



SAFEGUARDING CHILDREN POLICY & PROCEDURES

POLICY STATEMENT

Safeguarding is everyone's responsibility (Working Together to Safeguard Children, 2018). Over the Wall is fully committed to upholding the right of all children and young people to be protected from harm or abuse (Children Act, 1989) and to achieve the best outcomes (Working Together to Safeguard Children, 2018).

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1. Introduction and Definitions

Safeguarding Children Commitment

Over the Wall recognises and believes that the welfare of the child is paramount (Children Act, 1989). All children, without exception, have the right to equal protection from all types of harm or abuse regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, identity or any other factor.

Over the Wall's safeguarding policy and practices are underpinned by three guiding principles: all safeguarding should be child-centred, timely, and coordinated (Working Together to Safeguard Children, 2018). This is to ensure that every child's wishes and feelings are heard, understood, and, where possible; supported. Equal emphasis should be given to the coordination of timely, appropriate, and effective action in conjunction with, and under the guidance of Safeguarding Partners (Working Together to Safeguard Children, 2018; National Minimum Standards 1:1-1:4, 2013).

Acknowledgements

Over the Wall's model of therapeutic recreation camps offers time-bound opportunities for fun and respite for campers and families, affected by serious health challenges, in residential settings across the UK. It is recognised therefore that Over the Wall cannot undertake holistic assessments of need nor provide ongoing support for children and their families outside of camp.

Policy Aims and Purpose

Over the Wall is committed to best practice that seeks to safeguard **all** children and young people linked to its services. This document outlines the proactive measures taken to identify risk and to keep campers safe and well; and describes the procedures in place to respond to any safeguarding concerns that may arise on or off camp.

Research has found that children with disabilities are three times more likely to be abused (Jones et al, 2012) and that some children and young people are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or cognitive abilities (Working Together to Safeguard Children, 2018).

With this in mind, and in the context of the organisation's statement of purpose, Over the Wall recognises safeguarding children and young people affected by serious illness can raise additional challenges, such as:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration;
- The potential for children affected by serious illness to be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- Barriers to communication and/or raising concerns

(Working Together to Safeguard Children, 2018)

Safeguarding Definitions

For the purposes of this policy, 'safeguarding' is defined as:

- Protecting children from maltreatment;
- Preventing impairment of children's 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.

(Working Together to Safeguard Children, 2018)

Definition of a child

The legal definition of a child varies across jurisdictions of the United Kingdom, with no uniform consensus; however, the United Nations Convention on the Rights of the Child, ratified by the UK government in 1992, defines a child as anyone who is 'below the age of eighteen years' (UNCRC: Article 1 1992). Therefore, for the purposes of this policy, a child is **anyone who has not reached their eighteenth birthday**.

Scope of the Policy

This policy applies to any individual connected to the organisation (in any capacity) who has contact with the children, young people, and families linked to Over the Wall's services. Hereafter this policy will refer to staff and volunteers; however, this includes - but is not limited to - all Over the Wall employees, volunteers, ambassadors, activity providers, work experience students, and Board of Trustees.

Guidance from the Department of Education outlines parameters for good safeguarding policy and practice, which includes health and safety measures, anti-bullying practices, and first-aid (Keeping Children Safe in Education, 2016). Therefore, please refer to **Appendix (A)** for the statutory frameworks and guidance that this policy document should be read in conjunction with. This policy should also be appraised in the context of Over the Wall's:

- Behaviour Policy
- Equality and Diversity Policy
- Complaints Policy
- Sexual Harassment Policy
- Critical Incident Policy
- Two Adult Policy
- Missing Camper Policy

For ease and clarity, some of the key terms used throughout this document are provided in **Appendix (B)**.

2. Roles and responsibilities

All staff and volunteers who may come into contact with children or their families/carers should be aware of their responsibilities for safeguarding and protecting children from harm, how they should respond to child protection concerns and how to make a referral to Safeguarding Partners if necessary (Working Together to Safeguard Children, 2018).

Designated Safeguarding Officer

The Director of Services is the most senior member of staff who holds overall responsibility for the organisation's safeguarding arrangements, which includes supervision, development, and senior decision-making in conjunction with the Chief Executive Officer (Working Together to Safeguard Children, 2018).

