



## SBC Safeguarding & Child Protection Policy

SBC Safeguarding and Child Protection Policy	
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### Policy Statement

The following document outlines Summer Boarding Courses' commitment to Safeguarding and Child Protection.

This document is applicable to all persons under the age of eighteen who are part of a Summer Boarding Courses programme. SBC has a safeguarding responsibility towards all of our students and must abide by this in accordance with statutory guidance and the law, this is made clear to all parents, agents and guardians. It is applicable regardless of gender, religion, beliefs, ethnicity, disability, sexual orientation, nationality or socio-economic background.

### The document is split into four sections:

**Definitions** – Provide a framework for understanding safeguarding and child protection.

**Statement** – our Safeguarding and Child Protection Statement outlines Summer Boarding Courses' commitment to the safeguarding and welfare of children in our care. It provides an overview of the policy.

**Policy** – the policy gives specific details on how Summer Boarding Courses will protect children in its care. It outlines how we will meet these responsibilities, highlights policies that are linked to safeguarding and child protection and addresses how we will deal with any suspected child protection issues.

**Appendices** – the appendices contain further policies that are linked to our Safeguarding and Child Protection policy.



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## Safeguarding and Child Protection Definitions

In order to understand the policy it is important to consider the following definitions:

**Safeguarding** – Safeguarding, and promoting the welfare of children, is a broader term than child protection. It encompasses ensuring the general welfare and happiness of students in our care, child protection and any policies linked to looking after children in our care. 'Children' includes everyone under the age of 18. Everyone who comes in to contact with children and their families has a role to play. In order to fulfil this responsibility effectively all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interest of the child.

**Child Protection** – Child protection is part of safeguarding and refers to activities undertaken to prevent children suffering, or likely to suffer, significant harm or abuse. The following are the main categories of abuse:

**Physical abuse** happens when a child is deliberately hurt, causing injuries such as cuts, bruises and broken bones. It can involve hitting, shaking, throwing, poisoning, burning, slapping or suffocating. It is also physical abuse when a parent or carer fabricates, or induces, the symptoms of an illness in a child.

**Sexual abuse** involves forcing or enticing a child to take part in sexual activities. It does not necessarily involve violence and the child may or may not be aware of what is happening. Sexual abuse includes: grooming a child with the intention of sexually abusing them; all forms of penetrative and non-penetrative sex; sexually exploiting a child in return for gifts, money or affection; and making, looking at and distributing indecent images of a child.

**Neglect** is persistently failing to meet a child's basic physical and/or psychological needs resulting in serious damage to their health and development. Neglect is more difficult to define than other forms of abuse, but generally refers to the absence of something such as love or attention (Daniel et al, 2011). In practical terms, neglect may involve a parent's or carer's failure to:

- provide adequate food, clothing and shelter
- protect the child from physical and emotional harm or danger
- supervise the child properly
- make sure the child receives appropriate medical care or treatment.

Neglect often happens at the same time as other types of abuse:

**Emotional abuse** is persistent and, over time, it severely damages a child's emotional development. Emotional abuse can be active or passive. Active emotional abuse involves an adult deliberately trying to scare, humiliate or verbally abuse a child. It may involve serious bullying causing the child to feel frightened or in danger or the exploitation of children. Passive emotional abuse happens when a parent or carer denies the child the love and care they need in order to be healthy and happy. Such adults might be emotionally unavailable; fail to offer their child praise and encouragement; interact with them in an age-inappropriate way; be over-protective, limiting their opportunities to explore, learn and make friends; or expect the child to meet the parent's own emotional needs.



## Indications of Abuse

Abused children may be afraid to tell anybody about the abuse. They may struggle with feelings of guilt, shame or confusion – particularly if the abuser is a parent, caregiver or other close family member or friend. Anyone working with children or young people needs to be vigilant to the signs listed below.

Whilst these signs do not necessarily mean that a child is being abused, they may indicate that further investigation is required:

- Regularly experiencing nightmares or sleeping problems.
- Changes in personality.
- Outbursts of anger.
- Changes in eating habits.
- Self-harming (includes head banging, scratching, cutting).
- Showing violence to animals, toys, peers or adults.
- Knowledge of "adult issues" e.g. alcohol, drugs, sexual behaviour.
- Lacking in confidence or often wary/anxious.
- Regressing to the behaviour of younger children.
- Regular flinching in response to sudden but harmless actions, e.g. someone raising a hand quickly.



## Safeguarding and Child Protection Policy Statement

Summer Boarding Courses is committed to Safeguarding and promoting the welfare of children and expects all staff and volunteers to share this commitment. We have a comprehensive Safeguarding and Child Protection Policy and procedures in place which all employees, volunteers and contractors are expected to adhere to.

Safeguarding and Child Protection is **everybody's responsibility**. We recognise that we have a fundamental duty of care towards all children we engage with including a duty to protect them from abuse. We aim to achieve this through compliance with child protection laws and best practice guidelines. This is facilitated through a comprehensive staffing structure and dedicated welfare staff.

SBC takes a 'whole-company' approach to safeguarding, staff should respond to all signs, reports and concerns of abuse, and staff are advised to maintain an attitude that 'it could happen here'.

### We recognise that:

- The welfare of children is paramount.
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse.
- Working in partnership with children, young people, their parents, carers and protection agencies is essential in promoting young people's welfare.

### The purpose of the policy is:

- To help make sure that children who engage in Summer Boarding Courses programmes are safe and protected;
- To provide a common understanding of child protection issues and inform staff of best practice;
- To provide step by step guidance to staff on what action to take if there is an allegation of or concern about actual or suspected situations of abuse.

This policy is mandatory for all Summer Boarding Courses staff. This includes anyone who works for Summer Boarding Courses, either in a paid or unpaid, full- or part-time capacity. This includes directly employed staff, contractors, and partner agencies.

### We will seek to protect children by:

- Valuing them, listening to and respecting them.
- Adopting child protection systems and procedures for staff.
- Recruiting staff safely, ensuring all necessary checks are made.
- Sharing information about child protection and good practice with staff, children and parents/carers
- Reinforcing clear and easy systems to ensure anyone can report concerns
- Sharing information about concerns with agencies who need to know, and involving parents and children appropriately.
- Providing effective systems and daily routines to ensure that children are thoroughly supervised.
- Providing effective management for staff through supervision, support and training.



We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

Our policy will be reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. This will also be in keeping with any changes in advice issued by our accrediting body, and is available publicly either via the school or college website or by other means.

This statement provides a summary of our commitment to the Safeguarding and protection of children in the care of Summer Boarding Courses. Our full Safeguarding and Child Protection Policy is available on our website, in all summer school offices and at our Head Office.

The policy is available in large print or another accessible format if required.

Staff will be made aware of our Safeguarding Policy ahead of their arrival on site and during their induction training. External Providers and Contractors will have access to the policy during their first visit to any venue ran by us. They will be asked to sign a declaration form to confirm their staff have an up-to-date DBS check and are suitable to work with children.

The procedures as outlined in this policy apply wherever our staff or contractors are working with or near our child or young persons, for example on a residential venue or camp or online.

This policy applies to all children attending any of Summer Boarding Courses Schools / Colleges.



# Safeguarding and Child Protection Policy

## 1. Introduction

This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; The Education Act 2002, and in line with government publications: "Working together to safeguard children" 2018, "Keeping Children Safe in Education" 2024 and "What to do if you are worried a child is being abused" 2003. The guidance also reflects "Safeguarding children and safer recruitment in education" (DfES, 2012) and guidelines from the British Council, English UK and Accreditation UK. This policy also follows guidance and procedures set by the Local Safeguarding Partnerships in which our summer schools operate.

