safe and healthy working conditions, equipment and systems of work for all our employees, and to provide such information, training and supervision as they need for that purpose. We also accept our responsibility for the health and safety of other people who may be affected by our activities.

The allocation of duties for safety matters and the particular arrangements which we will make to implement the policy are set out below. The policy will be kept up to date, particularly as the organisation changes in size and nature.

As part of our commitment to the safety of our staff and our students we regularly assess the risks associated with our business as required under the 'Management of Health and Safety at Work regulations 1992/1999' and its subsequent revisions.

Overall Responsibility

Overall and final responsibility for health and safety (and the maintenance of health and safety records) in the company is that of the director.

Employees' Responsibility

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

Whenever an employee, manager or student notices a health and safety problem which they are not able to put right, they must immediately inform the school director (directly or through his secretary).

Students' Responsibility

It is the responsibility of our students to cooperate with the staff and management of the school to achieve a safe learning and working environment and to take reasonable care of themselves and others. If a student notices a health and safety problem they should immediately inform one of the school director (directly or through his secretary).

First Aid

The first aid box is kept in the reception area.

Incidents

All incidents must be reported to the school director (directly or through his secretary) and logged in the accident log book found in the reception area using the appropriate form.

In the case of a serious accident or illness requiring professional medical attention, contact the ambulance service. Phone: 999 from a landline or 112 from a mobile phone. The injured person must be accompanied to the hospital Accident and Emergency department. In non-urgent medical circumstances phone: 111 (NHS non-emergency).

When needed the director or his secretary are responsible for contacting the employee's or student's emergency contact person.

Fire Risk Assessment and Fire Safety Information

The landlord of the premises is responsible for ensuring that the fire risk assessment is undertaken and implemented, and information available throughout the building.

Fire Safety information can be obtained from the reception at any time by students or members of staff.

Training

All employees should receive all the training necessary to ensure that they are able to do their work safely. The person responsible for Health and Safety training on these premises the director.

Visitors and Contractors to the Premises

Visitors are not signed in/signed out of the school due to the size of the premises. All visitors are expected to follow the Health and Safety Police, which can be obtained from the reception.

All visitors on the premises should be made aware of any particular hazards at the time that they are on the premises and should be informed of any particular precautions that they should take.

Contractors in particular should carry out work on the premises at agreed specified times, to ensure the safety of students and employees. Dangerous tools, equipment and machines should not be left unattended.

Risk Assessment

If any machine, piece of equipment or substance could potentially cause harm to anyone on the premises a risk assessment should be carried out and clear procedures laid down for the use of the item.

The manufacturer's guidance should be followed at all times. All potential hazards should be brought to the attention of anyone who may come into contact with them. The person responsible for ensuring that this information is disseminated is the director.

House-keeping and Premises

All the following come under the responsibility of the director:

- 1. All floors and stairs must be kept clean and not slippery.
- 2. The premises, furniture and fittings (e.g. lights) should be cleaned regularly; all dirt, dust, refuse and trade waste regularly removed.
- 3. All spillages should be cleaned up promptly.
- 4. Special arrangements must be made for the disposal of sanitary waste.
- 5. All waste paper bins should be emptied regularly and the rubbish stored safely until collection.

Safe Stacking and Storage

All materials and objects should be stored and stacked so that they are not likely to fall and cause injury.

On arrival, deliveries of supplies and equipment should be stored safely away from public areas. Storage is the responsibility of the director.

Exits, Corridors, Stairways

All exits, corridors and stairways must be kept clear at all times.

Lighting

All light bulbs and fluorescent tubes should be replaced as necessary in order to ensure adequate lighting at all times.

Comfortable Conditions

A reasonable working temperature must be provided at all times.

Electrical Equipment

The director should make an annual inspection tour of the premises and arrange for replacement of any frayed or damaged cables, broken plugs, sockets or any other electrical appliance which is not functioning properly.

All appliances must be unplugged before cleaning or making adjustments.

All electrical equipment used for teaching must be switched off after use.

Extension leads may be used with portable electric equipment for teaching purposes. No leads are to be left where they could pose a threat to teachers, students or other staff.

All suspect or faulty equipment should be immediately removed from use, labelled 'Do Not Use' and kept secure until checked by a competent person.

All staff are required to report any electrical problems to the director.

Display Screen Equipment

All staff using DSE should plan their work so that there are regular short breaks/changes of activity after a period of constant use.

