

#### **SAFEGUARDING POLICY**

#### **Policy Statement**

Exsportise provides English language summer courses for 9–17-year-olds. At Exsportise Summer Schools, students are given the opportunity to improve their practical and spoken English by attending structured English lessons, engaging in a sport, music or dance option of their choice. All students take part in recreational activities and off-site excursions. Exsportise is committed to its duty of care to safeguard all children and young adults in its care and recognises that **all have the right to be protected**. Exsportise is also committed to its responsibility as an employer towards all staff (paid and voluntary).

The statutory guidance from the Department for Education for schools in England, Keeping Children Safe in Education (KCSIE, 2024) **defines Safeguarding and promoting the welfare of children** as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- taking action to enable all children to have the best outcomes

**Child protection** is part of this definition and refers to activities undertaken to "protect children from direct harmful behaviour".

A child is identified as any person under 18 that is in the care of Exsportise, with Exsportise staff acting in loco parentis.

The Exsportise Safeguarding Policy forms a vital part of the induction for all staff. In addition to this, all staff members are provided with a summary of this policy in their Induction Handbook and have access to the full policy.

#### We recognise that:

- We, as a company, and our staff are an important part of the wider safeguarding system for children
- the welfare of the child/young person is paramount and is everyone's responsibility
- all children, regardless of age, disability, gender, ability, racial heritage, language, religious belief, sexual orientation, or identity, have the right to equal protection from all types of harm or abuse
- all staff working in our centres are advised to maintain and attitude of "it could happen here" where safeguarding is concerned and have a responsibility to act in the best interests of the child and report concerns to the appropriate officer
- all staff members are expected to be vigilant, whether on or off duty, in order to identify early on any abuse, neglect or any other welfare related issue.
- working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.



#### Key documents in developing this policy are:

- Children's Act 1989 & 2004
- UN Conventions on the Rights of the Child 1989 (ratified 1991)
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedom Act 2012
- Counter-Terrorism & Security Act 2015 (updated Dec 2023)
- Children & Social Work Act 2017
- Ofsted guidance 'Inspecting safeguarding in early years, education and skills settings' (2019)
- Working Together to Safeguard Children (2023, edited Feb 2024)
- DfE guidance Keeping Children Safe in Education (2024 KCSIE)
- After-school clubs, community activities and tuition guidance (2020, updated Sept 2023, formerly Out of School Settings OOSS)
- Safer Recruitment Consortium's 'Guidance for safer working practice for those working with children and young people in education settings' (2022)
- Disqualification under the Childcare Act" 2006, revised 2018
- What to do if you're worried a child is being abused (2015)
- Information sharing (2018)
- The Prevent Duty (2023, updated by Gov.uk and DfE)
- Prevent duty guidance: Guidance for specified authorities in England and Wales (2023)
- The Prevent Duty: Departmental advice for schools and childminders (2015)
- The Prevent Duty: an introduction for those with safeguarding responsibilities (2023)
- The use of social media for on-line radicalisation (2015)
- When to call the police non-statutory guidance from the National Police Chief's Council
- UKCIS Sharing Nudes and Semi Nudes Advice for Education (updated March 2024)

## The purpose of this policy:

- To provide **protection** for the children and young people who receive Exsportise's services, including the children of adult members or users.
- To **prevent** impairment of children's health or development
- To provide staff or students with **guidance and support** on procedures they should adopt in the event that they suspect a child or young person may be experiencing, or be at risk of, harm.

This policy applies to all staff, including senior managers, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of Exsportise.

Exsportise expects a strong safeguarding ethos amongst all adults working with children.



We will do this by implementing and reviewing the arrangements recorded within this policy – under the following headings:

- 1. Code of Conduct for children and staff
- 2. Safer Working Practice for Staff
- 3. Safer Recruitment recruiting staff safely, ensuring all necessary checks are made
- 4. **Staff Training** ensuring that staff with specific safeguarding responsibilities receive certified training and regular updates and that all staff working within the company receive basic safeguarding training.
- 5. **Welfare and Implementing Safeguarding** implementing security procedures, providing staff and students with appropriate safety equipment and protection, valuing, listening to and respecting children, sharing information about safeguarding with children, parents and relevant agencies
- 6. Recognising Child Abuse
- 7. **Handling Allegations** implementing clear procedures for responding to concerns and allegations

## **Key Contacts at Exsportise**

**Designated Safeguarding Lead (DSL)**:

**Deputy DSLs:** 

The Centre Managers at each Venue

The Welfare Manager onsite with the option to escalate

Reviewed: May 2025

if necessary to Bram van Asselt (CEO) or Verena Grave

(General Manager)

This policy will be reviewed annually.

Last date of review: 13<sup>th</sup> May 2025

Signed:

Verena Grave (General Manager)



#### 1. CODE OF CONDUCT

Exsportise wishes to protect both staff and children from any behaviour/ action which might be misinterpreted and therefore has set out the following principles:

#### Code of Conduct for Staff

Exsportise prioritises the well-being of our students and require our staff to uphold the highest standards of personal behaviour and safeguarding. Our dedicated staff commit to fostering a positive environment by adhering to the following code of conduct:

- Promoting Safety and Well-being: Ensuring a secure atmosphere by refraining from any criminal acts, including the possession or use of illegal drugs.
- **Creating Respectful Connections**: Nurturing positive relationships with students through respectful and appropriate interactions, avoiding any form of inappropriate contact.
- Cultivating a Supportive Community: Upholding a culture of kindness by preventing bullying, harassment, or humiliation towards any student, staff member, or employees of the host school.
- Demonstrating Professionalism and Promoting a Healthy Environment: Maintaining a
  professional image by always adhering to an appropriate dress code, including in and
  around the boarding houses at night. Upholding a substance-free environment by avoiding
  the consumption of alcohol or drugs on site, whether on or off duty. This includes smoking
  (including e-cigarettes) which can only be done in designated areas.
- **Respecting Boundaries**: Adhering to guidelines that discourage any sexual relations between staff on site and limiting overnight visitors in staff bedrooms unless approved by the Centre Manager.
- **Fostering a Responsible Approach**: Discouraging the free use of the tuck shop, unauthorised driving around the camp without permission, and avoiding swimming alone.
- **Encouraging Thoughtful Communication**: Maintaining a positive atmosphere by refraining from swearing and using personal mobile phones in front of students unless for work related tasks. Social media friendships with students are prohibited.

#### **Code of Conduct for Students**

At Exsportise, students play a vital role in creating a positive and respectful community. We invite them to contribute to this environment by adhering to the following guidelines:

- Promoting a Healthy Lifestyle: Creating a smoke-free and substance-free environment by
  refraining from smoking, bringing cigarettes, e-cigarettes, or lighters to camp, abstaining
  from alcohol and drugs, except when prescribed by a doctor for a medical condition these
  must be submitted upon arrival for safe and correct storage and dosage.
- Ensuring Safety: Prioritising safety by refraining from bringing knives or other weapons.
- **Fostering Respectful Interactions**: Nurturing positive relationships by avoiding bullying, harassment (including humiliation), whether verbal, physical, online, or social, and refraining from fighting or swearing.



- **Promoting Trust**: Demonstrating responsibility and trustworthiness by refraining from stealing and always seeking permission before entering another student's room.
- **Respecting Boundaries**: Adhering to guidelines that prohibit boys and girls from entering each other's houses or rooms, and seeking permission before leaving the camp unaccompanied, respecting clear boundaries.
- **Cultivating a Positive Atmosphere**: Always showing respect to staff and fellow students, including refraining from mobile phone use during English classes, or any scheduled activity.
- **Committing to Participation**: Contributing to a focused learning environment by attending all sessions and meetings as per the timetable.

#### 2. SAFER WORKING PRACTICE FOR STAFF

#### Responsibilities

Overall responsibility for this policy rests with the CEO. Day to day responsibility is taken by the General Manager and Operations Manager.

On each site, the Centre Manager is the Designated Safeguarding Lead (DSL) and responsible for all Safeguarding issues which arise, their recording as well as staff training. The DSL will receive support from the onsite deputy DSLs, the centre's Welfare Manager, or offsite the CEO (Bram van Asselt) and the General Manager (Verena Grave) to ensure that matters are dealt with in accordance with this policy.

