



# **Policies and Procedures**

**The information in this document supports  
Ofsted requirements for the Compulsory Register and the Voluntary Register.  
It reflects statutory guidance in “Keeping children safe in education” published in  
September 2019 By the Department for Education.**

**Policies and Procedures are required for the efficient and safe management of camps and  
aimed to promote the welfare, care and learning of the children who attend**

**A copy of this document is available on request from the Jones Tuition Head Office.**

<b>Contents</b>	<b>Page</b>
<b>1.0 Attendance Policy</b>	<b>3</b>
<b>2.0 Visitor Policy</b>	<b>5</b>
<b>3.0 Safeguarding Policy</b>	<b>6</b>
<b>4.0 E-Safety Policy</b>	<b>24</b>
<b>5.0 Intimate Care Policy</b>	<b>30</b>
<b>6.0 Recruitment and Employment Policy</b>	<b>31</b>
<b>7.0 Alcohol and Substance Misuse Policy</b>	<b>36</b>
<b>8.0 Whistleblowing Policy</b>	<b>37</b>
<b>9.0 Health and Safety Policy</b>	<b>39</b>
<b>10.0 Incident and Accident Policy</b>	<b>44</b>
<b>11.0 Medication and Treatment of Anaphylactic Shock Policy</b>	<b>47</b>
<b>12.0 Emergency Evacuation Policy</b>	<b>48</b>
<b>13.0 Behaviour Policy</b>	<b>50</b>
<b>14.0 Complaints Policy</b>	<b>54</b>
<b>15.0 Equal Opportunities Policy</b>	<b>55</b>
<b>16.0 Confidentiality Policy</b>	<b>56</b>
<b>17.0 Data Protection</b>	<b>56</b>

## 1.0 Attendance Policy

Jones Tuition recognises the importance of having robust systems in place to ensure the safe arrival and collection of children on camp. Jones Tuition has a duty of care to all children that attend camp and is committed to ensuring there are effective methods of delivering information between camp staff and the authorised adult in order for each child to remain safe whilst in Jones Tuitions' care. Jones Tuition will ensure that an accurate record is kept of all children on camp.

### 1.1 Procedure for drop off and collection

Jones Tuition believes that the best possible way of achieving this policy is to receive each child from an authorised adult and to release each child securely to an authorised adult at the end of the day in the following way:

- Jones Tuition staff will receive information from the Camp Director detailing which children are expected to be on camp.
- On arrival the authorised adult must write the time of arrival and sign in to confirm the child is now in Jones Tuition care.
- Children must be collected by an adult who has been authorised on the registration form, photo ID will be required to confirm identity. The password system will be used if no photo ID is available (1.2 below)

Jones Tuition appreciate that many children make their own way to and from school and families may wish to continue this during the holidays. Whilst it is the preferred option that children are always accompanied by an authorised adult, Jones Tuition recognises that the parent(s)/guardian(s) would like to allow their children to make their own way to and/or from camp. If this is the preferred option for the parent(s)/guardian(s) then the **unaccompanied child system (1.3 below)** will need to be followed.

### 1.2 Password system

If the authorised adult who dropped the child off requires another authorised adult to collect the child they must inform the Camp Manager in advance and provide: the name, and a description of the person and a password that they will use to identify themselves and the child. Only then will the Camp Manager release the child to another authorised adult. If the Camp Manager has any concerns regarding the authorised adult collecting the child or if the collecting authorised adult does not have the correct password, the Camp Manager will contact the parent(s)/guardian(s) for confirmation. For the welfare of the child, the child will not be released from camp until the parent(s)/guardian(s) on the registration form has been contacted.

In exceptional circumstances, if the parent(s)/guardian(s) require another authorised adult who is not listed on the registration form to collect their child, they must inform the Camp Manager in advance and follow the same system.

### 1.3 Unaccompanied child

Jones Tuition will respect this wish and allow children to arrive and/or leave unaccompanied. This is on condition that the parent(s)/guardian(s) have put their wishes in writing to Jones Tuition indicating a time to expect the child on camp and a time that Jones Tuition should release the child at the end of the day. This written consent can be sent to Head Office prior to the camp opening or be given to the Camp Manager by the authorised adult on the child's first day as follows:

- Any child with permission to arrive at camp unaccompanied must report to a Jones Tuition staff member no later than ten minutes after the camp has started. Any child who is expected to arrive unattended and has not arrived by this time will be considered to be lost or missing. The **missing child system (1.6 Pg.5)** will be followed and the parent(s)/guardian(s) will immediately be contacted and informed. The minimum age for this is 10 years old at the time of attending.
- Only when the child has reported to the Camp Manager and has been signed into their group will Jones Tuition duty of care begin.
- Any child with permission to leave Jones Tuition unaccompanied will be signed out at the time stated by the parent(s)/guardian(s). At this point Jones Tuition duty of care will cease.
- Jones Tuition takes no responsibility for the health and welfare of any unaccompanied child before they signed in to camp or after they have been signed out.

