

EXSPORTISE SAFEGUARDING POLICY

Policy Statement

Exsportise provides English language summer courses combined with specialist activities for 9-17 year olds at four different centres (Clayesmore School, Seaford College, Oundle School and Worth School). Children are given the opportunity to improve their practical and spoken English by attending structured English lessons, engaging in a sport, music or dance option of their choice and taking part in recreational activities and off-site excursions. Exsportise is committed to its duty of care to safeguard all children in its care and recognises that **all children have the right to be protected**. Exsportise is also committed to its responsibility as an employer towards all staff (paid and voluntary).

Safeguarding, and promoting the welfare of children, is an umbrella term meaning “**looking after**” and **protecting children from maltreatment, preventing impairment of children's health or development, and ensures children grow up in a safe, healthy and caring environment**.

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

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

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

We recognise that:

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

Key documents in developing this policy are:

- Children's Act 1989 & 2004
- UN Conventions on the Rights of the Child 1989 (ratified 1991)
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedom Act 2012
- Counter-Terrorism & Security Act 2015
- Ofsted guidance 'Inspecting safeguarding in early years, education and skills settings' (2018)
- Working Together to Safeguard Children (2018, WTSC)
- DfE guidance Keeping Children Safe in Education (2020, KCSIE)

The purpose of this policy:

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

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

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

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

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

Key Contacts at Exsportise

Designated Safeguarding Lead (DSL): The Centre Managers at each Venue

Deputy Designated Safeguarding Lead(s): Bram van Asselt, Managing Director and
Verena Grave, General Manager

This policy will be reviewed annually.

Last date of review:

09th February 2021



Signed: Verena Grave (General Manager)

1. CODE OF CONDUCT

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

Code of Conduct for Staff

Exsportise safeguard the students and are required to set and maintain high standards of personal behaviour, and to adhere to the following code of conduct:

- The committing of any criminal act, such as the possession/taking of illegal drugs
- Sexual or otherwise inappropriate contact with the students
- Bullying or harassment of any student or other staff members, including employees of the host school
- Consumption of alcohol while on duty and/or in the presence of students
- Drinking alcohol or being under the influence of any alcohol or drugs on site whether on or off duty
- No sexual relations between staff on site
- No overnight visitors in staff bedrooms (unless the CM gives permission)
- No consumption of alcohol on site
- No smoking (including e-cigarettes) except in designated areas
- No swearing
- No swimming alone
- No free use of the tuck shop
- No driving around camp to get to or from different areas (unless the CM gives permission)
- No use of personal mobile phones in front of students (no photos, no videos, no social media friendships)
- Appropriate dress-code at all times, including in and around the boarding houses at night

Code of Conduct for Students

- No smoking, no cigarettes, e-cigarettes or lighters to be brought to camp
- No knives or other weapons
- No alcohol
- No drugs – unless prescribed by a doctor for a medical condition, these must be handed in on arrival for safe and correct storage and dosage
- No bullying or harassment, either verbal, physical, online or social
- No fighting or swearing
- No stealing – permission is needed to enter another student's room
- Boys and Girls are not allowed in each other's houses or rooms
- Students need permission to leave the camp unaccompanied; there are clear boundaries showing where students may go within the camp, which must also be adhered to
- Students must show respect to all staff and other students at all times
- No mobile phones to be used during music, English classes or during any Specialist Activity.
- Students must attend all sessions and meetings as per the timetable.

2. SAFER WORKING PRACTICE FOR STAFF

Responsibilities

Overall responsibility for this policy rests with the Managing Director. Day to day responsibility is taken by the General Manager and Recruitment Manager.

