



# SAFEGUARDING CHILDREN POLICY AND PROCEDURES

## POLICY STATEMENT

Safeguarding is everyone's responsibility (Department for Education, 2023). Over The Wall Camp 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 (Department for Education, 2023).

This policy reflects safeguarding legislation and statutory guidance for both England and Scotland, including Department for Education (DfE) guidance for England and Scottish Government guidance for Scotland.

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**Policy Contents**

## **1. Introduction and Definitions**

- I. Safeguarding Children Commitment
- II. Acknowledgements
- III. Purpose(s) of the Policy
- IV. Safeguarding Definitions
- V. Definition of a Child
- VI. Scope of the Policy

## **2. Roles and Responsibilities**

- I. Designated Safeguarding Officer
- II. Safeguarding At Camp
- III. Whistleblowing

## **3. Recruitment and Training**

- I. Safe Recruitment Practices – staff and volunteers.
- II. Staff training
- III. Volunteer training

## **4. Applications and Assessments**

- I. Pre-camp
- II. Inter-agency working
  - i) Local Service Notifications
  - ii) Section 45 and Section 17 arrangements
- III. Assessments

## **5. Safeguarding at Camp**

- I. Creating a culture of safety
  - i) Supervision
  - ii) Health and Safety Practices
  - iii) Recording and reporting incidents
  - iv) Intimate personal care
  - v) Information sharing and monitoring wellbeing
  - vi) Visitors on site
  - vii) Photographs and Video Images
  - viii) Camp Recorders
  - ix) Social Media

## **6. Disclosures and raising concerns**

- I. Reporting concerns

- II. Significant Harm
- III. Confidentiality and Information Sharing
- IV. Local Children's Services
- V. Escalation
- VI. Child's Wishes and Feelings
- VII. Peer on Peer Abuse

## **7. Handling Allegations Against Adults**

- I. Investigation
- II. Subject of the allegation
- III. Parents/carers and campers
- IV. Documentation and resolution
- V. Regulation

## **8. Safeguarding Adults**

## **9. Review**

## **10. Contacts**

## **11. References**

## **12. Appendices**

- a) Safeguarding Frameworks and Statutory Guidance
- b) Glossary
- c) Health and Safety
- d) Reporting and Recording an Incident
- e) Disclosures and Safeguarding Concerns

## **1. Introduction and Definitions**

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### **Safeguarding Children Commitment**

Over The Wall Camp 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 Camp operates across the UK and therefore aligns its safeguarding arrangements with statutory safeguarding guidance for both England (Department for Education) and Scotland (Scottish Government).

Over The Wall Camp's safeguarding policy and practices are underpinned by three guiding principles: all safeguarding should be child-centred, timely, and coordinated (Department for Education, 2023). 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 (Department for Education, 2023; Department for Education, 2013, Standards 1:1-1:4).

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

For the purpose of this policy, Over The Wall Camp's interactions with children and families are considered in three strands:

- Residential – sessions where interactions with children and/or families are facilitated face-to-face, in a residential setting.
- Virtual – sessions where interactions with children and/or families are facilitated on an online platform (e.g. virtual camp, conference calls).
- Other – interactions which fall outside the categories above (e.g. fundraising events, marketing campaigns and outreach).

## **Policy Aims and Purpose**

Over The Wall Camp 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 during or outside of camp operations.

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 (Department for Education, 2023).

With this in mind, and in the context of the organisation's statement of purpose, Over The Wall Camp 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

(Department for Education, 2023)

## **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.

(Department for Education, 2023)

## **Definition of a child**

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' (United Nations, 1992, Article 1). 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 Camp's services. Hereafter this policy will refer to staff and volunteers; however, this includes - but is not limited to - all Over The Wall Camp employees, volunteers, ambassadors, activity providers, work experience students, and Board of Trustees.

Guidance from the Department for 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, 2024). Therefore, please refer to **Appendix (A)** for the statutory frameworks and guidance that this policy document should be read in conjunction with.

