



# Safeguarding Policy

Including:

Safer Recruitment Policy

Whistleblowing Policy

2019

Date of Review: June 2019  
Date of Next Review: February 2020

Signed: Nigel Miller – Managing  
Director Active Learning Group

Reference to other policies within this document can be found in the main SuperCamps Policy and Procedures document.

### 3.0 Safeguarding Policy

#### Introduction

This policy has been developed in accordance with the principles established by the Children Act 1989 and in line with the following:

- “Working together to safeguard children 2015”.
- “What to do if you are worried a child is being abused 2015”.
- “Keeping children safe in education 2016”.

#### Policy

Safeguarding children describes the action SuperCamps takes to promote the welfare of children and protect them from harm. SuperCamps believe that safeguarding children is everyone’s responsibility and that everyone who comes into contact with children and families has a role to play.

#### SuperCamps define safeguarding as

- Protecting children from maltreatment including female genital mutilation and child sexual exploitation
- Preventing children from being drawn into extremism or radicalisation
- Preventing impairment of children’s health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care: and
- Taking action to enable all children to have the best outcomes.

SuperCamps believe that all staff need to be vigilant and act on any concerns they may have regarding the welfare of the children they are working with. If any member of staff has any suspicions about the treatment of a child, they must immediately raise it with the Camp Manager. The Camp Manager in turn must then raise the issue with the **Designated Safeguarding Lead (3.2 Pg.8)** so that the appropriate course of action for that child can be initiated. All staff should familiarise themselves with the **Local Safeguarding Children Board’s** contact details which can be found on camp, and any Local Safeguarding issues that may have existed in the area.

It is the legal responsibility of SuperCamps staff to report any suspicions they have regarding the treatment of the children in their care.

#### Safeguarding policy including child protection procedures

- All SuperCamps **Full Time** employees as a minimum, will complete safeguarding training, refreshed at least every two years, which enables them to recognise signs of potential abuse and neglect. All staff will be alert to the basic signs of abuse, be it physical, emotional, sexual or neglect. They will know to whom they should refer concerns or suspicions and be aware of the procedure to follow if a child discloses information to them regarding a situation in their life.
- All Seasonal staff are subject to safeguarding training. Staff will be instructed to complete online training with a knowledge test (with an 80% threshold pass rate) and receive face to face safeguarding training at a central training day.

All necessary steps to keep children safe and well are detailed in the following procedures:

- SuperCamps will report all allegations of serious abuse or harm by any person: living with, working with or looking after children, as well as serious accidents, illnesses and injuries

sustained by any child in SuperCamps care. SuperCamps are fully aware that not to do so, would be committing an offence.

- Super Camps' allocate a key person to each Early Years group (Early Years defined as 0 – year olds). This ensures that every child's care is tailored to meet their individual needs, to help the child become familiar with the setting and to offer a settled relationship for the child.
- SuperCamps fully complies with the ratio and qualification requirements applicable to each age range of children, (in keeping with the Statutory Framework).
- SuperCamps will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children.
- SuperCamps ensures that staff undertake appropriate training and professional development opportunities to ensure they offer quality learning and development experiences for children.
- All SuperCamps paediatric first aid training is compliant for workers caring for young children.
- SuperCamps complies with requirements of health and safety legislation including fire safety and hygiene.
- SuperCamps ensures that the premises, including floor space and outdoor spaces, are fit for purpose and suitable for the age of the children cared for and the activities provided on camp.
- SuperCamps do not allow smoking in or on the premises.
- SuperCamps ensures that it takes all reasonable steps to ensure staff and children in its care are not exposed to unacceptable risk and SuperCamps is able to demonstrate how it manages risk.
- All staff have an obligation to prevent children from being drawn into extremism and terrorism. SuperCamps recognise this is a statutory duty under the Counter Terrorism and Security Act 2015.
- Staff will be made aware of procedures regarding confidentiality and for the sharing and receiving of information, including the need for clear reporting of any conversations had, complete with dates and any action to be taken.
- SuperCamps have a Designated Safeguarding Team which is made up of a Designated Safeguarding Lead (DSL) and two Deputy DSLs. As per the **designated lead for safeguarding procedure (DSL) (3.2 Pg.8)** the DSL will ensure that all staff are aware of the safeguarding children procedures.
- All staff have access to the procedure, essential contact numbers, and procedures for sharing and receiving information.
- The Camp Manager will be the designated person for the co-ordination of safeguarding children procedures within each SuperCamps camp with guidance from the SuperCamps Designated Safeguarding Team.
- The **Designated Safeguarding Lead** will ensure that all staff are aware of the safeguarding children procedures to follow.
- Staff should be following best practice at all times and should not display inappropriate behaviour which could be deemed as a safeguarding issue. All staff should be aware of any signs of inappropriate behaviour by colleagues and should continue to follow procedure.
- All safeguarding concerns are to be communicated to Safeguarding team via phone and CPOMS concern management system. All safeguarding concerns are to be reported to the SuperCamps Designated Safeguarding Lead. The Safeguarding team will lead a thorough investigation. If deemed necessary, the case will be referred to the **Local Safeguarding Children Boards**.

### 3.1 Best practice

The behaviour of staff must not be open to criticism. Staff should protect themselves against liability or allegations which could cause conflict between them, the child and the parent(s)/guardian(s). Staff must ensure that they do not put themselves in a position that may inadvertently threaten or upset children in their charge, and use best practice in all they do.

Best practice refers to the actions of staff whilst working with or near to children. It also refers to the manner in which they communicate with the children and the information that they give them. SuperCamps staff will:

- Avoid shouting and making derogatory comments.
- Promote positive behaviours through positive comments and feedback whenever possible.
- Keep physical contact to a minimum unless absolutely necessary. When contact is necessary, make sure there is at least one other adult present and the incident is recorded on the online concern management system.
- Treat all children equally and avoid favouritism.
- Be non-judgemental when talking to or dealing with the children.
- Empathise with the children and understand their emotions.
- Ensure children are informed of why certain decisions are made in order for them to learn why certain things are done in certain ways (e.g. why you walk a certain way across the car park).
- Understand that it is their legal responsibility to report any suspected cases of child abuse to the **Designated Safeguarding Lead** so the best course of action for that child can be initiated.
- Not to use a mobile phone or camera whilst leading a session with a group of children as per the **mobile phone policy (4.1 Pg.17)**.
- Be aware of the **e-safety policy (4.0 pg.16)** to keep young people and staff safe in the digital world.
- All staff will be made aware of the potential risks of using social networking sites (e.g. Facebook) and the importance of considering the materials they post and how publishing unsuitable materials may affect their professional status as per the **social media policy (4.2 Pg.1)**.

### **3.2 Designated Lead for Safeguarding Procedure (DSL)**

It is the duty of everyone working for SuperCamps to ensure that children are provided with the highest protection whilst in SuperCamps care. As part of the company's **safeguarding policy (3.0 Pg. 8)** a Designated Safeguarding Lead is appointed to oversee the child protection and safeguarding provision in all of Super Camps' camps.