Personal Information and Data Protection Statement

Way Language Course is committed to ensuring that students' privacy is protected and that their data is divulged to third parties only within the provisions of the 1998 Data Protection Act. The privacy and personal information of staff is equally protected under the same act.

The following statement describes how students' data is used and held by Way Language Course. This information is available to all staff and students.

- 1. We will only use students' personal information to provide our services to them. We keep this information in electronic and paper format.
- 2. We must see right to study documentation from all students (in the form of residence permits, passports, visas or any other acceptable form of document) and take a copy to verify this.
- 3. Students must provide accommodation details before the start of their course (including a mobile phone number and e-mail) and keep them up to date if they change.
- 4. All students must provide details of their next-of-kin or preferred emergency contact person, locally or in their country of origin.
- 5. Students should disclose relevant medical information to the school when making their enrolment and ask before enrolling whether the school and accommodation facilities are suitable for the student's needs. Failure to so may result in a student's course and/or accommodation being cancelled, without refund.
- 6. In addition to any personal data students give us, we collect information and statistics in order to develop our services and we may provide this information to third parties. These statistics will not include information that can be used to identify individuals.
- 7. By accepting these terms and conditions students accept our right to use their personal information in this way.

Policy on Prevent Duty

Way Language Course understands the responsibilities of certain education providers under the Counter Terrorism & Security Act 2015 to prevent people of all ages being radicalised or drawn into terrorism. It is our understanding that Way Language Course is not required to register with the DfE for Prevent Duty. However, the school seeks to demonstrate best practice.

Way Language Course promotes a safe, multi-cultural environment with clear expectations of accepted behaviours and those behaviours, including radicalisation and extremism, that will not be tolerated.

Terminology

Radicalisation is the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of mind.

Extremism refers to holding extreme political or religious views which may deny rights to any group or individual.

Context

Way Language Course welcomes international students aged 16 and above, all year round.

The original period of study varies from 1 week to 24 weeks, with the possibility of extension.

Students are accepted without taking into consideration personal, sexual or cultural characteristics including (but not limited to) sex, gender reassignment, race, disability, religion/belief, sexual orientation and age.

Way Language Course is located in the Stockwell area of London, which has a multicultural local population. If other branches open in future, all Policies and Procedures will apply.

Prevent duty

The national Prevent strategy is designed to reduce the number of serious incidents of extremism and radicalisation. It is intended to identify and catch anyone, especially vulnerable people, before they enter the criminal justice system.

Some English language teaching organisations have already had to deal with Prevent-related incidents.

Students and other adults may develop extremist views and may be influenced by a range of factor such as global events, peer pressure, media, family views, extremist materials (hardcopy or online), inspirational speakers, friends or relatives being harmed, social networks, and more.

People who are vulnerable are more likely to be influenced. Their vulnerability could stem from a range of causes, including: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate crime or discrimination, and bereavement.

In the context of Way Language Course, Prevent duty involves:

- 1. Prevent co-ordinating making/maintaining contact with local police police/local authority
- 2. Prevent policy preparing, reviewing, updating, disseminating, risk assessment and action plan
- 3. Prevent training educating and informing named responsible persons.

Responsibility for Prevent duty lies with the director.

Signs that may cause concern:

- 1. Students talking about exposure to extremist materials or views outside Way Language Course (in this event, information must be shared with relevant local authorities)
- 2. Changes in behaviour, such as becoming isolated
- 3. Fall in standard of work, poor attendance, disengagement
- 4. Changes in attitude, such as being intolerant of differences/ having a closed mind
- 5. Asking questions about certain topics, such as extremism
- 6. Offering opinions that appear to have come from extremist ideologies
- 7. Attempts to impose own views or beliefs on others
- 8. Use of extremist vocabulary to exclude others or incite violence
- 9. Accessing extremist material online or via social network sites
- 10. Overt new religious practices
- 11. Drawings or posters showing extremist ideology/ views/ symbols
- 12. Students voicing concerns about anyone.

Way Language Course counteracts risks of radicalisation and extremism in these ways:

- 1. Promotion of core British values.
- 2. Appropriate interaction with staff inside/outside class
- 3. Teaching materials
- 4. Classes incorporating British culture and traditions and actively promotes these in the

The School aims to educate and inform students about these values, whilst acknowledging that they may be different to, or indeed the same as, the student's origin country. Where possible, the School tries to help develop critical awareness and thought, in order to counter accepting extremism without question, especially of online material.