All staff have a personal **responsibility** to ensure that they conduct themselves in line with our **good practice guidance**, to be vigilant and report any concerns they observe personally or to **respond in line with this policy to a disclosure** or allegation. **Staff will not be penalised for reporting any concerns and their report will remain confidential.** 

#### **Good Practice for Staff**

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about the appropriate action to take.

Abuse can occur within many situations including the home, school and the sporting environment. Some individuals will actively seek employment or voluntary work with young people in order to harm them. Exsportise Employees will have regular contact with young people and be an important link in identifying cases where they need protection. All suspicious cases of poor practice should be reported following the guidelines in this document.

When a child has been subjected to child abuse outside the sporting environment, sport can play a crucial role in improving the child's self-esteem. In such instances the Centre Manager must work with the appropriate agencies to ensure the child receives the required support.

All staff are encouraged to **demonstrate exemplary behaviour** in order to promote children's welfare and reduce the likelihood of allegations being made. The following are common sense examples of how to create a positive culture and climate.



#### Good practice means:

- Always working in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- Treating all students equally, and with respect and dignity
- Always putting the welfare of each student first, before winning or achieving goals
- Being of smart appearance appropriate to the role, on and off duty, and using appropriate language
- Maintaining a safe and appropriate distance with students (e.g. it is not appropriate for staff to have an intimate relationship with a child or to share a room with them)
- Building balanced relationships based on mutual trust which empowers children to share in the decision-making process
- Making sport fun, enjoyable and promoting fair play
- Ensuring that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the Coach Education Programme. Care will be required, as it is difficult to maintain hand positions when the child is constantly moving. Students and their parents should always be consulted and their agreement gained
- Keeping up to date with technical skills, qualifications and insurance in sport
- If groups of students have to be supervised in the changing rooms, always ensure teachers or coaches work in pairs
- Ensuring that if mixed groups of students are taken away on excursions, they should always be accompanied by male and female members of staff. However, remember that same gender abuse can also occur
- Ensuring that adults do not invite children into their rooms
- Adults only enter children's rooms to carry out specific checks and leave the door open
  whilst they are inside. Same gender staff will make such checks. In specific circumstances a
  more senior member of staff may be required to carry out a check in a room of a student of
  the opposite gender. Such checks will be organised in advanced and the senior staff
  member will be accompanied by a staff member of the same gender as the child.
- Being an excellent role model this includes not smoking or drinking alcohol in the company of students
- Giving enthusiastic and constructive feedback rather than negative criticism
- Recognising the developmental needs and capacity of the students avoiding excessive training or competition and not pushing them against their will
- Securing parental consent in writing to act in loco parentis, if the need arises to administer emergency first aid and/or other medical treatment
- Keeping a written record of any injury that occurs, along with the details of any treatment given
- Requesting written parental consent if members of staff are required to transport students in their cars.

<u>Practices to be avoided</u> (The following should be avoided except in emergencies. If cases arise where these situations are unavoidable it should be with the full knowledge and consent of someone in charge at the Company or the child's parents. For example, a child sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a child up at the end of the duration of their stay):

- avoid spending time alone with children away from others
- avoid taking or dropping off a child to an airport, train station or excursion unless it is a planned transfer using regular transport suppliers



## Practices never to be sanctioned. Staff should never:

- engage in rough, physical or sexually provocative games, including horseplay
- share a room with a child
- allow or engage in any form of inappropriate touching
- allow children to use inappropriate language unchallenged
- make sexually suggestive comments to a child, even in fun
- reduce a child to tears as a form of control
- fail to act upon and record any allegations made by a child
- do things of a personal nature for children, that they can do for themselves
- invite or allow children to stay with you at your home/in your room unsupervised.

N.B. It may sometimes be necessary for staff to do things of a personal nature for children, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of parents and the students involved. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

<u>Incidents that must be reported/recorded</u> (If any of the following occur you should report this immediately to the Centre Manager and record the incident. You should also ensure the parents of the child are informed):

- if you accidentally hurt a child
- if they seems distressed in any manner
- if a student appears to be sexually aroused by your actions
- if a student misunderstands or misinterprets something you have done.

#### **Transport Suppliers**

All coach and taxi companies contracted by Exsportise to transport children must adhere to the below points. As such, transport companies are authorised to transport children with or without an Exsportise staff member present. In the case of no Exsportise staff member being present, the driver takes full responsibility for the child or children being driven, including at airports and train stations for children that are arriving or departing.

- All vehicles provided or transporting participants must be in roadworthy condition and meet all the requirements of the law; Road Tax, Insurance, MOT certificate and Maintenance Log Book.
- A Fire Extinguisher and First Aid kit must be supplied in all vehicles.
- A PCV Operator's License or Small Bus Permit must be in place for carrying more than 8 passengers.
- All drivers must have had an enhanced DBS (Disclosure & Barring Service) check done and no criminal record found.



# **Electronic Equipment and Social Media**

There is evidence that some people have used sporting events as an opportunity to take inappropriate photographs or film footage of young sportspeople in vulnerable positions. All members of staff should be vigilant and any concerns should to be reported to the Company's Designated Safeguarding Lead.

#### Videoing as a coaching aid:

There is no intention to restrict coaches and teachers from using video equipment as a legitimate coaching aid. However, children, young people and their parents/guardians should be made aware that this is part of the coaching programme and their consent obtained.

Any videos taken to use as a coaching aid should be deleted from the camera when the child leaves at the end of the course. Videos can be stored on Company computers or Company monitored applications for use as a future coaching aid if the parents'/guardians' consent has been obtained.

## Mobile Phones:

Staff currently use their personal phones to stay in touch with each other during sessions and this helps with managing safety of children and young people where the site is large and multiple activities are taking place.

Under no circumstances are staff to use personal phones to photograph or video children. Phones should be out of sight unless being used for a legitimate reason.

No personal staff phone number should ever be given to a child. When children are taken off site, they should be provided with a Company duty mobile phone number, the site office and the head office phone numbers to contact in case of an emergency.

#### Social media:

Under no circumstances should there be any contact between staff and students over social media. Any attempt by a child to link up with/connect with a staff member over social media, including private messaging, should be rejected, and the reasons why explained to the child.

Staff should not show students their personal social media profile pages, nor allow any student to use their personal computers or show them any materials, including photos and videos that are stored on their personal computers.

Staff should adhere to this policy both during and after the end of their contract with Exsportise.



#### **Staff Accommodation**

- All staff, including Exsportise employees, cleaning staff, and maintenance staff must respect pupils' privacy, sex, age, and special requirements when entering boarding house accommodation.
- Staff of the opposite sex should be accompanied by another staff member when pupils are
  present, especially at night and in the morning when students may be changing or in bed. All
  staff must knock and wait for a response before entering a student's room. If there is no
  response, they should loudly announce their entry before opening or unlocking the door.
  For duty staff checking on pupils after lights out, it is sufficient to simply look in without
  waking them.
- Staff should use separate toilet and washing facilities from pupils. If separate facilities are
  not available, staff should exercise discretion, such as by avoiding using the facilities
  simultaneously with pupils. All washing facilities have cubicles that are made private by
  curtains or screens, which should be used at all times.
- Staff should be fully clothed whilst walking between their bedrooms and the washing facilities.
- Bedrooms do not have lockable doors and staff should be aware that a student might enter a room at any time and behave accordingly.
- Valuable items and medication should not be left in unattended bedrooms. Such items should be stored in the centre office and/or centre medical office.

#### 3. SAFER RECRUITMENT

To ensure unsuitable people are prevented from working in our organisation:

#### **Recruitment Process**

## Advertisement

Job advertisements will make explicit reference to the commitment of the organisation to Safeguarding, including the requirement for an Enhanced Disclosure & Barring Service check.

#### **Job Descriptions**

Job descriptions will be supplied to all staff. These outline tasks that staff will be expected to perform, the skills, qualifications and experience necessary to undertake the role and safeguarding references.