#### **The team**

##### **The Designated Senior Person: Nathan Nicholas (DSP) (Director)**

The DSP is supported by The Active Learning Group's Safeguarding senior person. The DSP has the overall view of the procedures and deputises the daily safeguarding responsibilities to the **Designated Safeguarding Lead** who is supported by a team of **Deputy Safeguarding Designated Persons**.

##### **Designated Safeguarding Lead:**

**Kirsty Farrar-Hockley (Operations Manager)**

##### **Deputy Safeguarding Designated Persons:**

**Louise Jones (Recruitment Team Leader/HR Coordinator)**

**Alan Stonell (Business Partnerships Manager)**

**Molly Goodenough (Customer Service Team Leader)**

**E:safeguarding@supercamps.co.uk**

**T: 01235 467300 (opt 5)**

It is the duty of the Training Manager to ensure that the training and professional development of the DSL and Deputy DSLs is ongoing, in order to enable them to deal effectively with changing child welfare concerns and the extra responsibilities that the job requires. This means being able to identify possible abuse, and knowing the right level of action to take, depending on the individual situation and circumstances.

SuperCamps will ensure that the DSL and the Deputy DSLs attend relevant new or refresher training courses throughout their time in this role to make sure that they are up to date with all statutory policy and legislation. They must be in the best position to deal with concerns, incidents and allegations, as well as feed back to the rest of SuperCamps staff on any updated safeguarding provisions and policies and any available support resources.

### **The purpose of the role**

The purpose of the Designated Safeguarding Lead for Child Protection is to:

- Ensure that child protection and safeguarding policies and procedures are correctly in place, all laid out clearly, and are accessible to all staff and the parent(s)/guardian(s).
- Ensure that that all staff, children, and the parent(s)/guardian(s) are familiar with and understand all aspects of SuperCamps safeguarding provision.
- Ensure that the camps operate in line with, and staff are up to date with, all safeguarding legislation and that information, support, and resources on the topic of child protection and safeguarding are readily accessible to all staff and the parent(s)/guardian(s).
- Be a personal advisor to all staff, children and the parent(s)/guardian(s) and promote their role to ensure that everyone is aware of who they are and how to contact them.
- Be the first point of contact for any staff, children, or the parent(s)/guardian(s) who have concerns about a child's welfare.
- Attend and/or contribute to child protection conferences.
- Refer concerns to the relevant external agencies as required by individual circumstances.
- Use their specialist skills and training in child protection to support the identification of possible abuse and decide on actions that need to be taken.
- Ensure that all staff are taking responsibility and following procedure for the safeguarding of the children on camp.

### **3.3 Fundamental British values**

What are British Values?

The Fundamental British values were first set out in the Government's Prevent Strategy 2015. In the "Early Education and childcare: Statutory guidance for local authority" document published by the Department For Education, British values are described as democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

The promotion of these fundamental British values are reflected in the Early Years Foundation Stage (EYFS) at SuperCamps and exemplified in an age-appropriate way through practice guidance below:

- **Democracy** - making decisions together e.g. giving opportunities to develop enquiring minds in an atmosphere where questions are valued).
- **The rule of law** - understanding that rules matter as cited in Personal Social and Emotional Development, (e.g. collaborating with children to create rules and codes of behaviour) and in line with the **behaviour policy (13.0 pg.42)**.
- **Individual liberty** - freedom for all e.g. reflecting on people's differences and understanding SuperCamps are free to have different opinions.
- **Mutual respect and tolerance** - treat others as you want to be treated, e.g. sharing and respecting others' opinions.

### **How SuperCamps promote British values strategies in their settings**

Strategies include, but are not limited to:

- Teaching children to listen to each other and wait before speaking.
- How to have a conversation.
- Kindness, helpfulness, being respectful of others.
- Encouraging table manners.
- Promoting politeness, through saying please and thank you.
- Encouraging listening during story and song time.
- Teaching empathy and understanding.
- Encouraging appropriate behaviour and learning right from wrong.
- Promoting taking turns and sharing.
- Facilitating friends and friendship.
- Team work.

### **3.4 Tackling extremism and radicalisation policy**

SuperCamps is fully committed to safeguarding and promoting the welfare of all children attending a camp. Every member of staff recognises that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability in today's society. The tackling extremism and radicalisation policy sets out SuperCamps beliefs, strategies and procedures to protect vulnerable individuals from being radicalised or exposed to extremist views.

The following national guidelines should also be read when working with this policy:

1. Prevent Duty (DfE)
2. Keeping Children Safe in Education (DfE)
3. Working Together to Safeguard Children (HM Government)

#### **Aims**

The SuperCamps tackling extremism and radicalisation policy is intended to provide a framework for dealing with issues relating to vulnerability, radicalisation and exposure to extreme views. The objectives are that:

1. All staff will have an understanding of what radicalisation and extremism are and why there is a need to be vigilant during camp time.
2. All staff will understand the policy for tackling extremism and radicalisation and will follow the policy guidance swiftly when issues arise.
3. All children will understand the dangers of radicalisation and exposure to extremist views: building resilience against these and knowing what to do if they experience them.
4. All parent(s)/guardian(s) will know that the policies are in place to keep children safe from harm and that SuperCamps regularly reviews its systems to ensure they are appropriate and effective.

#### **Definitions and indicators**

**Radicalisation** is defined as the act or process of making a person more radical or favouring extreme or fundamental changes in political, economic or social conditions, or institutions or habits of the mind.

**Extremism** is defined as the holding of extreme political or religious views.

There are a number of behaviours which may indicate a child is at risk of being radicalised or exposed to extreme views. These include:

- Day-to-day behaviour becoming increasingly centred on an extremist ideology, group or cause.

- Loss of interest in other friends and activities not associated with the extremist ideology, group or cause.
- Changing their style of dress or personal appearance to accord with a particular extremist ideology, group or cause.
- Possession of materials or symbols associated with an extremist ideology, group or cause.
- Attempts to recruit others to the extremist ideology, group or cause.
- Communications with others that suggests identification with an extremist ideology, group or cause.
- Using insulting or derogatory names for another ideology, group or cause group.
- An increase in prejudice-related incidents committed by that person – these may include:
  - Physical or verbal assault.
  - Provocative behaviour.
  - Damage to property.
  - Derogatory name calling.
  - Possession of prejudice-related materials.
  - Refusal to co-operate.
  - Condoning or supporting violence towards others.

### **Procedures for referrals**

It is important to be constantly vigilant and remain fully informed about the issues which affect the local areas, cities and society in which SuperCamps works. Staff are reminded to suspend any 'professional disbelief' that instances of radicalisation 'could not happen here' and to be 'professionally inquisitive' where concerns arise, referring any concerns to the **Designated Safeguarding Lead (3.2 Pg.8)**.

SuperCamps believe that it is possible to intervene to protect people who are vulnerable. Early intervention is vital and staff must be aware of the established processes for front line professionals to refer concerns about an individual(s) and/or an extremist ideology(s), group(s) or cause(s). SuperCamps staff must have the confidence to challenge, and to intervene, and ensure that strong safeguarding practices are based on the most up-to-date guidance and best practice.