- Jones Tuition will not accept children who arrive at camp unattended if it has not been pre-arranged. Any such child will be kept safe whilst the parent(s)/guardian(s) is contacted and asked to come and collect the child or sign them in. If no contact is made the police will be called.

#### 1.4 Uncollected child

Jones Tuition has a legal obligation to ensure that every child is safely returned to an authorised adult. Jones Tuition will not release any child to an unauthorised adult, even if the collection is late, unless:

- The authorised adult telephones to state that a different authorised adult will be collecting the child and photo ID will be asked for or the **password system (1.2 pg. 3)** is followed.

**All children MUST be collected by 4pm** (unless timings are otherwise specified at time of booking). If for any reason you are unable to collect by 4pm, we ask that you call the Camp Manager or Head Office as soon as possible. Two members of staff will wait with your child until they are collected. You will be charged a late pick-up fee of £20 for every 15 minutes after 4pm to cover the additional staffing cost. If we have no contact from a parent/guardian by 4.30pm, we will contact Social Services to advise them we have an uncollected child. We reserve the right to refuse future bookings from parents who continually pick up late.

In the event of a child still being present after 4.00pm, Jones Tuition staff will follow the procedure below:

1. If the child has not been collected by 4.00pm, and Jones Tuition has not been advised of a delay, the Camp Manager must notify Head Office.
2. Attempts will then be made by the Camp Manager and/or Head Office to contact the child's parent(s)/guardian(s) using the contact numbers provided on the registration form.
3. If the child's parent(s)/guardian(s) cannot be reached, and the child has not been collected by 4.30pm, the Designated Safeguarding Lead (3.2 Pg.8) will be informed and seek appropriate advice.
4. Jones Tuition staff will follow the advice and instructions of Social Services if requested.
5. The Camp Manager and at least one other member of staff will stay with the child until they have been collected by an authorised adult, who is authorised by the parent(s)/guardian(s) or Social Services.
6. Jones Tuitions' standard pick-up time is 3.00pm with an option to purchase extended care between 3:00pm-3:30pm available. The parent(s)/guardian(s) will be charged a late pick-up fee of £20 for every 15mins after 4pm the child remains in Jones Tuition care to cover staffing costs.

#### 1.5 Absences

- If a child is going to be absent from a scheduled day at Jones Tuition, the parent(s)/guardian(s) must notify the Camp Manager or Head Office to allow us to update our records.
- If a child is absent without explanation, the Camp Manager or Head Office will contact the parent(s)/guardian(s) to check where the child is.
- Jones Tuition will try to discover the causes of prolonged and unexplained absences. Regular absences could indicate that a child or their family might need additional support.

If staff have any concerns about the welfare of the child the Camp Manager will raise the concern with the **Designated Safeguarding Lead (3.2 Pg.8)**.

#### 1.6 Missing child

If a child appears to be missing, the following procedure should be followed:

1. The Camp Manager should be informed who will alert all other staff.
2. All children should be assembled as for a fire drill, to enable a roll call and head count to be completed.
3. A full register of the groups should be taken putting faces to names, to confirm the identity of the missing child.
4. Jones Tuition Head Office must be advised immediately a child is suspected of being missing, so that they can offer further support and guidance.

5. If the child is confirmed to be missing, the remaining children should be kept together, with the minimum number of staff possible (commensurate with safety) to supervise, while all other staff carry out a full search of the premises and grounds.

6. If after 10 minutes from the child first being realised as missing and they cannot be located, the Camp Manager will inform the Police and advise the parent(s)/guardian(s) of the situation. The **Designated Safeguarding Lead (3.2 Pg.8)** will be informed as part of point 4 above.

## **2.0 Visitor Policy**

Jones Tuition is committed to providing a safe and secure environment for the children in its care. When Jones Tuition has visitors and/or contractors on camp the below visitor procedure needs to be followed to ensure that the visitor and/or contractor will not have a detrimental effect on the children and that the person in question has a valid reason for attending the camp. The Visitor Procedure must be followed for both pre-arranged and unannounced visitors and/or contractors.

### **Visitor procedure**

- All visitors and/or contractors must report to the Camp Manager before entering camp. If the visitor cannot gain access to the sign in area, they must call the Camp Manager on the number provided on posters. If the visitor and/or contractor can gain access to camp, they must report directly to the Jones Tuition sign-in area.
- Jones Tuition will liaise with the camp management team to establish if and where any of their appointed contractors or visitors may be and if this will impact of the safe running of the camp.
- The Camp Manager should be aware that certain schools may have increased visitors during the summer, particularly on examination results day. As these visitors will have knowledge of the school they may not follow a set sign in procedure.
- The visitor and/or contractor must produce valid ID which is to be checked by the Camp Manager.
- If the Camp Manager requires further reassurance of the identity of the visitor and/or contractor, they will phone the employing organisation of the visitor (e.g. Ofsted/Local Authority), for further confirmation. If this is not possible, the Camp Manager will seek advice from Jones Tuitions Head Office.
- If a visitor and/or contractor has no reason to be on the camp's premises, staff will escort them from the premises.
- If the visitor and/or contractor refuses to leave, staff will call the police. In such an event an Incident Record will be completed and the Camp Manager will be immediately notified.
- Once/if approved the visitor and/or contractor must sign in the Visitor Log detailing the reason for their visit and the time they arrived.
- Before entering the visitor and/or contractor will be issued a Visitor Badge.
- All Jones Tuition visitors will be escorted around camp and will never be left alone or unsupervised with children.
- Any contractor appointed by the school will be the responsibility of the school, but should sign in with the Camp Manger if working in an area used by Jones Tuition.
- When a visitor and/or contractor leave, staff will record the time of departure on the Visitor Log.
- All visitors and/or contractors must follow the visitor code of conduct as set out below.