Job advertisements will generally mention the Job Title, Job Location(s), Salary Guide, and a link to the "Work with us" page of the Company's website where more information can be found such as a Job Description, Personal Specifications, details of the recruitment process and access to the application portal.

#### **Application Form**

All applicants will complete an application form. The application form will elicit information about an applicant's past and a self-disclosure about any criminal record as well as asking each applicant to certify that all information given is correct. In addition to this, all applicants must provide the contact details for at least two referees.



## **Equal Opportunity**

The company is an equal opportunities employer where all job applicants will receive equal treatment regardless of age, disability, gender reassignment, marriage and civil partnership status, pregnancy and maternity, race, religion or belief, sex or sexual orientation ('the protected characteristics').

The Company is committed to building an organisation that makes full use of the talents, skills, experience and different cultural perspectives available in a multi-ethnic society, where people feel they are respected and valued, and can achieve their full potential.

#### Shortlist

Applicants are measured against a predetermined selection criteria and scored against how well they meet this. Those with the highest score progress to the next stage of the recruitment process. The job description will provide the criteria for each role and evidence of a candidate's suitability will be sought in the application form and CV. Shortlisting is carried out by two Head Office staff members, independently of each other. This, together with a standardised selection criteria for each available role ensures a fair and objectively justified shortlisting and selection.

#### Interview

Initial telephone or video interviews will be carried out to narrow down interviewees to those considered for employment. An applicant's motivation behind applying will be explored, basic information checked, and opportunity given for any initial questions.

Successful applicants will be invited to a second, face-to face / video interview. Applicants will be assessed by another member of the recruitment team, usually the General Manager, or another experienced member of the company (e.g. a Centre Manager, Head of Specialist Academies or Director of Studies). Consent will be asked to audio record the interview in order to generate a transcript. The recording ensures full attention can be paid to the applicant and all information is captured accurately, consistently and fairly. On request, the recording can be stopped at any point. If preferred by the applicant, detailed notes can be taken by the interviewer instead. Interviews will be carried out either in person or via Google Meet video calls. Additionally, interview days consisting of a group assessment and individual interviews may be offered.

Interview questions will revolve around the skills, knowledge, experience and behaviours required for the position applied for. Applicants will be asked about gaps in work history and any anomalies explored to confirm the applicant can meet the safeguarding criteria (in line with Safer Recruitment Training).

All interviews will include questions to find out the applicant's motivation for and experience of working with children.

If any information regarding past disciplinary action, allegations, cautions, or convictions has been disclosed on the application, this will be discussed and considered in the context of the individual case.

EFL teacher applicants will undergo a further interview with one of the Exsportise Director of Studies with a focus on teaching skills, style, and expectations. In case a DoS is unavailable, a Head Office member will administer the teaching and methodology part of the interview with the answers given evaluated by a DoS. The questions will also include behavioural questions about an applicant's rewarding or difficult time in the classroom or when preparing a class.



At least one member of the interview team will have undertaken "Recruiting safely in ELT" training offered by English UK, the national association of accredited English language centres in the UK.

#### **Vetting Checks**

#### **References**

At least two confidential references must be provided and will be followed up. Referees will be asked specifically about the applicant's suitability to work with children and whether there have ever been any concerns about work with children and young people.

References may be taken up before your interview (applicants can indicate on the application form should they not wish their current employer to be contacted prior to a conditional job offer but this reference must be obtained prior to the start of employment). As prospective employer, we reserve the right to contact any previous employer, not just the referees provided.

References from family, friends or basic references are not acceptable. Any offer of employment may be withdrawn if references are not received, are inadequate or it becomes evident that an applicant has knowingly withheld or have given misleading or false information.

# Identity Checks & Right to Work in the UK

The original documents of all forms of ID will be seen either by a senior member of Exsportise, or by using the ID verification service provided by the Post Office.

Applicants who are unable to attend an in-person interview will have to present their original documents via video link and present these on site before taking up appointment.

If an applicant's original documents are insufficient to proof their right to work in the UK, a UK Visas and Immigration (UKVI) "share code" is requested and their status checked online as well as their identity documents.

## **Qualification Checks**

Applicants will be asked to provide any academic or vocational qualifications as required for the position they have applied for. Applicants who are unable to bring these to the interview must provide these as soon as they arrive on site and before taking up appointment.

#### **DBS** Disclosure

An Enhanced Disclosure and Barring Service check (DBS) will be undertaken by the company prior to taking up a position. Photographic evidence of identity is required for these checks, which also serve to confirm the applicant's identity. Acceptable proofs of identity may include passport, birth certificate, driving licence as well as evidence of proof of address.

The DBS Update Service allows for portability of a Certificate across employers. Should an individual have a subscription to this service, it can be checked whether there has been any change to the information recorded, since the initial certificate was issued. The initial certificate must be presented to confirm the certificate matches the identity of the individual and that it is for the appropriate workforce and level (i.e. enhanced certificate including barred list information).

For any applicants who are not resident in the UK a Police Certificate of Good Conduct (or equivalent) will also be obtained, according to the process that is in place in the country of residence.



For candidates who have a criminal record or other notification on the DBS Check or Police Check, further information will be sought from the applicant. A decision as to whether to proceed with employment will be made by the CEO or the General Manager that depends on the nature of the offence and whether it would have a negative bearing on the applicant's suitability for working with children.

Considerations will be given to the Rehabilitation of Offenders Act 1974 and Exceptions Order 1975 (2013,2022, 2023) and also:

- The nature, seriousness and relevance of the offence
- How long ago the offence occurred
- One-off or history of offences
- Mitigating circumstances
- Decriminalisation and remorse

No applicant will start work without a successful "Barred List" and, if applicable, "Prohibited List" check.

Individuals should only be allowed to commence employment without an enhanced disclosure certificate if, in exceptional circumstances and following completion of a satisfactory risk assessment by the CEO or General Manager, any delay is likely to severely affect service delivery. Unsupervised access to students will not be allowed until a satisfactory check has been obtained.

This will be achieved by implementing the following procedures:

- A third reference will be requested
- Coaches will coach in sight of other staff
- Teachers will only teach with the door open and the DOS will maintain a frequent presence in the corridor throughout the lesson
- Staff will be accommodated off site or in parts of the facility that children do not access and will not have unsupervised access to student accommodation areas; staff will not undertake any supervisory duties in the accommodation

## **Record Retention/Data Protection**

Exsportise is required by law to conduct pre-employment checks. If an applicant is successful, any relevant information provided as part of the application process will be kept on their personnel file. This includes copies of documents used to verify their identity, right to work in the UK, medical fitness, and qualifications. Medical information may be used to help Exsportise fulfil its obligations as an employer, such as considering reasonable adjustments if an employee has a disability or to assist with any other workplace issue. This documentation will be retained by Exsportise for the duration of employment and for 6 years, effective from the end date of contract.

All information retained on employees is kept centrally on the purpose-built Exsportise database.

Exsportise will retain all job application and interview records on unsuccessful applicants for a period of 12 months after the date the applicant is informed of the outcome. After this time the records will be deleted permanently. This retention period is in accordance with the General Data Protection Regulation (GDPR).



#### Selection Outcome And Conditional Offer

With three weeks of the interview, an offer of employment or rejection will be sent out. Any offer letters will clearly state that the offer is subject to passing certain pre-employment checks. These are:

- At least two satisfactory references
- A successful enhanced DBS check and Police "Certificate of Good Conduct" (or equivalent) of resident outside the UK
- Proof of identity
- Evidence demonstrating the entitlement to work in the UK
- Proof of any academic / vocational qualifications (role dependent)

Once all safer recruitment checks have been completed, the contract together with additional documentation (such as job description) will be emailed out and access given to extra information which must be read such as privacy notice, employee handbooks and Part 1 and Annex A of "Keeping Children Safe in Education" (DfE, 2024) etc.

#### 4. STAFF TRAINING

All staff will be provided with the Company employee handbook and a "Working for Exsportise" document prior to arriving at induction. Furthermore, all staff are issued and required to read Part 1 and Annex A. of DfE guidance on 'Keeping Children Safe in Education' (re-issued by DfE September 2024).