The Director of Services fulfils the role of the Designated Safeguarding Officer (DSO), with the responsibility of providing safeguarding guidance and support across the organisation (Working Together to Safeguard Children, 2018). This includes, but is not limited to:

- Ensuring that the voice of children is heard, understood; and underpins all safeguarding practice and development (National Minimum Standards 1:1-1:4, 2013; Working Together to Safeguard Children, 2018).
- Ensuring that all staff and volunteers receive necessary safeguarding training applicable to their respective roles and subject to necessary updates in line with best practice.
- Ensuring that safeguarding policies and practice are adhered to and reflect up to date legislation and guidance.
- Overseeing Local Services Notifications ahead of each Camp Session.
- Working alongside the Volunteering Team to recruit and select appropriate volunteers to provide independent safeguarding advice for each Camp Session.
- Ensuring that Safe Recruitment practices are upheld across the organisation.
- Creating and promoting an anti-bullying environment and culture on and off camp, as outlined in the Over the Wall handbook.
- Ensuring that all reasonable steps are taken to create a safe physical environment for children, staff, and volunteers by applying Health and Safety measures in accordance with the law and regulatory guidance (National Minimum Standard 6, 2013).

(Working Together to Safeguard Children, 2018).

The Designated Safeguarding Officer (DSO) for the organisation, or in their absence, the Chief Executive Officer, is the first point of contact for all staff or volunteers outside of a camp setting in the event of safeguarding concerns arising.

It is recognised that any member of staff or volunteer can make contact with emergency services and/or safeguarding partners in the event of concern arising if there is reasonable cause to suspect a child may come to significant harm if this contact is delayed. In the unlikely event of this occurrence, the DSO or Chief Executive Officer should be informed at the first available opportunity.

Independent Safeguarding Adviser (ISA)

In addition to the role of the Designated Safeguarding Officer, at least one volunteer should be identified for each Camp Session to act in the capacity of Independent Safeguarding Adviser (ISA). Ideally the role of the volunteer ISA is not combined with other responsibilities at camp. The ISA is normally trained to Level 3 in 'Safeguarding Children and Young People' or an equivalent; and typically comes from a professional background with safeguarding experience that is independent to the organisation.

The purpose of the ISA is to work alongside trained members of the Support and Medical Teams to provide impartial advice on potential safeguarding issues, and to ensure adherence to safeguarding policies and best practice.

If a volunteer ISA cannot be identified from the attending volunteer base, the organisation's Designated Safeguarding Officer takes responsibility for identifying a suitable alternative arrangement (Working Together to Safeguard Children, 2018; NSPCC Standards, 2017).

Other roles

All staff and volunteers who attend camp have a responsibility to safeguard children, and to report any concerns about their welfare.

All staff and volunteers undertake safeguarding training which is proportionate to their role, and includes at a minimum indicators of abuse and how to raise concerns. At each Camp Session, there will be at least one member of the staff Support Team trained to Level 3 Safeguarding Children or equivalent. In addition, many members of the Beach Patrol (Medical Team) will be trained to Level 3, or an equivalent, as part of their professional roles.

It is recognised that Over the Wall engages with campers and their families outside of camp in a variety of formats. Examples of this include (but are not limited to) fundraising events and campaigns. Any concerns about a child's welfare in this scenario should be raised in accordance with this policy.

Whistleblowing

All staff, volunteers and children should feel able to voice concerns about the organisation's safeguarding practice and culture (Working Together to Safeguard Children, 2018). All staff should be familiarised with whistleblowing procedures during staff induction and clear whistleblowing procedures are outlined to volunteers in All Camp Training at each camp session. Children are educated on arrival at camp on how to raise concerns.

Within Over the Wall, concerns should first be shared with the organisation's Designated Safeguarding Officer. If the nature of the concerns directly or indirectly involves the Designated Safeguarding Officer, the CEO or nominated Safeguarding Trustee should be contacted.

3. Recruitment & Training

Recruitment of Staff and Volunteers

Over the Wall is committed to safe recruitment selection, vetting, and screening practices. Our practices aim to recruit the most safe and suitable people to work in our organisation whether as trustees, staff or volunteers.