Keeping Children Safe in Education (KCSIE) is statutory guidance for schools and

colleges in England; however, it is also widely recognised as best practice guidance for organisations working with children, particularly in relation to safer recruitment, allegations management, and safeguarding culture.

This policy should also be appraised in the context of Over The Wall Camp's:

- Behaviour Support and Intervention Policy
- Equality and Diversity Policy
- Complaints Policy
- Sexual Harassment Policy
- Critical Incident Policy
- Emergency Procedures Policy
- Missing Camper Policy
- Online Safety Policy

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

## **2. Roles and Responsibilities**

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All staff and volunteers who may encounter children or their families/carers, in-person or online, 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 (Department for Education, 2023).

### **Designated Safeguarding Officer**

The Clinical Director 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 Designated Safeguarding Officer (Department for Education, 2023).

The Head of Nursing fulfils the role of the Designated Safeguarding Officer (DSO), with the responsibility of providing safeguarding guidance and support across the organisation (Department for Education, 2023). This includes, but is not limited to:

- Ensuring that the voice of children is heard, understood; and underpins all safeguarding practice and development (Department for Education, 2013, Standards 1:1-1:4; Department for Education, 2023).
- 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 residential camp session.
- Working alongside the Volunteering Team to recruit and select appropriate volunteers to provide independent safeguarding advice for each residential 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 Camp 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 (Department for Education, 2013, Standard 6).

(Department for Education, 2023).

The Designated Safeguarding Officer (DSO) for the organisation, or in their absence, the Clinical Director 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 Camp Director should be informed at the first available opportunity.

### Safeguarding at Camp

All staff and volunteers who attend camp, whether residential or virtual, have a responsibility to safeguard children and young people and to report any concerns about their welfare.

All camp staff and volunteers undertake safeguarding training appropriate to their role, including recognising indicators of abuse and neglect and understanding how to report safeguarding concerns.

Each residential camp session will have an identified Camp Safeguarding Lead. This role is undertaken by an experienced Over The Wall staff member who is trained to Level 3 Safeguarding Children (or equivalent) and is separate from the organisation's Designated Safeguarding Officer function.

It is recognised that many members of the volunteer clinical team will also hold Level 3 Safeguarding Children training (or equivalent) as part of their professional roles and

may provide additional safeguarding expertise where appropriate.

Each virtual camp session will have at least one member of the Support Team trained to Level 3 Safeguarding Children (or equivalent) available in an on-call capacity.

Where safeguarding concerns require additional advice, oversight or escalation beyond the Camp Safeguarding Lead, the Designated Safeguarding Officer and/or Clinical Director should be contacted. The Clinical Director will seek advice from the Nominated Safeguarding Trustee or other safeguarding professionals where specialist input is required.

It is recognised that Over The Wall Camp engages with campers and their families outside of residential and virtual camps in a variety of settings, including (but not limited to) fundraising events, campaigns and outreach services. Any concerns regarding the welfare of a child or young person arising in these settings should be managed 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 (Department for Education, 2023). All staff should be familiarised with whistleblowing procedures during staff induction and clear whistleblowing procedures are outlined to volunteers in training prior to any camp session. Children are encouraged to raise concerns, and ask for support, through expectations that are covered during their induction to camp.

Within Over The Wall Camp, 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 Chief Executive Officer or nominated Safeguarding Trustee should be contacted. Contact details for these individuals are available in this policy.

For camps operating in Scotland, where a concern relates to safeguarding practice or a child protection matter and internal escalation is not appropriate or has not resulted in a satisfactory response, concerns may also be raised directly with the relevant local authority Social Work Services / Child Protection Team, or Police Scotland where there is an immediate risk of harm.

Where concerns relate to serious safeguarding governance failings, Over The Wall Camp recognises that reports may also be made to the Office of the Scottish Charity Regulator (OSCR), in line with OSCR safeguarding expectations for charities within Scotland.