### **Visitor code of conduct**

Jones Tuition ask that visitors and contractors:

- Show identification to staff and sign the Jones Tuition Visitor Log.
- Treat children with respect. Once on camp the children's needs and interests take priority.
- Mobile phone or electronic devices to be kept out of sight and not to be used in front of children.
- Respect children's personal space and privacy.
- Only use the designated staff toilets.
- Report to the Camp Manager any concerns about staff conduct or children's wellbeing.

- Ask for permission before joining in with children's play. Although some children love to involve an adult in their play it is not always appropriate for any number of reasons. Please ask a member of staff before you interact with children in their play.

Jones Tuition ask that visitors and contractors do not:

- Use inappropriate language or display aggressive or threatening behaviour towards staff, children or other authorised adults either in person, on the phone or in writing.
- Discuss sensitive issues within earshot of a child or other adults.
- Take photos or videos unless approved as an official photographer arranged by Jones Tuition Head Office (as set out in the e-safety policy (4.0 Pg.16)).
- Leave tools, bags or other equipment unattended or within reach of children.

### **Jones Tuition Visiting Staff**

- Any visitor from Jones Tuition Head Office attending camp should produce their Jones Tuition Head Office Photo ID card and sign in as a visitor.
- With the Camp Manager's permission, they will be free to walk around the camp and visit all of the activity areas.
- Jones Tuition visiting staff will follow the set Policies and Procedures at all times.
- Any member of Jones Tuition Head Office Staff that does not present their ID badge will be signed in as a normal visitor and accompanied on camp.
- If the Camp Manager requires further reassurance of the identity of the visitor, they will seek advice from Jones Tuition Head Office.

## **3.0 SAFEGUARDING POLICY AND PROCEDURES**

### **POLICY STATEMENT**

#### **Aim**

- Jones Tuition aims to teach new skills, enhance children's creativity, socialisation, confidence and resilience through extra-curricular experiences.
- Its aims are achieved for children through multi-activity day camps during school holidays offering sports, outdoor exploration, arts, crafts and team games.

#### **Commitment**

Jones Tuition

- has statutory and moral duties to safeguard and promote the welfare of children and young people engaged in its activities
- believes that all students have the right to be protected from abuse, exploitation, extremism and radicalisation
- aims to ensure that proprietors, employees and volunteers comply with legal, contractual and professional standards and responsibilities in their work with children. This includes high quality record keeping and record management
- strives to build and embed a culture of openness that recognises and accepts that abuse can happen in this organisation
- believes that pro-active safeguarding and promoting the welfare of children is everyone's responsibility.

All children have the right

- To be safe; no one should take this right away from them.
- To protect their own bodies; their body belongs to them.
- To say no; it is alright to say no to someone if that person tries to do something to them that they feel is wrong.
- To get help against bullies; tell children to enlist the help of friends, to say no without fighting and to tell an adult.

- To tell; assure children that no matter what happens staff will not be angry with them should report any incident that frightens or confuses them or makes them unhappy.
- To be believed; when children are told to go to an adult for help, they need to know they will be believed and supported.
- Not to keep secrets; teach children that some secrets should never be kept, even if they promised the abuser not to tell.

#### **Jones Tuition endeavours to safeguard children and staff by:**

- Promoting and prioritising the safety and wellbeing of children.
- Adopting child protection guidelines through effective procedures and a staff code of conduct.
- Ensuring appropriate action is taken in the event of incidents/concerns of abuse and that support is provided to all parties.
- Following carefully the procedures for safer recruitment and selection of staff.
- Providing effective management for the staff through supervision, support and training.
- Sharing information about child protection and good practice with children, parents and care givers, staff and any relevant third parties.
- Sharing information about concerns with the agencies who need to know and involving parents and children appropriately.
- Reviewing our policy and best practice at regular intervals.

#### **Terminology**

**A child:** The legal definition of a child in the UK is a person under the age of 18.

**Safeguarding** and promoting the welfare of children is defined for the purposes of this guidance as:

- Protecting children from maltreatment e.g. abuse and neglect
- Preventing impairment of children's physical health and/or mental health, or development;
- Ensuring that children grow up in circumstances consistent with the provision of
- Safe and effective care
- Taking action to enable all children to have the best outcomes.

(Working Together to Safeguard Children, 2018)

#### **Safeguarding is what is done to prevent harm**

**Child protection** is an integral part of the safeguarding process. It focuses on protecting individual children identified as suffering from or likely to be at risk of significant harm (Working Together to Safeguard Children, 2018). Child protection is the response to harm.