The School is ready to react when world or local events increase the likelihood of conflicting feelings being expressed.

The School ensures that extremist speakers do not use premises to distribute material or expound views. Occasional visiting speakers/presenters are well-known to the school, and are qualified and vetted teaching professionals.

Way Language Course staff are required to be observant and vigilant in noticing any signs of radical or extremist behaviour, and to support any students identified as vulnerable.

Way Language Course staff are expected to understand the importance of their own behaviour and professionalism in being exemplars of British values.

Any concern, however small, should be reported to the director and will be treated confidentially and with sensitivity. The director will then liaise with local police/local authority as appropriate.

Quality Assurance and Customer Services Policy

Way Language Course is committed to excellence in English language teaching by providing a supportive, dynamic and professional learning environment. As well as in the teaching that students receive, we also seek to ensure high quality in all aspects of the student's experience.

We aim to improve quality by learning from situations where we are less successful. If there are any errors or problems in our administration, we formally review what went wrong and why, and try to improve our systems so that it will not happen again.

External audit – accreditations and memberships

Way Language Course is accredited by the Callan Method Organisation.

Internal audit – feedback

At Way Language Course our objective is to ensure that all school services meet or exceed the expectations of the students attending our courses. Feedback is discussed at staff meetings and informs school policy and decision-making at all levels of the organisation.

Student feedback mechanisms include, but are not limited to:

- 1. Formal student questionnaires
- 2. Informal staff checks that the student is happy during social interactions.
- 3. Informal feedback from students given to teachers and other members of staff, including email and posts on social networking sites.

Feedback from staff regarding services offered by the school is continuously provided during informal discussions, academic meetings, planning meetings and other interactions with the director and support staff.

Positive feedback is acknowledged and passed directly to member/s of staff concerned. Any negative comments are noted, commented on and appropriate action recommended or taken.

Staffing

Appropriate recruitment, selection and training of staff are fundamental procedures for quality assurance. Separate policies and procedures support this.

Publicity

The school strives to maintain high quality online and offline publicity information, presented through a range of channels.

We aim to provide detailed and accurate information on www.waylanguagecourse.co.uk We aim to ensure that detailed and accurate information is provided on all third-party websites.

Communication

We acknowledge all email enquiries as soon as possible and aim respond within one working day. During office hours, we respond to phone enquiries immediately when staff is not otherwise engaged.

Where questions require further investigation we provide a clear timeframe to the enquirer as to when they can expect a response.

We strive to deal with all enquiries with integrity and professionalism.

We communicate to all our customers in plain English and never assume they have background knowledge in relation to any query. When a student communicates in a language other than English we aim to maintain their preferred language, but are sometimes limited by staff availability and/or knowledge.

Students occasionally message the school using Facebook. These enquiries are acknowledged as soon as possible and we aim respond within one working day.

Safeguarding Under 18s and Vulnerable Adults

Way Language Course has responsibility to provide a safe and healthy learning environment for all students and staff but especially for students under the age of 18 and vulnerable adults (students with very limited English, or students with learning difficulties).

Way Language Course's Safeguarding Policies set out the school's commitment to maintaining a strong ethos of care and an appropriate culture of responsibility which ensures and promotes the safeguarding of these learners who are involved in courses or activities which come under the responsibility of the school.

The Welfare & Protection Policy for Under 18s deals with the welfare and protection of children, which the Children Act 1989 defines as a person under 18 years of age. All Way Language Course students are aged 16+. In an average year, less than 3 students are aged 16 or 17. Most of these are attending short courses in July and August.

Our policies apply to all staff working in the school setting. We believe that all our students including U18s and VAs should be safe and protected in the school and that their welfare and well-being is of paramount importance. We aim to create an environment where students and staff feel safe and protected, where they are listened to and their views respected. All staff at the school have a responsibility in relation to safeguarding and promoting the welfare of all students but especially U18s and VAs, and for ensuring that they are protected from harm and to follow the school's policies and procedures. All U18s and VAs have the right to protection from abuse, regardless of age, gender, ethnicity, disability, sexuality or beliefs. We will respect the decisions made by U18s/VAs about their own safety and well-being unless this is in conflict with our statutory duties.