Our child safe recruitment practices include:

- Every applicant is directed to a copy of Over the Wall's Safeguarding Children Policy and Procedures
- All Over the Wall staff and volunteers in roles involving contact with campers and families are required to hold an up to date and valid enhanced DBS/PVG certificate (or equivalent if from outside the UK)
- Applicants will be required to submit a detailed application when applying for any position. This form will ask for relevant information about the applicant's background such as dates and places of employment, education and other relevant experience.
- Job descriptions are provided for all positions (staff and volunteers) that describe key selection criteria and outline tasks, responsibilities and accountability.
- Where possible, interviews are conducted by more than one staff member.
- Interviews involve a range of assessment methods in order to assess and evaluate a candidate's suitability to the role.

- A minimum of two reference checks are required for candidates for every staff and volunteer position within Over the Wall. The candidate's most recent employer/supervisor must be one of these referees.
- All staff and volunteers will need to produce suitable proof of identity
- Trustees will undergo suitable vetting and DBS/PVG checks
- All staff positions are subject to a probationary period depending on contract length.
- Issues relating to safeguarding can be discussed in staff performance reviews.
- We reserve the right to refuse employment to, or terminate any person's employment, if we consider they may pose a risk to young people.
- Every new and returning volunteer is provided with training on a range of issues including the full contents of our Safeguarding Children Policy and Procedures and are directed to the Volunteer Handbook.

(National Minimum Standards 9:1-9:6, 2013)

Staff training

All Over the Wall staff have a responsibility to familiarise themselves with the organisation's Safeguarding Children Policy and Procedures. Staff receive safeguarding training relevant to their role, which is subject to necessary updates, monitored and coordinated by the Designated Safeguarding Officer. The maintenance of safeguarding competency is discussed with relevant staff at appraisals.

Volunteer training

Volunteers receive training in safeguarding and policies and procedures ahead of camper arrivals. Over the Wall's policies and procedures include appropriate and inappropriate physical contact with campers and media use.

Safeguarding training for volunteers includes recognising the key signs and indicators of common types of abuse and how to report a concern (National Minimum Standard 3:3, 2013). Training includes ways of helping children with additional needs understand issues around safeguarding (National Minimum Standards, 3:2).

Volunteers are asked to familiarise themselves with the Safeguarding Children Policy ahead of camper arrivals, and are asked to confirm in writing that they have done this

prior to camp. Printed copies of this policy are made available in the Camp Office.

4. Applications and Assessments

Pre camp - identifying risks, barriers and vulnerabilities

The camper application form is comprehensive and seeks to actively identify any safeguarding concerns, additional vulnerabilities, medical and/or psychosocial issues that may have an impact upon a campers' safety or wellbeing at camp. Camper applications are assessed and screened by the Nursing and/or Wellbeing Teams to ascertain what support a camper might need if they were to attend camp. Where there are safeguarding concerns or additional vulnerabilities, children will be prioritised for a place at camp, provided camp is deemed a safe and suitable environment and adequate support can be provided.

Inter-Agency Working

Over the Wall recognises that close inter-agency working and information-sharing practices are essential if children and families are to receive help and support at the right time and to protect children from harm (Working Together to Safeguard Children, 2018).

Local Services Notifications

Staff submit and record a Residential Holiday Scheme Notification ahead of each Camp Session to the relevant Safeguarding Partners or Child Protection Team (for operations in Scotland).

Section 45 and Section 17 arrangements

In cases where a camper(s) is on a Child Protection plan (CP) or Child in Need plan (CIN), Over the Wall recognises that, if it is necessary for the camper to travel across county-lines to attend the Camp Session, it is the statutory responsibility of the named Social Care Professional to notify Local Authority Children's Services in the area of the camp operation. Where these children are known to Over The Wall, we will make best efforts to communicate with the relevant Children's Social Care team before camp.

5. Safeguarding at Camp

Creating a culture of safety

Supervision

Over the Wall operates a strict two adult policy, whereby no adult should ever be alone with a child. Under this policy, any child (or group of children) will always be accompanied by a minimum of two adults. These adults must be within eyesight or earshot of each other, preferably both. This applies to all areas of Over The Wall's operations, including camper transport and any external events. The only exception to this policy is parent/carer(s) with their own children (e.g. at a Family camp).

