



# SAFEGUARDING & CHILD PROTECTION POLICY



Individual copies are available on request from the UAC Head Office, by contacting

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## Introduction

This policy is the responsibility of the Designated Safeguarding Lead at Ultimate Activity Camps and is reviewed annually as part of the company’s annual safeguarding review undertaken by the Director of Ultimate Activity Camps. .

It has been updated with having due regard to *Keeping Children Safe in Education* KCSIE, September 2023, as well as requirements from local Safeguarding Children’s Partnerships/ Boards.

Ultimate Activity Camps will operate safeguarding procedures in line with our locally agreed multi-agency safeguarding arrangements put in place by our safeguarding partners.

There is a whole company commitment to the safeguarding of all our children. This extends from our Directors, the Senior Leadership team and everyone who works at Ultimate Activity Camps.

**ALL staff have a duty to maximise the welfare, health, and safety of anyone in our care and to take immediate action to protect them from harm or any risk of harm.**

All staff understand that safeguarding is “everyone’s responsibility” and must act swiftly when any concerns are disclosed, or events witnessed. Staff will be made aware of our safeguarding policy as part of their onboarding, training and induction with us. Returning staff will also be informed of updates and be given refresher training.

Everyone who encounters children, and their families (or carers) has a role to play in safeguarding and should ensure their approach is child centred: this means considering at all times what is in the best interests of the child.

This policy is applied to all children attending any Ultimate Activity Programme, event, camp or online service provided by our company.

It has been developed in accordance the principles established by the Children Act 1989 and in line with a number of statutory and non-statutory documents some of which include:

- DfE Working Together to Safeguard Children – December 2023
- DfE Keeping Children Safe in Education (KCSIE) – September 2023
- What to do if you are worried a child is being abused - 2015
- Early Years Foundation Stage Framework – January 2024
- Local Safeguarding Children Board/Partnership guidelines

The full list of relevant policy documents, links and sources of information can be found in **Annex 3** of this policy.

This policy along with all UAC policies are available on request from our Head Office Customer support team:

**Email: [help@ultimateactivity.co.uk](mailto:help@ultimateactivity.co.uk)**

**Phone Number: 0330 111 7077**

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All of our policies and procedures are also available on camp at the sign in desk and available for staff in the staffroom. The policy is available in large print or another accessible format if required. Any questions regarding this policy should be directed towards our Designated Safeguarding Lead in the first instance, Elena Ciccotti.

## Key Personnel for Safeguarding and Child Protection

<b>Designated Safeguarding Lead (DSL):</b>	<b>Elena Ciccotti</b>
Email: elena@ultimateactivity.co.uk	Phone Number: 01865582637
<b>Designated Deputy Safeguarding Lead (DDSL):</b>	<b>Dave Matthews</b>
Email: dave@ultimateactivity.co.uk	Phone Number: 01865692568
<b>Designated Deputy Safeguarding Lead (DDSL):</b>	<b>Robert McIntyre</b>
Email: rob@ultimateactivity.co.uk	Phone Number: 01865692580
<b>Managing Director of Ultimate Activity Camps:</b>	<b>Luke Hayward</b>
Email: luke@activeeducationgroup.co.uk	Phone Number: 01865 582631

### Non-Emergency Advice

The Department for Education – telephone helpline non-emergency advice for staff and governors for extremism	020 7340 7264 Counter-extremism@education.gsi.gov.uk
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### Advice Lines for Parents / Carers / Child or young persons

<b>Childline</b>	0800 1111
<b>NSPCC</b>	0808 800 5000
<b>Ofsted’s Whistle-blower Hotline</b>	0300 123 3155
<b>Forced Marriage Unit</b>	020 7008 0151 fmu@fco.gov.uk

Ultimate Activity Camps works with social care, the police, health services and other services, as and where appropriate, in accordance with our statutory responsibility, to promote the welfare of children and protect them from harm. Please remember **anyone** can make a referral directly to children’s social care or the Local Authority Designated Officer if they believe that a child is at risk or may be at risk of significant harm. Our staff do not require parental consent to make such a referral to external statutory agencies. If a direct referral is made by a member of staff, the DSL should also be informed as soon as possible or in their absence the **Director of Ultimate Activity Camps**.

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## Key Definitions

**Camp Designated Person (CDP):** The appointed person responsible for safeguarding at each camp. This will be the Camp Manager (UAC), Course Leader (US), or Lead Coach (USA).

**Designated Safeguarding Lead (DSL):** The person responsible for safeguarding for Ultimate Activity Camps and its sub brands.

**Deputy Designated Safeguarding Lead (DDSL):** The Deputy DSL(s) are trained to the same level as the DSL and in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of children, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on their return.

**Child:** All young people who have not yet reached their 18th birthday.

**Staff:** All those working for or on behalf of Ultimate Activity Camps, full time, part time or in a voluntary role. This would include third-party workers who are not directly employed by Ultimate Activity Camps but are conducting work as part of our setting (e.g. 1:2:1 support workers or agency staff). Any reference made to staff in this and related policies would include such workers.

### Local Safeguarding Children’s Board/Partnership (LSCB or LSCP):

In response to the Children and Social Work Act 2017 and Working Together to Safeguard Children 2018, from September 2019 new local multi agency safeguarding arrangements will replace Local Safeguarding Children Boards. The local authority safeguarding partnership will consist of the local authority, clinical commissioning group within an area of the local authority and the chief officer of police for the police area within the local authority. Not all LSCBs have changed to partnerships but for the purposes of this policy the term “LSCB/P” can be used to describe the local multi-agency safeguarding arrangements for each local authority.

Ultimate Activity Camps understands the importance of reporting concerns and following guidance in line with the relevant local Authority in which our camps are located and the child resides. All staff are supplied with contact details for the relevant local authority’s local children’s safeguarding partnership / Board and the LADO on their staff lanyards and this is also available in the staff room.