There are three main elements to this policy:

- 1. ensuring we practise safe recruitment in checking the suitability of staff to work with U18s and VAs
- 2. establishing a safe environment in which U18s and VAs can learn and develop
- developing and then implementing safe procedures for identifying and reporting cases, or suspected cases, of abuse and inappropriate behaviour, which includes: designating members of staff and keeping appropriate records

Recruitment

Way Language Course will ensure safe recruitment practices are always followed.

With regard to employment of administration and teaching staff, these measures will include:

- 1. Written references will be required and all references will be followed up
- 2. Referees will specifically be asked whether there is any reason a person should not be employed in situations where they have responsibility or substantial access to young people Under 18 an/or vulnerable adults
- 3. Enhanced Disclosure and Barring Service (DBS) disclosure will be required prior to appointment
- 4. Proof of identity and qualifications will be required and any gaps in CV must be explained satisfactorily
- 5. Candidates will be also required to give any former names

6. Candidates are reminded that providing false information on a job application is a criminal offence, and they will be required to sign a declaration to this effect

Establishing a Safe Environment

We recognise that because of the day to day contact with U18s and VAs, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- 1. Establish and maintain an environment where young people feel secure, are encouraged to talk, and are listened to
- 2. Ensure young people know that there are adults in the school who they can approach if they are worried
- 3. Ensure all staff who have significant contact with Under 18s and VAa understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the director.

Procedures

It is not unusual to have concerns about students for all sorts of reasons. Staff should as a matter of course discuss their concerns with one of the director to clarify their understanding of the situation. The director will then make an assessment of the situation. The matter will be taken further where it is believed:

- 1. there is a risk of significant harm to the student or
- 2. harm to others or
- 3. a criminal act has taken place or
- 4. the student is at immediate risk of danger.

Where the director decide that further action is necessary, this may be to:

- 1. seek further advice from Social Services
- 2. make a referral to Social Services
- 3. report the incident to a designated Social Worker
- 4. report the matter to the Police if a crime is suspected.

Designated Members of Staff for Safeguarding, Child Protection and Welfare

The director has overall responsibility for the welfare, protection and safeguarding of students aged under 18 and vulnerable adults.

Record-keeping

It is essential that clear and accurate records are kept regarding all welfare issues.

Any disclosure of abuse from a student or another member of staff must be recorded in writing. This will cover:

- 1. student/staff details
- 2. reason for the concern
- 3. any apparent physical or virtual signs of abuse
- 4. an account given to the member of staff of abuse by the child concerned, as accurately as they are able to record it
- 5. dates and times of incidents
- 6. dates and time of when notes were made.

The report should be factual and should not include opinions or personal interpretations of the facts presented as it may form part of a criminal investigation. The report should be signed, dated and passed, at the latest within 24 hours, to the director, who will keep a copy stored in a secure place.

Allegations against Staff

There may be occasions where a person will accuse a member of staff of physically or sexually abusing them. This may be false or unfounded. However, in some cases the allegations may be true. In the event that any member of staff suspects any other member of staff of abusing a student, it is their responsibility to bring these concerns to one of the director. If a decision is made to pursue an allegation of abuse against a member of staff, this will be dealt with under advice from Police/Social Services.

Other Policies

The school will take regard to safeguarding, welfare and protection when developing and maintaining other policies and procedures.

Smoking, E-Cigarette and Vaping Policy

In the UK, smoking (cigarettes, cigars, pipes) is prohibited in enclosed public work places and schools.

It is not a legal offence to smoke e-cigarettes or vape in a public place. However, some e-cigarettes release a vapour or substance. To make sure that Way Language Course provides a comfortable studying and working environment for all, Way Language Course prohibits the use of all smoking devices throughout the premises. If students or staff wish to smoke e-cigarettes or vape during break times, they should leave the premises to do so.

Eating and Drinking Policy

To make sure that Way Language Course provides a comfortable and safe studying and working environment for all, Way Language Course prohibits eating and drinking in classrooms, other than bottled water.

Members of staff are allowed to have a cold or hot drink with them if they consider it necessary during the performance of their duties.

Students and staff can eat and drink freely in the kitchen and reception areas. Students or staff members with allergies or intolerances should be aware that no special provisions, limitations or accommodations are to be expected in these areas.

Policy for the Safe Use of Images and Film in Social Media and Publicity Materials

At Way Language Course, we undertake to use digital images and film in a responsible and appropriate way in Way Language Course publicity materials, including social media sites.