Volunteers are made aware of this policy during their initial orientation, in pre-camp eLearning and during on-camp training. Any noted or repeated breaches of this policy are reported and recorded, regardless of intention. Volunteers are encouraged to proactively seek support from staff to ensure this is upheld at all times.

Over the Wall aspire to a ratio of one adult to every child at our Health Challenge camps. The adult to child ratio at our Sibling camps may be less. Ratios will be determined by the assessment of various factors, including:

- The nature and duration of activities
- The experience of the adults involved
- The requirements of location and/or accommodation
- Any special medical needs or equipment

(NSPCC, 2019)

Health and Safety Practices

Over the Wall takes all reasonable measures to create a safe physical environment for children throughout each Camp Session. Please refer to **Appendix (C)** for an outline of health and safety practices. Children are also orientated to Over The Wall's Camper Charter on their arrival at camp where parents are not present, which sets out expectations around behaviour and specifically addresses respect, zero tolerance for bullying and/or harassment, and personal space.

Recording and reporting incidents

Notwithstanding the measures taken to mitigate and minimise risk, there remains the possibility of incidents occurring and/or risk of harm through abuse being identified. Over the Wall seeks to promote a positive reporting culture. All volunteers and staff are encouraged to report concerns or issues, including near misses, for the purposes of learning, the development of practice, and the promotion of a culture of continual improvement (Institute of Occupational Safety and Health Guidelines, 2015).

Please refer to **Appendix (D)** for the procedure for reporting incidents on camp.

Intimate or personal care

It is recognised that a minority of children may require assistance with personal care while at camp. All intimate or personal care needs are supported by members of Medical Team (Beach Patrol), who maintain the two adult policy at all times and encourage and empower children to be independent wherever possible.

Information sharing and monitoring wellbeing

Any child where there are live or potential safeguarding or wellbeing concerns is flagged to the ISA and medical team. At Health Challenge and Sibling camps, there is a daily Multiprofessional Huddle, involving the Nursing and Wellbeing teams, Medical Team and ISA. All campers are discussed in order that the team can share information which helps to build a bigger picture and identify concerns early.

Visitors on site

All visitors to the site are chaperoned by a member of Over the Wall staff for the duration of their visit (National Minimum Standards 3:5, 2013). Visitors must wear Over The Wall identification at all times, and must be recorded in the Visitors Book. Visitors are signposted to the Safeguarding Children Policy for more information about Over the Wall's safeguarding policies and procedures.

Photographs and Video Images

Over the Wall recognises that photographs and video images of campers are classed as personal **data** under General Data Protection Regulation (GDPR). For the purposes of safeguarding, care needs to be taken in respect of photographs or film footage taken of our campers and their subsequent publication.

Therefore we will:

- Seek permission in advance from parents and carers, young people and adults attending camp to allow photographs and video film of activities and events to be taken of them at camp; and be used or displayed on websites, publications or other public material/places.
- Avoid naming children if we use photographs or film footage, except in cases where the child and/or their parent/carer have granted express permission.
- Not use any images or videos taken out of context.
- Not permit staff or volunteers to publish photographs of campers on personal social networking sites,
- Not use any images to illustrate sensitive or negative issues,
- Not use any images that are likely to cause distress, upset or embarrassment,
- Ensure that children are appropriately dressed when images are taken.

Cultural traditions will be assessed when seeking to reproduce personal images. Staff and volunteers will be briefed to report any concerns regarding inappropriate or intrusive photography to the Camp Support Team.

Camp Recorders

Over the Wall will have at least one designated Camp Recorder at each camp session, overseen by the Media Coordinator role. The Media Coordinator takes responsibility for all imagery captured at camp. Volunteers and external parties not permitted to take any photographs and video film unless with the express permission of the Media Coordinator, who will set out the parameters for doing so.

Camp Recorders are required to sign a media agreement; to state they understand all of the above regulations and adherence to the media policies of Over the Wall. Ownership of all photos taken by Camp Recorders are exclusively the property of Over the Wall.