**Parent:** Birth parents and other adults who are in a parenting role, for example step-parents, legal guardians, foster carers and adoptive parents.

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## Key Responsibilities

### Responsibilities of the Camp Designated Person:

For every camp, the Camp Manager/Leader/Lead coach will take on the role of **Camp Designated Person for Safeguarding (CDP)** who is responsible for safeguarding for their camp. Their duty is to ensure all policies and procedures are correctly executed with respect to safeguarding children and the first point of contact for staff/children/parents if they have a safeguarding concern.

### Responsibilities of the DSL:

Ultimate Activity Camps has appointed a Designated Safeguarding Lead (DSL) and two Deputy Designated Safeguarding Leads (DDSLs), who are members of the Senior Leadership Team and have the necessary status, training and authority to be responsible for matters relating to the welfare of child or young persons, including child protection. The DSL is also responsible for the handling of allegations made against staff and is available as a source of advice for all staff on safeguarding matters.

Full details of all DSL responsibilities can be found below. See Annex 2 of this policy.

The DSL is Elena Ciccotti and can be contacted on 01865 582637.

### Responsibilities of the Deputy DSLs:

The Deputy DSLs are trained to the same level as the DSL and in the absence of the DSL, carry out those functions necessary to ensure the ongoing safety and protection of children, ensuring that the DSL receives copies of all reports and referrals and is fully briefed as soon as possible on their return.

The ultimate lead responsibility for safeguarding and child protection rests with the DSL. This responsibility will not be delegated, except under exceptional circumstances such as long-term absence of the DSL.

The DDSLs are Dave Matthews (01865 692568), and Robert McIntyre (01865 692580).

The DSL and/or the Deputy DSLs are available during **office** hours, either on site, or contactable by telephone, for staff, child or young persons or parents to discuss any safeguarding concerns.

### Responsibilities of Ultimate Activity Camps Staff

- to read and understand, Part 1 of Keeping Children Safe in Education, as well as **Annex B**
- to read and understand the Company's Safeguarding Policy and Procedures i.e. this document.
- to adhere to the Company's Staff Code of Conduct which is available as part of staff's onboarding, on request and a physical copy available in the staff room.
- to undertake regular safeguarding training, **at least annually**.
- to be alert to the signs of abuse, and to report any concerns to the DSL immediately, and to know what to do if a child tells a member of staff, he/she is being abused, exploited, or neglected.

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- To report to the **Designated Safeguarding Lead (or Deputies in their absence)** any concerns about the conduct of adults, including low level concerns (this includes behaviour outside Ultimate Activity Camps that might indicate an individual is unsuitable to work with children).

### Further Safeguarding Responsibilities

Ultimate Activity camps recognises that it is important that all members of the Ultimate Activity Camps team have set roles and responsibilities to ensure all aspects of safeguarding on camp are handled appropriately and in line with relevant regulations and guidance. This information is shared with our wider staff team so that if a concern cannot be passed on through the normal reporting pathway (either because the person is not contactable or because a concern has been raised against them) that staff know who they can contact.

Please see Annex 3 for full details of the responsibilities for the following people:

- Full responsibilities of the Designated Safeguarding Lead
- Responsibilities of the Director of Ultimate Activity Camps
- The Dukes Plus Safeguarding Advisory Board

### Staff Training & Induction

The DSL is responsible for ensuring that all new members of staff working for Ultimate Activity Camps, receive training on their responsibilities for safeguarding and child protection and on the procedures for recording and referring any concerns. This training will take place prior to the new member of staff starting work with the children and will be repeated annually.

The training provided to staff is in line with current LSCB(P) guidelines, and fully equips staff with the knowledge and tools to be vigilant for concerns and to handle and report in the correct manner. Training of staff covers the following main topics (non-exhaustive):

- Our Safeguarding policy and our legal responsibility to safeguarding
- Being made aware of the Designated Safeguarding Lead and Deputy DSLs and their roles.
- The main categories of abuse, how they manifest, what to look out for and how to report concern
- Other types of abuse (including Child Sexual/Drug/Criminal Exploitation, child on child abuse, domestic abuse, Extremism, Radicalisation and The PREVENT Duty, Honour based violence, Female genital mutilation, Modern Slavery and Forced Marriage, county lines)
- Procedure for dealing with concerns or disclosures and reporting pathways.
- Mobile device policy
- Best Practice
- IT Acceptable Use
- Behaviour Policy
- Health & safety
- Allegation against staff policy including Low Level Concerns (Staff)

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- Whistleblowing Policy (Staff)
- Keeping Children Safe in Education Part 1 and Annex B

DSL's and Deputy DSL undergo training at a minimum every two years, which includes training in inter-agency working in line with Annex C of KCSIE. They have updates, at least annually, on specific issues as required.

## How children can report concerns on camp

Ultimate Activity Camps promotes an ethos where young people feel safe to share information about anything that is worrying them.

Children are informed during the morning welcome who they can talk to should they have a concern. Activity Instructors take on the role of pastoral group leaders and Camp Managers are also available to support. Children are reminded they can raise a concern with any member of the Ultimate Staff team and that they are all there to help.

## What to do when there are concerns or if a child makes a disclosure

It is important that children receive the right help at the right time to address risks and prevent issues escalating. It is therefore vital that all staff understand their responsibility to:

- Identify and refer any concerns about a child
- keep clear written records
- listen to the views of the child
- reassess concerns if the child's situation does not improve
- share information quickly and challenge inaction

Staff are trained to observe signs of neglect, abuse, emotional distress, changes in behaviour and/or failure to thrive.