We respect students' rights of privacy (and the rights of parents/guardians of U18s and VAs) and we are aware of potential safe-guarding and child protection issues. The school therefore makes every reasonable effort to minimise risk by following the guidelines detailed in this policy and by obtaining the students' consent (and for U18s, parental consent) for the use of images and film.

Images (photographs) and film of people studying/working at the school brings real-life interest to publicity materials and social media sites, promoting the school and its activities. Making use of images/film for publicity materials and to promote the school in the media

Policy

This policy applies to the use of images/film in school publicity materials, on its website, on the school's pages on social media sites, in the press and in any other outlets the school might use.

The implementation of this policy is the responsibility of all staff. Way Language Course will:

- 1. ensure that images/film are stored on a secure network to which members of the public have no access
- 2. ensure that images/film are only used by those authorised to do so
- 3. obtain parental/guardian consent for the use of images/film of U18s (Parental/Guardian Consent Form)
- 4. clearly describe how images/film may be used (the Way Language Course Terms and Conditions)
- 5. obtain the consent of staff

Safe-guarding and child protection

Way Language Course has developed this policy to make every effort to minimise risk, when individual students can be identified in images/film. In the event of the inappropriate use of images/film of any U18s, the director will inform the relevant authorities. Data Protection Act 1998 Images and film of students and staff are classed as personal data under the terms of the Data Protection Act 1998. Therefore, using such images for school publicity purposes requires the consent of either the individual concerned or in the case of U18s, their legal guardians.

The Way Language Course Personal Information and Data Protection Statement describes in detail how students' data is used and held. Specifically, The Lake School will not display images/film of

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students or staff on websites, social media, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the school have access.

Where images are taken at an event attended by large crowds, this is regarded as a public area so it is not necessary to get permission of everyone in a crowd shot.

The Data Protection Act does not apply to images or film taken for personal use by family and friends.

REGARDING STAFF

Staff Recruitment and Selection Policy Statement

Way Language Course is committed to providing a supportive, dynamic and professional learning environment for all its students, and working environment for its staff. The School recognises that in order to achieve these aims, it must attract recruit and select appropriate staff who share this commitment.

The aims of the School's recruitment policy are as follows:

- 1. to ensure that the best possible staff are recruited on the basis of their merits, abilities and suitability for the position
- 2. to ensure that all job applicants are considered equally and consistently
- 3. to ensure that no job applicant is treated unfairly on any grounds including race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age
- 4. to ensure compliance with all relevant legislation, recommendations and guidance
- 5. to ensure that the School meets its commitment to safeguarding and promoting the welfare of young people by carrying out all necessary pre-employment checks.

Way Language Course is committed to safeguarding and promoting the welfare of all its students, especially those aged under 18. The school expects all staff to share this commitment, and understand that they have a specific 'Duty of Care' to students under 18, who depend on adults for their safety and well-being. Therefore:

- all references will be followed up and referees will specifically be asked whether there is any reason a person should not be employed in situations where they have responsibility or substantial access to young people under 18
- 2. Disclosure and Barring Service (DBS) disclosure (Enhanced) or international equivalent will be required prior to appointment
- 3. proof of identity and qualifications will be required and any gaps in CV must be explained satisfactorily
- 4. verification of right to work in the UK will be required
- 5. candidates will be also required to give any former names
- 6. candidates are reminded that providing false information on a job application is a criminal offence

Recruitment Procedure – teaching staff

A job description and person specification is prepared by the Director. Potential teachers are located through Way Language Course website, newspaper and professional journal advertising, online advertising on ELT websites, word of mouth, unsolicited CVs and any other means considered appropriate.

All job advertisements comprise a short job description and provide contact details. CVs are requested from all applicants.

All teaching staff recruited are required to:

- 1. have a general level of education, normally a first degree or equivalent (as defined by Accreditation UK) or be working towards one, and qualifications appropriate to the courses they are teaching
- 2. have valid TEFL qualifications and be either TEFL initiated or TEFL qualified (as defined by Accreditation UK)
- 3. be at least TEFLI with at least preferably 2 years' teaching experience, in a number of positions and preferably in multilingual classes

Teachers with specialisms, qualifications, work experience in addition to the above are welcomed.

Applications from teachers with disabilities are welcomed. Where a disabled candidate has appropriate skills, experience and qualifications, every effort will be made to enable their employment.