In order to ensure some measure of control over the appropriateness of images taken, children are not permitted to bring cameras - including those incorporated within mobile phones - to camp.

Social Media

Parent/carers are sent pre-camp information asking them not to communicate with volunteers or staff members on Social Media or other channels; or without first going through the organisation.

Volunteers and staff are asked not to accept social media requests from campers and/or families. In the event of a volunteer receiving a social media contact request, volunteers should decline the request and contact the Over the Wall office, who will contact the camper or family and explain why the request has been declined.

Children are asked not to bring electronic devices to camp and therefore should not access social media for the duration of the Camp Session, unless deemed appropriate and supervised by a member of the Camp Support Team.

6. Disclosures and raising concerns

Reporting of Concerns involving Abuse

Child Abuse includes the physical, sexual, emotional mistreatment, or neglect of children. Any report that a camper may be at risk or may have experienced harm, including any incident that is alleged to have just occurred at camp, will be taken seriously and considered with an open mind.

As outlined in **Appendix (D)**, in the first instance, if an injury has occurred, no matter how trivial; the incident should be reported immediately to a member of the Medical Team, for consideration of any necessary medical intervention. In cases of safeguarding or child protection concerns, the Wellbeing and Nursing Coordinator for the Camp Session should be informed immediately. At the first opportunity, the volunteer ISA should be consulted.

The first priority is ensuring the child's immediate safety. The Wellbeing and Nursing Coordinator, alongside the ISA, will ensure that all relevant information has been captured and recorded on an incident report and determine necessary next steps, in line with procedures outlined in this policy. Support should be given to the child(ren) involved at all times. Please see **Appendix (E)** for how to support a child who has made a safeguarding disclosure or allegation.

The senior member of staff for the Camp Session must be informed immediately if the concern has been or is likely to be; escalated into a Critical Incident.

Significant Harm

In cases where significant harm has been caused or is suspected, or a criminal act has been committed or suspected, safeguarding partners i.e. Local Authority Children's Social Care in the area within which the camp is operating, or the police (as appropriate) will be **contacted immediately** by Over the Wall staff.

Harm can be defined as 'ill treatment' or impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural). Harm may be caused by a single traumatic event or a compilation of events; acute or long standing.

Confidentiality and Information Sharing

Over the Wall recognises its responsibility to report and share any concerns or circumstances that are likely to significantly harm the safety, rights, or welfare of any child on or off camp (National Minimum Standards 9:7, 2013).

In the best interests of the child(ren) concerned, information regarding a concern for the safety or welfare of a child, or any allegation of child abuse, will be shared only with those who are required to have that information.

In the event of a child making a disclosure that prompts concerns around the safety or welfare of themselves or others, no assurances of secrecy and/or confidentiality can be made to the child. This must be made clear to all campers in a way in which they will understand.

If in accordance with the reporting procedure set out within this policy, sharing information pertaining to safeguarding disclosure(s) will not constitute a breach of confidentiality.

Within Over the Wall, all safeguarding information will be kept safe and confidential with access restricted to relevant members of staff.

Local Authority Children's Social Care

In order to fulfil its safeguarding responsibilities, Over the Wall recognises that at times further guidance may need to be sought from Local Authority Children's Social Care in the area that the Camp Session is operating within.

Over the Wall services do not include home visits nor do staff have substantial face to face contact with children or families, outside of time bound residential camp sessions. Over the Wall recognises it can only respond to the information provided. If there is **any doubt**, staff will always act in the best interests of the child and seek professional guidance, using local safeguarding thresholds to determine necessary actions when appropriate.

Staff will seek to gain the permission of the camper's parent/carer(s) to make contact with Local Authority Children's Social Care, unless there is reason to suspect that informing the camper's parents/carers of the concerns raised *could* increase the risk of the camper coming to harm. In line with its duty to safeguard the needs of all campers in accordance with the Children Act (1989), Over the Wall respectfully upholds a right to make contact with Local Authority Children's Social Care if permission is **not** given by parents/carers. This includes cases where permission is explicitly not given or cannot be sought; and/or where delay could increase the risk to the child (Working Together to Safeguard Children, 2018).