We recognise that all adults that come into contact with children under our supervision have a full and active part to play in protecting them from harm and ensuring that their welfare is our paramount concern.

*"Doing nothing is not an option" (Lord Laming, 2003)*

All staff understand that our schools should provide a caring, positive safe and stimulating environment that promotes the development of our students during their stay with us.

The Aims of the policy are:

- To support all students who attend our courses and ensure that they feel safe, secure, valued and respected.
- To provide a positive environment in which a child feels that they can approach a member of staff should they have any difficulties, and that they will be listened to and supported by that member of staff
- To raise awareness of all staff at the school about their responsibilities in identifying and reporting possible cases of abuse
- To provide a means of systematically monitoring children known or thought to be at risk of harm
- To identify, monitor and support those children who may be in need of Early Help including support from other agencies apart from Children's Services e.g., Child and Adolescent Mental Health Services (CAMHS) where relevant (e.g. the child is a resident year-round in the UK.)
- To emphasise the need for good communication between staff in regard to safeguarding concerns of any level to include the necessity to report and low-level concerns with regard to staff conduct (see detail below).
- To develop a structured procedure within the school which will be followed by all members of staff in case of suspected abuse
- To develop effective working relationships with English UK, the British Council, the Local Area Designated Officers (LADOs), and the Local Authority Safeguarding Partnerships.
- To ensure that all staff working with children have been checked as to their suitability; including verification of their identity, qualifications and a satisfactory DBS check (according to our Safer Recruitment Guidelines).





## 2. Safe School, Safe Staff

We will ensure that:

- There is a Safeguarding and Child Protection policy
- Recruitment is done in line with our Safer Recruitment Policy
- There are procedures for dealing with allegations of staff abuse
- There are Designated Safeguarding Leads (DSLs)
- The DSLs undertake Level 3 training every 2 years
- All summer school staff will undertake safeguarding training at the start of their contracts
- Any weaknesses in the Safeguarding and Child Protection Policy are remedied immediately
- Safeguarding and Child Protection policies and procedures are reviewed annually



### 3. Responsibility for Safeguarding and Child Protection

#### 3.1 The Designated Safeguarding Leads (DSLs)

The Designated Safeguarding Leads within Summer Boarding Courses are Hannah Capstick (DSL), Andy Brownlee (deputy DSL) and Tom Flaherty (deputy DSL).

Summer Boarding Courses has departmental Safeguarding leads; Lucy Heath (Admissions), Jenny Cadden (Staff Experience), Jack Laughlin (Programmes) and Fiona Armstrong (Programmes).

All have undertaken the required training as laid out by the British Council, and will undertake further Level 3 training as required, at least every 2 years.

Their contact details are as follows:

<b>Name</b>	Hannah Capstick
<b>Role</b>	Operations Director
<b>Email</b>	<a href="mailto:Hannah@summerboardingcourses.co.uk">Hannah@summerboardingcourses.co.uk</a>
<b>Head Office Number</b>	01943 878718

<b>Name</b>	Tom Flaherty
<b>Role</b>	Head of Programmes
<b>Email</b>	<a href="mailto:Tom@summerboardingcourses.co.uk">Tom@summerboardingcourses.co.uk</a>
<b>Head Office Number</b>	01943 878718

<b>Name</b>	Andy Brownlee
<b>Role</b>	Academic Director
<b>Email</b>	<a href="mailto:Andy@summerboardingcourses.co.uk">Andy@summerboardingcourses.co.uk</a>
<b>Head Office Number</b>	01943878718

The DSLs' contact details will be made available in the summer school office for 24-hour support and should be the first point of contact should the designated person at each school be unavailable.

Departmental Safeguarding Leads		
<b>Staff Experience</b>	Jenny Cadden	<a href="mailto:Jenny@summerboardingcourses.co.uk">Jenny@summerboardingcourses.co.uk</a>
<b>Admissions</b>	Lucy Heath	<a href="mailto:Lucy@summerboardingcourses.co.uk">Lucy@summerboardingcourses.co.uk</a>
<b>Programmes</b>	Jack Laughlin	<a href="mailto:Jack@summerboardingcourses.co.uk">Jack@summerboardingcourses.co.uk</a>
	Fiona Armstrong	<a href="mailto:Fiona@summerboardingcourses.co.uk">Fiona@summerboardingcourses.co.uk</a>



## 3.2 DSL Responsibilities

The main responsibilities of the DSL are as detailed in KCSIE Annex C, but are also detailed below:

- To promote a culture of safeguarding so the welfare and best interests of young people is embedded within all the company's processes and procedures (including online safety).
- To co-ordinate and monitor safeguarding across all SBC's sites.
- To be available as the first point of contact for parents, child or young persons, teaching and non-teaching staff and external agencies where required.
- To liaise with our local Safeguarding Children's Partnership (XSCP) and other neighbouring Children's Services departments.
- To understand child protection processes, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- To update the Dukes Plus Safeguarding Advisory Board about safeguarding concerns including any referrals.
- To attend case conferences or other multi-agency planning meetings and to contribute to assessments and reports.
- To be responsible for procedures in SBC and to keep detailed, accurate records, including action taken. This includes keeping records for those cases where there is no need to make a referral to any other service.
- To provide a systematic means of monitoring and supporting young people known or thought to be at risk of harm or where there are ongoing concerns.
- To promote the educational achievement and care of any young person who are looked after. The DSL will take lead responsibility for any looked after children.
- To maintain a regular training programme for all members of the SBC staff and volunteers in line with advice from our accrediting body the British Council
- To ensure all new staff receive induction training in safeguarding and understand their responsibilities as well as have received a copy of KCSIE Part 1 and / or Annex A.
- To ensure that all staff have confirmed that they have been provided with, read and understood a copy of the Safeguarding Policy (i.e., this document), KCSIE Part 1, Annex A as well as Annex B if they lead or manage or work directly with children have read and understood them.
- To ensure that all staff are assisted to understand and discharge their roles and responsibilities as set out in KCSIE and in this policy.
- To ensure child protection files are maintained, which show a clear chronology and the reason for decisions taken.
- To ensure there are other appropriate policies and procedures in place to safeguard and promote children's welfare including, but not limited to, a Staff Code of Conduct, Student Anti-bullying Policy, Student Behaviour Management Policy and IT policy.
- To ensure there is an effective Staff Code of Conduct (including online conduct) which is implemented throughout SBC
- To monitor the confidentiality, keeping and storage of records in relation to safeguarding. The Summer Boarding Courses records on child protection are kept in a secure online file and are separated from routine student records. Access is restricted to the Head of Summer Boarding Courses, DSL, and Deputy DSLs.
- To ensure the Safeguarding Policy is reviewed annually with the support and guidance of the Dukes Plus Safeguarding Advisory Board.



- To ensure the Safeguarding Policy is reviewed in the event of an incident or change in legislation, and that any remediation necessary in policy or procedures is given immediate effect
- To be responsible for overseeing online safety across the Company with the support of the Dukes Education IT Team.
- To ensure IT systems have appropriate filters installed (where possible) without unduly restricting access for educational purposes.
- To ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified.
- To consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs versus safeguarding risks. (KCSIE 2024, paragraph 140).
- To have policies and procedures in place regarding young people's access and use of the internet in while attending company events or services.
- To ensure the Safeguarding Policy is available on the SBC's website.
- To ensure that "Safeguarding" is a standing item on the agenda for, and minutes of, staff meetings. This is to ensure that all members of staff will be aware that there is a safeguarding concern about that child or young person, with detailed information only shared on a 'need to know' basis. It also provides those present with an opportunity to raise any general company safeguarding issues.
- To ensure an end of season report and an annual safeguarding audit is sent to the Dukes Plus Safeguarding Advisory Board.
- The DSL will make all staff aware of the requirement that children investigated by the police whether the police are attending in school or interviewing the child at a police station, that an appropriate adult present. [www.safeguarding.link/page](http://www.safeguarding.link/page). (Annexe C, KCSIE 2024, page 162).
- To comply with any assurance / safeguarding requirements required by our host schools and colleges, liaising on these matters where appropriate.