## **3. Recruitment & Training**

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### **Recruitment of Staff and Volunteers**

Over The Wall Camp 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 Camp's Safeguarding Children Policy and Procedures
- All Over The Wall Camp 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)
- In Scotland, safeguarding vetting is carried out through the Protecting Vulnerable Groups (PVG) Scheme, administered by Disclosure Scotland. In England, safeguarding vetting is conducted by the Disclosure and Barring Service (DBS).
- 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 from the age of 16
- 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 Camp. The candidate's most recent employer/supervisor must be one of these referees.
- All references will be verbally confirmed via telephone by OTW Human Resources team, as per Ofsted requirements
- All staff and volunteers will need to produce suitable proof of identity upon arrival at residential camps.
- 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 our Safeguarding Children Policy and Procedures and are directed to the Volunteer Handbook prior to interacting with campers.

(Department for Education, 2013, Standards 9:1-9:6)

### **Staff training**

All Over The Wall Camp 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, policies, and procedures ahead of any interaction with campers. This may be through face-to-face training, eLearning or a combination of both. Over The Wall Camp's policies and procedures include appropriate and inappropriate physical contact and language with campers, and appropriate media use.

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

Volunteers are asked to familiarise themselves with the OTWC Safeguarding Children Policy and Procedures before interacting with campers and to confirm they have done so.

## **4. Applications and Assessments**

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### ***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 any camper's safety or wellbeing at camp. Camper applications are assessed and screened by the Clinical and/or Wellbeing Team 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 for them, others will not put at increased risk, and adequate support can be provided.

### ***Inter-Agency Working***

Over The Wall Camp 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 (Department for Education, 2023).

For camps operating in Scotland, Over The Wall Camp follows the National Guidance for Child Protection in Scotland (2021, updated 2023), including expectations around information sharing, recording, and escalation to Social Work Services and Police Scotland.

### ***Local Services Notifications***

For residential camps, 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).

This notification is not required for online provision.

### ***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) in England and Wales, or is allocated a Child's Plan (under the GIRFEC framework) or identified on the Child Protection Register in Scotland, Over The Wall Camp recognises that, if it is necessary for the camper to travel across county-lines to attend a residential 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 Camp, we will make our best efforts to communicate with the relevant Children's Social Care team before camp.

## **5. Safeguarding at Camp**

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### **Creating a Culture of Safety**

## ***Supervision***

Over The Wall Camp operates a strict rule of three policy, and an adult should never be alone with a camper. No exceptions. Full details of this are found in Children and Young People 'Rule of Three' Supervision Policy.

For the protection of campers, staff, volunteers, and visitors, Over The Wall Camp prohibits interactions between an adult or child inside any closed room, vehicle, bathroom, showering stall, or any area that could be considered private.

Volunteers are made aware of this policy during their initial orientation, in pre-camp eLearning and, where possible, in 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 always upheld.

At Over The Wall Camp, we are committed to creating a safe and supportive environment for all our campers. To achieve this, we strive to maintain a ratio of one adult for every two campers at our residential Health Challenge Camps, ensuring each child receives the attention and care they need. At our Sibling Camps, the adult-to-camper ratio may differ but will always adhere to or exceed the recommended standards outlined in the NSPCC guidelines (2024). This approach reflects our dedication to upholding the highest standards of safety and quality across all our programs.

These ratios do not apply to online provision; however, the rule of 3 policy must always be followed.

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, 2024)

## ***Health and Safety practices***

Over The Wall Camp 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.

## ***Orientation***

Children are also orientated to Over The Wall Camp's Camper Charter on and/or before their attendance at camp, which sets out expectations around behaviour and specifically addresses respect, bullying and/or harassment, and personal boundaries.

### ***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 Camp 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.

### ***Intimate or personal care***

During residential camps, it is recognised that a minority of children may require assistance with personal care. All intimate or personal care needs are supported by members of the Clinical Team. The same rule of 3 policy applies and they should 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 relevant members of staff.