All SuperCamps staff undertake Channel General Awareness training created by the College of Policing. The DSL for SuperCamps will discuss the most appropriate course of action on a case-by-case basis and will decide when a referral to external agencies is needed.

As with any child protection referral, staff must be made aware that if they do not agree with a decision not to refer, they can make the referral themselves and will be given the contact details to do this via the Safeguarding Board on camp. SuperCamps staff have the option to follow the SuperCamps **whistleblowing policy (8.0 Pg.30)** if they are not comfortable discussing the concern with their line Manager.

### **3.5 Child sexual exploitation policy**

This policy has been developed in response to growing concerns about the scale of sexual exploitation and the recognition that any child might be targeted for grooming and exploitation. This policy should be followed by all Head Office staff, camp staff and volunteers.

### **Definitions**

The Government has released an updated definition of child sexual exploitation, following a consultation completed in 2017.

The new, clearer definition will help practitioners across all services understand and be able to recognise when children are in danger of child sexual exploitation. It will also help agencies record, analyse and disrupt incidences.

“Child sexual exploitation 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.”

The revised definition is included in the Working Together to Safeguard Children Statutory Guidance.

- Children may be exploited by an individual, several individuals working as an organised group, or by a gang.
- Grooming is the process of ‘preparing’ a boy or girl for a sexual purpose. Grooming is often slow and subtle, continuing for several weeks or months and lulling the child into a false sense of security. It always involves manipulation and deceit.
- Two types of grooming are recognised: street grooming which occurs in the community, and online grooming using technology including the internet and mobile phones.

### **The complexity and challenge of sexual exploitation and grooming**

It can be difficult to identify children and young people who are at risk of sexual exploitation. The grooming process draws children in to what they initially perceive as a new and caring relationship with an exciting older boyfriend or girlfriend. Attempts to explain the risks to the child may be met with derision and hostility. By the time the child realises the reality of the ‘relationship’ they may have been seriously sexually, physically and psychologically abused, threatened with the distribution of indecent photographs or videos of their abuse and warned that they will put themselves or their family in danger if they speak out. Unsurprisingly, the child will be unwilling to disclose their abuse, particularly to people in positions of authority such as teachers, social workers or police officers.

The child may find it impossible, for a number of reasons, to speak to their parent(s)/guardian(s) and their abusers will have sought to isolate them from their family and friends. Some children may have developed drug or alcohol addictions and rely on their abusers for supply.

### **Procedure**

Camp staff are in daily contact with the children during the holidays and play an important role in keeping children safe and supporting them when things go wrong. To help keep children safe from sexual exploitation and grooming, SuperCamps will:

- Raise staff awareness of sexual exploitation and grooming.
- Help parent(s)/guardian(s) to understand the issue if a concern is raised.
- Contribute to multi-agency safeguarding and child protection arrangements.
- Promote healthy and safe relationships.

### **Sexually active young people**

In law, a child is a person under the age of 18. Not all sexual activity involving a child is criminal, nor is it always abusive. The law is very clear on certain aspects of sexual activity, but care providers and other agencies are expected to use professional judgement to determine whether a concern about sexual activity involving a child over the age of 13 is exploitative or abusive and should be referred to children’s social care or the Police. Sexual activity involving a child under 13 is always a criminal offence and SuperCamps will always refer such concerns to children’s social care.

### **Procedure for reporting**

Camp staff should report any concern about under-age sexual activity to the **Designated Safeguarding Lead (3.2 Pg.8)** who will decide on the most appropriate course of action.

Camp staff that are approached by a child wishing to discuss sexual matters must make it clear to the children that they cannot guarantee confidentiality but will act in the child's best interests.

### **3.6 Female Genital Mutilation**

SuperCamps has robust and rigorous safeguarding procedures and takes its responsibilities of child protection seriously. Female Genital Mutilation is a form of child abuse and as such is dealt with under the SuperCamps **safeguarding policy (3.0 Pg.8)**. SuperCamps uses the World Health Organisation definition as written below.

"Female Genital Mutilation (FGM) comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons."

The UK Government has written advice and guidance on FGM that states:

"FGM is considered child abuse in the UK and a grave violation of the human rights of girls and women. In all circumstances where FGM is practised on a child it is a violation of the child's right to life, their right to their bodily integrity, as well as their right to health. The UK Government has signed a number of international human rights laws against FGM, including the Convention on the Rights of the Child." "Girls are at particular risk of FGM during school summer holidays. This is the time when families may take their children abroad for the procedure. Many girls may not be aware that they may be at risk of undergoing FGM.

UK communities that are most at risk of FGM include Kenyans, Somalis, Sudanese, Sierra Leoneans, Egyptians, Nigerians and Eritreans. However, women from non-African communities that are at risk of FGM include Yemeni, Kurdish, Indonesian and Pakistani women."

### **Procedures**

SuperCamps take proactive action to protect and prevent girls being forced to undertake FGM BY

- Having a robust attendance policy that does identify any unexplained absences.
- Giving FGM training for the **Designated Safeguarding Lead and team (3.2 Pg.8)** with disseminated training for all staff on camp.

### **Indications that FGM has taken place**

- Prolonged absence from camp with noticeable behaviour change – especially after a return from holiday.
- Spend long periods of time away from the sessions during the day. e.g. extended toilet breaks.
- A child who has undergone FGM should be seen as a child protection issue.

### **Indications that a child is at risk of FGM**

- The family comes from a community that is known to practice FGM - especially if there are elderly women present.
- In conversation a child may talk about FGM.
- A child may express anxiety about a special ceremony.
- The child may talk or have anxieties about forthcoming holidays to their country of origin.
- Parent(s)/Guardian(s) may comment on overseas travel.
- If a woman has already undergone FGM – and it comes to the attention of any professional, consideration needs to be given to any Child Protection implications e.g. for younger siblings, extended family members and a referral made to the **Designated Safeguarding Lead (3.2 Pg.8)** who will decide on the most appropriate course of action.

**If a member of staff suspect that a child is a victim of FGM it is their responsibility to raise the concern with the SuperCamps Designated Safeguarding Team who will provide advice.**

### **Record**

All interventions should be accurately recorded using the **incident and accident policy (10.0 Pg. 36)**.

### **Referrals**

The Designated Safeguarding Lead needs to seek advice about making referrals to Social Care and follow the Local Authority Safeguarding Boards Procedure Guidelines on FGM and Child Protection referrals.

### **3.7 Self Harm Policy**

Recent research indicates that up to one in ten young people in the UK engage in self-harming behaviours, and that this figure is higher amongst specific populations, including young people with special educational needs. SuperCamps staff can play an important role in recognising self-harm and contribute to its prevention, and also support children that may be currently engaging in self-harm and their parents.