All staff will receive an induction prior to commencing work which include:

- Clarification of their job role and requirements
- Our Code of Conduct, including this Safeguarding Policy
- Health and Safety and emergency procedures
- First Aid awareness training where relevant

Specific training on Safeguarding practice and policy will also be provided to include:

- Guidance on self-protection from allegations of abuse, including analysing own practice against our guidelines
- Personal responsibility and reporting of concerns of poor practice amongst staff or possible abuse
- How to respond to concerns or allegations made by a child or young person
- Our detailed guidance for working safely and effectively with children and young people, with specific reference to cultural differences among our students
- A 2-hour training session to comprehensively cover safeguarding (including online safety),
  prevent and good practice, to facilitate the development of a positive culture towards good
  practice. The training also allows staff to understand the expectations, applicable roles and
  responsibilities in relation to filtering and monitoring.
- Centre Managers will receive training on what to do in the event of an allegation against a member of staff, or where concerns about poor practice have been made.



#### Our policy is to ensure that:

- Centre Managers as well as at least 2 Head Office staff members receive specialist safeguarding for designated lead (formerly Level 3). This training will be updated formally every two years but informal updates will be done annually.
- Welfare Managers receive at least advanced safeguarding training (formerly Level 2).
- All staff receive a 2-hour training session on Safeguarding delivered by an external safeguarding specialist. This includes any safeguarding and child protection (including online safety) updates as required in order to provide staff with the relevant skills and knowledge to safeguard children effectively.
- All staff who start after the first week of camp will be given an abridged version of the full
  induction training, to cover all of the same salient points. All "late starters" will also be
  required to complete an online "Introduction to Safeguarding for UK Language Centres",
  provided by Accreditation UK. The course includes details on Safeguarding, Child Protection
  as well as Prevent.

Update training will be provided as necessary. Information about meeting training needs can be obtained from SkillsActive, Sports Coach UK, NSPCC and the Sport Council.

#### 5. WELFARE AND IMPLEMENTING SAFEGUARDING

# **Centre security procedures**

Students are registered at least three times daily:

- Morning: At the start of coaching/teaching.
- Afternoon: At the start of coaching/teaching.
- · Evening: At bedtime.

Additional registers are taken on certain days during breakfast, lunch, or dinner.

Onsite the overall staff to student ratio is 1:4.

## Intruder (Unknown visitor) procedure:

Applies to all pupils, staff, contractors, parents, guardians, agents and visitors across academic areas, boarding houses, sports grounds and any off-site venue under the school's control.

## 1. Definition of an Intruder

#### An individual who:

- 1. Has not followed the school's *Visitor Management Procedure* (sign-in, safeguarding briefing and lanyard), or
- 2. Refuses to identify themselves or to cooperate with staff, or
- 3. Otherwise causes staff to form a *reasonable belief* that they may pose a risk to pupils, staff or property.



#### 2. Roles & Responsibilities

Role	Key responsibilities when intruder identified
All staff	Maintain dynamic risk assessment; challenge or
	report intruders; initiate lockdown if necessary;
	safeguard pupils.
Administrators	Complete sign-in procedures including verifying
	ID; activate lockdown signal.
Centre Manager / Designated Safeguarding	Coordinate on-site response; liaise with police;
Lead (DSL)	preserve evidence (e.g. CCTV). Lead safeguarding
	response; ensure records entered on Exsportise &
	school safeguarding system; inform Head Office,
	parents and stakeholders.
Welfare Manager / Deputy DSL (DDSL)	Secure boarding houses; account for boarders;
	communicate with House Parents.

## 3. Preventative Measures (Visitor Management)

- 1. All visitors sign in, show photo ID and receive a *VISITOR* lanyard plus required to read safeguarding leaflet.
- 2. Contractors and external providers are risk-assessed in advance (in line with KCSIE) and supervised at all times.
- 3. **No visitor is permitted in boarding houses** unless pre-authorised by the Centre Manager and accompanied by staff (House Parent).

## 4. Recognition & Initial Challenge

- 1. **Spot** any person without an appropriate lanyard or behaving suspiciously.
- 2. **Assess** from a safe distance: Is it safe to approach? If not, move to Step 6.
- 3. Challenge (if safe and preferably in pairs):
- 4. "Good morning, may I help you? Could I see your visitor badge please?"
- 5. Request name, purpose, whom they are visiting, and proof of identity.
- 6. Discreetly call the Office and state the designated Code Unknown Visitor with location.

#### 5. Escalation & Containment

- Low risk / genuine visitor → escort to Office to sign in.
- Uncertain or escalating risk → remain at least 2 m away, do not block exit routes (if indoors). Alert Centre Manager / DSL immediately.
- Immediate threat (weapon, aggression, terrorism warning) → dial 999 (give site postcode and any site-specific entrance details), activate lockdown

#### 6. Lockdown Procedure

We have a tested Lockdown, Invacuation and Evacuation procedure to protect students, staff and visitors from intruders and environmental threats. The Centre Manager (Designated Safeguarding Lead) and Welfare Manager (Deputy DSL) oversee implementation on-site; all staff receive training and drills are held during annual induction training. The full procedure is held in the controlled, staff-only Emergency Action Plan, reviewed annually.



#### **Excursions**

Students are registered at the following times:

- 1. Before boarding the coach
- 2. On the coach before departure
- 3. At the excursion destination upon arrival
- 4. At scheduled check-ins throughout the day (based on group size and age)
  - Ages 9–11: Minimum 1 adult for every 10 children
  - Ages 12–14: Minimum 1 adult for every 15 children
  - Ages 15+: Minimum 1 adult for every 20 children
- 5. Before departure, both at the destination and once seated on the coach

## **Procedure for Missing Child: On-site Registration**

- 1. Any child unaccounted for during registration must be reported to the site office immediately.
- 2. The Administrator and/or Centre Manager will call the child's mobile phone (if applicable).
- 3. A search will be initiated, starting with bedrooms, friends' rooms, and bathrooms, followed by a thorough search of boarding houses and the wider site.
- 4. If necessary, parents, police, or local authorities will be contacted.
- 5. The Designated Safeguarding Lead (Centre Manager) may involve the Local Safeguarding Children Partnership (LSCP) and coordinate any required safeguarding investigation.

# **Procedure for Missing Child: Off-site Registration**

- 1. After 10 minutes Call the student's mobile (or a friend's phone)
- 2. After another 10 minutes Notify the Excursion Supervisor (who will consult with friends and initiate a search)
- 3. After 30 minutes Contact parents/guardians, and the police and site staff contacted if necessary

## **Key Safeguarding Measures**

- All children must provide their Group Leader with a contactable mobile phone number (their own or a friend's).
- During offsite excursions, children must wear wristbands or carry ID cards with the company's contact information.
- The Centre Office is always staffed while children are offsite and can provide support to searches where necessary.



## Procedure for Missing Child: Airport/Rail Station Arrival

- 1. If a flight or train has been removed from the arrivals board and the child has not arrived:
  - Staff will enquire at the airline/train information desk.
  - An announcement will be made over the loudspeaker requesting the child to meet at the designated location.
  - Staff will wait at the meeting point for 10 minutes, repeating the announcement if necessary.
- 2. If the child does not appear, the child's mobile phone will be called, and parents/emergency contacts informed.
- 3. If parents confirm the child was on the flight/train but has not arrived, the airline/rail service will be contacted for assistance.
- 4. Exsportise staff will remain at the location until the child is located. If necessary, the police or local authorities will be informed.

## **Risk Assessments and Safety Equipment for Activities**

Risk Assessments are in place for all activities offered, and in all areas used by the camp operations. These are reviewed and updated both at the start of each new summer and as and when circumstances change within each activity/area. Risk assessments also serve to ensure that all activities are age appropriate.

Staff must ensure that safety equipment specific to each sport is well maintained and that children are using it appropriately whilst playing sport. This includes ensuring that all children are wearing appropriate clothing, footwear and protective gear for their sport.

#### In case of Accidents and Injuries

There are a number of trained first aiders onsite. Each sport or activity (including offsite excursion groups) is provided with a first aid bag that is refilled whenever necessary by the onsite medical team. The onsite medical team comprises of two Medical Officers with an advance first aid qualification who are overseen by a Welfare Manager, at least one of whom is onsite (and on call) at all times.