**Abuse:** A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm (commission), or by failing to act to prevent harm (omission). Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by one adult, or adults, or another child or group of children (Working Together to Safeguard Children, 2018)

#### **Principles**

Every member of staff must:

- accept that the well-being of children is of paramount importance
- have a child-centred approach and always consider what is in the best interests for the safety of the child

- read and understand this policy and the procedures being aware of their responsibilities and duty of care
- understand that one person, or organisation, cannot have a complete picture of a child's needs, therefore Local Safeguarding Partners like the local authority, health and the police, have a role in identifying concerns, sharing information and taking prompt action
- complete the safeguarding induction and training, read and understand updates and be able to recognise signs of potential abuse and neglect
- undertake training and professional development to ensure that they offer quality learning and development opportunities for children
- undertake first aid training for the specific to the age range of their children and activities
- 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 will be reported which is a legal requirement
- be vigilant and act on any suspicions about the treatment of a child (this is a legal responsibility)
- be aware of the procedure to follow if a child discloses information to them
- raise concerns or suspicions immediately with their Designated Safeguarding Lead for appropriate action to be taken
- staff member should make a written record of the incident as soon as possible
- be suitable people to work with children and any significant event likely to affect their suitability will be reported to the British Activity Providers' Association and the Local Authority Designated Officer (LADO)
- behave appropriately, inappropriate behaviour should be reported to the Designated Safeguarding Lead
- be aware of procedures for confidentiality and for sharing and receiving information, including the need for reporting and recording
- have access to the safeguarding procedures and essential contact telephone numbers
- stay calm, think logically, use their professional judgment and seek advice.

### **Responsibilities**

All staff of Jones Tuition know that safeguarding is *everyone's responsibility*. Each individual has their role to:

- Proactively teach students about safeguarding
- Ensure that systems and procedures are in place to protect students
- Always act in the best interests for the safety of the child

The company have a DSL who acts as the overarching Designated Safeguarding Lead. Jones Tuition has a Camp Director that also acts as the Designated Senior Person (DSP). Collectively they must ensure that:

- There is a strong culture of safeguarding across the organisation
- There are clear structures, processes, line management and resources to safeguard children at risk
- Senior leaders/directors are held to account for safeguarding
- They receive regular updates about safeguarding matters.

### **Designated Safeguarding Lead**

A Designated Safeguarding Lead (DSL) and deputies should be appointed. The Designated Safeguarding Lead (DSL) must be a member of the senior leadership team who will take responsibility for safeguarding and child protection in the organisation. This should be reflected in their job description.

The Designated Safeguarding Lead (DSL) must decide on out-of-hours and out-of-term contact e.g. via telephone or Skype.

The key functions are to:



- Manage referrals by referring cases, supporting staff to refer cases
- Work with others by liaising with the most senior person in the business, the Managing Director, the “case manager” and staff. Liaise with safeguarding partners and other agencies
- Receive formal training for safeguarding including Prevent and online safety, keep updated with relevant developments
- Raise awareness by ensuring that with the safeguarding policy and procedures are easily accessible to staff, parents and the public and that staff understand the contents.

### **Deputy Designated Safeguarding Leads**

They support their Designated Safeguarding Lead and are trained to the same level. Their responsibilities should be reflected in their job description.

### **Training**

#### **Full-time staff** must

- complete safeguarding training and refresh it at least every two years enabling them to recognise signs of abuse
- report all allegations of serious abuse or harm by anyone living with or looking after children as well as serious accidents, illnesses and injuries sustained by any child in Jones Tuition care
- know who concerns or suspicions should be referred to
- be aware of the procedure to follow if a child discloses information to them regarding abuse, neglect, extremism or radicalisation.

#### **Seasonal staff** must

- complete the online safeguarding training and the knowledge test achieving at least 80%.
- report all allegations of serious abuse or harm by anyone living with or looking after children as well as serious accidents, illnesses and injuries sustained by any child in Jones Tuition care.
- Be aware of the reporting lines within Jones Tuition

This policy has been developed in accordance with the following documents:

- Working Together To Safeguard Children, July 2018
- Cognita Safeguarding And Child Protection Policy And Procedure. September 2019
- Active Learning Group Safeguarding Policy. July 2019
- British Activity Providers’ Association
- Active Learning Group Safeguarding Policies and Procedures April 2020

This policy is updated annually. Staff are encouraged to comment on the contents based on their use of it and the effectiveness.