#### **Definition of Self-Harm**

Self-harm is any behaviour where the intent is to deliberately cause harm to one's own body for example:

- Cutting, scratching, scraping or picking skin
- Swallowing inedible objects
- Taking an overdose of prescription or non-prescription drugs
- Swallowing hazardous materials or substances
- Burning or scalding
- Hair-pulling
- Banging or hitting the head or other parts of the body

#### **Risk Factors**

Several factors can contribute to making a child vulnerable to self-harm: individual factors such as:

- Depression / anxiety
- Poor communication skills
- Low self-esteem
- Poor problem-solving skills
- Hopelessness
- Impulsiveness
- Drug or alcohol abuse

Family factor:

- Unreasonable expectations
- Neglect or physical, sexual or emotional abuse
- Poor parental relationships and arguments
- Depression, self-harm or suicide in the family

And social factors, such as:

- Difficulty in making relationships / loneliness
- Being bullied or rejected by peers

SuperCamps staff may become aware of warning signs which indicate a child is experiencing difficulties that may lead to thoughts of self-harm or suicide. These warning signs should **always** be

taken seriously and staff observing any of these warning signs should seek further advice from one of the designated safeguarding team.

Possible warning signs include:

- Changes in eating / sleeping habits (e.g. children may appear overly tired if not sleeping well)
- Increased isolation from friends or family, becoming socially withdrawn
- Changes in activity and mood e.g. more aggressive or introverted than usual
- Lowering of academic achievement
- Talking or joking about self-harm or suicide
- Abusing drugs or alcohol
- Expressing feelings of failure, uselessness or loss of hope
- Changes in clothing e.g. becoming a goth

### **Staff Roles in working with children who self-harm**

Children may choose to confide in a member of SuperCamps staff if they are concerned about their own welfare, or that of a peer. SuperCamps staff may experience a range of feelings in response to self-harm in a child such as anger, sadness, shock, disbelief, guilt, helplessness, disgust and rejection. However, in order to offer the best possible help to children it is important to try and maintain a supportive and open attitude – a child who has chosen to discuss their concerns with a member of SuperCamps staff is showing a considerable amount of courage and trust.

Children need to be made aware that it may not be possible for staff to offer complete confidentiality. **If you consider a child is at serious risk of harming themselves then confidentiality cannot be kept.** It is important not to make promises of confidentiality that cannot be kept even if a child puts pressure on you to do so.

Any member of staff who is aware of a child engaging in, or suspected to be at risk of engaging in, self-harm should consult one of the designated safeguarding team.

Following the report, the designated safeguarding team member will decide on the appropriate course of action.

This may include:

- Contacting parents / carers
- Arranging professional assistance e.g. doctor, nurse, social services
- Arranging an appointment with a counsellor
- Immediately removing the children from activities if their remaining on camp is likely to cause further distress to themselves or their peers
- **In the case of an acutely distressed child, the immediate safety of the child is paramount and an adult should remain with the child at all times.**
- **If a child has self-harmed whilst attending SuperCamps a first aider should be called for immediate help.**
- **Head Office must always be notified immediately if there is suspicion or evidence of self-harming.**

### **Further Considerations**

Any meetings with a child, their parents or their peers regarding self-harm should be recorded in writing including:

- Dates and times
- Concerns raised

- Details of anyone else who has been informed

This information should be stored in line with SuperCampsPolicy on retaining confidential documents.

If staff are aware of a child self-harming or a child on camp has spoken about self-harming, even if it is regarding a sibling, friend or parent, It is important to encourage the child to talk. They must be reassured that they are not in trouble; friends can worry about betraying confidences so they need to know that self-harm can be very dangerous and that by seeking help and advice for a friend they are taking responsible action and being a good friend. They should also be aware that their friend will be treated in a caring and supportive manner.

The peer group of a young person who self-harms may value the opportunity to talk to a member of staff either individually or in a small group. Any member of staff wishing for further advice on this should consult one of the SuperCamps designated safeguarding team.

When a young person is self-harming it is important to be vigilant in case close contacts of the individual are also self-harming.

### **3.8 Peer on Peer Abuse**

Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control exercised between children, and within children's relationships (both intimate and non-intimate), friendships, and wider peer associations.

Peer-on-peer abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence. Online peer-on-peer abuse is any form of peer-on-peer abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, peer-on-peer grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

SuperCamps are committed to the prevention, early identification, and appropriate management of peer-on-peer abuse (as defined as above) both within and beyond the activity setting. In particular, we:

- In order to protect children, SuperCamps have taken a whole-company Contextual Safeguarding approach to preventing and responding to peer-on-peer abuse
- SuperCamps do not feel it is acceptable merely to take a reactive approach to peer-on-peer abuse in response to alleged incidents of it; and believe that to tackle peer on-peer abuse proactively, it is necessary to focus on all four of the following areas:
  - Systems and structures
  - Prevention
  - Identification
  - Response/intervention
- SuperCamps recognises the national and increasing concern about this issue and wish to implement this policy in order to mitigate harmful attitudes and peer-on-peer abuse in their activity settings.

How SuperCamps uses Contextual Safeguarding to Peer on Peer Abuse

SuperCamps is adopting a whole-company Contextual Safeguarding approach, which means:

- Being aware of and seeking to understand the impact that these wider social contexts may be having on the children in our care
- Creating a safe culture in the activity settings by, for example, implementing policies and procedures that address peer-on-peer abuse and harmful attitudes
- Promoting healthy relationships and attitudes to gender/ sexuality.
- Hotspot mapping to identify risky areas geography to look for trends or abusive natures.
- Training on potential bias and stereotyped assumptions.
- Being alert to and monitoring changes in students' behaviour and/or attendance.

When does behaviour become problematic or abusive?

All behaviour takes place on a spectrum. Understanding where a child's behaviour falls on a spectrum is essential to being able to respond appropriately to it.

SuperCamps follow the continuum model (below) to demonstrate the range of sexual behaviours presented by children, which may be helpful when seeking to understand a student's sexual behaviour and deciding how to respond to it.

<b>Normal</b>	<b>Inappropriate</b>	<b>Problematic</b>	<b>Abusive</b>	<b>Violent</b>
<b>Developmentally Expected</b>	<b>Single instances of inappropriate sexual behaviour</b>	<b>Problematic and concerning behaviour</b>	<b>Victimising intent or outcome</b>	<b>Physically violent sexual abuse</b>
<b>Socially acceptable Consensual, mutual, Reciprocal</b>	<b>Socially acceptable behaviour within peer group</b>	<b>Developmentally unusual and socially unexpected</b>	<b>Includes misuse of power</b>	<b>Highly intrusive Instrumental violence which is psychologically and/or sexually arousing to the child responsible for the behaviour</b>
<b>Shared decision making</b>	<b>Context for behaviour may be inappropriate</b>	<b>No overt elements of Victimisation</b>	<b>Coercion and force to ensure compliance Intrusive</b>	
	<b>Generally consensual and reciprocal</b>	<b>Consent issues may be unclear May lack reciprocity or equal power</b>	<b>Informed consent lacking or not able to be freely given</b>	<b>Sadism</b>
		<b>May include levels of compulsivity</b>	<b>May include elements of expressive violence</b>	

Other behaviour

When dealing with other alleged behaviour which involves reports of, for example, emotional and/or physical abuse, Active Learning Group staff can draw on aspects of the continuum to assess where the alleged behaviour falls on a spectrum and to decide how to respond.