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

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

Good Practice for Staff

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

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

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

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

Good practice means:

- Always working in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- Treating all students equally, and with respect and dignity
- Always putting the welfare of each student first, before winning or achieving goals
- Being of smart appearance appropriate to the role, on and off duty, and using appropriate language
- Maintaining a safe and appropriate distance with students (e.g. it is not appropriate for staff to have an intimate relationship with a child or to share a room with them)

- Building balanced relationships based on mutual trust which empowers children to share in the decision-making process
- Making sport fun, enjoyable and promoting fair play
- Ensuring that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the Coach Education Programme. Care will be required, as it is difficult to maintain hand positions when the child is constantly moving. Students and their parents should always be consulted and their agreement gained
- Keeping up to date with technical skills, qualifications and insurance in sport
- If groups of students have to be supervised in the changing rooms, always ensure teachers or coaches work in pairs
- Ensuring that if mixed groups of students are taken away on excursions, they should always be accompanied by male and female members of staff. However, remember that same gender abuse can also occur
- Ensuring that adults do not invite children into their rooms
- Adults only enter children's rooms to carry out specific checks – and leave the door open whilst they are inside. Same gender staff will make such checks. In specific circumstances a more senior member of staff may be required to carry out a check in a room of a student of the opposite gender. Such checks will be organised in advanced and the senior staff member will be accompanied by a staff member of the same gender as the child.
- Being an excellent role model - this includes not smoking or drinking alcohol in the company of students
- Giving enthusiastic and constructive feedback rather than negative criticism
- Recognising the developmental needs and capacity of the students - avoiding excessive training or competition and not pushing them against their will
- Securing parental consent in writing to act in loco parentis, if the need arises to administer emergency first aid and/or other medical treatment
- Keeping a written record of any injury that occurs, along with the details of any treatment given
- Requesting written parental consent if members of staff are required to transport students in their cars.

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

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

Practices never to be sanctioned. Staff should never:

- engage in rough, physical or sexually provocative games, including horseplay
- share a room with a child
- allow or engage in any form of inappropriate touching
- allow children to use inappropriate language unchallenged
- make sexually suggestive comments to a child, even in fun
- reduce a child to tears as a form of control
- fail to act upon and record any allegations made by a child

- do things of a personal nature for children, that they can do for themselves
- invite or allow children to stay with you at your home/in your room unsupervised.

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

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

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

Transport Suppliers

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

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

Electronic Equipment and Social Media

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

Videoining as a coaching aid:

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

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

Mobile Phones:

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

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

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

Social media:

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

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

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

Staff Accommodation

Accommodation is provided for all staff in single sex boarding houses where bathroom facilities are shared with students. Staff should adhere to the following points:

- No male staff should enter the female boarding houses and vice versa. It may become necessary for a member of staff to enter the opposite gender's boarding house, for example in a medical emergency, or for the Centre Manager to deal with a serious welfare or disciplinary issue. In such cases the member of staff should at all times be accompanied by a colleague of the "correct" gender and care should be taken before entering any areas or rooms that the student(s) are in an appropriate state to receive the staff member of the opposite sex.
- The washing facilities should be used by staff at times when the students are not in the boarding houses, and all staff rotas allow for free time during student coaching/teaching/activity sessions. All washing facilities have cubicles that are made private by curtains or screens, which should be used at all times. Staff should be fully clothed whilst walking between their bedrooms and the washing facilities.

- Bedrooms do not have lockable doors and staff should be aware that a student might enter a room at any time and behave accordingly.
- Valuable items and medication should not be left in unattended bedrooms. Such items should be stored in the centre office and/or centre medical office.

3. SAFER RECRUITMENT

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

Recruitment Process

Advertisement

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

Job Descriptions

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

Application Form

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

Equal Opportunity

The company is an equal opportunities employer where all job applicants will receive equal treatment regardless of sex, sexual orientation, marital status, pregnancy or maternity, age, religion or belief, creed, race, colour, nationality, ethnic or national origins or disability ('the protected characteristics'). The Company is committed to building an organisation that makes full use of the talents, skills, experience and different cultural perspectives available in a multi-ethnic society, where people feel they are respected and valued, and can achieve their full potential.

Shortlist

Short, informal telephone conversations may be arranged and carried out by a member of Head Office staff if they are undecided on an applicant's suitability for an interview just from reading the application form and CV.

A shortlist of applicants will be invited to interview. The job description will provide the criteria for each role and evidence of a candidate's suitability will be sought in the application form and CV

Interview

Applicants will be assessed by two members of the recruitment team and notes will be taken. Where possible applicants will attend both a group assessment and a one to one interview.