## **Behaviour and Discipline**

Both staff and students are given clear codes of conduct to adhere to, in writing and prior to their arrival at camp. In addition, rules and regulations concerning behaviour are made clear to staff during their induction training. Student rules are reiterated and made clear during welcome meetings, held weekly to coincide with new arrivals.

Among the information reiterated to students during their welcome meeting:

- Accommodation in the boarding houses considers the students' privacy, sex, age, and special requirements. Students may only enter their own boarding house and must ask for permission before entering another child's room.
- Senior staff are introduced to the students. The names, photos and job roles of all staff are displayed in the central student social area to help students to know who is who. Notices



are also put up to direct the children who they should go to for various problems and in case of illness or injury

- What to do in the event of a fire. Fire drills are held in all boarding houses within 24 hours of students' arrival and written records of each held in the Centre office (For more details see Fire and Building Policy).
- The Centre boundaries are explained and children told where they can and cannot go. For any school where it is necessary to cross a road to get to a particular activity, staff are organised to accompany the children or to act as a "lollipop person."
- Mutual respect is to be shown at all times between students and staff. Bullying and harassment are not tolerated.

#### **E-safety and Children's Internet Access**

The breadth of issues classified within e-safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate or harmful material. This includes, but is not limited to:
  - pornography
  - o fake news
  - o racism
  - o misogyny
  - o self-harm
  - o suicide
  - o anti-semitism
  - radicalisation
  - extremism
- Contact: being subjected to harmful online interaction with other users. Examples include:
  - Child-to-child pressure
  - Commercial advertising
  - Grooming or exploitation for sexual, criminal, financial or other purposes
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm. Examples include:
  - Making, sending and receiving explicit images (consensual and non-consensual) such as nudes and semi-nudes and/or pornography
  - o Online bullying
  - Disclosure of personal information
  - Digital footprint and online reputation
  - Health and well-being (amount of time spent online)
- Commerce: the risk from things like:
  - Gambling
  - o Inappropriate advertising
  - Phishing
  - o Financial scams



Student e-safety will be ensured by the following procedures:

- Induction training for all staff, includes a focus on online safety which, amongst other things, provides an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- Internet access (provided by host schools) for students may require an individual login and password (depending on school) and the sites available for them to access will be restricted according to the host school policy to exclude all inappropriate sites including, but not limited to, online pornography and gaming sites, or other sites with age restrictions.
- Internet access is monitored by the IT department of the host school and any attempt to access restricted sites will be blocked and flagged.
- Filtering and monitoring systems are in place on the school networks, are overseen by the host schools and are subject to regular review.
- Any reports or evidence of cyber-bullying will be investigated and dealt with accordingly.

#### **Arrival and Departure Arrangements**

Any child that has opted for an Exsportise transfer is met/dropped at a pre-arranged location, usually at an airport or train station by an Exsportise representative. This location is either to meet parents or other authorised responsible adults or to meet children who are travelling on flights/trains either as Unaccompanied Minors or alone. Those travelling alone are met at airport/train arrival areas and are assisted with check-in and taken as far as security/border control on departure. Children are supervised at a transport gateway from the time they are met in arrivals until they arrive at camp, and from the time they leave camp until they are seen through airport/train station security/border control. Small groups are put in the care of taxi drivers working for transport suppliers contracted by Exsportise. Larger groups are accompanied by an Exsportise staff member.

Exsportise staff members cannot accompany children past airport/train station security or border controls but we offer advice to all parents and agents on available Unaccompanied Minor arrangements. An Exsportise representative remains at each transport gateway until all flights/trains carrying our students have departed.

## **Supervision Guidelines**

Exsportise enforces strict supervision policies:

- All sessions and activities are mandatory, including evening entertainment and weekend excursions
- Free time is limited to mealtimes, during which students may stay in their rooms or authorised areas. Staff will supervise these locations.
- Swimming sessions are supervised by qualified lifeguards, with pools locked at all other times. Students with no swim consent will not be allowed to participate in the swimming sessions.

Certain sites will have non-Exsportise camps running simultaneously, and other staff/children will be nearby on site. These and other sites have certain areas which act as public thoroughfares and will have members of the public walking through the areas where the Exsportise camps are operating. At these sites, children must wear Exsportise wristbands or carry Exsportise ID cards at all times, and any person in the Exsportise areas not working for Exsportise or wearing an Exsportise wristband or ID badge must be reported to the Centre Manager. Any visitors must be signed into the site office



and issued with an Exsportise visitor pass (to be returned on leaving the site when the visitor signs out).

#### **Leaving the Centre**

Students may not leave the centre without the Centre Manager's permission and adult supervision, except for students aged 15+ visiting Oundle village under specific conditions:

- Students must be in groups of at least two, all aged 15 or over.
- They must sign out at the camp office and providing a phone number and collecting a colour-coded card with camp contact details.
- They must return the card and sign back in upon their return.
- Misconduct will result in revoked permissions.

#### The Multi-National Environment and PREVENT

Exsportise is a multi-national and multi-cultural environment, where students are able to broaden their horizons, make new friendships and develop greater understanding of each other through mixing with others from different countries and cultures. We welcome students from all backgrounds and will not permit discrimination by students or staff on the grounds of either religion, gender, sexual orientation, or ethnicity. In addition, even greater sensitivity will be shown to students who are arriving in the UK from territories currently in the midst of internal or international conflict.

Exsportise understands its responsibilities under the Counter Terrorism & Securities Act 2015 to prevent all people of different ages being radicalized or drawn into terrorism and seeks to meet its obligations by educating staff in the terminology and risks covered by the Act.

# **Terminology**

<u>Radicalism:</u> 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 the mind.

<u>Extremism:</u> holding extreme political or religious views which may deny rights to any group or individual Extremism can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as religious extremism. It can be expressed vocally or via active opposition to **Core British Values:** including democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs.

#### **Risks of Extremism**

- Staff, students and other adults (e.g. Group Leaders) may arrive at camp already holding extremist views
- Whilst part of the school staff or students may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials via hardcopy or online, inspirational speakers, friends or relatives being harmed, social networks
- People who are vulnerable are more likely to be influenced. Vulnerability could stem from a range of causes: loss of identity or sense of belonging, isolation, exclusion, mental health problems, sense of injustice, personal crisis, victim of hate or discrimination, bereavement



## **Counteracting Risk**

- Promote a safe and supportive international environment via clear expectations of accepted behaviours and those that will not be tolerated
- Promote core British values through the code of conduct and via lessons on British culture and traditions
- Challenge radical or extremist views in any context (formal or informal) via usual procedures for unacceptable behaviour
- Have strong filters on IT equipment to prevent students accessing terrorist websites or using social networks to exchange terrorist and/or extremist views
- Ensure that extremist speakers do not use Exsportise premises to distribute materials or expound views

#### Signs that may cause concern

- Students talking about exposure to extremist views or materials outside the camp
- Changes in behaviour, e.g. becoming isolated
- Fall in standard of work, poor attendance
- Changes in attitude, e.g. intolerant of differences/having a closed mind
- Asking questions about certain topics (e.g. those connected to extremism)
- Offering opinions that appear to have come from extremist ideologies
- Attempts to impose own views/beliefs on others
- Use of extremist vocabulary to exclude others or incite violence
- Accessing/attempting to access extremist material online or via social network sites
- Drawings or posters (e.g. in bedrooms) showing extremist ideology/views/symbols
- Students voicing concern about anyone

#### Channel

Anyone being referred to Prevent is assessed by the local authority and other partners, including the police, to assess if they are suitable for Channel, Prevent's specialist support scheme.

Channel is a voluntary, confidential, early intervention programme that supports people who may be at risk of being drawn into terrorism. If Channel support isn't deemed appropriate – for example, if the person is at risk of harm but they aren't being radicalised – they may be signposted to other safeguarding services for help. Taking part in Channel doesn't go on someone's criminal record, and won't negatively impact their future education or career prospects. It means getting the right kind of help for the person who needs support to move away from extremism.