This could include, for example, whether it:

- Is socially acceptable
- Involves a single incident or has occurred over a period of time.
- Is socially acceptable within the peer group
- Is problematic and concerning
- Involves any overt elements of victimisation or discrimination e.g. related to race, gender, sexual orientation, physical, emotional, or intellectual vulnerability.
- Involves an element of coercion or pre-planning,
- Involves a power imbalance between the child/ children allegedly responsible for the behaviour and the child/children allegedly the subject of that power.

How can a child who is being abused by their peers be identified.

All staff should be alert to the well-being of students and to signs of abuse, and should engage with these signs, as appropriate, to determine whether they are caused by peer-on-peer abuse. However, staff should be mindful of the fact that the way(s) in which children will disclose or present with behaviour(s) because of their experiences will differ.

### **Record**

All concerns should be accurately recorded using the online safeguarding reporting system (CPOMS).

### **Referrals**

The Designated Safeguarding Lead needs to seek advice about making referrals to Social Care and follow the Local Safeguarding Partners Guidelines on Protection referrals.

## **6.1 Safer Recruitment and Employment Policy**

SuperCamps' reputation for high quality childcare depends on the professionalism and hard work of all staff. SuperCamps place the safeguarding and safety of all children as their number one priority, and therefore follow this strict safer recruitment policy, to protect both the children and the staff working within the individual camp settings, and wider offices.

### **Recruitment**

SuperCamps use a variety of recruitment channels to appoint staff members with relevant experience in childcare. Recruitment decisions are made following an extensive application, interview, training and vetting process. Camps are staffed with the following positions:

- Regional Manager
- Camp Manager
- Early Years Practitioner
- Early Years Instructor
- Senior Activity Instructor
- Lifeguard
- Activity Instructor
- RAW Manager
- RAW Instructor
- A Passion for... Leader
- A Passion for... Instructor

In making the decision, the following factors are taken into account:

- Relevant qualifications or applicants studying towards a relevant qualification.
- Experience working with children in similar environments.
- Additional skills such as first aid or lifeguarding.
- Personality and enthusiasm.

### **Advertising**

At SuperCamps, we believe in providing an environment which recognises and values people's differences/individuality, and benefits from the unique strengths that these differences bring to our organisation. This commitment promotes respect and equal treatment for all persons regardless of age, disability, gender, ethnicity, marital or civil partnership, nationality, race, religion or belief, sex, or sexual orientation. We insist that this respect is applied in every aspect of our business and in how we conduct ourselves, under the Equality Act 2010. We advertise our vacancies through a variety of channels, from specialist job boards, to local schools, to our own website. We believe this approach allows us to reach a wide range of applicants, to ensure SuperCamps attracts the best talent.

## **6.2 Selection and appointment**

In appointing staff, SuperCamps use the following procedures:

### **For Seasonal Workers and Fixed Term Contract Workers.**

- **Application Form:**  
All Seasonal staff are required to complete an application form for the role for which they are initially applying. This includes all Personal Details (e.g. Current and previous name(s)), full Educational History including dates and institutions, and five years of Employment History at the time of application. Any gaps in the Application Form must be clarified and updated with the Recruitment Co-Ordinator responsible for the camp prior to the commencement of employment.
- **Interview:** Candidates with a strong application will be invited to take part in a telephone or Skype interview with one of our Recruitment team for a suitable role. Camp Manager applicants may be required to attend an assessment day with members of the HR Recruitment and Operations teams. At least one member of the Assessment Panel will have completed Safer Recruitment Training. All members of the HR Recruitment team have received extensive Safer Recruitment Training.

SuperCamps use interview templates that are specific to the role for which a candidate has applied. They help to assess a candidate's suitability for the role by investigating their experiences, motivation for working with SuperCamps, any gaps in employment, ability to adapt to on-camp scenarios, personality and safeguarding experience amongst other factors.

- **References:**  
SuperCamps require one professional or academic reference covering the past 3 years for every seasonal candidate as sufficient evidence to establish a candidate's employment and / or educational history.

Volunteer or Personal (e.g. Baby sitting) referees cannot be used.

- **Health Declaration:**  
All seasonal staff are required to complete an annual self-assessed Health Declaration for SuperCamps to ensure they are fit for work, and to declare any medical issues that may impact their ability to complete their job role on camp. Where any concerns are raised, further discussion will take place with the Recruitment Co-Ordinator responsible for that camp.
- **Certificates and Qualifications:**  
Seasonal staff appointed in specialist roles (e.g. Camp Managers, Early Years Practitioners and Lifeguards) are required to provide evidence of their qualification to SuperCamps. These records are kept on file centrally at Head Office and the staff member is required to have the originals on camp for inspection, if required.
- **UK Right to Work and Identification (ID) Checks:**  
All staff members are required to provide original evidence that they are eligible to work in the UK, by providing at least one document from the list provided by the Home Office.

Separate to the UK Right To Work Check,

- one proof of name - ID 1 (e.g. Full Driving Licence with current name) and
- one proof of address – ID 2 (e.g. bank statement with current address dated in the past 3 months) document is required for identification purposes.

This can be done either in person or via the Post Office Document Certification Service, it is to be kept on file centrally at Head Office. Staff members are required to show photo ID when they arrive at any assessment day and on their first day on camp to the Camp Manager.

- **DBS Staff Checks:**

A prerequisite to be able to work with children in SuperCamps' care is to hold and provide evidence of a valid Enhanced Disclosure & Barring Service (DBS) Certificate where the outcome of the check is deemed satisfactory. The DBS certificate may be registered on the DBS Update Service, with DBS certificates obtained and issued via SuperCamps they will be valid for three years. Non SuperCamps DBS certificates will be accepted if they are either on the Update Service, or were obtained within the last 3 years with no breaks in either education or work history, for more than 3 months. This must be with a current employer or University.

SuperCamps may make checks regarding this period of time, including checks against the children's barring list. A Staff member should only start work if they fall under one of the categories below:

- a. **SuperCamps DBS:** issued within 3 years of the last day of your employment.
- b. **Non SuperCamps DBS; under 1 year:** if the check is LESS THAN a year old by the time the staff member works, they must provide a copy of the certificate and be in the process of applying for a SuperCamps DBS. This will be accompanied by a SuperCamps risk assessment.
- c. **Non SuperCamps DBS; between 1 – 3 years:** if the check is MORE THAN a year old by the time a staff member works and no more than 3 years old, SuperCamps will require confirmation from either the current employer or University that issued the DBS. SuperCamps ask them to provide a copy of the certificate and be in the process of applying for a SuperCamps DBS. This will be accompanied by a SuperCamps risk assessment, including to be supervised at all times as a control measure.
- d. **DBS Update Service:** the subscription must be valid on the last day of employment with SuperCamps.

Confirmation of student or work history can be in the form of:

**School, College or University**

- Current ID card, or
- a 'Letter of Study Verification' from the Student Admissions department only (need to be currently studying)

This is valid for two seasons at a time, excluding Summer which will require a separate check.