### 3.3 The Deputy DSLs & Departmental Safeguarding Leads

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

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

When courses are operating, the DSL and/or the Deputy DSLs are available either on site, or contactable by telephone, for staff, child or young persons or parents to discuss any safeguarding concerns.

Departmental Safeguarding Leads are also trained to the same level as the DSL and ensure that Safeguarding and Child Protection is advocated for in their departments liaising regularly with the DSL.



### 3.4 The Designated Safeguarding Officers (DSOs)

There will be at least one Designated Safeguarding Officer (DSO), at each school that are qualified to a minimum of Level Two Safeguarding and Child Protection. Details for the schools' DSOs can be found on the summer school staff noticeboard and will be made available to staff at the school during the induction training. The DSOs are the local point of contact and will always pass information onto the company DSL where required.

### 3.5 Responsibilities of the staff

- To provide a safe and supportive learning environment
- To read and understand, Part 1 of Keeping Children Safe in Education and Annex A, as well as Annex B if they lead or manage or work directly with children.
- To read and understand the Company's Safeguarding and Child Protection Policy and Procedures i.e. this document.
- To read and understand the SBC Student Behaviour Management and Anti-Bullying policies
- To adhere to the SBC Staff Code of Conduct.
- To undertake regular safeguarding training, at least annually.
- To be alert to the signs of abuse and neglect, including child-on-child abuse, and to report any concerns to the DSO immediately.
- To be aware that that even if there are no reports of child-on-child, or any other form of abuse, it does not mean it is not happening, it may just not be being reported.
- To understand the local authority thresholds for reporting of allegations about children (Children's Social care or those who require early help and support. (Early help).
- To know what to do if a child tells a member of staff he/she is being abused, exploited or neglected.
- To understand the child protection process, including Section 17 and Section 47 assessments under the Children's Act (1989) and 'Early Help' processes.
- To help children or young persons understand how to keep themselves safe and manage risk.
- To consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare (Contextual Safeguarding).
- To report to the Director of SBC any concerns about the conduct of adults, including low level concerns (this includes behaviour outside SBC that might indicate an individual is unsuitable to work with children)



### 3.6 Responsibilities of the Director of SBC

The Director of SBC plays a vital role in ensuring the welfare, health, and safety of all young people in their care. To promote an overarching culture of safeguarding so the welfare of children is embedded within all the SBC's processes and procedures operating with the best interests of the child at their heart.

Further responsibilities include:

- Facilitate a whole-site approach to safeguarding and child protection to ensure that welfare, health, and safety procedures underpin all aspects of process and policy development.
- Ensure all students are provided with a safe and caring environment, their concerns are listened to and acted upon in a swift and timely manner.
- Ensure any concerns of a welfare or safeguarding nature are acted upon in a swift and timely manner, liaising with external statutory agencies and multi-agency partners including LADOs, police, MASH, Single Point of Access.
- Ensure they meet their safeguarding and child protection responsibilities as detailed in their own safeguarding and child protection policy.
- Regular liaison with the Dukes Plus Safeguarding Advisory Board with any concerns of a welfare or safeguarding nature which meet the thresholds for referral.
- Ensuring that all staff are recruited using safer recruitment procedures and records of checks made before employment are maintained in HR files or electronically to meet minimum regulatory requirements.
- Ensure a single central register or a manual log is kept for their setting and maintained appropriately meeting regulatory requirements of all staff checks required pre-employment.
- Ensure all policies and procedures relating to the welfare, health, and safety of young people in their care are kept up to date, reviewed regularly and are implemented effectively paying due regard to Keeping Children Safe and Education Sept 22.
- To ensure the policy is available publicly on the SBC's website.
- To ensure that SBC holds at least two emergency contact numbers for each young person.
- To ensure safeguarding and child protection underpin all relevant aspects of process and policy development, and that processes and policies operate with the best interests of young people at their heart.
- To ensure policies, procedures and training in the Company are effective and comply with the law at all times.
- To ensure there is an effective Safeguarding Policy in place, which is consistent with best practice taken from KCSIE (Sept 2024), Working Together (2023) and the requirements of the local Safeguarding Children's Partnership (SCP).
- The SBC Director should ensure that all tasks relating to Safeguarding addressed in this policy have been actioned with the support and guidance as needed of the Dukes Plus Safeguarding Advisory Board, through the annual safeguarding reviews.
- To conduct a review of the Safeguarding Policy at least annually (and in the case of a serious incident), including an update and review of the effectiveness of procedures and their implementation. The annual review of safeguarding forms part of the Annual Safeguarding Meeting.



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

The board is in place to offer support and guidance to the Director of SBC and SBC safeguarding staff. This support and guidance may take the form of support of live safeguarding issues or supporting the Director in monitoring the quality of practices and policy.

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

- Tim Fish, Managing Director Dukes Plus
- Ricky Tavares Director Dukes Plus
- Marcelle Steward, Director of People
- Paul Ludlow Compliance Director, Dukes



## 4. Preventing Unsuitable People from Working with Children

Head office staff in charge of recruitment have undertaken Safer Recruitment Training. This will be renewed every 3 years. Details of staff that have undertaken this training are as follows:

Will Finlayson	Director
Faye Cook	Head of People
Eve Nicholson	Staff Experience Coordinator
Sally Bowman	HR and Office Coordinator
Hannah Capstick	Operations Director
Jack Laughlin	Programme Manager
Jess Ball	Recruitment Manager
Jenny Cadden	HR Manager
Kyle Rogan	Head of Marketing
Jenni Fogg	Academic Manager
Tom Flaherty	Head of Programmes
Fiona Armstrong	Programme Manager

### 4.1 Safer recruitment

SBC follows statutory guidance for the safer recruitment and employment of staff who work with children as set out in Part Three of KCSIE and Disqualification under the Childcare Act 2006 (September 2018). Please also see our safer recruitment policy.

All staff are checked as to their suitability. These checks include:

- (a) The taking up of references
- (b) Verification of identity
- (c) Verification of right to work in the UK
- (d) Where appropriate, verification of qualifications
- (e) Where appropriate, overseas police checks
- (f) Online searches as part of the shortlisting process
- (g) A satisfactory enhanced check with the Disclosure & Barring Service (DBS), including a Barred List check for staff engaged in regulated activity with children
- (h) A self-declaration to ensure compliance with disqualification regulations made under the Children's Act 1989





- (i) For staff engaged in teaching duties, a check that the teacher is not subject to a prohibition order issued by the Secretary of State. NB this is applicable for anyone with QTS and / or has worked in a state school.
- (j) A medical fitness questionnaire and / or medical self-declaration.

In exceptional circumstances, and as long as specific criteria are met, a newly recruited member of staff may, if closely supervised and accommodated separately, begin work without an enhanced DBS certificate or overseas police clearance. The conditions applicable are set out in the Recruitment Policy and include a requirement for all other checks to be completed, including a Barred List check. The Summer School Director/College Principal will also complete a DBS Risk Assessment with support from the Staff Experience Team, signed off by the SBC Director and reviewed fortnightly until the DBS certificate is received and, if applicable, the overseas police clearance is also received. A DBS Risk Assessment is also completed if a staff member's references checks have not been returned.

Staff involved in recruitment receive appropriate training in safer recruitment and this is updated no less than every three years.

All staff at the schools will have completed their online Level 1 Safeguarding and Child Protection awareness training via Accreditation UK and receive further Safeguarding training at the school to ensure that they are aware of their responsibilities.

