

**CODE OF CONDUCT & CHILD SAFEGUARDING POLICY:
The Learning Adventure (Part of Transforma Travel Group)**

Transforma Travel Group (The Learning Adventure) and Shanghai Zhonglei Travel Service seek to serve the needs of children and young people. In doing so it takes seriously the welfare of all children and young people who come onto our tours. Our code of conduct and child safeguarding systems aim to prevent any physical, sexual or emotional abuse of children and young people. We recognize our responsibility to implement, maintain and review the following procedures.

Definition:

- A. Child or children: Anyone under 18 years of age
- B. Child Abuse: Anything which individuals, institutions or processes do or fail to do which directly or indirectly harms children or damages their prospect of safe and healthy development into adulthood.

Descriptions of abuse:

- Physical, where children and young people receive physical hurt or injury. ^[1]_[SEP]
- Sexual, where adults seek sexual gratification by using children and young people.
- Emotional, where children and young people are harmed by a constant lack of love and affection, or threats, taunting etc.
- Negligent Treatment, where there is a persistent failure to meet child's basic physical and/or psychological needs.

Policies:

I. Policy on Commitment to Children

- All staff from The Learning Adventure and companies which use The Learning Adventure Brand are expected to conduct themselves in a manner consistent with this Code of Conduct & Child Safeguarding Policy.
- Treat children with respect at all times and give equal attention.
- Make sure students respect each other and report any type of bullying. In case of being witness of bullying, address this problem to Adventure Leader & Group Leader immediately.
- Physical violence or threats or psychological abuse are completely prohibited.

II. Policy Regarding Sexual Activity with Children

An underage child cannot legally give informed consent to any type of sexual activity. Underage means any person under 18 years old.

- Report any suspicions of abuse. You should first notify Group Leader and file a report for The

Learning Adventure, recording time and date of when Group Leader was notified of this abuse. If in doubt about whether or not the situation would be deemed as abuse or negligence speak to your Adventure Leader or the operations manager.

- Any insinuation of a sexual nature between staff, including school staff, and students will be reported to local and national authorities as well as the Adventure Leader and the operations manager on the trip. If in doubt about whether or not the situation would be deemed as abuse or negligence speak to your Adventure Leader or the operations manager.
 - If the situation has arisen in regards to the person that you are reporting to, contact a Director of the company: ramsay.kerr@thedragontrip.com or alex.seigel@thedragontrip.com

III. Policy on Adequate Behavior around Children

- Avoid behavior or language which could negatively influence children. No cursing, no sexual innuendo, no racist jokes.
- Always present yourself in a clean and proper way, be a good example to children at all times.
- Maintain a proper hygiene and wear appropriate clothes.
- If you witness staff, regardless of whether they are our staff, local providers, or school teachers/staff, failing to fulfill and abide by this Code of Conduct & Child Safeguarding Policy then inform the Adventure Leader. In the case of a minor incident, if the Adventure Leader is failing to fulfill and abide by this Code of Conduct & Child Safeguarding Policy then report it to the operations manager. In the case of a major incident, if the Adventure Leader is failing to fulfill and abide by this Code of Conduct & Child Safeguarding Policy then report it to a Director of the company: ramsay.kerr@thedragontrip.com or alex.seigel@thedragontrip.com
- Avoid being alone with one child in closed or isolated areas. This is for your protection as much as it is for the students' protection. For example:
 - You may not take one child to the bathroom away from the group, this must be done with at least 2 students, or a teacher should take them.
 - You may not take a child with an injury to the nurse who is a car ride away by yourself, you must be with a teacher from the school.
- Do not touch children in any inappropriate way or in a way that might get misinterpreted by them or third parties.
- Do not help students in any action that they can do themselves; such as using the toilet, shower, get dressed, etc.

Aims:

- To plan a tour which aims to minimize situations where the abuse of young people or children may occur.

- To give all staff and volunteers clear roles.
- To give supervision as a means of protecting children.
- To explore applicants' experience of working or having contact with children and young people before appointment.
- To implement and issue guidelines to all staff with children or young people on company conduct and how to deal and prevent abuse.

Implementation:

To implement and issue guidelines to all staff with children or young people on company code of conduct and child safe guarding policy and how to deal and prevent abuse.

("Staff" constitutes as freelance or fulltime guides or leaders who will be in contact with children)

- All staff are made aware of the company "Code of Conduct and Child Safeguarding Policy" (either verbally or written)" and therefore have prior knowledge to what is expected of them on a tour.
- Arrange that, as far as possible, staff members are not left alone with a child or young person where there is little or no opportunity of the activity being observed by others.
- Wherever possible staff will deal with incident and disclosures within the organization. When an incident is more serious a referral or reporting of the information will take place.
- All incidents of abuse must be shared with the party leader (Teacher). If the incident involves the party leader the school must be informed at the earliest convenience.
- Any incident report is written and given to head of department.
- Depending on the severity of the incident local law enforcement may be involved. The party leader and the company will decide this.
- Staff should also have a clear idea of what is expected of them, as outlined by their pre-tour briefing.
- References and/or interviews will be sought or conducted, for all staff coming in contact with children. It will be made clear that the person will be working with children and young people and that views on their suitability for this work will invite. If references are vague or ambiguous it may be necessary for them to be followed up in person or by telephone. Reference checks shall also include an internet search of the staff member including social media platforms.
- For groups that require DBS Checks or police reports of staff in contact with the children on the tour, this can be arranged but is not issued as standard. In the case that it must be arranged then the school or organization shall bear the burden of cost in doing this check.
- More time talking with a staff member before appointment will give the opportunity to find out about their contacts with children and young people. These may be through mutual contacts, an internet search, or through previous work. If there is any doubt about the suitability of the volunteer this should be explored further through searching questions.

Reporting an incident

All representatives should know the steps to take and to whom to contact when concerns arise regarding the safeguarding of children.

Definitions

- I. Minor incident: The child is safe and just faced a small accident, meaning, nobody caused this

incident with the purpose of hurting the child. For example, a small fall, getting lost and found immediately, etc.

- II. Major incident: The child suffered physical, emotional, psychological damage. For example, abuse from another child or adult, severe injuries, etc.

How to report a Minor Incident

After a minor incident, first thing to do is make sure the child is safe, then report the problem to Group Leader and Adventure Leader, the issue must be explained in detail to the Adventure Leader and he/she will give a written report to The Learning Adventure describing the issue and what to do to avoid this in the future.

How to report a Major Incident

Do not lead to any conclusions, inform Group Leader and Adventure Leader of the situation, and if needed the Group Leader and Adventure Leader will report the issue to the respective authorities. A written document must be filled explaining the incident and what is the status of the situation, finally The Learning Adventure will write a form that explains how to avoid this incidents in the future.

Media

- Staff are not allowed to share photos or video, or any media, on any private or public media platforms whereby students are identifiable, unless permission has been granted in writing by an authorized representative from the school.
- Any media collected during the trip that contains students or student activity should be sent to the designated staff member in charge of uploading media to our company shared drive then deleted from your personal storage/phone/device/cloud/places.
- You are not allowed to connect on any social media or telecommunications platforms with any students at any time unless okayed by a teacher in a written format.
- You are not allowed to share the contents/screen of any of your personal electronic devices with students.
- Any music or movies/media to be played should be suggested/offered by the teacher or checked by the teacher before the trip.

Personal information

- Do not reveal excessively personal information about yourself such as anything of a sexual nature, or discussion of non-legal behavior or experiences.