**From Current or Previous employer**

- Current ID Card,
- a 'Letter Of Employment Verification',
- reference from a senior manager, or
- a Payslip issued in the past month (this must include name and address, and employer details (e.g. logo) on it)

- **Overseas Police Checks**

Overseas Police Checks' or a 'Certificate of Good Conduct' will be required from the applicant's country of residence where the applicant has lived outside the UK. This may be in addition to the UK Enhanced DBS if circumstances apply.

- **Contract Paperwork:**

All Staff will be sent a contract of employment, which they are asked to read, understand and sign with wet ink (physically sign). Contracts should be returned to the Recruitment Co-Ordinator within 7 days of issue, along with the:

- Employee declaration,
  - financial details (including bank details), and
  - new starter checklist (including employee statement and student loan questions for taxation purposes).
  - Next Of Kin details (for emergency purposes),
  - Overseas Criminal Record checks (if applicable), and
  - other relevant information should be provided.
- **SuperCamps Reserve Seasonal Staff Members:**  
Where an applicant is strong, but no position is currently available, that applicant will be invited to an assessment and appointed as an assessed reserve staff member. They are subject to the same background checks as appointed staff members, captured in the current staff database, and are called upon as and when work is available. This is usually to cover last minute sicknesses and dropouts or when there are increases in bookings.
  - **Returning Members Of Staff:**  
Returning members of staff are asked to re-apply, and re-interview (if applicable) each season to inform SuperCamps of any change in circumstances. This ensures SuperCamps records are kept up to date and employment gaps are monitored. SuperCamps will not re-employ anyone that has previously been dismissed from the Company.
  - **Performance Management & Appraisals:**  
All seasonal staff members will be subject to ongoing performance management to help identify strengths and weaknesses. Seasonal appraisals will also be held, and information passed on to the Recruitment Team. Any performance or conduct issues will be addressed by the Camp Manager, Operations and or Recruitment Team, and may affect future employment with SuperCamps.
  - **Risk Assessments:**  
In the event that some Personal Details and or documents have not been provided prior to the commencement of employment, a Seasonal staff member may be allowed to work subject to a strict and full Risk Assessment against background checks such as; A Full five year work History and a Clear Barred List Check. SuperCamps reserves the right not to employ a staff member if key background and or document checks (e.g. UK Right To Work) have not been deemed satisfactory.
  - **Agency Staff**  
The Agency will be required to submit a copy of their vetting form to confirm the individual meets the requirements for employment in the UK in regulated activity. On their first day, the agency staff must provide proof of identification for verification by the Camp Manager, and complete the onsite induction check.

#### **For Full Time Members of Staff Including Head Office and SuperClubs Staff.**

- **References:**  
Staff members require two professional and / or academic references covering the past 3 years.

Volunteer or Personal (e.g. Baby sitting) referees cannot be used.

- **Curriculum Vitae (CV)**

Staff are required to provide a CV to SuperCamps. SuperCamps will keep a copy of the staff members CV on file at Head Office. A CV should not and will not be used instead of a fully completed role specific application form.

- **Health Declaration:**

Staff are required to complete an annual self-assessed Health Declaration for SuperCamps to ensure they are fit for work, and to declare any medical issues that may impact their ability to complete their job role. Where any concerns are raised, further discussion will take place with their Line Manager and HR representative.

- **Certificates and Qualifications:**

Staff appointed in or asked to complete specialist roles (e.g. First Aider or Lifeguard) are required to provide evidence of their qualification to SuperCamps. These records are kept on file centrally at Head Office and the staff member is required to have the originals when working in a location other than Head Office for inspection, if required.

- **UK Right to Work and Identification (ID) Checks:**

All staff members are required to provide original evidence that they are eligible to work in the UK, by providing at least one document from the list provided by the Home Office.

Separate to the UK Right To Work Check,

- one proof of name - ID 1 (e.g. Full Driving Licence with current name) and
- one proof of address – ID 2 (e.g. bank statement with current address dated in the past 3 months) document is required for identification purposes.

This can only be done in person at Head Office or with a Safer Recruitment trained member of staff if offsite.

- **DBS Staff Check:**

Staff must hold either a valid SuperCamps DBS certificate or third party DBS which is live on the Update Service at all times. SuperCamps DBS certificates will be obtained and issued via Head Office and are valid for three years. Staff can then, if they wish to, register on the DBS Update Service at their own expense. Staff with a third party DBS must provide the original DBS certificate as part of this validation. If the subscription to the Update Service lapses at any time, then the staff member will be issued with a SuperCamps DBS. The cost of the Update Service subscription is at the sole expense of the staff member.

- **Overseas Police Checks**

Overseas Police Checks' or a 'Certificate of Good Conduct' will be required from the applicant's country of residence where the applicant has lived outside the UK. This may be in addition to the UK Enhanced DBS if circumstances apply.

- **Contract Paperwork:**

All Staff will be sent a contract of employment, which they are asked to read, understand and sign with wet ink (physically sign). Contracts should be returned to the Recruitment Co-ordinator within 7 days of issue, along with the:

- Employee declaration,

- financial details (including bank details), and
  - new starter checklist (including employee statement and student loan questions for taxation purposes).
  - Next Of Kin details (for emergency purposes),
  - Overseas Criminal Record checks (if applicable),
  - Signed job role, and
  - other relevant information should be provided.
- **Performance Management & Appraisals:**  
Staff members will be subject to ongoing performance management to help identify strengths and weaknesses. Annual appraisals will also be held, and any performance or conduct issues dealt with at the time they occur. Depending upon the outcome of these, this may affect future employment with SuperCamps.
  - **Application Form:**  
Staff are required to complete an application form for the role for which they are initially applying. This includes all Personal Details (e.g. Current and previous name(s)), full Educational History including dates and institutions, and full Employment History from the moment of leaving full-time Education. Any gaps in the Application Form must be clarified and updated with the Safer Recruiter at interview prior to the commencement of employment.

In the event that some Personal Details and or documents have not been provided prior to the commencement of employment, a full-time member of staff member may be allowed to work subject to a strict and full Risk Assessment against background checks such as; A Full work History and a Clear Barred List Check. SuperCamps reserves the right not to employ a staff member if key background and or document checks (e.g. UK Right To Work) have not been deemed satisfactory.

#### **For all Staff members.**

SuperCamps will record the information provided from any DBS Check but will only keep a copy of the disclosure for a maximum of 6 months if there is a disclosure note.

- In exceptional circumstances a staff member who does not hold a current DBS may work on camp, supervised by a fully DBS checked member of staff. This will be subject to a risk assessment, authorised by the company director and placed on Camp.
- As the information contained in a DBS Check is only correct at its date of issue, all staff members are asked to sign a DBS Declaration as part of their Application Form and contract of employment. Before they begin work the staff member needs to state that no criminal offences have been committed since the disclosure was issued, which would be every 3 months. Any false information or deliberate omission may result in dismissal or disciplinary action.
- SuperCamps volunteers are subject to the same pre-employment checks as paid staff members. This includes satisfactory DBS status and references.
- SuperCamps takes its responsibility to safeguard children seriously and acts on 'Keeping children safe in education' guidance referring to 'Disqualification by Association'. SuperCamps asks their staff to provide relevant information about themselves or a person who lives or works in the same household as them, in order to determine whether or not the disqualification by association requirement applies.