We will ensure that all contractors and external providers are given a copy of our Safeguarding and Child Protection Policy and that their staff are suitable to work with children. Contractors and external providers are required to sign documentation to confirm compliance with SBC's Safeguarding and Child Protection Policy. For more details, see *Recruitment Policy*.

## 4.2 Referral to the Disclosure & Barring Service (DBS) and Teaching Regulation Agency (TRA)

If the company ceases to use the services of any person (whether employed, contracted, a volunteer or a student) because that person was considered unsuitable to work with children, a prompt and detailed report will be made to the DBS.

This will also include anyone who would have been dismissed if they had not resigned first.

For teaching staff, the company also has a legal responsibility to report the matter to the Teaching Regulation Agency (TRA) which may result in a prohibition order being issued by the Secretary of State for Education, as required by sections 141D and 141E of the Education Act 2002.

A report to the TRA may also be made for additional reasons 'unacceptable professional conduct', 'conduct that may bring the profession into disrepute' or a 'conviction, at any time, for a relevant offence'.

Advice about whether an allegation against a teacher is sufficiently serious to refer to the TRA can be found in misconduct: the prohibition of teachers (October 2015). Further guidance is published on the TRA website - <https://teacherservices.education.gov.uk/>



## 4.3 Low-Level Concerns

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 SBC may have acted in a way that is inconsistent with the Staff Code of Conduct, including inappropriate conduct outside of work, and does not appear to meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

A member of staff may have doubts about the behaviour of another adult towards a young person, or another child, or concerns about how their own behaviour might be interpreted.

*For elimination of any doubt a "young person" is defined as someone up to the age of 18 years or someone with special needs in your care up to the age of 25 years.*

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

- being over friendly with young people.
- having favourites
- taking photographs of young people on their mobile phone/other device
- engaging with a young person on a 1:1 basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language,
- Email, messaging, use of social media sites or other communication between adults and young people outside agreed protocols
- Any incident where he/she feels that his/her actions or behaviour towards a young person or that of another adult, may have been misinterpreted or may have given rise to a risk or misinterpretation.

Staff must report any low-level concerns to their Designated Safeguarding Officer who will liaise with the DSL: Hannah Capstick.

The Director of SBC, Will Finlayson, will be the ultimate decision maker in respect of all low-level concerns. The Director of SBC may wish to consult with the Dukes Plus Safeguarding Advisory Board.

Staff are also encouraged, and to feel confident if the need arises, for them to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

When a low-level concern has been raised by a third party, the SBC Director will collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The name of the person making the report will be noted and requests to remain anonymous will be respected as far as reasonably possible.

SBC will also consider if any wider issues within its company which has enabled the behaviour to occur or contributed to it, and if appropriate policies could be revised or extra training delivered to minimise the risk of recurrence.



All low-level concerns will be recorded in writing. The record will include:

- details of the concern.
- the context in which it arose.
- evidence collected by the SBC Director where the concern has been raised via a third party.
- the decision categorising the type of behaviour.
- action taken.
- the rationale for decisions and action taken.
- the name of the individual sharing the concerns (respecting any wish to remain anonymous as far as possible)

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

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the Director will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO.

The purpose of low-level reporting is to protect both young people and the staff working with them and allows a system for a simple record to be kept in case events are later referred to or any patterns emerge.

Low-level concerns relating staff employed by a third party will be reported to the agency/employer in order that any patterns of behaviour may be identified. (KCSIE 2024, paragraph 443).

A staff member who reports a low-level concern, or a more serious allegation, in good faith will suffer no detriment as a result and will benefit from the protection set out in the SBC's Whistleblowing Policy.

If there is any doubt as to whether a low-level concern meets the harms threshold, then the SBC Director will consult with the LADO. (KCSIE 2024, paragraph 436).

## 4.4 Allegations against other Children

If the allegation involves another child the procedure outlined in Appendix 1: *"Child Protection Guidance Notes to all Summer School Staff: How to Respond to Allegations of Abuse from a Child"* must be followed.

There will be a need to distinguish between actions that can be dealt with through normal disciplinary channels and those that constitute potential abuse where involvement of other statutory agencies is required. If in any doubt the member of staff who witnesses the incident or to whom it is disclosed must directly contact the DSO.



## 5. Procedures if a child protection concern is raised

If a child protection concern is raised at one of our schools then we will act immediately to ensure the safety of all students at that school.

All members of staff know how to respond to a child who discloses abuse. Guidelines for this process can be found in Appendix 1 and further training provided during the induction week.

### Allegations against Staff

- All staff should take care not to place themselves in vulnerable positions with students.
- All staff should be aware of SBC's policies on *Behaviour Management* and the *Staff Code of Conduct*.
- Guidance about staff conduct and safe practice will be given during induction and staff will sign to confirm receipt of this training.
- We understand that a student may make an allegation against a member of staff.
- If such an allegation is made, or information is received that suggests that an adult working at one of our schools may be unsuitable to work with children, the member of staff receiving the allegation or becoming aware of the information should immediately inform Designated Safeguarding Officer/Designated Safeguarding Lead.
- Designated Safeguarding Officer/Designated Safeguarding Lead in consultation with the Summer School Director/College Principal will discuss the content of the allegation with the Local Authority Designated Officer or team of Officers if these allegations raise serious Child Protection concerns.
- If the allegation is made against the Summer School Director/College Principal then the information should be passed to the Company Director
- If there is a present threat to a child then the accused member of staff will be removed from the school site immediately.
- Auxiliary discussions will be held with the Designated Officer or team of Officers (Previously known as LADO) to establish further steps, including suspension and termination of the staff member's contract.
- Any member of staff found not suitable to work with children will be notified to the Disclosure and Barring Service for consideration for barring following their resignation or dismissal.
- Summer Boarding Courses will make a referral to DBS where a person satisfies the harm test.

The harm test is explained in the Disclosure and barring service guidance: Making barring referrals to the DBS and Section 31(9) of the Children Act 1989 as amended by the Adoption and Children act 2022.

Where it is alleged that anyone working in a school or college 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 they may pose a risk of harm to children, and/or



- Behaving or may have behaved in a way that indicates they may not be suitable to working with children.

The last bullet point above includes behaviour that may have happened outside of school or college, that might make an individual unsuitable to work with children. This is known as transferable risk. Where appropriate an assessment to transferrable risk to children with whom the person works should be undertaken. If in doubt, seek advice from the local LADO.

## 6. Sharing Information

It is important that children, parents and staff are all made aware of our Safeguarding and Child Protection Policy. Set out below are the steps taken to ensure that each party has received the relevant information:

### *Students*

The names of the Designated Safeguarding Officers and pastoral staff at each school will be clearly displayed. Students will be made aware that should they have any concerns they can talk to any member of staff. This information will be passed to students through the welcome talk, student notice boards, the student handbook and house inductions.

### *Staff*

All new members of staff will be given a copy of our Safeguarding and Child Protection Policy within the Staff Handbook. They will also take part in a Safeguarding and Child Protection workshop as part of their induction at the school. Staff will also be made aware of SBC's DSL and Deputy DSLs and how to contact them if needed in addition to the DSOs at each site.

### *Parents*

All parents, guardians and agents are made aware of Summer Boarding Courses Safeguarding and Child Protection Policy through our Safeguarding Statement which is available on the Parent Welcome Pack links. The full policy will be available to parents, guardians and agents.

## 7. Confidentiality

We recognise that all matters relating to Child Protection are confidential.

The Directors or DSLs will disclose any information about a child to other members of staff on a need-to-know basis.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

All staff must be aware that they cannot promise a child to keep secrets which may compromise the child's safety or wellbeing.



The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.'