## **SAFEGUARDING PROCEDURES**

**Jones Tuition** will keep children safe and well by:

- reporting all allegations of serious abuse or harm by anyone living with or looking after children as well as serious accidents, illnesses and injuries sustained by any child in Jones Tuition’ care; failure to do so is an offence
- allocating a key person to each early years group. This ensures that every child’s care is tailored to their individual needs, helps them with the new setting and offers a settled relationship with an adult
- complying with statutory regulations for staff/child ratios and qualification requirements
- informing OfSTED of any significant event which is likely to affect the suitability of any person who is in regular contact with children

- ensuring that staff undertake appropriate training and professional development that enables them to provide high quality learning and development experiences for children
- ensuring that the Designated Safeguarding Lead and their Deputy Designated Safeguarding Persons attend relevant new or refresher training for the period during which they have this role so that they are up to date with statutory policy and legislation
- ensuring that the paediatric first aid training for staff caring for young children is compliant with OfSTED Early Years and Childcare Register requirements
- complying with the requirements of health and safety legislation including fire safety and hygiene
- ensures that premises, including outdoor spaces, are fit for purpose and suitable for the age of the children and the activities being provided on camp
- not allowing smoking of any kind, including vaping, in the premises or on the
- campus
- taking reasonable steps to ensure that children and staff are not exposed to unacceptable risks and is able to demonstrate how risks are managed
- ensuring that staff are aware of procedures regarding confidentiality, sharing and receiving information, reporting of safeguarding conversations with names, dates, times, action taken and reasons
- having a Designated Safeguarding Team consisting of a Designated Safeguarding Lead, who ensures that staff are aware of procedures for safeguarding children, and 1 Deputy Designated Safeguarding Lead
- ensuring staff have access to the procedure and essential contact numbers
- designating the Camp Manager as the coordinator of safeguarding children procedures in each camp with guidance from the Designated Safeguarding Team
- reminding staff not to display inappropriate behaviour which could be deemed as a safeguarding issue. Staff should also be aware of inappropriate behaviour by colleagues and follow the reporting procedure
- ensuring that all safeguarding concerns are reported to the Designated Safeguarding Team via phone and the Designated Safeguarding Lead who will decide whether to conduct an investigation and if there is a need to contact the Local Authority Designated Officer.

### **Best practice**

Best practice refers to the behaviour and actions of staff working with or near children , the manner and tone of communication and the information given.

Staff will

- display behaviour that is above criticism
- protect themselves against liability or allegations which could cause conflict between them, the child and the parents or guardians
- not put themselves in a position that may, inadvertently, threaten or upset children in their charge
- avoid shouting and making derogatory comments
- promote positive behaviour through positive comments and feedback whenever possible
- keep physical contact to a minimum, unless absolutely necessary.
- treat children equally and avoid favouritism
- be non-judgmental when talking to or dealing with children
- empathise with children and understand their emotions
- ensure children are informed about why certain decisions are made as a way of them learning about decision-making
- understand their legal responsibility to report suspected safeguarding cases of child abuse, neglect, extremism or radicalisation to the Designated Safeguarding Lead so that the best course of action for the child can be followed
- not use a mobile phone or camera whilst leading a session with a group of children (refer to the Mobile Phone Policy)

- be aware of e-safety and keeping children and staff safe in the digital world (refer to the E-Safety Policy)
- be aware of the potential risks of using social networking sites e.g. Facebook and the importance of considering what they post and the potential impact of unsuitable material on their professional status media (refer to the Social Media Policy).

**If a child tells a member of staff that they have been abused or neglected**, or if the member of staff is concerned about unmet need, they should:

- Make the child's welfare the focus.
- Be child-centred, use language appropriate for their age and stage of Development.
- Listen carefully and actively, allowing the child to speak at their own pace. Take account of their age, culture, language, communication skills and any disabilities.
- Do not interrupt or be afraid of silences.
- Not show any signs of shock as it may discourage the child from talking. Avoid comments like "I wish you had told me this earlier", "I cannot believe what I am hearing".
- Do not ask any leading questions such as "how hard were you hit"
- Remain calm.
- Encourage with reassuring nods and comments like "I am so sorry that this has happened", "you are doing the right thing talking to me".
- Gather as much detail as they can around the context whilst not fully investigating (this is the role of the partner agencies – social care and the Police). If clarification is required ask open questions like "tell me", "describe", "explain", "what", "when", "where", "who", or "how". However, a context around what the child has said should always be sought prior to any referral being made to partner agencies. This should be done by the DSL or the staff member who obtained the initial disclosure. Limit questioning to the minimum necessary for clarification using What, When, How and Where.
- Not ask "why" as it can suggest guilt. Do not ask if it has happened to siblings but do ask if there are any siblings, their ages and gender.
- Ask if there is anything else that the child would like to tell you.
- If abuse is disclosed, ask whether other adults observed the abuse and whether it has happened before.
- Never promise to keep it a secret, explain that it will be referred in confidence e.g. "I am really concerned about what you have told me and I have a responsibility to make sure that you are safe".
- Explain what will happen next. The child may wish to accompany you to see the Designated Safeguarding Lead, or their deputy. If not, let them know that someone will see them before the end of the day. Check that this happens and check to see how the child is.
- If a disclosure has been made by a child, find the Designated Safeguarding Lead or their Deputy, **immediately**. *There should be no delay.*
- Make a written record of the conversation as soon as possible. As far as possible try to note the child's language. Any documents should be kept in a secure, restricted location.
- The Jones Tuition DSL will take appropriate action such as making a referral to Children's Social Care when appropriate to do so.
- The Jones Tuition Director is to be kept informed of all referrals via phone.