A **Single Central Register** containing the vetting requirements of all staff working at Head Office and on camp is maintained in accordance with current guidelines to ensure the safeguarding of all children in SuperCamps care.

### **6.3 Assessment and Selection Training**

SuperCamps believe pre-camp and ongoing training is vital in ensuring the safe and smooth running and delivery of the SuperCamps product and all safeguarding practices. SuperCamps will endeavour to ensure all staff complete 3 stages of section and training relevant to their role, before working with children. Returning staff all have regular training updates during their employment with SuperCamps. Although SuperCamps preference is to employ qualified staff in childcare studies or teaching, SuperCamps understands the importance of SuperCamps specific training to ensure all staff members are aware of SuperCamps Policies and Procedures and the on-going updates in the childcare industry.

Once a member of staff has been employed they will be required to complete this 3 part training process:

1. **Online training:** SuperCamps has an online training platform which requires staff to watch various videos and read literature which gives an introduction to SuperCamps and includes in depth training on Health and Safety and Safeguarding. Staff will need to complete a modular knowledge test with a threshold of 80% to complete the training. SuperCamps keeps a central record of all staff that complete the online training.
2. **Central Assessment & Selection Days:** This is the core element for all camp staff. This face to face and led by the SuperCamps Operations Team. It builds on the lessons from the Online Training programme through team building games, workshops and exercises. There is also specific Safeguard element.
3. **Camp Induction Day:** This takes place at the specific SuperCamps camp at which a staff member is employed. It is compulsory for all staff to complete a Camp Induction Form at each different SuperCamps camp, each season. (A season is defined as an individual school holiday break be it half term or between terms). If a member of staff is unable to make the Camp Induction Day (usually the weekend before camp starts) then they will need to complete the Camp Induction Form on the first day they start at that particular camp. Staff will put what they learn at their Central Training and Assessment Day into practice at the camp whilst preparing camp for the upcoming season.

#### **Returning members of staff**

Due to camps only operating during the school holidays, SuperCamps defines a returning member of staff as someone that has worked on camp previously and has been through the SuperCamps Assessment and Selection within the past year.

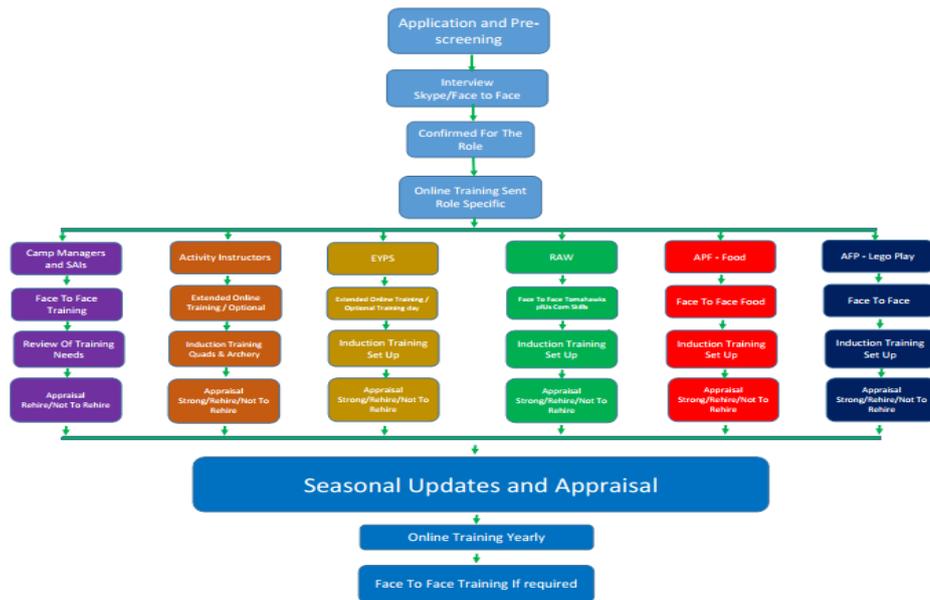
Returning members of staff receive training in the following ways:

1. Returning staff are asked to complete the SuperCamps assessment and selection every year.
2. Returning members of staff are on the SuperCamps mailing list and receive a pre-camp update email pre-camp, each season. The pre-camp email contains updates and changes to SuperCamps procedures.
3. Returning members of staff have the opportunity to gain further qualifications through SuperCamps such as Paediatric First Aid, Specialist Safeguarding Training and a Food Hygiene Certificate.

#### **Records of assessment and Selection**

Selection records for SuperCamps staff members are kept centrally at SuperCamps Head Office. Information regarding the training a staff member has received is sent to the Camp Manager on a weekly basis during the season.

#### **SuperCamps Recruitment, assessment and selections:**



#### 6.4 Allegations against a member of staff

SuperCamps is committed to providing a service of the highest quality. This right to a high quality service applies to all children, the parent(s)/guardian(s), staff members, host camp staff and members of the public. If any individual feels that the service they have received is less than adequate SuperCamps ask that they make a complaint through the **complaints procedure (14.1 Pg. 46)**. If an individual feels that a staff member has acted inappropriately, they have the right to make a formal allegation of misconduct against that staff member.

#### If the allegation is made by a child

- The member of staff who receives the allegation should involve the Camp Manager immediately.
- The Camp Manager will inform the **Designated Safeguarding Lead** who will then will discuss this with the local authority designated officer (LADO) in the first instance before SuperCamps investigates. **(3.2 Pg.8)** The **Recruitment Manager** at Head Office will also be informed at the earliest convenience.
- If the allegation is against the Camp Manager the member of staff who received the allegation should contact the **Designated Safeguarding Lead (3.2 Pg.8)** or **Recruitment Manager** at Head Office at the earliest convenience.
- Full notes should be recorded detailing what is said, and staff dealing with the allegation must show themselves to be sympathetic and understanding, but non-committal and non-judgemental.
- Once informed, the **Designated Safeguarding Lead (3.2 Pg.8)** or **Recruitment Manager** will take charge of the situation and commence the investigation process.
- The **Designated Safeguarding Lead (3.2 Pg.8)** or **Recruitment Manager** will contact the parent(s)/guardian(s) of the child to explain the nature of the allegation and to discuss/propose the action to be taken.

- The **Designated Safeguarding Lead (3.2 Pg.8)** or **Recruitment Manager** will arrange for the member of staff concerned to be questioned about the matter, and for the incident to be investigated. This may necessitate taking statements from other members of staff/children on camp about the alleged incident.
- The **Designated Safeguarding Lead (3.2 Pg.8)** or **Recruitment Manager** will use all available resources to resolve the matter, including informing Ofsted, the Local Authority Safeguarding Board, Social Services and the Police where necessary, and will ensure that all parties, staff member(s) the parent(s)/guardian(s) and child) are kept advised of any on-going developments.