## 8. Supporting Staff

We recognise that any staff member who has become involved with a child who has suffered, or appears to have suffered harm, may find the situation stressful and upsetting.

We will support such staff through discussions with the DSL and Directors and seek further support as appropriate

## 9. Supporting Students

We will support all children by:

- Encouraging self-esteem and assertiveness, through the curriculum as well as our relationships, whilst not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the schools.
- Encouraging students to be open and feel that they can share information if they wish with any adult in the school whom they trust. We should not pry into a child's life but provide an environment in which the children feel safe and secure and where they will have the maximum opportunity to speak freely about concerns and worries.
- Liaising and working together with other support services and those agencies involved in the safeguarding of children.

We recognise that a child who is abused or witnesses' violence may feel helpless and humiliated, may blame themselves and find it difficult to develop and maintain a sense of self-worth.

We recognise that there are certain areas for concern that deserve particular attention and that all adults working with children should be aware of:

### 9.1 Female Genital Mutilation

We recognise that female genital mutilation (FGM) is a violation of the human rights of girls and women and a form of abuse. If any member of staff suspects that FGM is a risk, is imminent, or has already taken place on a student, they must inform a DSO. The c will liaise with the DSLs. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police immediately where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18 and they have a legal responsibility to do this.



## 9.2 Child Sexual Exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (e.g. food, accommodation, drugs, alcohol, gifts, money or affection) as a result of engaging in sexual activities. Sexual exploitation involves varying degrees of coercion, intimidation or enticement. It can include unwanted pressure from peers to have sex, sexual bullying including online bullying or grooming. It is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of abuse. If any staff member is concerned that a student is caught up in CSE they must share their concerns with a DSO or DSL.

## 9.3 Child Criminal Exploitation (CCE)

Child Criminal Exploitation takes varied forms but is ultimately the grooming and exploitation of children in to criminal activity. This may include extra-familial harms. If any staff member is concerned that a student is involved in CCE they must share their concerns with DSO or DSL.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.





## 9.4 Child on Child Abuse (formerly known as Peer-on-peer abuse)

Children can abuse other children. This is generally referred to as child-on-child abuse and can take many forms. This can include (but is not limited to) bullying (including online bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Any child can be vulnerable to child-on-child abuse and staff should be alert to signs of such abuse amongst all children.

However, individual, and situational factors can increase a child's vulnerability to abuse by their peers.

For example,

children who are more likely to follow others and/or who are socially isolated from their peers may be more vulnerable as may child or young persons with SEND or certain medical conditions.

Children who are LGBTQIA+ can also be targeted by their peers. In some cases, a child or young person who is perceived by their peers to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQIA+.

SBC has a zero-tolerance approach to such abuse and it will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". Staff will always challenge such behaviours.

## 9.5 Harmful Sexual Behaviour (HSB)

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). HSB can occur online and/or face-to-face and can also occur simultaneously. HSB should be considered in a child protection context.





It is effective safeguarding practise for the DSL (and deputies) to have a good understanding of HSB. HSB can, in some cases, progress on a continuum. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that they are offered appropriate support.

## 9.6 Domestic Abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial; and
- emotional

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. Domestic abuse can include when children see, hear or experience its effects.

## 9.7 So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

## 9.8 Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both



parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

## 9.9 Mental health

SBC have an important role to play in supporting the mental health and wellbeing of children and young people. Mental health problems can also, in some cases, be an indicator that a child or young person has suffered or is at risk of suffering abuse, neglect or exploitation.

Early intervention to identify issues and provide effective support is crucial. Our company's role in supporting and promoting mental health and wellbeing can be summarised as:

**Prevention:** the creation of a safe, calm school environment where mental health problems are less likely, improving the mental health and wellbeing of the whole Company's population, and equipping child or young persons to be resilient so that they can manage the normal stresses of life effectively.

This includes teaching children and young people about mental wellbeing through the curriculum and reinforcing this teaching through our Company's activities.

- Identification: recognising emerging issues as early and accurately as possible – parents/guardians are asked to make SBC aware if their child has previously suffered from poor mental health via the medical form
- If identified by parents/guardians, SBC's admissions team will ensure this is explored prior to a student's arrival at summer school with potential programme modifications identified
- Early support: helping child or young persons to access early support and intervention
- Access to specialist support: working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When staff suspect that a child or young person is having mental health difficulties, support will be put in place, using a graduated response process.

1. an assessment to establish a clear analysis of the child or young person's needs.
2. a plan to set out how the child or young person will be supported including the creation of an Individual Health Care Plan where required.
3. action to provide that support.
4. regular reviews to assess the effectiveness of the provision (monitoring may be provided by Individual Student Observation Forms).



Adverse Childhood Experiences (ACEs) and other events may also have an impact on child or young persons.

These include:

- loss or separation – resulting from death, parental separation, divorce, hospitalization
- loss of friendships (especially in adolescence)
- family conflict or breakdown that may result in the child having to live elsewhere, being taken into care, or adopted, deployment of parents in armed forces families
- life changes – such as the birth of a sibling, moving house or changing schools or during transition from primary to secondary school
- traumatic experiences such as abuse, neglect, domestic violence, bullying, violence, accidents, or injuries.
- other traumatic incidents such as a natural disasters or terrorist attacks – Where children – experience a range of emotional and behavioural problems that are outside the normal range for their age, they might be described as experiencing mental health problems or disorders.

Mental health professionals have classified these as:

- emotional disorders – phobias, anxiety states and depression
- conduct disorders – stealing, defiance, fire-setting, aggression, and antisocial behaviour
- hyperkinetic disorders – disturbance of activity and attention
- developmental disorders – delay in acquiring certain skills such as speech, social ability, or bladder control, primarily affecting children with autism and those with pervasive developmental disorders
- attachment disorders – children who are markedly distressed or socially impaired because of an extremely abnormal pattern of attachment to parents or major care givers
- Trauma disorders, such as post-traumatic stress disorder, because of traumatic experiences or persistent periods of abuse and neglect
- other mental health problems including eating disorders, habit disorders, somatic disorders; and psychotic disorders such as schizophrenia and manic-depressive disorder

Only appropriately trained professionals can make a diagnosis of a mental health problem. Our staff, however, are well placed to observe children and young people day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have any concerns about the mental health of a child or young person, they should report this to the DSL immediately following the procedures outlined in this policy.

More information can be found in the DfE 'Mental Health and Behaviour in Schools' guidance.



## 9.10 Young People with special educational needs and disabilities (SEND)

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

Staff will be aware that:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration as it might be due to abuse taking or have taken place.
- children with SEN and disabilities can be disproportionally impacted by things like bullying – without outwardly showing any signs.
- communication barriers may exist and difficulties in overcoming these barriers.
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

Any reports of abuse involving children with SEND will require close liaison with the designated safeguarding lead (or deputy).

We will consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.

## 10. Prevent Duty & Extremism

In the current international climate, it is important for those working with vulnerable and young people to be aware of their exploitation, including from potential radicalisation. This policy sets out Summer Boarding Courses' commitment to ensuring the safety of its students, increasing resilience to radicalisation and challenging extremist views in line with the Counter Terrorism & Security Act 2015. All staff at the schools will have Prevent Duty awareness training to ensure that they are aware of how to identify students who may be at risk and how to promote Core British Values.

Responsibility for the Prevent risk assessment, action plan and policy lie with the Designated Safeguarding Lead and deputy Designated Safeguarding Lead. Their duties are to ensure delivery of an effective risk assessment/action plan and policy as outlined here.

Due to the size of Summer Boarding Courses, the lead person duties are shared between Hannah Capstick (Operations Director & DSL), Tom Flaherty (Head of Programmes), Andy Brownlee (Academic Director) alongside Summer School Directors/College Principals.

