



SAFEGUARDING (CHILD PROTECTION)

Camp 4-2-11 believes that children have the right to be completely secure from both the fear and reality of abuse, and we are committed to safeguarding all the children in our care from harm.

The Camp Manager and Camp 4-2-11 Owner are appointed as the Child Protection Officers (CPO). They will have suitable experience, training and expertise, and will be responsible for liaising with Local Authority Early Years Support Contacts and Ofsted in any child protection matter.

Our Camp's child protection procedures comply with all relevant legislation and other guidance or advice from the Gloucestershire Safeguarding Children Board in Gloucestershire County Council.

Our Camp is committed to reviewing the Safeguarding policy and procedures at regular intervals.

RECOGNISING CHILD ABUSE

Child abuse manifests itself in a variety of different ways, some obvious and others much less so. Our Camp will offer training to all staff in child protection. Those staff working for us who are awaiting formal training will have induction to recognise the signs and evidence of physical, sexual and emotional abuse or neglect from the CPO.

PHYSICAL ABUSE: This involves hitting, shaking, throwing, burning, suffocating or any other physical harm. Deliberately causing a child's ill health also constitutes physical abuse.

SEXUAL ABUSE: This involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetration or non-penetrative acts. Showing children pornographic materials, sexual activities or encouraging children to behave in sexually inappropriate ways also constitutes sexual abuse.

EMOTIONAL ABUSE: Varying degrees of emotional abuse is present in virtually all child protection incidents but can also constitute abuse in its own right. Emotional abuse involves persistent or severe emotional ill-treatment or torture causing, or likely to cause, severe adverse effects on the emotional stability of a child. Such behaviour may involve conveying to a child that they are worthless, unloved or inadequate, or making them feel unnecessarily frightened or vulnerable.

NEGLECT: Neglect is the persistent failure to meet a child's basic physical, emotional or physiological needs, such as is likely to have a severe impact on their



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health, development or emotional stability. Neglect may involve failing to provide adequate food, shelter or clothing for a child or failing to adequately protect them from physical harm or ill health. Neglect can also manifest itself in a failure to meet the basic emotional needs of a child.

STAFF SUPPORT AND TRAINING

Camp 4-2-11 is committed to ensuring that it meets its responsibilities in respect of child protection through the provision of support and training to its staff. Therefore, our Camp will ensure that:

- All staff are carefully recruited, having verified references and have full and up to date Disclosure Barring Service checks.
- All staff are given a copy of this policy during their induction and have its implications explained to them.
- All staff are encouraged to undertake formal training in child protection issues within one year of starting work with our Camp.
- All staff are provided with supervision and support appropriate to their responsibilities in relation to child protection and their requirement to maintain caring and safe relationships with children.
- All staff are aware of the main indicators of child abuse.
- All staff are aware of the need to report the disclosure or discovery of abuse to the CPO.
- Our Camp will take appropriate action in relation to the findings of any investigation into allegations of abuse, consistent with its duties to protect the safety of children and support fair procedures for staff.
- Any member of staff under investigation for the alleged abuse of a child will be subject to the provisions of the **Staff Disciplinary** policy.

SAFE CARING

All staff understand our Camp's Child Protection procedures and have had appropriate guidance in the principles of safe caring. To this end:

- Every effort will be made to avoid or minimise time when members of staff are left alone with children. If staff are alone with a child, the door of the room should be open, and another member of staff informed.



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- Staff with Mobile phones and camera's will not be allowed to be used during the day unless in the allocated staff room.
- Offsite Mobile phone will be used during trips and the use of other mobile phones will only be used in an emergency.
- If a child makes inappropriate physical contact with a member of staff this must be recorded in the Camp 4-2-11 Log.
- Staff will never carry out a personal task for a child if they can do it themselves. Where this is essential, staff should help a child whilst being accompanied by a colleague. Unless a child has a particular need, staff should not accompany a child into the toilet. Staff are aware that this and other similar activities could be misconstrued.
- Staff will be mindful of how and where they touch a child, given their age and understanding. Unnecessary or potentially inappropriate physical contact will be avoided at all times.
- Any allegations made by a child against a member of staff will be fully recorded, including the actions taken, in the Camp 4-2-11 Log. In the event of a witness to an incident, they should sign the records to confirm this.