## 6. RECOGNISING CHILD ABUSE

Child abuse can take four forms, all of which can cause long term damage to a child

- physical abuse may include hitting, shaking, burning, poisoning or any way of causing physical harm to a child
- emotional abuse persistent emotional maltreatment of a child. Usually involved in most types of ill treatment but can occur alone
- neglect-persistent failure to meet a child's basic physical and/or psychological needs



sexual abuse - forcing or enticing a child (including abuse of trust – Sexual Offences Act 2003) to take part in in sexual activities, including prostitution and can include non-contact activities such as involving children in looking at pornographic material or encouraging children to behave in sexually inappropriate ways. Preparing children for sexual abuse is called grooming and is also illegal.

Child Sexual Exploitation (CSE) is another type of sexual abuse in which children are sexually exploited for money, power or status. Children may be tricked into believing they are in a loving, consensual relationship or may also be groomed online.

Most types of child abuse can take one or several of these forms, for example bullying and domestic violence are often both physical and emotional forms of abuse.

#### Signs of Abuse

A child may be experiencing abuse if he or she is:

- frequently dirty, hungry or inadequately dressed
- left in unsafe situations (being left alone or unsupervised) or without medical attention
- constantly "put down", insulted, sworn at or humiliated
- changes in behaviour withdrawn behaviour, attention seeking or depression
- seems afraid of parents or carers
- · severely bruised or injured
- displays sexual behaviour which doesn't seem appropriate for their age
- growing up in a home where there is domestic violence
- living with parents or carers involved in serious drug or alcohol abuse.
- victim of female genital mutilation (FGM). It is the partial or total removal of external female genitalia for non-medical reasons. Religious, social or cultural reasons are sometimes given for FGM. It's dangerous and a criminal offence and any adult has the legal duty to report this if they find out it has happened.

Remember, this list does not cover every possible type of child abuse. Other things may be seen in the child's behaviour or circumstances which may cause reason for concern. Abuse can also be disclosed to by the child in question or reported by another child.

#### Child-on-Child Abuse

All staff must understand that children can abuse other children, and this abuse should never be tolerated or passed off as "banter" or "part of growing up."

#### Child-on-child abuse can include:

- Bullying (including cyberbullying)
- Physical abuse (e.g. hitting, kicking)
- Sexual harassment or sexual violence
- Initiation/hazing-type violence and rituals
- Abuse in intimate personal relationships between peers
- Sharing of nude or semi-nude images

Staff must report all incidents to the Designated Safeguarding Lead (DSL), even if they seem minor. Disclosures must be taken seriously, recorded, and followed up appropriately



#### **Mental Health and Safeguarding**

Poor mental health can be both a cause and an indicator of abuse, neglect, or exploitation.

#### Staff must be alert to:

- Sudden changes in behaviour or mood
- Signs of distress, anxiety, or depression
- Withdrawal from activities or relationships

Concerns should be shared with the DSL, even if they appear minor, as part of early help or safeguarding intervention. Staff are not expected to diagnose issues, but they must act on concerns.

#### 7. HANDLING ALLEGATIONS

## Responding to allegations or suspicions

It is not the responsibility of anyone working for the Company to decide whether or not child abuse has taken place. However, there is a **responsibility to act on any concerns by reporting these** to the appropriate officer or the appropriate authorities.

The Company assures all staff that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child.

## The role of the Designated Safeguarding Lead (DSL)

- To be responsible for overseeing the day to day execution of safeguarding and child protection on site.
- To be the central point of contact for all staff and students to voice any safeguarding concerns
- To maintain a confidential recording system for safeguarding and child protection concerns ('minor' welfare concerns will be dealt with and recorded by the Welfare Manager, Medical Officers and House Parents)
- To refer an allegation to the relevant agencies such as the Local Safeguarding Children Partnership comprising of the local authority, clinical commissioning groups and the police.
- To manage and monitor Exsportise's role in any multi-agency plan for an individual child
- To keep parents/carers updated, unless by doing so would undermine a criminal investigation or put the child at risk of harm

## Concerns about suspected abuse/disclosure by a child or young people:

 Any suspicion that a child has been abused by a member of staff or by another child must be reported to the DSL, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk



- Depending on the nature of the concern, the DSL may contact the Local Safeguarding Children Partnership / LADO for guidance on whether to involve the authorities or whether the Company will deal with the matter
- The parents or carers of the child will be contacted as soon as possible following advice from Children's Services
- The DSL should also notify the Company's Head Office which in turn will inform the appropriate authorities who will deal with any media enquiries
- If the DSL is the subject of the suspicion/allegation, the report must be made to the Deputy DSL (Welfare Manager onsite) with the option to escalate to the Company's Head Office directly which will follow the referral procedures above
- Staff should make accurate, detailed and factual records of what has happened, what has been said, where and when, as soon as possible after reporting to the DSL

## Disclosures made by children

- Advise the child/young person that you have to tell someone else; reassure them that they
  have done the right thing by 'telling'
- Encourage the child to TED Tell, Describe and Explain. Listen calmly without interrupting
  and do not ask leading questions. Instead ask open questions like "is there anything else you
  would like to tell me?"
- Make notes/record everything that is said and done, where possible in the words used by the child, no matter how trivial it may seem, sign and date your record
- Communicate with the child in a way that's appropriate to their age and understanding.

## **Confidentiality and Information Sharing**

The welfare of the child is paramount and every effort should be made to ensure that confidentiality is maintained for all concerned. Privacy and confidentiality should be respected where possible but if doing this leaves a child at risk of harm then the child's safety has to come first. Legally, it is fine to share information if someone is worried about the safety of a child.

Not everyone needs to know when a concern or worry is raised. This respects the child's, family's and/or staff's **rights to privacy**. So **only people who need to know should be told about** it. Otherwise there might be gossip and rumours or other people may be genuinely concerned. It is fine to say that a concern has been raised and it is being dealt with following the group's procedures.

Information should be handled and disseminated on a need-to-know basis only. This includes the following people:

- the Company's Designated Safeguarding Lead (DSL)
- the parents/carers of the child or young person who is alleged to have been abused
- the person making the allegation
- Local Safeguarding Children Partnership, and Ofsted
- the Company's Head Office

Please note, unless there is a valid reason not to do so, e.g. if doing so would undermine a criminal investigation or put the child at risk of harm, parents/carers will be made aware of the concerns for their child as soon as possible.



Staff should only take action as advised by the Local Safeguarding Children Partnership once the referral has been made.

Information will be stored in a locked facility within the centre (usually the centre office), with limited access to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

#### **Bullying and Harassment**

Bullying is defined as "the use of superior strength or influence to intimidate (someone), typically to force them to do something." Bullying is essentially unwanted, aggressive behaviour that involves a real or perceived power imbalance. The behaviour is repeated, or has the potential to be repeated, over time and can be seen in both staff and student behaviour. Bullying can be:

- verbal: teasing, name-calling, spreading rumours, sarcasm, taunting, threats
- **physical**: hitting, kicking, punching, pushing etc.
- non-verbal: hand signs, text messages
- social / emotional: excluding people on purpose, embarrassing/ humiliating others in public
- racist / cultural: racial taunts, graffiti, gestures
- religious: creed, traditions, clothing etc.
- sexual: unwanted physical contact or sexually abusive comments
- homophobic: because of, or focussing on the issue of sexuality
- **disability**: physical, emotional, academic, mental
- cyber: using ICT, mobile phones, social networks, e-mail, to deliberately upset someone else

Harassment – aggressive pressure or intimidation – is a common form of bullying.

**Bullying hurts**. It can have severe, long-term, consequences for the victim. No one deserves to be a victim of bullying, instead, everybody has the right to be treated with **respect**.

Bullying is mostly about **education** – teaching what is acceptable and what is bullying. Different nationalities will have different ideas, what one student construes as playful and/or just banter can be very upsetting and hurtful to another.

All staff remain vigilant to make sure any cases of bullying are reported and dealt with. Forms of bullying that are **illegal** may be reported to the police. These include, but are not limited to:

- violence or assault
- theft
- repeated harassment or intimidation, e.g. name calling, threats and abusive phone calls, emails or text messages
- hate crimes

## Action if bullying is suspected

If bullying is suspected (by students or staff), the same procedure should be followed as set out in 'Responding to suspicions or allegations' above.