It is more common with primary aged children for concerns to arise about a child through staff observations and casual conversation rather than a child making a direct disclosure. There may be a change in a child's art or written work which may show signs of confusion or distress. Staff should be aware that younger children may also talk about, or demonstrate behaviour, through their play which may give rise to safeguarding concerns. Concerns may also be raised about a parent/carer's interaction with a child or young person or issues such as parental alcohol misuse, domestic abuse, or mental health.

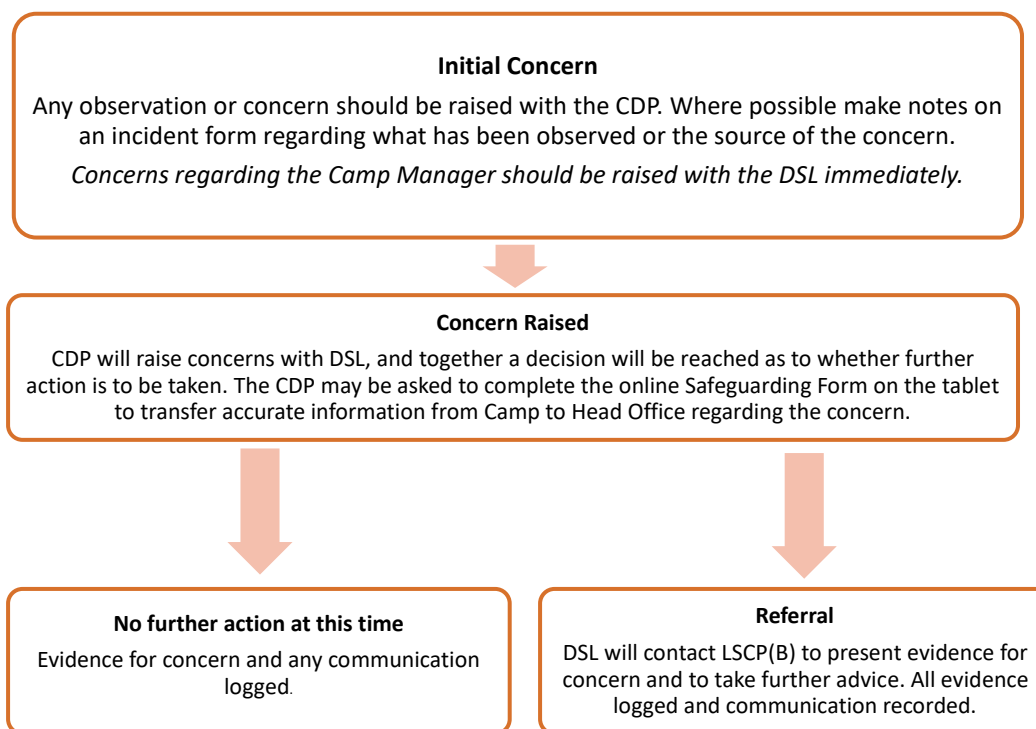
If there is any concern at all, the incidents must be reported and recorded. In many safeguarding cases it is not one major incident which triggers a referral, but a series of seemingly minor events. It is therefore of the utmost importance that all concerns are recorded and reported to the DSL immediately.

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## Procedures if staff have a concern about a child or young person:

If a member of staff is concerned about a child or young person the matter should be referred **immediately** to the Camp Designated Person and this concern shared with the DSL, or the Deputy in the DSL's absence.



**Camp Managers and all staff have LSCB(P) contact details and are trained to know that in the event of a serious and immediate threat to a child, that LSCB(P) teams and emergency services can be contacted without first contacting the DSL.**

In all instances, a written record must be made by the member of staff on an incident form, which all staff have access to. If a member of staff cannot access an incident form for any reason must always contact the DSL directly, and without delay.

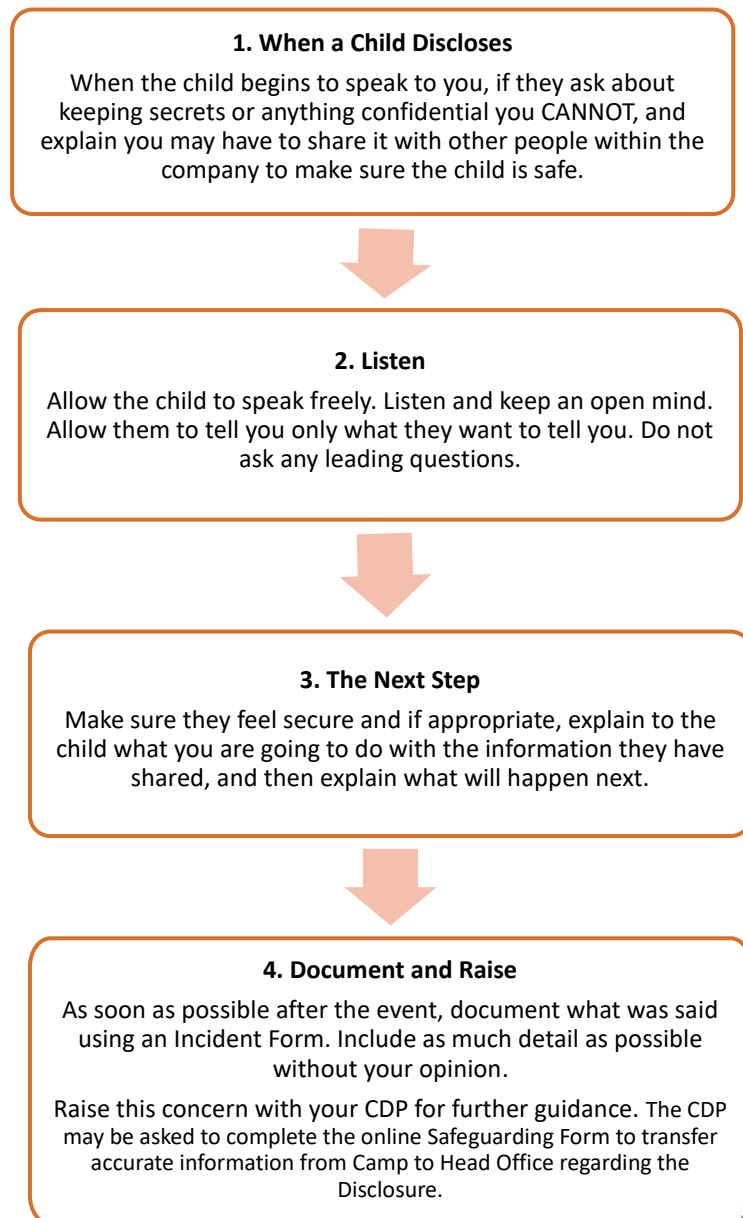
To ensure information is relayed from camp to Head Office in a timely and secure manner, where a concern is believed to meet the threshold or needs an urgent response the DSL or DDSLs may ask staff to complete an online form which includes all of the details recorded on the original form so that an accurate referral can be made.