Should the Local Authority Children's Social Care accept the contact as a referral; a copy of the referral should be stored on the individual camper's record. The outcome of any referral should be received within 24 hours or one working day.

Staff are mindful of the need to do their utmost to communicate all actions and decisions to parents/carers, using methods and language that can be best understood, in a timely and appropriate manner.

Escalation

In the event of an incident occurring where, owing to its seriousness or nature, there is potential for any external scrutiny or commentary on the organisation, the CEO should be notified immediately. If that initial assessment is confirmed, the CEO will advise the nominated Safeguarding Trustee as soon as practicable about the incident and management measures being taken. In such circumstances the CEO will also notify SeriousFun Children's Network through the agreed channels. If unhappy with the response from safeguarding partners, a member of staff should contact the CEO immediately.

Serious safeguarding incidents must be reported to Ofsted.

Child's Wishes and Feelings

It is recognised that in cases of safeguarding concerns, there may be disparity between a camper's wishes and feelings and what staff consider is in the best interests of the camper. In cases where it is not possible to uphold a campers' wishes and feelings, staff will communicate the reasons for this clearly to the camper using developmentally appropriate language (National Minimum Standards 1:1-1:3, 2013).

Peer on Peer Abuse

When a child abuses another child, it is sometimes called 'peer on peer abuse' or 'peer abuse' (Department for Education, 2018; Department of Health, 2017). This may involve bullying (including cyberbullying), sexting, harmful sexual behaviour or emotional, physical or sexual abuse (NSPCC, 2018).

Following the procedures outlined above, any concerns raised, disclosed or observed around peer on peer abuse will be responded to quickly and appropriately, with the initial priority of ensuring the safety of the child(ren) involved.

A child who is displaying abusive, or potentially abusive, behaviour may not realise they are doing so (NSPCC, 2018). If allegations have been made against a child, advice will be sought from the Nursing and Wellbeing teams, in liaison with the DSO and volunteer ISA, on the most appropriate way to proceed. In all instances of peer on peer abuse, a decision needs to be made around whether there is a safeguarding concern. If concerns are identified, these may need to be shared with safeguarding partners using the procedures identified above.

Any response to peer on peer abuse should ensure the best interests of all children involved, including the child who may have carried out the abuse.

7. Handling Allegations Against Adults

Responsibility for handing safeguarding allegations against any member of staff, camper, volunteer or persons linked to the organisation resides with the Director of Services.

Investigation

Over the Wall recognises its statutory duty to report any concerns that an adult associated with the organisation's services has, or is suspected to have:

- Behaved in a way that has, or may have, harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child in a way that indicates he or she is unsuitable to work with children.

(National Minimum Standards 13:1, 2013),

Any concerns pertaining to an adult associated with the organisation's services should be reported to the Director of Services or CEO immediately, who will involve the Local Authority Designated Officer (LADO), the Chief Executive Officer and nominated Safeguarding Board member within 24 hours of the allegation being made.

In the event of an allegation being made, a full and impartial investigation will be carried out.

Subject of the allegation

The Director of Services, or individual nominated by them, will take responsibility for keeping the subject of the allegation informed of the process, during and after (National Minimum Standards 13.5, 2013). Unless otherwise objected to by the Police or Children's Services, the subject of the allegation should be kept informed of all decision-making and actions.

If the subject of the allegation concerns the Designated Safeguarding Officer, responsibility for the investigation should pass to Chief Executive Officer or nominated Safeguarding Trustee.

Parents/carers and campers

Under the guidance of the LADO, parents and carers should be informed of the allegation at the first opportunity if they are not already aware of the allegation. The Director of Services, or an individual nominated by them, will take responsibility for keeping parents/carers and the camper informed of the process during and after. Appropriate support should be provided to the child if on camp at the time of the allegation.

Documentation and Resolution

Upon culmination of the investigation, a written report will be produced and circulated to all parties detailing relevant conclusions, decisions, and outlining any further actions needed. A copy should be provided to the child, parents/carers and subject of allegation as soon as the investigation is concluded. The information is retained on the confidential file, even after someone leaves the organisation, until the person reaches normal retirement age or for ten years if this is longer (National Minimum Standard 13.7, 2013).