**If a child is thought to be at risk of harm or likely to be**

- A referral should be made immediately to Children's Social Care or the police if a criminal act has occurred or there is imminent danger to a child/other
- The Designated Safeguarding Lead would usually do this, under the guidance of the Head of Safeguarding, but any member of staff can make contact. It is important not to delay. *Parental consent is not required to make referrals to statutory agencies where harm is alleged. Do not inform the parents/carers/alleged perpetrator of the harm unless told to do so by Children's Social Care. To do this too early could heighten the risk of further harm to the child.*

- A record must be made of the decision that was reached and the reason, what action was taken by whom including dates and times.

### **Reporting a concern**

- Make a note of your concern as soon as possible.
- Inform the DSL of your concern.
- DSL to contact local Children's Social Care Team
- DSL to inform the Camp Director
- Referrals being made out-of-hours should be made in the same way via the out-of-hours service.
- DSL to follow social care guidance on referral.
- If this has been done without parental consent a note should be made of this with the reasons and the date.

### **What to expect from the local authority**

- Children's Social Care should respond within 24 hours of receiving the referral and acknowledge receipt, the reporting person should request the name of the staff member they have spoken to and record this
- If no response is received, contact them again (ensuring you also log a record of your attempts to contact them).
- If the response is not adequate, and/or not achieved in a timely manner i.e. the child is due to go home and you consider there to be a risk of harm, in discussion with the Designated Safeguarding Lead, a decision should be made about whether to escalate the matter the Social Care Team Manager.

### **If the child has unmet needs**

- If the child is not at risk of harm, they could be a **Child In Need** (see appendix) and have unmet needs. A referral should be made to Children's Social Care who will make the decisions about whether to conduct an assessment of the child's needs
- Ideally parental consent should be sought although it is not a requirement for referrals to statutory agencies. Parents/carers are to be informed of the referral in line with current GDPR legislation for Children in Need.

### **If there is a concern or allegation against a member of staff (by a child/other member or staff or parent)**

#### **Low Level concerns**

If there is even the slightest concern, or that "niggling doubt" about an adult's behaviour or attitude, including visitors, or a breach of any company policy, these are called Low Level Concerns and should be reported to the Designated Safeguarding Lead *immediately*. Those raising concerns in good faith will be supported and every effort will be made to protecting their identity. Those against whom the concerns or allegations have been raised will not suffer anything detrimental unless the concerns are substantiated. If the Low Level Concern is about the DSL, then they should be reported directly to the Camp Director.

#### **Allegations**

Allegations represent situations that might indicate a person would pose a risk of harm to children if they continue to work in regular or close contact with children in their present position, or in any capacity. This policy now refers to agency staff on site (including supply teachers). Concerns may meet what is known as the four 'harm tests' (KCSIE 2020);

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

- behaved or may have behaved in a way that indicates they may not be suitable to work with children (potential transfer of risk)

### **What to do**

- Report your concerns immediately and verbally to the Designated Senior Person, and/or the Designated Safeguarding Lead. They will discuss together what needs to be done immediately to protect children and young people, and whether the concerns are sufficient to contact Social Care. The DSL **must** inform the Camp Director of any allegations made against staff, and decisions must be made in regards to whether the staff member should be formally suspended whilst investigations are ongoing.
- The adult about whom the allegation has been made should **not** be informed until initial decisions have been made to reduce or eliminate any risk of harm.
- If the allegation is about the Company or Director, it should be referred to the DSL immediately who will contact the Local Authority Designated Officer. This should be done without informing the Company or Director.
- This process is the same regardless of where or when the alleged abuse occurred.
- In the case of historic abuse, the Police should be informed.
- Support should be provided for the child who had made the disclosure.
- The staff member, including volunteers, will be given a named contact for the period of their suspension, if that is the decision, and should be supported during that time.
- Such allegations of abuse should be dealt with as quickly as possible whilst ensuring that the child is well protected.

In some circumstances we will have to consider an allegation against an individual not directly employed by Jones Tuition, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business. Whilst the Jones Tuition are not the employer of supply teachers, they should ensure allegations are dealt with properly. Decisions will need to be made in discussion with the school and agency as to whether it is appropriate to suspend the supply teacher, or redeploy whilst they carry out their investigation. Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services.

The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school are under the supervision, direction and control of the school when working for the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation. When using an agency, schools should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the Police.

It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time, supports the person who is the subject of the allegation.

### **Dealing with the allegation**

#### **Initial discussion**

- If the allegation is against the Designated Senior Person or a senior member of staff, the Camp Director will usually be the Case Manager (see above).

- If the allegation is against another staff member, the DSL and Jones Tuition's Camp Director will usually be the Case Managers.
- The Case Manager and Local Authority Designated Officer will discuss the nature, content and context of the allegation and agree what action will be taken. The Local Authority Designated Officer might want more information.
- If the initial sharing of information leads to a conclusion that there should be no further action, both the Case Manager and the Local Authority Designated Officer should record it in their respective files and agree what to write, and who will do it, to the person against whom the allegation was made.
- There should be an agreement about if any action should be taken against the person who made the allegation.