Applicants will be asked about gaps in work history

All candidates will be interviewed by a member of the Head Office staff or another experienced member of the company (e.g. a Centre Manager or Director of Studies), preferably in person; skype will be used for applicants who will not be in the UK at any time during the recruitment period. All interviews will include questions to find out the applicant's motivation for and experience of working with children

EFL teacher applicants will undergo a second interview with the Academic Manager

Vetting Checks

References

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

Identity Checks

The original documents of all forms of ID will be seen either by a member of the Exsportise Head Office staff, or by using the ID verification service provided by the Post Office. Applicants who are unable to provide these prior to the start of their contract must do so as soon as they arrive on site and before taking up appointment

Qualification Checks

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

DBS Disclosure

An Enhanced Disclosure and Barring Service check (DBS) will be undertaken by the company prior to taking up a position if not already in possession of one dated from within the last 3 months of the time of employment. Photographic evidence of identity is required for these checks, which also serve to confirm the applicant's identity. Acceptable proofs of identity may include passport, birth certificate, driving licence as well as evidence of proof of address.

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

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

No applicant will start work without a successful barred list check.

For any applicant whose DBS or Police check has not arrived before the start of his/her employment, unsupervised access to the students will not be allowed until a satisfactory check has been obtained. This will be achieved by implementing the following procedures:

- A third reference will be requested
- Coaches will coach in sight of other staff

- Teachers will only teach with the door open and the DOS will maintain a frequent presence in the corridor throughout the lesson
- Staff will be accommodated in parts of the facility that children do not access and will not have unsupervised access to student accommodation areas; staff will not undertake any supervisory duties in the accommodation

Conditional Offer

An offer of employment will be sent out which clearly states that the offer is subject to passing certain pre-employment checks.

These are:

- Two satisfactory references
- A successful enhanced DBS check
- Proof of identity
- Evidence demonstrating the entitlement to work in the UK
- Proof of any academic / vocational qualifications (ELF Teachers and Sports Coaches only)

4. STAFF TRAINING

All staff will be required to complete an online “Introduction to Safeguarding for UK Language Centres”, provided by Accreditation UK. The course includes details on Safeguarding, Child Protection as well as Prevent.

All staff will be provided with the Company employee handbook and a “Working for Exsportise” document prior to arriving at induction. Furthermore all staff are issued and required to read Part 1 and Annex A. of DfE guidance on ‘Keeping Children Safe in Education’ (September 2018).

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

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

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

- Guidance on self-protection from allegations of abuse, including analysing own practice against our guidelines
- Personal responsibility and reporting of concerns of poor practice amongst staff or possible abuse
- How to respond to concerns or allegations made by a child or young person
- Our detailed guidance for working safely and effectively with children and young people, with specific reference to cultural differences among our students
- A 3-hour training session to comprehensively cover safeguarding and good practice, to facilitate the development of a positive culture towards good practice

- Centre Managers will receive training on what to do in the event of an allegation against a member of staff, or where concerns about poor practice have been made

Our policy is to ensure that:

- Centre Managers (or one other senior staff member per camp) as well as 2 Head Office staff members receive advanced safeguarding for designated lead (formerly Level 3). This training will be updated formally every two years but informal updates as well as an online course will be done annually.
- All staff receive a 3-hour training session on Safeguarding delivered by a senior member of staff who has attended external Safeguarding training
- All staff who start after the first week of camp will be given an abridged version of the full induction training, to cover all of the same salient points

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

5. WELFARE AND IMPLEMENTING SAFEGUARDING

Centre security procedures

Students are registered on a daily basis at least 3 times a day:

- At the start of morning coaching/teaching
- At the start of afternoon coaching/teaching
- At bedtime
- In addition, further registers are taken on certain days at breakfast, lunch or dinner.

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

During excursions children will be registered:

1. Before boarding the coach
2. On the coach just before departure
3. At excursion destination drop-off point
4. At various times during the day depending on age and group size and according to the following ratios:
 - a. Minimum 1 adult for every 10 children aged 9 - 11
 - b. Minimum 1 adult for every 15 children aged 12 – 14
 - c. Minimum 1 adult for every 20 children aged 15 – 17
5. At the end of the day before departure and once on the coach before departure

What to do if a child is missing during registration onsite

Any child missing from registration should be reported to the site office immediately. The Administrator and/or Centre Manager will then call the child's mobile phone (if known to have one) before organising a search for the child. Bedrooms, friends' bedrooms and bathrooms are checked first, followed by a wider search of boarding houses and the rest of the site. Parents, police or other local authorities are contacted if necessary.