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## Procedures for staff if a child discloses information:

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

The member of staff should:



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### Key considerations for staff:

- Staff should not take a decision as to whether or not abuse has taken place.
- Our staff will explain that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way that avoids alarming or distressing them. (KCSIE 2023).
- Staff should not ask leading questions, that is, a question which suggests its own answer. Let the child tell you what they want to and no more. The child may be interviewed by a specialist later and too much questioning may prejudice later investigations or cause the child to become anxious and retract his/her information.
- Staff should be prepared to follow up with the young person, but only in conjunction with advice from the DSL.
- Staff should be aware that younger children may disclose issues of a safeguarding nature in general conversation rather than as a specific disclosure to a member of staff.
- Staff should not attempt any examination or remove a young person's clothes to look further at an injury. Under no circumstances should photographs be taken of a young person's injury. It may be possible to observe the young person during the normal daily routine, for example in an outdoor team skills exercise.
- If a young person wants to show you his or her injuries, **staff should try and insist that this must wait for a health professional to make an assessment. No child or young person should be asked to undress to show their injuries to a member of staff.**
- Staff should not attempt to investigate matters further; their role is to listen, record and report your concerns to the DSL.

## E- Safety & Online Abuse

Ultimate Activity Camps adopts a whole organisational approach to online safety. All programmes run by Ultimate Activity Camps except for Ultimate Tech Camps and Ultimate Residential adopt a screen free approach. See *Mobile Device Policy* for more information.

Ultimate Tech camp is the only programme where children have access to technological devices and the internet. Devices are either supplied by Ultimate Activity Camps or the host school and relevant filters and monitoring systems are in place to safeguard children.

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

- content: being exposed to illegal, inappropriate, or harmful material
- contact: being subjected to harmful online interaction with other users
- conduct: personal online behaviour that increases the likelihood of, or causes, harm.
- commerce: - risks such as online gambling, inappropriate advertising, phishing and or financial scams

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The Company's *Staff Code of Conduct* and *IT Acceptable Use Policy* explain the responsibilities of staff in relation to keeping child or young persons safe online.

Ultimate Activity Camps does all it reasonably can to limit a child or young person's exposure to the above risks in the organisation. Filters and monitoring systems are in place, which are designed to protect them from online abuse without imposing unreasonable restrictions and preventing children and young people benefitting from the wealth of resources available online.

Child abuse in all its forms is increasingly occurring online. Staff should be aware that abuse that occurs online or outside of the any Company event or online service should not be downplayed and should be treated equally seriously.

Internet chat rooms and social networking sites can all be used as a means of contacting children with a view to grooming them for inappropriate or abusive relationships. This may include requests to make and transmit indecent images of themselves, or to perform sexual acts live online or to give their mobile phone number and other personal information.

Children can also engage in, or be a target of, bullying using a range of methods including text, phones or social network sites to reach their target. Mobile camera phones are also used to capture violent assaults of other children for circulation. This form of bullying is a growing problem in schools and other settings.

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, online technology has also given children and adults the opportunity to produce and distribute inappropriate imagery (nudes, semi-nudes, sexting) in the form of photos and videos. Such imagery involving anyone under the age of 18 is illegal.

### **What to do if an incident comes to your attention:**

- ❖ If the device is present on camp, the member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off.
- ❖ **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share, forward, print or download – **this is illegal**
- ❖ Never look for further images
- ❖ If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- ❖ **Do not** delete the imagery or ask the young person to delete it.
- ❖ **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- ❖ **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- ❖ **Do not** say or do anything to blame or shame any young people involved.
- ❖ **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

If there is concern a child or young person has been harmed or is at risk of harm a referral will be made to Children's Services, or the police following the procedures as outlined above.

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All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and /or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and / or sexual orientation or language barriers.

This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication (KCSIE 2023).

### **Recording Safeguarding Concerns**

All staff have access to incident forms on which they are able to record concerns. With regard to any conversations directly with a child or young person or overheard, staff must keep a written record of the conversation and concerns arising.

The record should include the date, time, and place of the conversation, who was present and what was said by the child or young person. The record should use names, not initials, for all references to people. The record should be specific. Record actual behaviour and language used by a child or young person rather than more vague terms such as inappropriate language/behaviour.

It is important to record as much as can be remembered, using the child or young person’s own words and the record should contain facts and information only, taking care to avoid personal opinion.

Notes made of such disclosures or concerns could become part of a statutory assessment by Children’s Services and/or part of a criminal investigation so must be completed accurately. If more than one member of staff is present when a child or young person discloses information or behaves in a manner which gives rise to concerns, each member of staff must make a separate safeguarding report on an incident form.

It is important to record all concerns regarding the welfare of child or young persons, even those which may appear minor. This is because it is common for minor pieces of evidence to emerge over time and build up a pattern. This type of recording also allows information from various members of staff to be collated. Staff must not investigate further or speak to parents or other staff.