Due to the nature of the instruction methods (students' needing to see how the teacher articulates sounds) items of clothing that cover or hide the mouth totally or partially cannot be worn while performing teacher's duties. While we will try to accommodate the needs of any teaching candidate, the religions, origins, and genders of our students are mixed and we cannot guarantee a class that would follow any specific religious or social needs that might be needed for the teaching candidate to be uncovered.

Recruitment – other staff

A job description and person specification is prepared by the director. Potential staff are located through the school's own website, newspaper and professional journal advertising, online advertising on ELT and local websites, word of mouth, unsolicited CVs and any other means considered appropriate.

Selection Procedure - all staff

Suitable candidates for interview are selected according to the job description and person specification.

All suitable candidates regardless of race, colour, nationality, ethnic or national origin, religion or religious belief, sex or sexual orientation, marital or civil partner status, disability or age are interviewed, in accordance with the school's Equality and Diversity Policy.

All candidates are personally interviewed by the Director and introduced to the other Director of the school. Some candidates are also introduced to teaching members of staff.

Candidates are given a tour of the school and resources by the Director. Candidates' references are followed up by email (with a written request form) and by phone. The written reference is verified with initials and date. The candidate's identity is verified by sight of original passport or ID, a photocopy is taken, and kept with staff records. Any former names must also be declared. Candidates must also prove their right to work in the UK.

Candidates must sign a written declaration that the information given on their job application is true.

Questions asked during the interview should be relevant to the job description. Interviews must include questions that prove candidate's attitudes to safeguarding young people. If a candidate's enhanced DBS or equivalent check shows a criminal record, the candidate's suitability to work with

Under 18s is judged on a case by case basis, taking into account only those offences relevant to the job or situation.

Job offers are confirmed in writing, e-mail or by phone to suitable applicants and a copy of the contract sent for perusal before signing.

Staff Code of Conduct

Way Language Course English is a friendly school and staff are encouraged to support the students in a professional way.

Teachers are expected to familiarise themselves with notices on display in school so that they can help to maximise the benefits of their students' language travel experience.

We expect staff to behave appropriately at all times and to show cultural sensitivity at all times. We respect everybody, irrespective of age, gender, nationality, marital status, beliefs or sexual orientation.

Staff must act within the law at all times, in particular with regard to the taking of drugs or alcohol and sexual relations.

Safeguarding Under 18s and Vulnerable Adults

Way Language Course of English has responsibility to provide a safe and healthy learning environment for all students and staff but especially for vulnerable adults and students under the age of 18. All Way Language Course students are aged 16+.

Way Language Course is committed to maintaining a strong ethos of care and an appropriate culture of trust and responsibility which ensures and promotes the safeguarding of these learners who are involved in courses or activities which come under the responsibility of the school.

Teachers should behave as suitable role models at all times.

Dress

There are no dress rules other than teachers should be clean and tidy and dress appropriately as professionals and representatives of the school.

Teachers may be expected to dress more smartly if teaching a special group.

Smoking

To make sure that Way Language Course provides a comfortable studying and working environment for all, Way Language Course prohibits the use of all smoking devices throughout the premises.

If staff wish to smoke cigarettes or e-cigarettes, or vape during break times, they should leave the premises.

Staff should not buy cigarettes for U18s or allow them to smoke with them.

General interaction

Staff should build professional relationships with students that are based on trust and positive communication, be ready to offer guidance to help students interpret their new cultural situation, and praise students for appropriate behaviour and attitudes.

Safeguarding

Staff should consider their own behaviour towards students aged U18 as that of a responsible parent. Staff should not put themselves in a compromising situation and must report any inadvertent, inappropriate or accidental conduct as soon as possible, to the director of the school.

Safeguarding

Staff must not give their personal email address or phone number to U18 students or communicate with them via email, text, phone or social network sites.

Transporting students

Staff should not transport students in our own private vehicle or be on their own with an U18 student in a vehicle at any time.

Alcohol and drugs

Staff should not promote the drinking of alcohol or the use of drugs.

Language

Staff should not swear in front of students, on or off school premises or teach swear words to U18 students.

Privacy

Sometimes students may ask to talk to staff privately or in confidence. If this is the case, you should tell them that you may need to discuss the matter with the school director.

Staff should make sure that they are never on their own with an U18 student. When delivering 1-1 tuition to a U18 student, the classroom door should be kept open at all times.