### **Strategy discussion**

- If there is a suspicion that a child has been harmed or is at risk of being significantly harmed, a 'Strategy Discussion' will be convened by the Local Authority Designated Officer and/or the Police. Children's Social Care will be involved. The Case Manager may or may not be invited to this meeting. They must not inform the alleged perpetrator until the Strategy Discussion has taken place and there is an agreement about what can be disclosed.
- If it is decided that the concerns do not reach threshold for a statutory investigation, the Local Authority Designated Officer will determine what should happen next e.g. no further action, internal investigation by Jones Tuition.

### **Internal investigation**

- If further enquires are needed, the Local Authority Designated Officer will agree with the Case Manager who is best placed to be the Internal Investigator (usually a senior member of staff) to undertake the investigation and how.
- The HR manager should arrange for the member of staff to whom the allegation has been made to be interviewed about the matter. This should take place in a neutral setting, and a minute taker should be provided. The investigation which may potentially also involve taking statements from children and other staff, again using a minute taker for the latter. Parents **must** be asked for consent, prior to their child being interviewed. The Case Manager will keep the Camp Director and Head of Safeguarding informed at all times. All staff to be interviewed must be given reasonable notice of any pending interview and allowed to have a representative attend with them.
- A safeguarding investigation takes precedence over a grievance or disciplinary matter and should be completed first.

### **Suspension of staff**

- All options to avoid suspension will be considered before taking this step.
- Consideration should be given to the risk of harm and well-being of the child concerned. If the Case Manager is concerned about the welfare of other children in the community or the member of staff's family, the Local Authority Designated Officer should be notified.
- Suspension has to be agreed with the Camp Director. A member of staff should not be automatically suspended and all other options should be considered.
- The Case Manager should check the views of the Local Authority Designated Officer, Children's Social Care and the Police, as appropriate but ultimately it is the Camp Directors' decision.
- Other considerations could include redeployment to supervised work with children, moving to a different organisation in the Group.
- If the staff member is suspended, written confirmation should be sent within a working day setting out the reasons for the suspension. A named contact with their details should be given to provide support.
- The accused person will be advised to contact a colleague or friend for support.
- They will also be given information about the employee support service.
- The accused will be kept informed about the progress of their case.

- Social contact should not be prevented.
- The Case Manager should use their professional judgment and seek advice from the Designated Officer about whether it is appropriate to inform parents and carers of the allegation, the progress of the case, or the outcome. If the decision is to share any information, parents must be made aware of the need for confidentiality.

### **Outcomes of the investigation**

- If the allegations are proved to be true and are considered to be gross misconduct, the member of staff may be dismissed immediately and referred to the Local Safeguarding Board, OfSTED, the police and other regulatory bodies like the Disclosure and Barring Service.
- If the outcome is that the allegation is deemed to be an act of misconduct, a first or final warning may be issued to the member of staff.

**For all of the areas listed below if there is a child causing concern because they have been harmed or are at risk of significant harm, the matter should be discussed with the Designated Safeguarding Lead and/or Head of Safeguarding to agree an appropriate course of action. A record of the concern should be made on CPOMS with a note of the discussion and outcome with the Designated Safeguarding Lead; note times and dates.**

### **Definition Of Peer On Peer Abuse**

Staff should be aware that peers are capable of abusing their peers.

It is any form of physical, sexual, emotional, financial abuse or coercive control exercised between children in their relationships (intimate and non-intimate), friendships and wider peer groups. Different forms include but are not limited to serious bullying, cyberbullying, relationship abuse, domestic violence and abuse, child sexual exploitation, youth violence, harmful sexual behaviour, prejudice-based violence including, gender-based violence. Online peer-on-peer abuse e.g. sexting, online abuse, coercion, exploitation, peer-on-peer grooming, threatening language, distribution of sexualised content, and harassment. To protect children a “contextual safeguarding” approach (see below) is often taken which means safeguarding takes account of a child’s experience of harm **outside** of their home e.g. with peers, in schools, in neighbourhoods or on-line which can affect their behaviour. We can adopt a contextual safeguarding approach by:

- 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, discussing the implementation of 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 geographic areas on our properties and sites
- Training on potential bias and stereotyped assumptions
- Being alert to and monitoring changes in students’ behaviour and/or attendance.

### **If peer of peer abuse is suspected**

- Report concerns to the Designated Safeguarding Lead *without delay*
- A child is in immediate danger or at risk of harm a referral should be made by the DSL to Children’s Social Care and /or the police immediately.
- A record should be kept.

The Designated Safeguarding Lead, in collaboration with the Head of Safeguarding and/or Consultant Safeguarding Adviser will make a decision about whether the behaviour might indicate abuse and whether there is the need to contact/make a referral to Children’s Social Care. Their discussion will agree the action e.g. first ensuring the safety and well-being of any child affected including the completion of a risk assessment, whether an investigation is needed, referral to other agencies e.g. the police, where a crime might have been committed, or Children and Adolescent Mental Health Service (CAMHS) or a specialist team dealing with harmful sexual behaviour.