All evidence (which could include a child or young person’s drawings, scribbled notes, iPads, mobile phones containing text messages, computers) must be preserved.

They must contact the DSL who will then determine the next course of action.

### **DSL Action on receipt of a concern about a child**

On receipt of the safeguarding report, the DSL must record the decisions made and action taken. Action will depend on the nature of the concern. It may include one or more of the following:

- monitoring the child or young person on camp.
- a discussion with parents – **if this does not place the child at greater risk of harm after they have disclosed.**
- making a referral to the LSCP(B) for early help

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- referral to Children’s Services
- referral to the LADO
- report to the police
- the member(s) of staff making the report will be informed by the DSL of the action taken.
- if the child or young person’s situation does not appear to be improving, the staff member with concerns should request the DSL to re-consider the action taken.

Should a referral be made to the Children’s Services or the LADO contacted, the Dukes Plus Safeguarding Advisory Panel will be updated.

### **Referrals to Children’s Services and/or other agencies**

Referrals about an individual child or young person must be made to the Local Authority in which the child resides. However, advice may always be obtained from the Children’s Services department of the camp’s local authority, regardless of the where the child or young person resides. Ultimate Activity Camps will refer to relevant local threshold documents and where a concern meets a level 3 or 4 threshold a referral will be made to the MASH team immediately by the DSL.

In cases of extreme emergency, if there is risk of immediate serious harm to a child or if a serious criminal offence appears to have been committed **the police will be contacted immediately.**

### **Child protection records**

Safeguarding records are kept securely on the Central Safeguarding Record at Head Office. There is a clear, detailed chronology for each child or young person where concerns have been raised. Written records are kept of all concerns, whether or not there is a need to refer the matter to Children’s Services or another agency.

If a referral to Children’s Services is thought to be required, the DSL will usually contact the local authority for advice prior to notifying parents. All discussions with the local authority along with the decisions made and the reasons for those decisions are recorded in writing on the Central Safeguarding Record action log. Each individual Local Safeguarding Children’s Partnership has its own referral form which must be completed if a formal referral is made by the DSL. A copy of the referral form sent to the local authority must be retained.

Minutes of any case conferences or discussions with social workers or other professionals involved with the child or young person will be retained in the child’s file and stored securely on the Central Safeguarding Record.

Any new concern or information about a child who has active involvement or previous involvements with Children’s Services must be passed to the child’s allocated social worker without delay. Parental permission is not required for records to be shared with the child’s school / college. On a case-by-case basis the DSL will also consider sharing information proactively with the child’s term time setting to ensure key staff are aware of the child’s needs and can have any support in place when the child returns.

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In some cases, information may need to be shared. If this is the case, the information will be shared according to the HM Government guidance Information Sharing (July 2018.) For more information see our *Data Protection and Privacy Policy*.

### **Non-recent / Historical allegations**

Abuse can be reported no matter how long ago it happened. Where an adult makes an allegation to the Company that they were abused as a child, the individual will be advised to report the allegation to the police.

Non-recent / historical allegations made by a child, will be reported to the LADO in line with local Safeguarding Children’s Partnership/Board procedures for dealing with non-recent allegations. The LADO will coordinate with Children’s Services and the police.

### **Communication with parents/carers**

All parents are aware that Ultimate Activity Camps Policies are available on camp and on request through our Customer Support team.

Ultimate Activity Camps will work with parents and outside agencies to help support children and their families; however, it will always place the duty of care towards the child as the priority and will refer concerns if it considers a child is or may be at risk of harm or has suffered harm. The DSL / DDSL’s will normally request a phone call with the parents of the child or young person about whom there are concerns to discuss the matter. He/she will explain the reasons for the company’s concerns and the course of action the company intends to take.

Referrals to Children’s Services or the LADO (or initial advice from either service) **do not require prior parental consent**. The DSL must act in in the best interests of the child, even if this results in making a referral against the parents’ wishes. If the DSL believes that notifying parents might in any way exacerbate the problem, increase the risk to the child or young person or if there are any other extenuating circumstances, initial advice will be sought from Children’s Services prior to notifying the parents. This may result in an immediate referral to Children’s Services without parents being notified.

If there is an allegation which involves a member of staff, parents will only be informed after Ultimate Activity Camps has consulted with the LADO and has obtained the LADO’s consent. If a parent has any safeguarding concerns, he/she should contact the Ultimate Activity Camp’s DSL / DDSL as soon as possible.

### **Children with special educational needs and disabilities (SEND)**

Staff are made aware that young people with special educational needs and/or disabilities as well as other vulnerable groups may be especially at risk of abuse including those with physical health issues. Such young people are also more prone to peer group isolation or bullying.

Staff should not assume that:

- indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration as it might be due to abuse taking or have taken place.

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- children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs.
- communication barriers may exist and difficulties in overcoming these barriers.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours on camp or the consequences of doing so.

Any reports of abuse involving children with SEND will require close liaison with the designated safeguarding lead (or deputy) and the SENCO at Ultimate Activity Camps.

### Support for staff

Ultimate Activity Camps recognises that staff who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

Staff must be prepared to challenge abusive behaviours between peers and have a **professional curiosity** to act on anything they overhear when working on camp or directly from the children themselves without fear of retribution.

Our Company will support such staff by providing an opportunity to talk through their anxieties with the DSL and will seek further support as appropriate.

The NSPCC helpline is also available if staff have concerns about the way a concern is being handled by the camp. Staff can call **0800 028 0285** or email [help@nspcc.org](mailto:help@nspcc.org).

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## How to Raise Concerns About a Member of Staff

All staff working for Ultimate Activity Camps are subject to relevant safer recruitment and vetting checks as part of their onboarding. For more information on this please see the *Recruitment and Selection Policy*.