REGARDING STUDENTS

Policy on Student Attendance and Absence

Way Language Course monitors student attendance.

No refunds or credits will be given for any unattended courses or lessons or student cancellations unless covered within these Policies and Procedures.

Class times

Students should always be on time for lessons.

If a student cannot be on time, they should enter the classroom causing minimal disruption.

Absence

All students are expected to attend all classes. Students should inform the reception in advance if they expect to be absent by email only (info@waylanguagecourse.co.uk) in order not to lose their payment, if applicable (see 'Holiday' below).

Way Language Course keeps a record of the number of hours that each student attends.

If a student is absent from school for more than 2 consecutive days and does not tell us, we will contact the student by phone, if possible, or by e-mail.

Visa students

Way Language Course is not a Visa Sponsor and therefore does not issue General Student Visa supporting documentation.

Following government regulations students on a Tourist Visa are only allowed to study for 30 consecutive or non-consecutive days.

Holiday

If a student wants to take a holiday (for any reason, including religious observance) during their course, they must tell the school at least the day before the start of their holiday.

They may take one week for every twelve weeks paid, and proportional thereafter. We do not refund fees but add the days that the student takes as holiday to the end of their course as extension. The week must be taken whole, not as individual days.

No holidays will be granted to students paying for less than a twelve-week period.

Bank holidays

Way Language Course will take a discretionary approach regarding public holidays. All decisions will be announced at least one week in advance on the school notice board.

If the school remains closed on a Bank Holiday the day will be counted as part of the student's course. If the school opens on a bank holiday, students not present will be considered as having been absent.

Discipline and Exclusion Policy

We expect all students to deal with members of staff and other students politely and with respect. We also expect students to follow the school Policies and Procedures at all times.

Students' behaviour should not cause offence or distress to others in the school based on racial, sexual or religious differences. It is also unacceptable to use abusive behaviour, such as harassment, bullying, actual or threatened violence and damage to personal property.

If a student's behaviour in school is not acceptable, we will take the following steps:

- 1. Verbal warning The student will be spoken to about the problem.
- 2. Written warning The student will receive a letter with details of the problem. Embassies, parents, agents and colleagues will be informed where appropriate.
- 3. Expulsion We will expel the student from school (refunds will not be given in this case).

In serious cases, we may expel the student from the school immediately.

School Rules

Students who study with us at Way Language Course must understand and agree to these rules:

- 1. Please arrive on time to every class.
- 2. Please do not use your phone to send messages or make calls during class.
- 3. Please do not take food or drink into the classrooms.
- 4. Please use plastic and stereo foam cups only.
- 5. Please use the bins and do not leave rubbish on the desks.
- 6. If you smoke, please only use the designated smoking areas.
- 7. Please don't bring any alcohol to the school.
- 8. We ask all students to be polite to fellow classmates and members of staff at all times.

Inappropriate behaviour

Students who are involved in Police action, continually break the rules of the school or are continually disruptive in class will receive a warning letter. If such problems continue, the school may ask the student to leave the course with immediate effect and without access to a refund.

Student leaving course early policy

Way Language Course understands that some students wish to leave their course earlier than scheduled for a variety of reasons; for example, to join a university pre-sessional course or due to an emergency.

The school aims to be flexible but also must manage resources and staffing levels.

The school requires 1 week's notice from students who wish to leave the school earlier than expected.

Refunds are only given for the remaining course fees in cases where the school management consider the request to leave to be due to major causes (such as ill health, family tragedy). The school has the right to ask for documentary evidence before issuing a refund - Medical reports or other relevant documentation resulting in the need for cancellation.

Changes in travel arrangements are not considered to be a major cause, and students are expected to plan their schedule responsibly.

There will be a 30% cancellation fee in all circumstances, without exception.

Any discounts on tuition fees will become null and void and you will be charged the full price for the weeks that you have attended the course. No refund will be given for registration fees or any other applicable fees (materials, resources, etc...).

Students moving class or level

Way Language Course understands that students may wish to move class or level for a number of reasons, for example, too easy, too difficult, preference for one teacher, preference for studying with friends.

The School takes all cases on an individual basis. When classes are formed, wherever possible, consideration is given to the nationality mix, number of men and women and the relative strengths and weaknesses of individuals.