DEALING WITH ALLEGATIONS

Camp 4-2-11 is committed to ensuring that it meets its responsibilities in respect of child protection by treating any allegation seriously and sensitively. Our Camp will not carry out investigation itself into a suspected child abuse incident. On discovering an allegation or abuse, the CPO will immediately discuss concerns with the parent/carer (unless concerns amount to sexual or serious physical abuse) and seek medical attention if necessary.

The following principles will govern any suspected or reported case of abuse:

- Where actual or suspected abuse comes to the attention of staff, they will report this to the CPO at the earliest opportunity possible.
- Staff are encouraged to trust their professional judgement, and if they suspect abuse, to report it.
- Full written records of any reported incidents will be produced and kept. Information will include full details of the alleged incident, details of all parties involved, any evidence or explanations offered, relevant dates, times and locations together with any supporting information from members of staff.



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- The CPO will be responsible for ensuring that written records are dated, signed and kept confidentially.
- If an allegation of abuse is made against the Camp Manager, the Camp 4-2-11 Owner will be informed as soon as possible. They will then assume responsibility for the situation.
- Staff will ensure that all concerns and allegations are treated sensitively and confidentially.
- Any children involved in alleged incidents will be comforted and reassured.

In circumstances where a child makes an allegation or a disclosure, the member of staff concerned will:

1. Listen carefully to all the child has to say.
2. Make no observable judgement.
3. Ask open questions that encourage the child to speak in their own words.
4. Ensure the child is safe, comfortable and not left alone.
5. Make no promises that cannot be kept, such as promising not to tell anybody what they are being told.

SECTION ONE: ALLEGATIONS THAT MAY MEET THE HARMS THRESHOLD

This part of the guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children at Camp. This guidance should be followed where it is alleged that anyone working in the Camp that provides care for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.



THE INITIAL RESPONSE TO AN ALLEGATION

Where Camp identifies a child has been harmed, there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children’s social care and as appropriate the police immediately as per the processes explained in Part one of KCSiE 2021.

There are two aspects to consider when an allegation is made:

- Looking after the welfare of the child - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children’s social care as described in Part one of KCSiE 2021.
- Investigating and supporting the person subject to the allegation - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.
- When dealing with allegations, schools and colleges should:
 - apply common sense and judgement;
 - deal with allegations quickly, fairly and consistently; and
 - provide effective protection for the child and support the person subject to the allegation.

Camp 4-2-11 should ensure they understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made. Before contacting the LADO, Camp 4-2-11 should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example:

- was the individual in the school or college at the time of the allegations?
- did the individual, or could they have, come into contact with the child?
- are there any witnesses? and,
- was there any CCTV footage?

These are just a sample of example questions. Camp 4-2-11 should be familiar with what initial information the LADO will require. This information can be found in local policy and procedural guidance provided by the LADO service.

When to inform the individual of the allegation should be considered carefully on a case-by-case basis, with guidance as required from the LADO, and if appropriate



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children's social care and the police.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance Working Together to Safeguard Children. If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances.

Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the designated safeguarding lead and make a risk assessment of the situation. It may be necessary for the designated safeguarding lead to make a referral to children's social care.

Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

NO FURTHER ACTION

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

CONTRACTED STAFF

Whilst Camp 4-2-11 are not the employer of contracted staff, they should ensure allegations are dealt with properly. In no circumstances should Camp 4-2-11 decide to cease to use a staff member due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome.

The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to any other employers.

CONFIDENTIALITY AND INFORMATION SHARING

In an allegations management meeting or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.



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Where the police are involved, wherever possible Camp 4-2-11 should ask the police to obtain consent from the individuals involved to share their statements and evidence.

Camp 4-2-11 must make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

Legislation prevents the “publication” of material by any person that may lead to the identification of the teacher who is the subject of the allegation. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.” This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In circumstances where Camp 4-2-11 need to make parents aware about an allegation, they should make parents and others aware that there are restrictions on publishing information.

FOLLOWING A CRIMINAL INVESTIGATION OR A PROSECUTION

The police should inform the LADO and Camp 4-2-11 immediately when:

- a criminal investigation and any subsequent trial is complete;
- it is decided to close an investigation without charge; or,
- it is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action is appropriate and, if so, how to proceed. The information provided by the police and/or children’s social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial.

UNSUBSTANTIATED, UNFOUNDED, FALSE OR MALICIOUS ALLEGATIONS

If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children’s social care may be appropriate.



RETURNING TO WORK

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Guidance and advice are usually provided by LADO. Most people will benefit from some help and support to return to work after a stressful experience.

Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending Camp 4-2-11.

RECORD KEEPING

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and the outcome as categorised above;
- a copy provided to the person concerned, where agreed by children's social care or the police; and,
- a declaration on whether the information will be referred to in any future reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

Camp 4-2-11 has an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on record retention. This can be found on the ICO website.



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REFERENCES

Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

NON-RECENT ALLEGATIONS

Where an adult makes an allegation to Camp 4-2-11 that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

SECTION TWO: CONCERNS THAT DO NOT MEET THE HARM THRESHOLD

Camp 4-2-11 should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. It is important that Camp 4-2-11 have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

LOW LEVEL CONCERNS

Camp 4-2-11 should ensure that they promote an open and transparent culture in which all concerns about all adults working on behalf of Camp 4-2-11 are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable Camp 4-2-11 to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of Camp 4-2-11 are clear about professional boundaries.



WHAT IS A LOW-LEVEL CONCERN?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in PART ONE (above). A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of Camp 4-2-11 may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of Camp 4-2-11 from potential false allegations or misunderstandings.

STAFF CODE OF CONDUCT AND SAFEGUARDING POLICIES

As good practice, Camp 4-2-11 should set out their low-level concerns policy within their staff code of conduct and safeguarding policies. They should make it clear what a low-level concern is and the importance of sharing low-level concerns, and an explanation of what the purpose of the policy is – i.e. to create and embed a culture of openness, trust and transparency in which the Camps values and expected behaviour which are set out in the staff code of conduct are constantly lived, monitored and reinforced by all staff.

As set out in Part two of this guidance, Camp 4-2-11 should ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner.

Camp 4-2-11 can achieve the purpose of their low-level concerns policy by, for example:

- ensuring their staff are clear about what appropriate behaviour is, and are



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confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;

- empowering staff to share any low-level safeguarding concerns.
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and,
- helping identify any weakness in the Camp 4-2-11 safeguarding system.

RECORDING LOW-LEVEL CONCERNS

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records must be kept confidential and held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR)

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, Camp 4-2-11 should decide if it is meeting the harms threshold, in which case it should be referred to the LADO.

Consideration should also be given to whether there are wider cultural issues within Camp 4-2-11 that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

REFERRING ALLEGATIONS TO CHILD PROTECTION AGENCIES

If the CPO has reasonable grounds for believing that the initial concerns raised with the parent/carer remain, or if the concerns were too serious to be discussed with the parent/carer in the first instance, the following procedures will be activated:

- Advice will be sought by contacting MASH (Multi Agency Safeguarding Hub) on 01452 426 565 (where a child welfare concern can be logged)
- If warranted the CPO should make a referral to the Children and Families Help Desk, on 01452 426565 within 24 hours (immediately if the concerns are about physical injury or sexual abuse.) The Children and Young People's Social Care department will then take responsibility for managing any subsequent enquiries.
- The CPO should confirm the details of the concern to the Children and Young People's Directorate, in writing, within 48 hours.



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- At all times the safety, protection and interests of the child concerned will take precedence. The Manager and staff will work with and support parents/carers as far as they are legally able.
- Camp 4-2-11 will assist the Children and Young People's Social Care department and the police, as far as they are able, during any investigation of alleged abuse. This will include disclosing written and verbal information and evidence.
- OFSTED will be informed of any allegations of abuse against a member of staff, or any abuse that is alleged to have taken place on the premises or during a visit or outing.

CONTACTS

- MASH (Multi Agency Safeguarding Hub)
01452 426565 *option 3*
01452 614 194 Out of Office Hours
- LADO (Local Authority Designated Officer) and Allegations
Nigel Hatten
01452 426 994
Nigel.hatten@gloucestershire.gov.uk
- Allegations Management Co-ordinator
Jenny Kadodia
01452 426 320
Jenny.kadodia@gloucestershire.gov.uk
- Children's helpdesk can be contacted
01452 426 565
childrenshelpdesk@gloucestershire.gov.uk
- Gloucestershire Safeguarding Children Board
gcsb@gloucestershire.gov.uk
01452 583 629
Safeguarding Children Service, Gloucestershire County Council, Room 133b, Block 4, Shire Hall, Gloucester, GL1 2TH
- Police
(out of hours) can be contacted on 101
In an emergency dial 999

N.B. A review and update to this policy has been carried out on 05.05.22



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