What to do if a child is missing during registration offsite

Any child missing from registration should be reported to the site office immediately. The Excursion Supervisor will then call the child's mobile phone (if known to have one), ask friends and organise a search for the child. Parents / guardians will be informed and if appropriate the police or other local authorities.

All children are required to provide their Group Leader with a mobile phone number on which they can be contacted during off-site excursions, whether this is their own or that of a friend. Children off-site wear wristbands and/or ID cards with the company contact information on it – the head office phone number. The Centre Office is staffed at all times while children are offsite and can provide support to searches were necessary.

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

What to do if a child does not arrive as planned at airport / rail station

We understand that weekends are busy travel dates, especially during the summer holidays, so delays can be expected. However, should a flight or train been taken off the arrivals information board and the child still hasn't come through to the arrivals hall, the following procedure will be followed:

- Staff will enquire at the Information or airline desk whether passengers of the flight have been through the customs hall.
- Staff will request to put an announcement over the loudspeaker system calling the child to meet the Exsportise representative at the Information / Airline desk
- Staff will wait at the arranged meeting point for 10 minutes after the announcement
- A second announcement will be put out and staff will wait another 10 minutes
- If the child still hasn't come through, the child's mobile (if known) will be called as well as the parents / emergency contact details.

If parents assure that child has been on the plane / train as planned but still hasn't shown, the support of the airline / Eurostar is sought to locate the child airside. Exsportise staff will not leave the airport / train station until the situation has been cleared up. If necessary, police or other local authorities will be contacted.

Risk Assessments and Safety Equipment for Activities

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

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

In case of accidents and injuries

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

Behaviour and Discipline

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

Among the information reiterated to students during their welcome meeting:

- Accommodation in the boarding houses is separated into boys and girls, and students may not enter houses of the opposite sex
- Senior staff are introduced to the students. The names, photos and job roles of all staff are displayed in the central student social area to help students to know who is who. Notices are also put up to direct the children who they should go to for various problems and in case of illness or injury
- What to do in the event of a fire. Fire drills are held in all boarding houses within 24 hours of students' arrival and written records of each held in the Centre office (For more details see Fire and Building Policy).
- The Centre boundaries are explained and children told where they can and cannot go. For any school where it is necessary to cross a road to get to a particular activity, staff are organised to accompany the children or to act as a "lollipop person."
- Mutual respect is to be shown at all times between students and staff. Bullying and harassment are not tolerated.

E-safety and Children's Internet Access

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

- Content: being exposed to illegal, inappropriate or harmful material. This includes, but is not limited to:
 - online pornography
 - ignoring age ratings in games
 - lifestyle websites (e.g. pro-anorexia/self-harm sites)
 - hate sites

- Contact: being subjected to harmful online interaction with other users. Examples include:
 - grooming
 - cyber-bullying
 - identity theft, including “frape” and sharing passwords
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm. Examples include:
 - disclosure of personal information
 - digital footprint and online reputation
 - health and well-being (amount of time spent online)
 - sexting
 - copyright

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

- Internet access for students will require a login and password and the sites available for them to access will be restricted to exclude all inappropriate sites including, but not limited to, online pornography and gaming sites, or other sites with age restrictions.
- Internet access is monitored by the IT department of the host school and any attempt to access restricted sites will be flagged to the Exsportise Centre Manager so that he/she can speak to the relevant student.
- Any reports or evidence of cyber-bullying will be investigated and dealt with accordingly.

Arrival and Departure Arrangements

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

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

Supervision

All sessions and activities are compulsory for all students, including evening entertainment and weekend excursions. Free time is during meal times, when students may stay in their rooms, or in the authorised areas within the camp. During these times staff will be supervising the boarding houses and common areas. Students may also swim during specified swim times; qualified lifeguards supervise all swimming sessions and the swimming pools are locked and inaccessible during all other times. Students with no swim consent will not be allowed to participate in the swimming sessions.