In the event of an allegation being made against an adult at camp, the LADO for the area that the camp is currently operating in should be informed within 24 hours of the allegation being made (National Minimum Standard 13.6, 2013).

If Over The Wall removes an individual (paid worker or unpaid volunteer) from work in regulated activity with children (or would have, had the person not left first) because the person poses a risk of harm to children, Over The Wall will make a referral to the Disclosure and Barring Service.

Regulation

A notification to Ofsted must be made in the event of any of the following:

- I. Instigation and outcome of a child protection enquiry in relation to a child
- II. Serious incident necessitating calling the police to camp
- III. Involvement or suspected involvement of a child in sexual exploitation
- IV. Any serious complaint about the scheme or an employee/volunteer
- V. Allegation that a child has committed a serious offence
- VI. Referral of an employee/volunteer pursuant to section 35 of the Safeguarding Vulnerable Groups Act (2006)

(The Residential Holiday Schemes for Disabled Children (England) Regulations 2013)

7. Review

This policy is subject to a 2 yearly review for accuracy and currency. This does not prevent any changes taking place to this policy at any other time due to changes in practice or legislation.

8. Contacts

Internal Contacts

- **Designated Safeguarding Officer** – Natalie Marshall, Director of Services
(natalie.marshall@otw.org.uk/ 02392477110).
- **Chief Executive Officer** – Kevin Mathieson
(kevin.mathieson@otw.org.uk/02392 477 110).
- **Nominated Safeguarding Trustee** – Dr Bianca Tiesman

9. Appendices

(A) SAFEGUARDING FRAMEWORKS AND STATUTORY GUIDANCE

The below statutory frameworks and guidance should be considered in light of safeguarding responsibilities and best practice. For the purposes of this policy, 'Working Together to Safeguard Children' (2018) is the key guidance that outlines the safeguarding responsibilities of charities and organisations in the Voluntary Sector.

- Working Together to Safeguard Children, HM Government, 2018
- The Residential Holiday Schemes for Disabled Children (England) Regulations 2013
- Children and Social Work Act, 2017
- Protection of Children (Scotland) Act, 2003
- Children Act 1989 (and subsequent 2004 revision)
- United Convention of the rights of the Child, 1991
- General Data Protection Regulation,
- Human Rights Act 1998 (which privileges the rights of the child)
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006.
- Special educational needs and disability (SEND) code of practice: 0-25 years (which provides statutory guidance for organisations which work with and support children and young people who have special educational needs or disabilities, HM Government, 2014).
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers: HM Government, 2015.
- Keeping Children Safe in Education, 2016.

(B) GLOSSARY

The following aims to clarify the meaning of some of the terms used in this policy.

- **Camper** – any child or young person who has not reached their eighteenth birthday who participates in Over the Wall camps or activities.
- **Child** – for the purposes of safeguarding, anyone who has not yet reached their eighteenth birthday.
- **Parent/carer** – refers to adults who are in a parenting role, for example, birth parents, step-parents, foster carers and adoptive parents.
- **Child Abuse** – is any action by another person – adult or child – that causes significant harm to a child.

- **Child Protection** – is one aspect of safeguarding. Child Protection specifically refers to the activity that is undertaken to protect specific children who are suffering - or are likely to suffer - significant harm (Working Together to Safeguard Children, 2015).

(C) HEALTH AND SAFETY

Over the Wall recognises that it is impossible to eradicate/mitigate against every risk posed in a camp setting. Over the Wall operates out of a variety of activity centres and residential schools. There are inevitable locations of risk on each site. These include – but are not limited to - areas of water, roads, and other activity groups. Staff and volunteers take all reasonable measures to create and uphold a **culture of safety** in order to minimise risks or hazards posed by the physical camp environment. All sites and activities are subject to a full risk assessment, which is reviewed regularly (National Minimum Standard 6:3, 2013). Staff work with each site to make any necessary adaptations and or source equipment for campers with additional needs to enable safe participation in the program (National Minimum Standard 6:2, 2013).