At residential camps, there is a daily Multi-Professional Meeting (MPM), involving the Clinical and Wellbeing team, clinical volunteers and the camp Director on Duty. All campers are discussed, to provide space for teams to share information which helps to build a bigger picture and identify concerns early.

During virtual provision, there is a daily handover meeting attended by all staff supporting the session. This meeting will look to highlight and monitor any concerns around campers in attendance.

### ***Visitors***

All visitors to residential camps are chaperoned by a member of Over The Wall Camp staff for the duration of their visit at all times (Department for Education, 2013. Standard 3:5). Visitors must wear Over The Wall Camp 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 Camp's safeguarding policies and procedures.

### ***Photographs and Video Images***

Over The Wall Camp 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, recordings or film footage taken of our campers and their subsequent publication.

Therefore, we will: OBJ

- Seek permission in advance from parents and carers, young people and adults attending camp, virtual or residential, to allow photographs and video film of activities and events to be taken of them; and separately to 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 relevant member of staff.

All images and videos which campers themselves upload to online platforms will be moderated by a member of Over The Wall Camp staff. Any inappropriate images will be removed and, where appropriate, addressed with the individual camper.

### ***Camp Recorders***

The Media Coordinator takes responsibility for all imagery captured at camps. 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.

Over The Wall Camp will have at least one designated Camp Recorder or Media Team member at each residential camp session, overseen by the Media Coordinator role. This role is not offered for virtual provision.

Camp Recorders/Media Team members 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 Camp. Ownership of all photos taken by these individuals are exclusively the property of Over The Wall Camp.

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 residential camps. Children and families are asked to refrain from

screenshotting or recording images/video on virtual platforms.

### **Social Media**

Parent/carers are sent 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 Camp office, who will contact the camper or family and explain why the request has been declined.

For residential camps, 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**

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### **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.

For residential camps, as outlined in **Appendix (D)**, if an injury has occurred, no matter how trivial; the incident should be reported immediately to a member of the Clinical Team, for consideration of any necessary medical intervention. In cases of safeguarding or child protection concerns, the Wellbeing Team and Clinical Team should be informed immediately. At the first opportunity, the camp safeguarding lead should be consulted.

For virtual camps, any safeguarding or child protection concerns should be shared with the Designated Safeguarding Officer, or the member of staff who is senior on that camp immediately.

The priority is ensuring the child's immediate safety. A member of staff with Level 3 training, 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.

A senior member of staff, as identified prior to 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, or the police (as appropriate), will be **contacted immediately** by Over The Wall Camp 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 Camp 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 (Department for Education, 2013, Standard 9:7).

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 Camp, 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 Camp recognises that at times further guidance may need to be sought from Local Authority Children's Social Care; in the Local Authority that the residential camp session is operating within, or the child's own Local Authority.

Over The Wall Camp services do not include home visits nor do staff have substantial face to face contact with children or families, outside of time bound camp sessions. Over The Wall Camp 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 look to gain the permission of the camper's parent/carer(s) to contact 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 Camp respectfully upholds a right to contact 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 (Department for Education, 2023).

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 CampSite record. The outcome of any referral should be received within 24 hours or one working day and should also be uploaded to the camper's CampSite record.

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 Clinical Director and CEO should be notified immediately. If that initial assessment is confirmed, the nominated Safeguarding Trustee should be notified as soon as practicable about the incident and management measures being taken. In such circumstances arrangements will also be made to notify SeriousFun Children's Network through the agreed channels. Serious safeguarding incidents must be reported to Ofsted.

Where Over The Wall Camp is not operating as an Ofsted-registered provider, serious incidents will be reported through the appropriate statutory safeguarding routes and, where required, to the Charity Commission (England and Wales) and/or OSCR (Scotland) in line with charity serious incident reporting expectations.

If unhappy with the response from Safeguarding Partners (i.e., Local Authority Children's Social Care or the Police), a member of staff should contact the DSO, or CEO immediately.