A risk assessment has been produced showing what is already being done and what still needs to be done; it will be reviewed and updated at least annually.



Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement.

Staff are encouraged to counteract risks where possible in the following ways (NB this list is not exhaustive):

- Promote a safe and supportive international environment via clear expectations of accepted behaviours and those, including radicalisation and extremism, that will not be tolerated.
- Promote core British and international values through curriculum, school rules, welcome talk, parent welcome pack, and positively reinforced throughout the courses. Approach is to educate that this is how things are in UK; may be different to your country.
- Where possible, develop critical awareness and thought to counter accepting extremism without question, especially of online material.
- Challenge radical or extremist views in any context (formal or informal). In most situations this would require an immediate response, referring to international environment of school, and tolerance expected, then reporting concerns.
- Be ready to react when world or local events cause upset, and the likelihood of conflicting feelings being expressed. Prevent lead to take initiative in these situations.
- E-safety awareness stating clear rules on accessing extremist/ terrorist websites/use of social networks to exchange extremist/terrorist views.
- Ensure that extremist speakers do not use premises to distribute material or expound views; have system for vetting any visiting speakers/presenters.
- Staff get to know students and friendship groups. Through knowing students well, it is easier to spot changes in behaviour.
- Staff to be observant and vigilant in noticing any signs of radical or extremist behaviour.

All staff will undertake online training, which will be supplemented with face-to-face training to ensure staff understand:

- Context and expectations of Prevent
- Their duty to implement the policy
- Terminology and risks associated with radicalisation and extremism



- How to identify and support vulnerable students
- Ways the school will counteract the risks
- Signs to notice that may cause concern
- Who the lead Prevent person is and procedures for communicating concerns
- The importance of their own behaviour and professionalism in (a) being exemplars of British values and (b) not discussing inflammatory subjects with students (Code of Conduct).

Students are made aware of the key elements of the policy through the Welcome Talk and ongoing staff support. The key features of this are:

- Importance of maintaining a supportive and tolerant society within school
- What core British values are and why they are considered important
- School rules, particularly those regarding IT
- That they must report any concerns/incidents, and procedure for that

Channel. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools and colleges to make referrals if they are concerned that an individual might be vulnerable to radicalisation.

SBC has a Prevent risk assessment which is shared with staff during induction.

## 11. Online safety

SBC adopts a whole organisational approach to online safety which seeks to reduce risk as far as possible without depriving children and young people of the significant benefits provided by technology and the internet.

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

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

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

SBC does all it reasonably can to limit the child or young person's exposure to the above risks in the organisation. Where possible SBC will adopt the filters and monitoring systems in place at host sites, which are designed to protect them from online abuse without imposing unreasonable restrictions and preventing children and young people benefitting from the wealth of resources available online. Students are asked to sign an IT code of conduct on their arrival on-site and staff receive training and guidance with regards to encouraging a responsible use of IT. Staff are also made aware of their responsibilities in regard to filtering and monitoring where relevant.



Where host sites have filtering and monitoring systems in place to alert staff to IT use that may fall in to the areas of risk identified above they are asked to notify the sites' Designated Safeguarding Officer who will then liaise with the Company DSL with regard to next steps.

SBC recognises that many students have unlimited and unstricted access to the internet via mobile phone networks. This access means that some children whilst in the care of SBC may sexually harass, bully and control others via their mobile phone and smart technology, share indecent images consensually and non-consensually and view and share pornography and other harmful content. Behaviour of this nature by child or young persons, via texts, direct messages, social media or email, will be treated as seriously as any other type of bullying and will be managed through the Company's ***Student Behaviour and Anti-Bullying policy and procedures***.

Social networking sites and other apps can be sources of risk of inappropriate and harmful behaviour. If staff suspect that a child or young person may be at risk of or suffering from online harm, they should follow the reporting procedures set out in this policy.

## 12. Whistle Blowing

All staff should be aware of their duty to raise concerns in regard to Safeguarding and Child Protection. Raising concerns in this way is referred to as "Whistle Blowing". Such concerns with regard to staff behaviour may include, but are not limited to: witnessing an incident, overhearing an inappropriate comment, becoming aware of the attitude and actions of another member of staff towards a student. Concerns should be raised directly to the Summer School Director, or if the concerns are about the Summer School Director to the Company Director. Staff will be reminded of this during induction.

SBC recognises that our host sites are also duty bound to report any concerns in regard to Safeguarding and Child Protection.

## 13. Physical Intervention

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering him/herself or others, and that at all times the minimal force necessary must be used to prevent injury to another person.

Such events should be recorded and signed by a witness on an incident report form, and reported to the DSL immediately.

We understand that physical intervention of a nature which causes injury or distress to a child may be investigated under child protection or disciplinary procedures.

We recognise that in the context of working with children that there will be a degree of physical contact. All staff will be given "Safe Practice" guidance to ensure that they are clear about their professional boundaries. As advised in KCSIE, 2024.



## 14. Other Related Policies

The following policies are linked to the Safeguarding and Child Protection Policy:

- Safer Recruitment
- Data Protection
- Behaviour Management & Anti-Bullying
- Student Code of Conduct
- Staff Code of Conduct
- Student Internet Code of Conduct
- Health and Safety Policy
- Summer Risk Assessment Policy
- Medical Policy
- IT Policy
- Social Media and Social Networking
- Offsite Supervision Policy
- Onsite Supervision Policy

The following are appendices to the Safeguarding and Child Protection Policy:

- Responding to a disclosure from a child
- SBC Child Protection Disclosure Pathway
- Responding to allegations against staff
- Responding to allegations against the SBC Director
- Referral Form
- DSO contact details
- DSL contact details
- LADO contact details

## 15. Monitoring and Evaluation

Our Safeguarding and Child protection Policy will be monitored and evaluated by:

- Accreditation UK visits to our schools
- Discussion with the DSLs
- Student Questionnaires
- Parent Questionnaires
- Staff Questionnaires
- Safeguarding Compliance Check by DSL/dDSL
- Reviewing students logs (to include accident and incident logs)
- With the support of the Dukes Plus Safeguarding Advisory Board through a process of annual safeguarding meetings and audit and any other support as required.





## 16. Record Keeping

SBC will ensure that any records about children or adults should be handled and stored carefully, according to Data Protection principles, records containing personal information should be:

- Adequate, relevant and not excessive for the purpose(s) for which they are help
- Accurate and up to date
- Only kept for as long as is necessary (Information Commissioner's Office, 2021).

Any records pertaining to child protection should be kept confidential and stored securely. SBC has a secure filing system accessed by the DSL and Deputy DSLs.

If there are any concerns about a child's welfare or safety SBC will ensure an accurate record is kept of:

- The date and time of the incident/disclosure
- The date and time of the report
- The name and role of the person to whom the concern was originally reported by and their contact details
- The name and role of the person making the report (if different to above) and their contact details
- The names of all parties who were involved in the incident including witnesses
- The name, age and any other relevant information about the child who is subject of the concern
- Any action taken to look in to the matter
- Any further action taken (such as a referral being made)
- The reasons why the organisation decide not to refer those concerns to a statutory agency (if relevant)

Any reporting should be factual. Any interpretation or inference drawn from what was observed, said or alleged should be clearly reported as such. The report should be signed and dated by the person making the report.

Retention periods:

Any files relating to child protection should be kept until the child is 25 years old, in some cases, records should be kept for longer periods such as if the records provide information about a child's personal history which they may wish to access later. When records are being kept for longer than the recommended period, files should be clearly marked with the reasons for the extension period.

When the retention period is finished, SBC will ensure confidential records should be incinerated or shredded, any electronic versions of the record must be purged.