Oundle School only – students aged 15 or over may go into Oundle village during free time under the following conditions (Exsportise staff carry out spot checks in the village):

- Students must be in groups of minimum 2 students, all of whom are aged 15 or over
- They must sign out at the camp office, leaving their phone number with the Administrators. At sign out they are given a time to be back by and a coloured card with the camp phone number and information about who to contact in case of emergency that both the student and members of the public can use. Different coloured cards are used each day and members of staff may stop students in the village and ask to see them
- On arrival back at camp the cards are handed back in. All students must sign in and out in person
- Students are expected to conduct themselves appropriately whilst in the village or in shops and cafes
- Failure to follow these rules will result in a student's permission to leave camp being withdrawn immediately

The Multi-National Environment and PREVENT

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

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

Terminology

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

Extremism: holding extreme political or religious views which may deny rights to any group or individual. Extremism can refer to a range of views, e.g. racism, homophobia, right-wing ideology, as well as religious extremism. It can be expressed vocally or via active opposition to:

Core British Values: including democracy, the rule of law, individual liberty and respectful tolerance of different faiths or beliefs.

Risks of Extremism

- Staff, students and other adults (e.g. Group Leaders) may arrive at camp already holding extremist views
- Whilst part of the school staff or students may be influenced by a range of factors: global events, peer pressure, media, family views, extremist materials via hardcopy or online, inspirational speakers, friends or relatives being harmed, social networks

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

Counteracting Risk

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

Signs that may cause concern

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

6. RECOGNISING CHILD ABUSE

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

- **physical abuse** - may include hitting, shaking, burning, poisoning or any way of causing physical harm to a child
- **emotional abuse** - persistent emotional maltreatment of a child. Usually involved in most types of ill treatment but can occur alone
- **neglect**-persistent failure to meet a child's basic physical and/or psychological needs
- **sexual abuse** - forcing or enticing a child (including abuse of trust – Sexual Offences Act 2003) to take part in in sexual activities, including prostitution and can include non-contact activities such as involving children in looking at pornographic material or encouraging children to behave in sexually inappropriate ways. Preparing children for sexual abuse is called grooming and is also illegal.

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

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

Signs of Abuse

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

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

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

7. HANDLING ALLEGATIONS

Responding to allegations or suspicions

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

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

The role of the Designated Safeguarding Lead (DSL)

- To be responsible for overseeing the day to day execution of safeguarding and child protection on site.
- To be the central point of contact for all staff and students to voice any safeguarding concerns

- To maintain a confidential recording system for safeguarding and child protection concerns ('minor' welfare concerns will be dealt with and recorded by the Medical Officers and House Parents)
- To refer an allegation to the relevant agencies such as Local Safeguarding Children Board (LSCB), Police, Children's Services and/or Ofsted (please note: LSCBs are being transitioned to local safeguarding partnerships ("three safeguarding partners" – the local authority, clinical commissioning groups and the police). which must publish details of the new local arrangements by 29 June 2019 and implement these by 29 September 2019. Until then, referrals should continue to be made to the LSCB and any relevant local arrangements followed).
- To manage and monitor Exsportise's role in any multi-agency plan for an individual child
- To keep parents/carers updated, unless by doing so would undermine a criminal investigation or put the child at risk of harm

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

- Any suspicion that a child has been abused by a member of staff or by another child must be reported to the DSL, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk
- Depending on the nature of the concern, the DSL may contact the Local Safeguarding Children Board (LSCB; or to the local safeguarding partnerships once the transition from LSCBs has taken place) for guidance on whether to involve the authorities (Police, Children's Services) or whether the Company will deal with the matter
- The parents or carers of the child will be contacted as soon as possible following advice from Children's Services
- The DSL should also notify the Company's Head Office which in turn will inform the appropriate authorities who will deal with any media enquiries
- If the DSL is the subject of the suspicion/allegation, the report must be made to the Deputy DSL at the Company's Head Office directly which will follow the referral procedures above
- Staff should make accurate, detailed and factual records of what has happened, what has been said, where and when, as soon as possible after reporting to the DSL

Disclosures made by children

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

Confidentiality and Information Sharing

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

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

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

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

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

Staff should only take action as advised by LSCB, Police/Children's Services once the referral has been made.