Staff are expected to always maintain appropriate professional boundaries, avoid behaviour which could be misinterpreted by child or others and report any conduct by an adult which raises concern. Staff will sign our UAC Staff Code of Conduct as part of the onboarding process and failure to follow the Staff Code of Conduct is likely to result in disciplinary action being taken.

For more detailed information about how to raise a concern about an adult on camp and for more information regarding what happens once a concern is raised (including details of the process for contacting the LADO) please see the following full policy documents:

- *Whistleblowing Policy*
- *Allegation Against Staff policy*
- *Disciplinary Policy*
- *Low Level Concerns policy*
- *UAC Staff Code of Conduct*

**Concerns or allegations about the DSL or Director of UAC should be reported as follows:**

Allegations about the <b>DSL / Director of UAC</b>
↓
Aatif Hassan, Chairman of UAC
↓
Local Authority Designated Officer ( <b>LADO</b> ) for advice / next steps
<b>If crime committed or suspected of being committed referral straight to the Police first (dial 101) and then inform the DSL of actions taken.</b>

The DSL & Director of Ultimate Activity Camps may take advice at any time during this process from the Dukes Plus Safeguarding Advisor who is a member of the Dukes Plus Safeguarding Advisory Board.

The Director of Ultimate Activity Camps, will also make the decision to inform the Chair of UAC, Mr Aatif Hassan at the appropriate time, once either Children’s Services and / LADO have confirmed next steps.

**Please remember anyone can make a referral directly to external agency if they are unable to get hold of key personnel in these procedures.**

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# Annex 1 - Types of Abuse

Ultimate Activity Camps recognises the following types of abuse that may occur and will train staff in recognising the signs of abuse and responding appropriately. All staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. The following information on signs of abuse is intended as a guide only; signs listed in one category may apply equally to another, as behaviours can be very interlinked.

Detailed in this section are some of the types of abuse that may be most likely to present themselves on camp. This is not a list of all safeguarding concerns staff need to be aware of. In addition to this section, staff must **read Annex 1 of this policy and Annex B of KCSIE 23** to understand further safeguarding issues and how these may present themselves so that they are able to report and share concerns on camp.

The following signs are not conclusive evidence but may be a warning, particularly if a child or young person exhibits several signs or a pattern emerges. It is important to remember that there may also be explanations, other than abuse, for a child or young person showing such signs.

## Categories of Abuse

The main categories of abuse outlined in KCSIE, are

- Physical abuse
- Emotional abuse (including domestic abuse)
- Neglect
- Sexual abuse

### **Physical abuse**

This type of abuse can involve hitting, shaking, throwing, poisoning, burning, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Signs a child may be being physically abused include:

- an explanation which is inconsistent with an injury
- several different explanations provided for an injury
- unexplained delay in seeking treatment
- the parents/carers are uninterested or undisturbed by an accident or injury
- parents are absent without good reason when their child is presented for treatment
- repeated presentation of minor injuries (which may represent a “cry for help” and if ignored could lead to a more serious injury)
- family use of different doctors and A&E departments
- reluctance to give information or mention previous injuries
- two simultaneous bruised eyes, without bruising to the forehead (rarely accidental, though a single bruised eye can be accidental or abusive)

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- repeated or multiple bruising on the head or on parts of the body unlikely to be injured accidentally
- variation in colour, possibly indicating injuries caused at different times
- the outline of an object used, e.g., marks from a belt or a hairbrush, or of a handprint
- bruising or tears around, or behind, the earlobe/s indicating injury by pulling or twisting
- bruising around the face
- grasp marks on small children
- bruising on the arms, buttocks and thighs may be an indicator of sexual abuse
- bite marks
- circular burns from cigarettes (but may be friction burns if along the bony protuberance of the spine)

### **Fabricated Illness**

Fabricated or induced illness is a condition whereby a child has suffered, or is likely to suffer, significant harm through the deliberate action of their parent and which is attributed by the parent to another cause.

There are three main ways of the parent fabricating (making up or lying about) or inducing illness in a child:

- Fabrication of signs and symptoms, including fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts, records, letters and documents and specimens of bodily fluid.
- Induction of illness by a variety of means

### **Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child’s emotional development. It may involve making the child feel that they are worthless, unloved, or inadequate. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

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## Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. It can involve a failure to provide adequate food, clothing and shelter, to protect a child from physical and emotional harm, to ensure adequate supervision or to allow access to medical treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicative of neglect of a child:

- the child is dirty, smelly, poorly clothed or appears underfed
- the child has lingering illnesses which are not attended to
- there is a marked deterioration in schoolwork
- the child exhibits significant changes in behaviour, aggressive behaviour, severe tantrums
- an air of 'detachment' or a 'don't care' attitude
- overly compliant behaviour
- a child who is reluctant to go home or is kept away from school for no apparent reason
- 'tummy pains' with no medical reason
- running away from home, suicide attempts
- extreme anger, sadness or depression
- child left with adults who are intoxicated or violent
- child left alone for excessive periods
- child thrives away from home environment.

## Affluent neglect

Staff should also be aware of the impact of affluent neglect, which refers to the neglect experienced by children in more wealthy families. This can be difficult to identify, as the type of neglect experienced by children in these circumstances is often emotional.

Parents may work very long hours or be absent for extended periods, leaving children in the care of paid carers. This can create an emotional disconnect and leave children feeling isolated and lonely, with their emotional needs unfulfilled by their parents.

Affluent parents may also subject their children to a high amount of pressure to succeed academically, or in other pursuits such as sport or music, which can lead to psychological and emotional problems.

Absent parents may also have little knowledge of what their children are doing.

This can lead to increased risks with children who may spend long periods online or at an older age have the financial means to facilitate drug abuse and the independence to engage in harmful sexual activity.