## **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 (Department for Education, 2013, Standards 1:1-1:3).

## **Child on Child Abuse**

The term "**child-on-child abuse**" has replaced "peer-on-peer abuse" to provide greater clarity and inclusivity in safeguarding discussions and practices. The shift reflects a broader understanding that abuse can occur between children of varying ages and dynamics, not strictly among peers of the same age group. This change acknowledges the power imbalances that may exist between children, whether due to age, development, or other factors, and aligns terminology with a child-centred approach to safeguarding. By focusing on the nature of the abuse rather than the relationship between individuals, the updated term ensures that all instances of harmful behaviour between children, such as bullying, physical violence, emotional abuse, or sexual misconduct, are appropriately recognised and addressed within safeguarding policies. This evolution in terminology underscores the importance of maintaining precise, inclusive, and effective language to promote the safety and welfare of all children (Department of Education 2023). Child-on-child abuse may involve bullying (including cyberbullying), sexting, harmful sexual behaviour or emotional, physical or sexual abuse (NSPCC, 2021).

Following the procedures outlined above, any concerns raised, disclosed or observed around child-on-child abuse will be responded to immediately 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, 2021). If allegations have been made against a child, advice will be sought from the camp safeguarding lead, in liaison with the DSO, on the most appropriate way to proceed.

In all instances of child-on-child 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 outlined in this policy.

Any response to child-on-child 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**

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Responsibility for handling safeguarding allegations against any member of staff, camper, volunteer, or persons linked to the organisation resides with the Clinical Director and CEO.

### **Investigation**

Over The Wall Camp 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 they are unsuitable to work with children.

(Department for Education, 2013, Standard 13:1),

Concerns pertaining to an adult associated with the organisation's services should be reported to the Designated Safeguarding Officer (DSO) or CEO immediately, who will involve the Local Authority Designated Officer (LADO). The Safeguarding Trustee board member should also be informed within 24 hours of the incident.

Scotland does not operate a Local Authority Designated Officer (LADO) system; therefore, incidents occurring in Scotland should be reported to the local authority's Social Work Services or Child Protection Team, in line with the procedures outlined in the National Guidance for Child Protection in Scotland (2021). Where appropriate, Police Scotland should be involved directly.

In both England and Scotland, concerns must be reported to the local authority where the incident took place. In Scotland, this typically involves contacting the Child Protection Officer within the relevant local authority, as Scotland does not have an equivalent to the LADO.

In the event of an allegation being made, a full and impartial investigation will be carried out, adhering to either English or Scottish safeguarding guidelines as appropriate.

### **Subject of the allegation**

A nominated member of the OTW team will take responsibility for keeping the subject of the allegation informed of the process, during and after. (*Department for Education, 2013, Standard 13.5*)

- Unless otherwise directed by Police, the LADO (in England), or Child Protection Services (in Scotland), the subject of the allegation should be kept informed of all decision-making and actions.
- If the subject of the allegation concerns the CEO, responsibility for the investigation should pass to the Designated Safeguarding Officer or a nominated Safeguarding Trustee.
- If the subject of the allegation concerns the Clinical Director, responsibility for the investigation should pass to the CEO or a nominated Safeguarding Trustee.

### **Parents/carers and campers**

Under the guidance of the LADO (England), Social Work Services (Scotland), Police, or Children’s Services, parents and carers should be informed of the allegation at the first opportunity if they are not already aware of it.

The Designated Safeguarding Officer, or an individual nominated by them, will take responsibility for keeping parents/carers and the camper informed of the process during and after the investigation.

If the allegation occurs during a Scotland camp:

- The **National Guidance for Child Protection in Scotland (2021)** will be followed.
- The appropriate **Social Work Department** within the local authority will be contacted to report the concern and coordinate further actions.
- Police Scotland will be involved if there is a suspicion of criminal activity.
- Parents and carers will be informed in consultation with Social Work Services and Police Scotland.

### **Support for the Child**

If the child is on camp at the time of the allegation, the organisation will:

- Assign a trusted adult to provide immediate support and ensure the child feels safe and cared for.
- Work in consultation with safeguarding authorities to determine any additional measures required to protect the child.