#### **If the allegation is made by the parent(s)/guardian(s)**

- The parent(s)/guardian(s) will be directed immediately to the Camp Manager, and the above procedure will be followed and the matter will be investigated accordingly.

#### **If the allegation is made by another member of staff**

- Minor internal disputes e.g. stemming from a conflict of interest/personality should not need to involve other members of staff, parent(s)/guardian(s), and will be resolved through a meeting with the involved parties, the Camp Manager and/or a representative from Head Office.
- Allegations regarding the staff member's behaviour towards a child, the parent(s)/guardian(s) or member of the public will follow the procedure above.
- If an allegation is made and proved to be accurate, resulting in formal action, where appropriate and necessary to do so, SuperCamps will inform all the appropriate regulatory bodies, including Ofsted.
- SuperCamps believes that every member of staff has the right to work in an environment that is free of abuse and harassment. This includes verbal, physical, sexual, emotional and racial abuse and bullying. SuperCamps will take very seriously any reports of abuse, assault or harassment and will support the individual in making complaints to the police and other appropriate authorities.
- If the staff member does not feel that SuperCamps have taken the allegation seriously enough then the staff member should follow the **whistleblowing policy (8.0 Pg. 30)**.

#### **Suspension of staff**

- If allegations of misconduct are made against a staff member and this requires investigation from the Local Authority Safeguarding Board, the police, Ofsted or any other regulatory body, SuperCamps will suspend the staff member whilst the investigation takes place.
- If allegations of misconduct are made against a staff member and are investigated internally, SuperCamps will make any decisions regarding suspension during the investigation in accordance with SuperCamps Disciplinary Procedures.
- SuperCamps will fully cooperate with any external agencies that may be involved in all or part of any investigation.

#### **The outcome of investigations**

- If allegations of misconduct are proved to be true and are considered to be an act of gross misconduct, the staff member concerned may be immediately dismissed and referred to the Local Safeguarding Board and Ofsted if not done so already.
- If the allegations of misconduct are proved to be true and are considered to be an act of misconduct, the staff member concerned may be issued with a first or final formal warning.
- The SuperCamps staff member coordinating the investigation will inform all parties involved where appropriate, of the outcomes reached.

**This procedure should be read in conjunction with the Complaints Policy and Procedure (14.0 Pg. 45). This procedure in no way affects the rights of any individual to make a complaint to SuperCamps Head Office, Ofsted, Local Safeguarding Board or the police**

## **8.0 Whistleblowing Policy**

### **Policy**

SuperCamps is committed to the highest possible standards of:

- Openness and inclusiveness.
- Accountability.
- Integrity in-line with that commitment.

### **Aims**

- Encourage those working in a SuperCamps setting to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.
- Provide guidance on how to raise concerns.
- Reassure those raising concerns that they are able to raise genuine concerns “made in the public interest” without fear of reprisal, even if they turn out to be mistaken.

SuperCamps will provide all reasonable protection for those who raise concerns “made in the public interest”. SuperCamps will be responsible for ensuring that appropriate personal support is offered both to a staff member raising a concern and to any staff member against whom allegations have been made under this policy.

### **What is whistleblowing?**

Whistleblowing is defined as ‘raising concerns about misconduct within an organisation or within an independent structure associated with it’ (Nolan Committee on Standards in Public Life). In the legislation it is called a protected disclosure. The Public Interest Disclosure Act 1998 protects staff from suffering a detriment in their employment or being dismissed by their employer if they make disclosures in accordance with the legislation.

A staff member has certain common law confidentiality obligations to their employer. However, in a limited set of circumstances whistleblowing may override these obligations if a staff member reveals information about their employment or the work of SuperCamps. This guidance sets out the circumstances under which these disclosures may lawfully be made.

### **A concern must relate to something which:**

- Is a breach of SuperCamps policies.
- Falls below established standards or practice.
- Amounts to improper conduct, including something that may be:
  - A breach of the law.
  - A failure to comply with a legal obligation.
  - A possible miscarriage of justice.
  - A Health & Safety risk.
- Is damaging the environment.
- Is corruption or unethical conduct.
- Involves the abuse of children or other adults.
- Deliberately conceals any of these matters.
- Is of any other substantial or relevant concern.

These issues could have arisen in the past, be currently happening or likely to happen in the future. The law does not protect a staff member who would be breaking the law in making the disclosure.

### **How to raise a concern**

All concerns will be treated sensitively and with due regard to confidentiality and where possible every effort will be made to protect identity. Nevertheless, this information will need to be passed on to those with a legitimate need to have this information and it may be necessary for the whistle-blower to provide a written statement or act as a witness in any subsequent disciplinary proceedings or enquiry. This will always be discussed first.

### **Step 1**

To raise a concern you should normally raise it with your line manager. This can be done in person or in writing. SuperCamps recognises that sometimes it may be inappropriate for you to approach your line manager with your concern. In these circumstances, a number of alternatives are available depending on the nature of your concern. You can contact any of the following:

- **DSL Team**
- **Head of Operations**
- **Ofsted**

Although you are not expected to prove beyond doubt the truth of your concerns, you will need to demonstrate that you have sufficient evidence or other reasonable grounds to raise them.

### **Step 2**

The person with whom you have raised your concern will acknowledge its receipt as soon as possible and will write to you within 10 days to let you know how your concern will be dealt with. The information you can then expect to receive is:

- An indication of how the concern will be dealt with.
- An estimate of how long it will take to provide a final response.
- Whether any initial enquiries have been made.
- Whether further investigations will take place, and if not why not.
- Information about support available for you.

The person with whom you have raised your concern will at the same time notify the **HR Manager** that a whistleblowing allegation has been made.

### **Step 3**

Initial enquiries will be made to decide whether an investigation is appropriate. Where an investigation is necessary, it may take the form of one or more of the following:

- An internal investigation by the manager, which may, for example, take the form of a disciplinary investigation.
- An investigation by the HR Manager.
- A referral to Ofsted or the police.
- The setting up of an external independent inquiry.

### **Step 4**

You will be informed of the outcome of any investigation, in writing, and/or of any action taken, subject to the constraints of confidentiality and the law. If you do not feel your concern has been addressed adequately you may raise it with an independent body such as one of the following as appropriate:

- The Citizen's Advice Bureau.
- Ofsted.

- A relevant voluntary organisation.
- The Police.
- The Local Government Ombudsman.
- Equality and Human Rights Commission.

You must make a disclosure “in the public interest”: and in the circumstances it must be reasonable for you to make the disclosure. If there is an issue of an exceptionally serious nature which you believe to be substantially true, then you may disclose the issue to someone other than those listed above. In determining whether it is reasonable for you to have made a disclosure the identity of the person to whom the disclosure is made will be taken into account. Disclosures to anyone outside of the recognised bodies specified may not be protected under the Disclosures Act.

You have a duty to SuperCamps not to disclose confidential information. This does not prevent you from seeking independent advice at any stage.