## Sexual abuse

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

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This can involve physical contact, or non-contact activities such as showing children sexual activities or encouraging them to behave in sexually inappropriate ways. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (child on child abuse).

Recognition can be difficult unless the child makes a disclosure. There may be no physical signs and indications are more likely to be emotional/behavioural.

Some behavioural indicators associated with this form of abuse are:

- inappropriate sexualised conduct
- sexually explicit behaviour, play or conversation, inappropriate to the child or young person's age
- continual and inappropriate or excessive masturbation
- self-harm (including eating disorders), self-mutilation and suicide attempts
- involvement in prostitution or indiscriminate choice of sexual partners
- an anxious unwillingness to remove clothes, e.g. for sports events (but this may be related to cultural norms or physical difficulties)
- some physical indicators associated with this form of abuse are:
  - pain or itching of genital area
  - blood on underclothes
  - pregnancy in a younger girl where the identity of the father is not disclosed
  - physical symptoms such as injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

Staff should also be aware of the possibility of sexual exploitation (see below).

### **Child-on-Child abuse**

Children can be vulnerable to abuse by their peers. Child-on-child abuse is taken seriously by staff and will be subject to the same child protection procedures as other forms of abuse. Staff are aware of the potential uses of information technology for bullying and abusive behaviour between young people. Staff will not dismiss abusive behaviour as normal between young people.

The presence of one or more of the following in relationships between children should always trigger concern about the possibility of child-on-child abuse:

- Sexual activity (in primary school-aged children) of any kind, including sexting
- One of the children is significantly more dominant than the other (e.g. much older)
- One of the children is significantly more vulnerable than the other (e.g. in terms of disability, confidence, physical strength)
- There has been some use of threats, bribes or coercion to ensure compliance or secrecy.

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If child-on-child abuse is suspected or disclosed, staff should follow the same procedures as set out above for reporting abuse. When responding to a report of sexual violence the DSL will decide on the response following the advice detailed in KCSIE 2023. The DSL will not undertake any investigation where it is decided a case must be referred to Children’s Services or the police.

The initial assessment will be made by Children’s Services and the DSL to judge whether there is a need for immediate action to protect the child or young persons involved. The DSL will lead enquiries at an **Ultimate Activity Camps** level if agreed with the relevant investigating agencies.

The DSL will inform the parents of the child or young person making the allegation and the alleged perpetrator and will explain the course of action, unless this is considered to place either of them at further harm. We will do all we can as an organisation to protect the anonymity of any children involved in any report of sexual violence or sexual harassment.

When there has been a report of sexual violence, or harassment it may be necessary for the designated safeguarding lead (or a deputy) to make an immediate risk and needs assessment taking into account the victim themselves, the alleged perpetrator(s) and other children on camp.

### **Radicalisation, Extremism and PREVENT Duty**

Children are vulnerable to extremist ideology and radicalisation. Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Terrorism is a by-product of radicalisation. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

The Counter Terrorism & Security Act 2015 places a PREVENT duty on childcare providers to have “due regard to the need to prevent people from being drawn into terrorism”.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised.

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)

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- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

The procedures for handling or raising a concern with regards to extremism is the same as for raising any type of safeguarding concern or disclosure. Further guidance can be found in the safeguarding resources on camp, including *“The PREVENT Duty – Departmental advice for schools and childcare providers, 2023”*.

**Child sexual exploitation (CSE):** is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Some of the following signs may be indicators of child sexual exploitation:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

If CSE is suspected or disclosed, we will follow the same procedures as set out above for responding to child abuse.

**Child Criminal Exploitation (CCE)**

This is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country, forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;

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- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education

**County Lines**

County lines is where drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

**Female Genital Mutilation (FGM)**

Female genital mutilation (FGM) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice is a form of child abuse and is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Indications that a child might be about to undergo FGM:

- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a ‘special’ procedure to become a woman

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The following may be signs that a child has been subject to FGM:

- difficulty walking, sitting or standing and may even look uncomfortable.
- frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- prolonged or repeated absences from camp and/or noticeable behaviour changes (e.g. withdrawal or depression) on the child's return.

The Serious Crime Act 2015 sets out a duty on professionals (including teachers) to notify police when they discover that FGM appears to have been carried out on a girl under 18. This will usually come from a disclosure. **Under no circumstances should our company staff physically examine child or young persons.** The duty applies to the individual who becomes aware of the case to make a report direct to the Police by dialling 101. The report should be made immediately. **The duty to report should not be transferred to the DSL,** however the DSL must be informed.

### **Honour-based abuse/violence (HBV)**

HBV encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Staff should be alert to the possibility of children being subjected to or having been subjected to HBV and report any concerns to the Camp Designated Person.

### **Domestic abuse**

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. Children may witness and be adversely affected by domestic abuse between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. The National Domestic Abuse Helpline and the police-led initiative Operation Encompass provide emotional and practical support to children affected by domestic abuse. If you are concerned that a child may be exposed to domestic abuse, contact your CDP and DSL.

If a child is suspected to be at risk of or involved in county lines, contact the DSL and a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

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## Annex 2 – Further Safeguarding Issues

Staff must be prepared to act on disclosures from any child or parent / carer which may be occurring or witnessed outside of their organisation. Extensive guidance on a wide variety of specific issues can be found in **Annex B of KCSIE 2023**.

### **Annex B of KCSIE 23 includes more information on:**

- Child abduction and community safety incidents
- Children missing from education – also see *UAC Missing Child Policy*
- Children and the court system
- Children with family members in prison
- More information on child criminal exploitation (CCE) (including county lines/gangs) & child sexual exploitation (CSE)domestic abuse
- Homelessness
- More information on so-called ‘honour based’ abuse, female genital mutilation (FGM) and forced marriage
- Sexual Violence and Sexual Harassment
- Up-Skirting
- Online behaviour and cyber crime
- Mental health
- Preventing radicalisation (including Channel)

Click [HERE](#) to access the full document or physical copies will be available on camp in the staff room.