### **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 (Department for Education, 2013, Standard 13.7).

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

If Over The Wall Camp 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 Camp will make a referral to the Disclosure and Barring Service/Disclosure Scotland.

## **Regulation**

A notification to Ofsted or the Scottish Care Inspectorate 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)

(Department for Education, 2013)

## **Low-Level Concerns Policy**

Over The Wall Camp is committed to fostering a safe and transparent environment where all concerns, however minor, are taken seriously. To this end, we have implemented a Low-Level Concerns Policy. This policy enables us to document and monitor behaviours or situations that do not meet the threshold for formal reporting but may still warrant attention. By maintaining a record of low-level concerns, we can identify patterns or cumulative risks and take proactive steps to address them, ensuring the ongoing safety and well-being of our campers and staff. This approach reflects our commitment to safeguarding best practices and creating a culture of vigilance and accountability.

This approach reflects best practice outlined in Keeping Children Safe in Education (KCSIE) and supports early identification of behaviours that may indicate safeguarding risk.

## **8. Safeguarding Adults**

An adult at risk is 'any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and support' (Care Act 2014 [England]). They may need community care services by reason of mental or other disability, age, or illness, and who is or may be unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

At Over The Wall Camp whilst adults are not our primary client in our service delivery, we acknowledge the potential of one of our members of staff, volunteers, or indeed a family member of a child attending camp, falling within the above definition. We also acknowledge that some people may have a nonvisible vulnerability that needs to be considered.

The same focus and duty of care and responsibility we apply to safeguarding children also applies to adults at risk. If any issues are identified, our staff and volunteers **must** alert the Clinical Director, Camp Director or CEO. This will then trigger an incident/case review to be carried out as soon as possible which will identify the actions required to provide the most appropriate level of protection to the adult at risk.

## 9. Review

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This policy is subject to a 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.

## 10. Contacts

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- **Designated Safeguarding Officer** – Gemma Johnson, Head of Nursing  
([gemma.johnson@otw.org.uk](mailto:gemma.johnson@otw.org.uk)).
- **Chief Executive** – Kevin Mathieson  
([kevin.mathieson@otw.org.uk](mailto:kevin.mathieson@otw.org.uk)/02392 477 110).
- **Nominated Safeguarding Trustee** – **Cathy Morley-Jacobs**

## 11. References

Care Act, 2014 Available [here](#) (Accessed January 2026)

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Protection of Children (Scotland) Act 2003. Available [here](#). [Accessed January 2026]

United Nations, 1992. *United Nations Convention on the Rights of the Child*. Available [here](#). [Accessed January 2026]

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## 11. Appendices

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### **(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' (Department for Education, 2023) is the key guidance that outlines the safeguarding responsibilities of charities and organisations in the Voluntary Sector.

- Residential Holiday Schemes for Disabled Children, National Minimum Standards, Department for Education, 2013
- Children and Social Work Act, 2017
- Protection of Children (Scotland) Act, 2003
- Children Act 1989 (and subsequent 2004 revision)

- United Nations 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, 2024.

## **(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 Camp 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 Camp recognises that it is impossible to eradicate/mitigate against every risk posed in a residential camp setting. Over The Wall Camp 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 (Department for Education, 2013, Standard 6:3). 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 (Department for Education, 2013, Standard 6:2).

Dynamic risk assessment forms part of volunteer 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 Camp 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 any incident, an incident form must be completed.

The process for reporting an incident, and good practice guidelines, are included in volunteer 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 during camp sessions by relevant members of the 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 by the Designated Safeguarding Officer, or individual identified by them, 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 Camp prioritises support for the child or young person and recognises that the young person may continue to be involved with Over The Wall Camp 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 DSO or Wellbeing 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 Camp 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 Wellbeing Team is to work alongside volunteer teams to establish developmentally appropriate ways of communicating safeguarding procedures to campers before and during each residential camp session (Department for Education, 2013, Standard 3:2).