Action to help the victim and prevent bullying while at an Exsportise Course:

Take all signs of bullying very seriously



- Encourage all children to speak and share their concerns (It is believed that up to 12 children
  per year commit suicide as a result of bullying, so if anyone talks about or threatens suicide,
  seek professional help immediately). Help the victim to speak out and tell the person in
  charge or someone in authority. Create an open environment
- Investigate all allegations and take action to ensure the victim is safe. Speak with the victim and the bully(ies) separately
- Reassure the victim that you can be trusted and will help them, although you cannot promise to tell no one else
- Keep records of what is said (what happened, by whom, when)
- Report any concerns to the Company's Designated Safeguarding Lead

#### Action towards the bully(ies):

- Talk with the bully(ies), explain the situation, and try to get the bully(ies) to understand the consequences of their behaviour. Seek an apology to the victim(s).
- Inform the bully's parents
- Insist on the return of 'borrowed' items and that the bully(ies) compensate the victim
- Provide support for the victim's coach and/or teacher
- Impose sanctions as necessary
- Encourage and support the bully(ies) to change behaviour
- Keep in contact with the families to report on progress
- Inform all organisation members of action taken
- Keep a written record of action taken
- Most 'low level' incidents will be dealt with at the time by coaches and teachers. However, if
  the bullying is severe (e.g. a serious assault), or if it persists despite efforts to deal with it,
  incidents should be referred to the Company's Designated Safeguarding Lead as in
  "responding to suspicions or allegations" above.

## Concerns outside the immediate Camp environment (e.g. a parent or carer)

- Report your concerns to the DSL who should contact the Company's Head Office, Local Safeguarding Children Partnership (LSCP) and/or Local Authority Designated Officer (LADO or DO). See below for the information Children's Services and/or the Police will need
- If the DSL is not available, the person being told of or discovering the abuse should contact a deputy DSL at the centre or at Head Office, LSCP or LADO/DO immediately
- LSCP / LADO/DO will advise on how to involve the parents/carers
- The Company's Head office should ascertain whether or not the person/s involved in the incident play a role in the company's camp and act accordingly
- Maintain confidentiality on a need to know basis only

## Local Safeguarding Children Partnership (LSCP) and Local Authority Designated Officer (LADO/DO)

The LSCP is responsible for ensuring that effective safeguarding services are available in the local authority area, it is separate from but works closely with social care. Different authorities may use different terminology and may have different departments. LSCP should be seen as a source for advice as well as a place to go when there has been a serious incident.

A LADO deals with issues when accusations of child abuse and/or inappropriate behaviour with children are made against staff working with children.



## Information for LSCP / LADO about suspected abuse

To ensure that this information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern, which should include the following:

- The child's name, age and date of birth
- The child's home address and telephone number
- Whether or not the person making the report is expressing their own concerns or those of someone else
- The nature of the allegation. Include dates, times, any special factors and other relevant information
- Make a clear distinction between what is fact, opinion or hearsay
- A description of any visible bruising or other injuries. Also any indirect signs, such as behavioural changes
- Details of witnesses to the incidents
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred
- Whether parents are aware and what has been divulged
- Whether any other organisations has been consulted/advised and the details
- If the child was not the person who reported the incident, details of what the child has said when given the opportunity (without leading or direct questions)
- Has anyone been alleged to be the abuser? Record details
- Where possible a referral should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded.

If you are worried about sharing concerns about abuse with a senior colleague, you can contact your Local Safeguarding Children Partnership (SCP), the NSPCC Helpline on 0808 800 5000, or Childline on 0800 1111.

# Contact details for Local Safeguarding Children Partnership (LSCP) and Local Authority Designated Officer (LADO, sometimes called just Designated Officer (DO))

## Clayesmore School (Dorset)

Purpose	Contact route	Details / notes
Single point of contact for safeguarding concerns	Phone	Family Support and Advice Line (was ChAD - Children's Advice & Duty Service): 01305 228558 For out of hours emergencies call: 01305 221000
For allegations against a member of staff	Phone / Web	Dorset Council LADO referral form to be sent to lado@dorsetcouncil.gov.uk / 01305 221122 or LADO@dorsetcouncil.gov.uk
Channel and Prevent	Web	Complete the <u>Prevent National Referral form</u> and send to:  preventreferrals@Dorset.PNN.Police.uk  For updates on a report, or for general advice before making a referral, call 01202 222777



National advice line (ACT	Phone	0800 011 3764
Early)		

# **Oundle School (Northamptonshire)**

Purpose	Contact route	Details / notes
Children's social care and early help services in Northamptonshire	Phone / Web	Northamptonshire Children's Trust – Multiagency safeguarding hub (MASH) - 0300 126 7000 or if no immediate danger – complete online MASH referral
For allegations against a member of staff	Phone / Web	Local Authority Designated Officer (LADO) / or just Designated Officer (DO) — Andy Smith — 07850 854 309 / Sian Edwards — 07738 636 449 / Francesca Hamilton — 07443 348 418 LADOConsultations@NCTrust.co.uk or complete online referral to LADO
Channel and Prevent	Web	Complete online referral
National advice line (ACT Early)	Phone	0800 011 3764

# Seaford College and Worth School (West Sussex)

Purpose	Contact route	Details / notes
Request support or raise a concern about a child	Phone / Web	The Integrated Front Door (IFD) for West Sussex Children Services: 01403 229900 (Office hours) / 033 022 26664 (Emergency Duty Team) Online referral
Specialist emotional wellbeing and mental health support for children and young people	Web	Single Point of Access (SPoA) Service leaflet Online referral
For allegations against a member of staff	Phone / Web	West Sussex County Council LADO Online referral LADO@westsussex.gov.uk / 0330 222 6450
Channel and Prevent	Web	Sussex Police Prevent Team  prevent@sussex.pnn.police.uk/ Call 101 and ask for the Prevent Team. Complete National Prevent referral form National Referral Form (NRF) guidance notes
National advice line (ACT Early)	Phone	0800 011 3764

# If you think a child is in Immediate Danger call 999 for the Police



## **Accusations against an Adult**

Where there is a complaint against a member of staff there may be three types of investigation:

- a criminal investigation
- a child protection investigation
- a disciplinary or misconduct investigation.

The results of the police and child protection investigation may well influence and inform the disciplinary investigation, but all available information will be used to reach a decision.

## Low Level Concerns (managing allegations against staff)

"Low-level" does not mean that is insignificant, but that the behaviour towards the child does not meet the threshold of harm. Any concerns, regardless of their severity or just a sense of unease or a "nagging doubt" should always be shared with the Centre Manager / DSL. This will ensure any unprofessional behaviour can be addressed and support provided to correct this behaviour at an early stage.

Examples of "low-level" concerns may include:

- being overly friendly with children
- having favourites
- taking photographs of children on personal mobile phones
- engaging with a child on a one-to-one basis in a private environment (behind closed doors)
- using inappropriate sexualised, intimidating or offensive language
- breaching professional boundaries

#### Concerns about poor practice

A whistleblower, "a worker who reports certain types of wrongdoing", is protected by law and should not be treated unfairly or lose their job because they "blow the whistle".

If, following consideration, the allegation is clearly about poor practice, the Company's Designated Safeguarding Lead (DSL) will deal with it as a misconduct issue.

If the allegation is about poor practice by the DSL, or if the matter has been handled inadequately and concerns remain, it should be reported to the Company's Head Office which will decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

If a staff member feels unable to raise an issue with the Company's Head Office or feels that their genuine concerns are not being addressed, the NSPCC whistleblowing helpline can be contacted on 0800 028 0285 – 8:00 AM to 8:00 PM, Monday to Friday or email: <a href="help@nspcc.org.uk">help@nspcc.org.uk</a>

## Internal enquiries and suspension

• The DSL will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further Police and Children's Services inquiries. In some cases this will be an immediate suspension; in the event of suspension the Company will appoint someone to support and advise the employee. The employee should also contact his/her professional organisation.