Dynamic risk assessment forms part of All Camp Training. Volunteers and staff are encouraged to take proactive action to report or mitigate any potential risk or hazard before it arises. All campers and volunteers are made aware of where to go and what to do in the event of a fire. Volunteers and staff ensure campers are appropriately supervised during transitions between activities and openly communicate with campers about staying safe and well while at camp.

Any health and safety concerns should be reported to a member of the Camp Support Team if on camp; or the Designated Safeguarding Officer if outside of camp. All concerns should be recorded and appropriate action taken.

(D) REPORTING AND RECORDING AN INCIDENT

Definition of an incident

Over the Wall defines an incident as ‘an event or circumstance that could have, or did cause, unexpected or unwanted harm (physical or emotional) loss or damage to any individual. Where the incident did not result in harm, loss or damage, but could have, this is referred to as a Near Miss’.

Reporting and documenting incidents or accidents

In event of an incident, the Team Leader should ensure that an incident form is completed.

The process for reporting an incident and good practice guidelines are included in All Camp Training. Volunteers and staff are directed to guidelines for good reporting,

which include the need for objectivity, accuracy and timeliness, when filling out an incident form.

The incident form should outline the full known details of the incident or accident – including the time, date, list of individuals involved, witnesses, a full record of the event or concern, and any action taken.

Incident Log

The Incident Log is reviewed daily by relevant members of the Camp Support Team, who will consider what - if any - action is needed in response to an incident and what preventative measures need to be put into place to minimise the chances of any reoccurrence.

The Incident Log is monitored throughout the Camp Session by the Camp Session Coordinator (CSC) and will include details of all incident occurrences and measures taken. Each incident recorded, and subsequent actions, is subject to sign off a member of the Camp Leadership Team.

(E) DISCLOSURES AND SAFEGUARDING CONCERNS

In the event of a disclosure of potential safeguarding concerns and/or abuse, Over the Wall prioritises support for the child or young person and recognises that the young person may continue to be involved with Over the Wall after the reporting of their concern.

Staff and volunteers involved with the camper should act in a supportive manner. In such instances, our commitment to our young people is to –

- Actively listen with care, giving full attention to the child or young person.
- Be non-judgmental in response.
- Offer empathy with the child or young person's feelings, as expressed by them and using only their own words.
- If appropriate, offer reassurance that the young person was right to speak out with their concerns.
- Exercise discretion, while maintaining the 2:1 adult to child policy.
- Fully communicate with the young person regarding any further action or steps that may need to be taken.
- Act in the best interests of the child or young person; and offer a clear explanation if there is a disparity between this and the child's wishes or feelings.
- If needed, take any proportionate immediate action needed to mitigate imminent risk.
- Respond in developmentally appropriate manner for the child or young person.
- Following the reporting procedures outlined in this document; and alert the

Wellbeing or Nursing Coordinator at the first opportunity.

In such instances, we **cannot** and **should not** –

- Provide any assurance that secrecy or confidentiality can be maintained.
- Question or overly interrogate the child or young people - using closed questions.
- Make promises of change or action that could give false hope.
- Introduce any personal or third party experiences of abuse or self-disclose. In the event of a disclosure being made by a young person, volunteers are directed to help the young person identify an adult who is able to offer listening support. This may or may not be them depending on their experience and skill-set.
- Demonstrate disbelief or strong emotions (e.g. shock or disbelief).
- Share the information disclosed with individuals outside of the reporting procedures outlined in this document.

Campers with additional needs

Research shows disabled children are less likely to disclose abuse and are more likely to delay disclosure than their non-disabled peers (Hershkowitz, Lamb and Horowitz, 2007). Over the Wall recognises that for some campers the nature of their medical conditions, or psychosocial needs, means that comprehension and understanding of safeguarding concerns and procedures can be impeded.

Any known additional needs of campers are highlighted to volunteers and staff, on a needs-to-know basis. The role of the ISA and Wellbeing Team is to work alongside volunteer teams to establish developmentally appropriate ways of communicating safeguarding procedures to campers before and during each Camp Session (National Minimum Standards 3:2, 2013). This can include discussions during team agreements and or the use of visual resources. Ways to support and safeguard campers with additional needs is covered in All Camp Training.