Recording concerns about adult behaviour:

SBC will ensure clear and comprehensive records of all allegations made against adults working with young children will be kept, this will include:

- What the allegations were
- How the allegations were followed up
- How things were resolved
- Any action taken
- Decisions made about the person's suitability to work with children.



Any records relating to concerns about an adult's behaviour are kept in the person's confidential personnel file. These are kept until they at least reach retirement age or for 10 years – whichever is longer. Records are kept regardless of whether the allegations were unfounded. However, if allegations are found to be malicious then records will be destroyed immediately.

Further information can be found in SBC's Data Retention Policy.

## **17. Policy Review**

Summer Boarding Courses will review its Safeguarding Policy on a yearly basis (or at least two months before the commencement of any courses run outside of July and August) in consultation with local Safeguarding Partnerships, Summer Boarding Courses' Child Protection Officer and the Directors. The consultation will take into account the views of staff that are expressed during the summer. The policy will then be checked by the Dukes Education Group Compliance Director.

The policy will also be reviewed in line with any significant changes to the law or recommendations from Accreditation UK and the British Council (Summer Boarding Courses Accrediting Body).



## Appendix

### Responding to a disclosure from a child

#### Child Protection Guidance Notes to all Summer School Staff

*It is not for staff to decide if the allegations are true or not. Their role is only to listen, report as accurately as possible and allow the official procedure to then take over.*

***If a crime is committed or suspected of being committed please refer straight to the policy (dial 101) and then inform the DSL of actions taken.***

When responding to a disclosure from a child it can often be helpful to remember the 5Rs:

- **Recognise** – physical signs/behavioural changes
- **Respond** – take action – don't ignore the situation
- **Report** – report to the Safeguarding Lead (unless implicated) and share on a need-to-know basis only
- **Record** – concerns, disclosures and allegations should be recorded on a Notice of Concern
- **Refer** – situation may need to be reported to statutory authorities (police, children's services, etc.) by DSL

#### When listening to a discloser staff should:

- Stay calm and be available. (The student has put their trust in you.)
- Find out the general subject area. Ask '**What is it about?**'
- If subject matter does require privacy and you are in public place, suggest to student to go somewhere quieter.
- Tell another staff member where you are and that you are having a private meeting with a student.
- Try to sit at right angles to student rather than directly opposite or next to them. Be open and ready to listen. Ask '**What do you want to tell me?**'
- Be open, calm, patient and listen. Your role is only to hear what they have to say – and try and remember their exact words.
- If appropriate, you can say; '**Is there anything else you want to tell me?**'
- If the student hasn't already told you, you are allowed to ask only '**When did this happen?**'
- When student has told all they want to, reassure them and say '**You've done the right thing to tell me.**'
- Find somebody responsible (usually another staff member) to sit with them whilst you respond.
- Tell the Designated Person what has happened.
- Immediately afterwards, write a report of the meeting using the student's exact words, giving only facts and record time, date, place etc. If the student's language level was low, state that in your report.
- Ensure report is filed in proper (secure) place.
- Once you have handed matter over to the Designated Person (or other senior staff) and completed and filed your report, and you know the student is being looked after, (it may



be appropriate to go and see the student again to make sure they are OK), make sure you look after yourself. Being told information about child abuse is often very upsetting.

**When listening to a disclosure staff should not:**

- Refuse to listen; e.g. tell them you're too busy or to see them later. Or over-react.
- Assume it's something related to abuse.
- Start asking more questions. Show worry or concern with your facial expressions.
- Be in a room on your own with a student with the door closed.
- Draw too much attention to the situation.
- Promise confidentiality if they ask you to keep a secret. Explain *'If it's necessary, I will tell somebody else (who can help more than I can.)'*
- Put words in their mouth or make any comments on what they tell you.
- Write while they are talking to you.
- Ask any direct or leading questions or start probing. (That could jeopardise any subsequent police investigation, if that becomes necessary.)
- Leave the student alone after they've disclosed. Make it clear to staff member sitting with student not to ask any questions; just be a reassuring presence
- Tell any colleagues what the student has said (apart from one of those listed as needing to be told).
- Write any opinions, or draw any conclusions about anything. Don't write any comments about the accused.
- Try and 'improve' the student's English if it wasn't grammatically accurate or vocabulary was wrong. (That is a job for any police or social services people to do.)
- Talk to any colleagues about what has happened.

In all cases, staff and parents are advised that phone contact will be the first point of communication to report any concerns.

Email communication is only to provide further detail if required and will not be used to believe any concern has been passed on.

If the person is not directly contacted and is unable to be found, then staff / parents will need to make further contact with key personnel on the flow charts or Children's Social Care Team and / or LADO directly.

Referrals to social care should generally be made with the consent, or the knowledge of, the parents/child. However where there is an immediate risk of harm, or where the parents are implicated, a referral may be made without the knowledge or consent of the parents or child.



## SBC Child Protection disclosure pathway

In the event of a Child Protection disclosure the following pathway should be followed. All stages should be documented and reports to the Designated Safeguarding Lead.

Student to staff member.



Staff member to one of the Designated Safeguarding Officers at the school or one of the Designated Safeguarding Lead.



Designated Safeguarding Officer and Designated Safeguarding Lead (or deputy DSL) to discuss.

If there is any immediate danger to the student, some immediate action may be required.



Designated Safeguarding Lead refers to the relevant local MASH/LADO team.

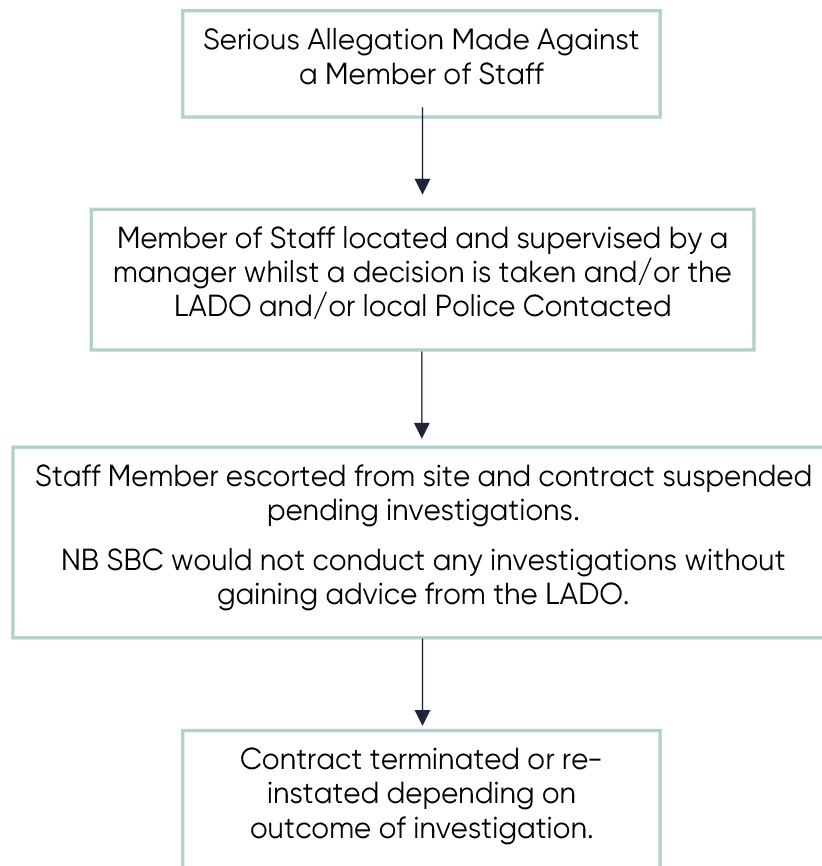


If the disclosure of abuse is about somebody in the student's home country, the same procedure is followed. Local Safeguarding Partnerships may decide to inform the relevant authorities in that country.