Irrespective of the findings of the social services or police inquiries the Company's
 Disciplinary Committee will assess all individual cases to decide whether a member of staff
 or volunteer can be reinstated and how this can be sensitively handled. This may be a
 difficult decision; particularly where there is insufficient evidence to uphold any action by
 the police. In such cases, the Company's Disciplinary Committee must reach a decision
 based upon the available information which could suggest that on a balance of probability; it
 is more likely than not that the allegation is true. The welfare of the child should remain of
 paramount importance throughout.

# Support to deal with the aftermath of abuse

- Consideration should be given to the kind of support that children, parents and members of staff may need. Use of helplines, support groups and open meetings will maintain an open culture and help the healing process. The British Association for Counselling Directory is available from The British Association for Counselling, 15 St John's Business Park, Lutterworth, Leicestershire, LE17 4HB, Tel: 01455 883300, E-mail: bacp@bacp.co.uk, Internet: www.bacp.co.uk
- Consideration should be given to what kind of support may be appropriate for the alleged perpetrator

#### Allegations of previous abuse

- Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children)
- Where such an allegation is made, the Centre Manager should follow the procedures as
  detailed above and report the matter to the Company's Head office and Children's Service
  and the Police. This is because other children, either within or outside sport, may be at risk
  from this person. Anyone who has a previous criminal conviction for offences related to
  abuse is automatically excluded from working with children. This is reinforced by the details
  of the Protection of Children Act 1999.



#### Support

## Support for staff

- Education Support Partnership <u>www.educationsupportpartnership.org.uk</u> providing mental health and wellbeing support services to all education staff and organisations
- Professional Online Safety Helpline www.saferinternet.org.uk/helpline
- Forced Marriage Unit <a href="https://www.gov.uk/guidance/forced-marriage">https://www.gov.uk/guidance/forced-marriage</a>
   how to protect, advise and support victims of forced marriage information and practice guidelines for professionals

## Support for students

- NSPCC <u>www.nspcc.org.uk</u> children's charity fighting to end child abuse
- ChildLine <a href="www.childline.org.uk">www.childline.org.uk</a>
  help anyone under 19 in the UK with any issue they're going through. By enabling the accessible tool, the information provided can be translated into many different languages.
- Papyrus www.papyrus-uk.org
   national charity dedicated to the prevention of young suicide
- Young Minds <u>www.youngminds.org.uk</u> metal health support for all young people)
- The Mix <u>www.themix.org.uk</u>
   UK's leading support service for young people
- Anti-Bullying Alliance <a href="https://anti-bullyingalliance.org.uk/">https://anti-bullyingalliance.org.uk/</a>

## Support for adults

- Family Lives <u>www.familylives.org.uk</u> support for all aspects of family life
- Crime Stoppers <u>www.crimestoppers-uk.org</u> anonymous crime reporting and guidance
- Victim Support <u>www.victimsupport.org.uk</u>
   free and confidential support victims of any crime
- The Samaritans <a href="www.samaritans.org">www.samaritans.org</a> charity dedicated to the prevention of suicide
- Mind <u>www.mind.org.uk</u> mental health support
- NAPAC <u>napac.org.uk</u>
   National Association for People Abused in Childhood
- MOSAC <u>www.mosac.org.uk</u> supporting non-abusing parents / carers of sexually abused children
- Action Fraud <u>www.actionfraud.police.uk</u>
   UK's national reporting centre for fraud and cybercrime

# <u>Support for Learning Disabilities</u>

- Respond <u>www.respond.org.uk</u> trauma and abuse support for people with disabilities and their families
- Mencap <u>www.mencap.org.uk</u>
   support for people with learning disabilities



#### **Domestic Abuse**

- National Domestic Violence Helpline 0808 2000 247
- Refuge <u>www.refuge.org.uk</u> for women and children, against domestic violence
- Men's Advice Line <u>www.mensadviceline.org.uk</u>
   advice and support for men experiencing domestic violence and abuse
- Mankin <u>www.mkcharity.org</u>
   Sussex-based support for men who have been affected by unwanted sexual experiences

# Sexual Abuse and Child Sexual Exploitation

- Stop it Now! <a href="https://www.stopitnow.org.uk">www.stopitnow.org.uk</a>
  child sexual abuse prevention campaign and helpline; run by the Lucy Faithfull Foundation
  (<a href="https://www.lucyfaithfull.org.uk">www.lucyfaithfull.org.uk</a>), the only UK-wide charity dedicated solely to tackling child sexual abuse
- Parents Protect <u>www.parentsprotect.co.uk</u>
   to help parents and carers protect children from sexual abuse and exploitation
- CEOP <u>www.ceop.police.uk</u>
   Child Exploitation and Online Protection command
- Marie Collins Foundation <u>www.mariecollinsfoundation.org.uk</u>
  to help children who suffer sexual abuse and exploitation via internet and mobile
  technologies
- Internet Watch Foundation <a href="www.iwf.org.uk">www.iwf.org.uk</a>
   to anonymously report child sexual abuse content and have images of child sexual abuse removed

#### Online Safety

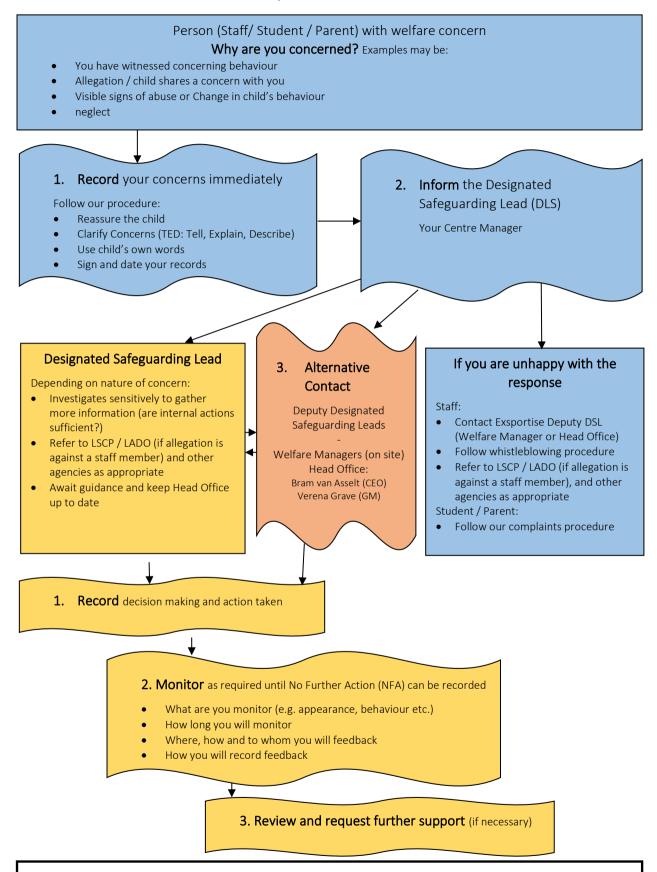
- Childnet International <u>www.childnet.com</u>
   (to help make the internet a great and safe place for children):
- UK Safer Internet Centre <u>www.saferinternet.org.uk</u>
   online safety tips, advice and resources to help children stay safe online
- Parents Info <u>www.parentinfo.org</u>
   help and advice for families in a digital world
- Internet Matters <u>www.internetmatters.org</u>
   helping parents keep their children safe online
- Net Aware <u>www.net-aware.org.uk</u>
   parent's guide to social networks their children use
- Get safe Online <u>www.getsafeonline.org</u>
   UK's leading source of unbiased, factual and easy-to-understand information on online safety

## Radicalisation and hate

- Educate against Hate <u>www.educateagainsthate.com</u>
   practical advice and information for teachers and parents on protecting children from
   extremism and radicalisation
- Counter Terrorism Internet Referral Unit <u>www.gov.uk/report-terrorism</u> report online material promoting terrorism or extremism
- True Vision <u>www.report-it.org.uk</u> information about hate crime or incidents and advice on how to report it



## What to do if you have a welfare concern



The child's circumstances will be under review at all stages, and re-referred if appropriate.

The child's best interest must always come first