It is essential that all staff are familiar with the information contained in this policy and don’t assume it would never occur in their camp or setting If ever in any doubt refer anything reported to the DSL in the first instance.

Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

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# Annex 3 – An outline of the further Safeguarding Responsibilities

## Responsibilities of the DSL

The DSL at Ultimate Activity Camps is Miss Elena Ciccotti.

The main responsibilities of the DSL are as detailed in **KCSIE Annex C**. In addition to this the DSL will:

- a) ensure the Ultimate Activity Camps **Managing Director, Luke Hayward** is informed about safeguarding concerns including any referrals.
- b) Monitor the confidentiality, keeping and storage of records in relation to safeguarding. Ultimate Activity Camps hard copy records on child protection are kept locked at the company's Head Office and are separated from routine student records. Access is restricted to the DSL, and Deputy DSLs and the Director of Ultimate Activity Camps.
- c) Ensure the Safeguarding Policy is reviewed annually in conjunction with the DSL and the Director **of Ultimate Activity Camps**, with the support and guidance from the Dukes Plus Safeguarding Advisor and from the Dukes Plus Safeguarding Advisory Board.
- d) Ensure the Safeguarding Policy is reviewed in the event of an incident or change in legislation, and that any remediation necessary in policy or procedures is given immediate effect
- e) Ensure an annual report is sent to the Director of Ultimate Activities Camps and the annual Safeguarding Audit is presented to the Dukes Plus Safeguarding Advisory Board

## Responsibilities of the Director of Ultimate Activity Camps

The Director of Ultimate Activity Camps is Mr Luke Hayward.

To promote an overarching culture of safeguarding so the welfare of children is embedded within all the **company's** processes and procedures operating with the best interests of the child at their heart.

- To have read and understood all parts of Keeping Children Safe in Education thereby ensuring that the **company's** policy and procedures follow statutory guidance.
- To allocate sufficient time, training and resources to enable the DSL and Deputies to carry out their roles effectively.
- To ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively in accordance with the Ultimate Activity Camps Whistleblowing procedures.
- To ensure systems are in place, which are easily understood and easily accessible for children to report concerns, including abuse.
- To liaise with the DSL regarding any reports regarding concerns or allegations related to the conduct of adults (this includes behaviour outside of camps that might indicate an individual is unsuitable to work with children), including low level concerns.

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- To work with the DSL to seek advice and liaise with the Local Authority Designated Officer (LADO) regarding concerns about adults.
- To undertake training on safer recruitment processes at regular intervals
- To monitor the effectiveness of this policy and its procedures in liaison with the Dukes Plus Safeguarding Advisor and the Dukes Plus Safeguarding Advisory Board and to remedy any deficiencies immediately.

The Director of Ultimate Activity Camps plays a vital role in ensuring the welfare, health, and safety of all young people in their care.

Further responsibilities include:

- Facilitate a whole-site approach to safeguarding and child protection to ensure that welfare, health, and safety procedures underpin all aspects of process and policy development.
- Ensure all children, young people and students are provided with a safe and caring environment, their concerns are listened to and acted upon in a swift and timely manner.
- Ensure any concerns of a welfare or safeguarding nature are acted upon in a swift and timely manner by the safeguarding team, and that they are liaising with external statutory agencies and multi-agency partners including LADOs, police, MASH, Single Point of Access.
- Working with the DLS and UAC HR department to ensure that all staff are recruited using safer recruitment procedures and records of checks made before employment are maintained in HR files or electronically to meet minimum regulatory requirements.
- Ensure a single central register or a manual log is kept for their setting and maintained appropriately meeting regulatory requirements of all staff checks required pre-employment.
- Ensure all policies and procedures relating to the welfare, health, and safety of young people in their care are kept up to date, reviewed regularly and are implemented effectively paying due regard to Keeping Children Safe and Education Sept 23.
- Ensure an end of season report, an annual safeguarding report and audit is presented to the Dukes Plus Safeguarding Plus Advisory Board.
- To ensure policies, procedures and training in the Company are effective and comply with the law at all times.
- To ensure child protection files are maintained, which show a clear chronology and the reason for decisions taken.
- To ensure there are other appropriate policies and procedures in place to safeguard and promote children’s welfare including, but not limited to, a *Staff Code of Conduct, Behaviour Policy and IT Acceptable Use policy*.
- To ensure there is an effective Staff Code of Conduct (including online conduct) which is implemented throughout Ultimate Activity Camps.
- The Director should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.

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### **The Dukes Plus Safeguarding Advisor**

The Dukes Plus Safeguarding Advisor is available for support and guidance for the DSL and Managing Director on all matters regarding safeguarding live issues and policy advice. The Dukes Plus Safeguarding Advisor is Paul Ludlow.

### **The Dukes Plus Safeguarding Advisory Board**

The board is in place to offer support and guidance to the Director and safeguarding staff. This support and guidance is in place to assist the Directors in monitoring the quality and practices and policy.

The Dukes Plus Safeguarding Advisory Board consists of the following staff:

- Managing Director Dukes Plus
- Director Dukes Plus
- Dukes Plus Safeguarding Advisor (Compliance Director, Dukes)
- Director of People Dukes

### **Director of UAC Training**

The Dukes Plus Safeguarding Advisory Board will support the Director of Ultimate Activity Camps in identifying and accessing appropriate safeguarding and child protection (including online) training at induction.

This knowledge should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our organisation are effective and support the delivery of a robust whole **company** approach to safeguarding. Their training will be regularly updated (KCSIE, 23).

The Director of UAC should receive safeguarding training specifically for senior leaders and undertakes refresher training every two years, as a minimum.

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