If you wish to change group because you think it is too easy or too difficult:

- 1. Speak to your teacher first
- 2. Speak to the director or secretary
- 3. The Director will speak to your teacher to try to find a solution
- 4. The Director will speak to you again about what we have decided
- 5. We may ask you to take a test of your level of English or a diagnostic test to see how much of your current course you have mastered.

If you wish to change class for another reason:

- 1. Speak to the director or secretary and explain why you wish to move group.
- 2. You may be asked to write the reasons
- 3. The director will decide and speak to you again

Any payments remaining will be transferred to the new class if the request is successful.

Postponing a course or late commencement on a course

Late commencement

Way Language Course expects students to arrive on the day that they have booked a course to start, and if delayed, to contact the school with a new arrival date at least one day in advanced.

Postponing a course

A course extension is granted in cases where the student informs us in writing of a delay in advance. If students start late and do not contact the school beforehand we will not offer any refunds and their payments will be considered from the date originally agreed.

The amount of hours remaining will be calculated and put on hold for up to 3 months from the date of postponement. If a student does not return to their course after 3 months, the hours remaining will be computed as being used and no refund will be offered.

Students will be reminded by e-mail at least 2 weeks in advance when the 3-month postponement period comes to an end.

Refund policy

Cancelling a course before arrival

The school must be notified of any cancellations before the start of the course before any refunds will be considered.

Any discounts on tuition fees will become null and void and you will be charged the full price for the weeks that you have attended the course. No refund will be given for registration fees or any other fees (materials, resources, etc...).

The school has the right to ask for documentary evidence before issuing a refund - medical reports or other relevant documentation resulting in the need for cancellation

During the course

All holidays must be pre-booked at least 1 day in advance, if applicable (see 'Holidays' section). Refunds will not be given for holiday periods but we will extend your course end date.

Leaving the course early

The school requires notice in advance before considering a refund.

If the school needs to cancel a course due to unforeseen circumstances a full refund will be given.

If the school is unable to provide a course due to the special needs of a student, medical issue, or disability that was not disclosed in advance then no refund will be issued.

Payment policy

Payment dates

All students are expected to pay for their lesson before entering the classroom.

If a student enters the classroom without having paid they can be asked to leave the classroom and pay for the day's lesson by the director or secretary.

Registration fees

Most courses at Way Language Course require a registration fee.

A student is considered *active* for 2 weeks after their last renewal due date, and will not be required to pay for registration upon return.

A student is considered *inactive* 2 weeks after their last renewal due date, and will be required to pay for registration upon return.

Other fees

Some courses at Way Language Course require extra fees for resources. The resources are considered mandatory.

In the case of a physical resource, if a student already owns it, they will not be required to purchase it from Way Language Course.

In the case of digital or subscription resources, all students are required to purchase them from Way Language Course. A subscription resource, such as Callan's Student Practice Area, will be cancelled from the day following the student's renewal due date if the course is not renewed. If the student returns, a full fee with be applicable.

All resources are for personal use only. If a student is found to be sharing any resources with other people, they will be charged accordingly. If a student is found to be using any of the resources for financial gain legal action could be taken.

Request for delayed payments

On occasion students ask for permission to attend class on promise of payment at a later date. Way Language Course will only allow payment deferral on extreme circumstances and only exceptionally.

Students will be asked to pay for individual lessons before any deferral will be considered.

Payment deferral due to poor budgeting, forgetfulness or any other similar issues will not be allowed.

If a student wants to be considered for a deferral they should send an email from the address they used to register at the school to info@waylanguagecourse.co.uk in English explaining the situation and the date the payment will take place.

Requests will not be considered when placed in person to either the director or secretary on the day. In such case a student will be asked to pay for the day's lesson.

Way Language Course reserves the right to not accept any request for deferral. If a deferral is granted, the payment must be done on the agreed date. If the payment is not done, the following steps will be followed:

Way Language Course Ltd. Policies and Procedures

- 1. During the first 10 working days after the agreed payment date: contacting the student by phone.
- 2. On the 10th working day after the agreed payment date: sending one email to the student.
- 3. On the 15th working day after the agreed payment date: sending an invoice by email for the classes owed, with accrued interest.
- 4. On the 20th working day after the agreed payment date: sending an invoice by letter for the classes owed, with accrued interest.
- 5. One month after the agreed payment date: sending an invoice by letter for the classes owed, with accrued interest.
- 6. Commencing 2 months after the agreed payment date: legal action.