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

Bullying and Harassment

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

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

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

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

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

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

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

Action if bullying is suspected

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

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

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

Action towards the bully(ies):

- Talk with the bully(ies), explain the situation, and try to get the bully(ies) to understand the consequences of their behaviour. Seek an apology to the victim(s).
- Inform the bully's parents
- Insist on the return of 'borrowed' items and that the bully(ies) compensate the victim
- Provide support for the victim's coach and/or teacher
- Impose sanctions as necessary
- Encourage and support the bully(ies) to change behaviour
- Keep in contact with the families to report on progress
- Inform all organisation members of action taken
- Keep a written record of action taken

- Most 'low level' incidents will be dealt with at the time by coaches and teachers. However, if the bullying is severe (e.g. a serious assault), or if it persists despite efforts to deal with it, incidents should be referred to the Company's Designated Safeguarding Lead as in "responding to suspicions or allegations" above.

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

- Report your concerns to the DSL who should contact the Company's Head Office, Local Safeguarding Children Board (LSCB), Local Officer (DO), Police and/or Children's Services (please note: the Department of Education has recently announced a transition from LSCBs to local safeguarding partnerships ("three safeguarding partners" – the local authority, clinical commissioning groups and the police) which must publish details of the new local arrangements by 29 June 2019 and implement these by 29 September 2019. Until then, referrals should continue to be made to the LSCB and any relevant local arrangements followed.)
See below for the information Children's Services and/or the Police will need
- If the DSL is not available, the person being told of or discovering the abuse should contact the Deputy DSL at Head Office, LSCB, DO and Children's Services and/or Police immediately
- LSCB, DO / Children's Services will advise on how to involve the parents/carers
- The Company's Head office should ascertain whether or not the person/s involved in the incident play a role in the company's camp and act accordingly
- Maintain confidentiality on a need to know basis only

Information for LSCB / DO / Children's Services or the Police about suspected abuse

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

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

If you are worried about sharing concerns about abuse with a senior colleague, you can contact your Local Safeguarding Children Board (LSCB), Children's Services or the Police direct, the NSPCC Helpline on 0808 800 5000, or Childline on 0800 1111.

Contact details for DO (Designated Officer, formerly LADO - Local Authority Designated Officer)

- **Clayesmore** School – Patrick Crawford 01305 221122 / p.crawford@dorsetcc.gcsx.gov.uk
- **Oundle** School – Andy Smith 01604 367862 /AndSmith@childrenfirstnorthamptonshire.co.uk
Christine York - 01604 362633 / CYork@childrenfirstnorthamptonshire.co.uk
Shared inbox: doreferral@northamptonshire.gov.uk
- **Seaford** College and **Worth** School – Lindsey Tunbridge-Adams
0330 222 3339 / Lindsey.Tunbridge-Adams@westsussex.gov.uk

Accusations against an Adult

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

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

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

Concerns about poor practice

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

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

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

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

Internal enquiries and suspension

- The DSL will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further Police and Children's Services inquiries. In some cases this will be an immediate suspension; in the event of suspension the Company

will appoint someone to support and advise the employee. The employee should also contact his/her professional organisation.

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

Support to deal with the aftermath of abuse

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

Allegations of previous abuse

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

Support

Support for staff

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

Support for students

- NSPCC - www.nspcc.org.uk
children's charity fighting to end child abuse
- ChildLine - www.childline.org.uk
help anyone under 19 in the UK with any issue they're going through
- Papyrus - www.papyrus-uk.org
national charity dedicated to the prevention of young suicide
- Young Minds - www.youngminds.org.uk
metal health support for all young people)
- The Mix - www.themix.org.uk
UK's leading support service for young people
- Kidscape - www.kidscape.org.uk
bullying support

Support for adults

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

Support for Learning Disabilities

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

Domestic Abuse

- National Domestic Violence Helpline - 0808 2000 247
- Refuge - www.refuge.org.uk
for women and children, against domestic violence
- Men's Advice Line - www.mensadviceline.org.uk

advice and support for men experiencing domestic violence and abuse

- Mankin - www.mkcharity.org
Sussex-based support for men who have been affected by unwanted sexual experiences

Sexual Abuse and Child Sexual Exploitation

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

Online Safety

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

Radicalisation and hate

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

What to do if you have a welfare concern