## Responding to allegations against Staff

Any allegation made against a member of staff in regard to Child Protection will be taken seriously by the management team at the school and the Director. In the nature of a serious allegation the following process will be followed:



*If a crime is committed or suspected of being committed, please refer straight to the policy (dial 101) and then inform the DSL of actions taken.*

Examples of serious allegations include, but are not limited to: bullying, assault, sexual harassment grooming, or any other activity that may pose a risk to the safety or welfare of one of our students.

Any member of staff against whom a significant allegation has been made will be removed from the site and suspended from their role pending investigation.

In the event of more minor allegations (examples set out under Appropriate Behaviour in Staff Conduct guidelines), an internal investigation will be carried out by the Summer School Director and disciplinary action may be taken, up to and including dismissal.

Any allegations made against staff that are founded will be recorded on their staff file.



## Responding to allegations about the Director of SBC

Any allegation about the Director of SBC should be reported directly to the Chair of the Board, Aatif Hassan. He may consult with the Dukes Plus Safeguarding Advisory Board and refer to LADO for advice/next steps.

Aatif Hassan (Chair of SBC Board)	
Telephone Number	020 3696 5300
Email Address	<a href="mailto:aatif.hassan@dukeseducation.com">aatif.hassan@dukeseducation.com</a>

*If a crime is committed or suspected of being committed, please refer straight to the police (dial 101) and then inform the Chair of the Board.*



## Safeguarding Report Form

Online form to be completed as soon as possible after a disclosure has been made by the member of staff whom the disclosure has been made to. Once submitted the form will be directed to the site DSO and Head Office Safeguarding team.

Date & time (form submitted)	
Name of School	
Referrer's name	
Referrer's job title	
Referrer's phone number	

### Details of student(s) involved in the incident

Full name	
Gender	
Nationality	
Date of Birth	

### Safeguarding Report Details

Date	
Please provide a summary of the safeguarding concern	
Names of Potential Witnesses	

### Details of staff involved in the incident (if applicable)

Full name	
Role/connection with school	

Signed (by person submitting referral) .....

Details that need collecting from salesforce following the submission of the Safeguarding Report Form

### Details of the students

Level of English	
Home address	
Parents name	

### Details of the staff involved in the incident.

Home address	
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## Designated Safeguarding Lead Contacts

<b>Name</b>	Hannah Capstick
<b>Role</b>	Operations Director
<b>Email</b>	<a href="mailto:Hannah@summerboardingcourses.co.uk">Hannah@summerboardingcourses.co.uk</a>
<b>Head Office Number</b>	01943 878718
<b>Summer Mobile Number</b>	07392438651

<b>Name</b>	Tom Flaherty
<b>Role</b>	Head of Programmes
<b>Email</b>	<a href="mailto:Tom@summerboardingcourses.co.uk">Tom@summerboardingcourses.co.uk</a>
<b>Head Office Number</b>	01943 878718
<b>Summer Mobile Number</b>	07464780908

<b>Name</b>	Andy Brownlee
<b>Role</b>	Academic Director
<b>Email</b>	<a href="mailto:Andy@summerboardingcourses.co.uk">Andy@summerboardingcourses.co.uk</a>
<b>Head Office Number</b>	01943878718
<b>Summer Mobile Number</b>	07586650184



## LADO Contact Details

Headington and Oxford College	
Contact	Jo Lloyd – Local Authority Designated Officer (LADO)
Email Address	<a href="mailto:lado.safeguardingchildren@oxfordshire.gov.uk">lado.safeguardingchildren@oxfordshire.gov.uk</a>
Contact Number	01865 810603
<a href="#">Concerns over professionals working or volunteering with children   Oxfordshire County Council</a>	

### Canford:

In the first instance, please report your concern/allegation against a person who works with children in Dorset, via our e-referral form which can be accessed [here Referral – Management of Allegations against people who work with children \(Dorset\)](#). Please complete the form according to your particular circumstance. Once completed, the form will be sent directly to the LADO, who will respond to your query as soon as possible.

Canford	
Email Address	<a href="mailto:LADO@dorsetcouncil.gov.uk">LADO@dorsetcouncil.gov.uk</a>
Contact Number	01305 221122
Emergency/ out of hours Contact	01305 228558
<a href="#">Dorset – Pan-Dorset Safeguarding Children Partnership (pdscp.co.uk)</a>	

Cambridge College	
Email Address	<a href="mailto:LADO@cambridgeshire.gov.uk">LADO@cambridgeshire.gov.uk</a>
Contact Number	01223 727967
Emergency/ out of hours Contact	0345 0455203
<a href="#">Report allegations about a practitioner or volunteer – Cambridgeshire County Council</a>	

Eton College	
Email Address	<a href="mailto:LADO@achievingforchildren.org.uk">LADO@achievingforchildren.org.uk</a>
Contact Number	0208 8917370 or 07774 332675
<a href="#">AfC Info website – Windsor and Maidenhead :: Community Information / Information And Advice / Child Protection Information / LADO (Local Authority Designated Officer)</a>	



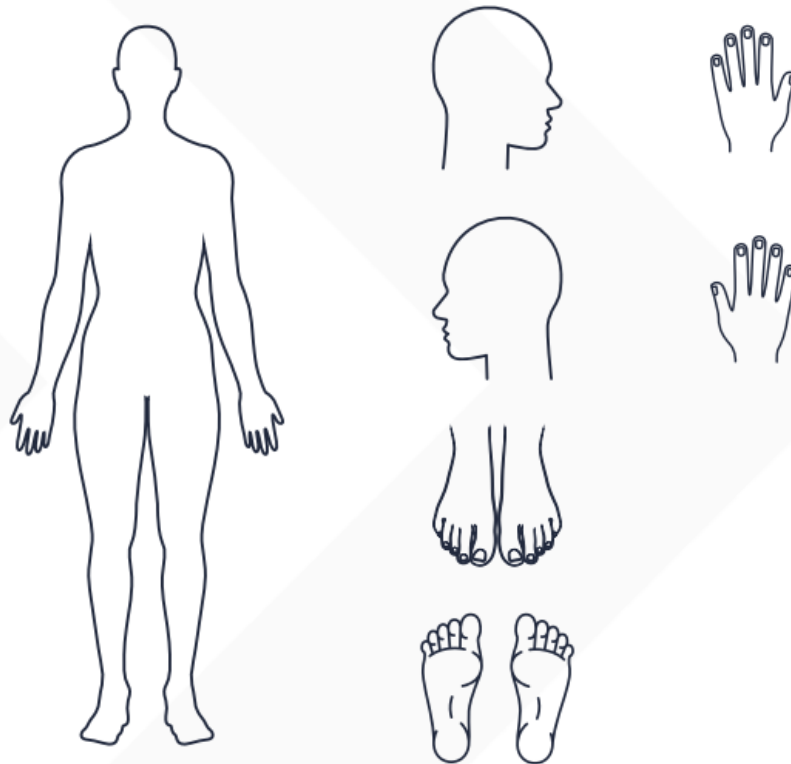
Earlscliffe & Rochester	
Email Address	<a href="mailto:kentchildrenslado@kent.gov.uk">kentchildrenslado@kent.gov.uk</a>
Contact Number	03000 41 08 88
Emergency Contact Number	03000 41 11 11
Emergency/out of hours call	03000 41 91 91
<a href="#">Local Authority Designated Officer (LADO) – Kent Safeguarding Children Multi-Agency Partnership (kscmp.org.uk)</a>	



## Child Protection Body Map Template

NB Please only use this resource when directed by the company DSL or LADO. They will provide further instructions and guidelines and can support with this process

### Child protection body map



Name of child

Date of birth

Name of worker

Date recorded

Observations