Be aware that:

- The abuse may indicate wider safeguarding concerns for the children.
- The victim and perpetrator are both at risk -although the perpetrator may pose a risk to other children, they may also be at risk themselves and have unmet needs.
- Power, consent and choices play a role, dependent on the child and the situation they could appear to be making choices whilst not consenting.
- Provide on-going support for the victim for their safety and address any unmet needs, monitor the child's well-being within the organisation, engage with the child's parents.
- Disciplinary action may be appropriate for the perpetrator as they have to take responsibility and realise the seriousness of their behaviour. It gives a message that such behaviour will not be tolerated, it ensures the future safety and well-being of the victim and other children. Permanent exclusion should be a last resort and used where it is required for the safety of the victim and other children.

### **Sexual Violence and Sexual Harassment between Children**

Peer on peer abuse can *include* two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with our safeguarding procedures.

Sexual Violence includes sexual offences which fall under the Sexual Offences Act 2003.

Sexual Harassment refers to 'unwanted conduct of a sexual nature'. This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline (including but not limited to making sexual comments, sexual taunting or 'jokes', and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two children, or a group of children against one individual or group;
- be perpetrated by a child of any age against a child of any age;
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation;
- include behaviours that exist on an often progressive continuum and may overlap; and/or
- be online and offline (physical or verbal).
- sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up

### **Contextual Safeguarding**

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

The contextual safeguarding approach says that children's social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.

### **Tackling extremism and radicalisation**

Children are vulnerable to extremist ideology and radicalisation. Education providers, including but not exhaustive of schools and colleges, are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015, in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. For



more information, please see the Preventing Extremism and Radicalisation Policy and Annex A of KCSIE.

**Radicalisation:** A process by which someone adopts increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo, contemporary ideas and expressions of freedom of choice.

**Extremism:** Holding extreme political and religious views, the vocal or active opposition to the values of democracy, the rule of law (obeying the law), mutual respect and tolerance of different faiths, beliefs and those with no faith.

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

**All** children and young people are vulnerable to extremist ideology and radicalisation.

### **Indicators of radicalisation or extremism**

- Behaviour becoming more centred on extreme ideologies
- Loss of interest in friends and activities not associated with the extreme ideology, group or cause
- Changing their personal appearance to align with the extreme ideology, group or cause
- Possession of materials or symbols associated with the extreme ideology, group or cause
- Attempts to recruit others to the extreme ideology, group or cause
- Communication with others that suggest an affiliation with an extreme ideology, group or cause
- Using insulting or derogatory language about another extreme ideology, group or cause
- An increase in prejudice-related incidents committed by the individual for example
  - physical or verbal assault
  - provocative behaviour
  - damage to property
  - derogatory name calling
  - possession of prejudice-related material
  - refusal to cooperate
  - supporting violence towards others

To safeguard against this all staff will

- Have an understanding of radicalisation and extremism.
- Complete the free government Prevent Awareness Training every two years.
- Be constantly vigilant to signs of radicalisation
- Be informed about issues affecting the local area and society by their Prevent Officer.
- Respond quickly when issues arise.
- Help children to understand the dangers of radicalisation and exposure to extremist views including knowing how to be resilient against them and what to do if they are experiencing them.
- Inform parents of this approach to keep children safe from harm.
- Suspend “professional disbelief” that radicalisation “could not happen here” and adopt a “professional inquisitive” approach.
- Be confident to challenge views and intervene as early as possible to safeguard children.

### **Procedure**

- Discuss any concerns about a child with the Designated Safeguarding Lead who, with the member of staff, will agree a course of action which could include referral to the Local Prevent Referral Team.

- A member of staff who does not agree with the decision and does not feel comfortable talking with their line manager can contact the Local Prevent Referral Team directly (see contact list) or use the whistleblowing policy.

## Child sexual exploitation

### Definition

**Child sexual exploitation** is a form of child sexual abuse where an individual or group takes advantage of an imbalance in power to exploit the child

- 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 child or young person for a sexual purpose.
- Grooming is often slow and subtle, continuing for several weeks or months and lulling the child or young person 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 telephones.
- By the time a child or young person realises that they are not having a 'real' relationship they have probably been seriously abused sexually, physically and psychologically. They will probably have withdrawn from family and friends and there will be a threat of distribution of indecent images of them to their family. Some children may have developed substance addictions as a coping strategy or because they have been given substances during their exploitation.

## Child Criminal Exploitation (CCE) and Serious Violence

### Definition

- where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence.
- The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, forced to shoplift or pickpocket, or to threaten other young people. CCE also involves children and young people being coerced into moving drugs or money across the country; this is commonly referred to as County Lines.
- County Lines usually occurs through engaging children into gangs and using them to carry money or drugs from urban areas to suburban and rural areas, market and seaside towns. Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office

## Procedure for CSE, CCE and Serious Violence

Staff will:

- Have had awareness training about sexual exploitation and grooming
- Help parents to understand any issues raised
- Contribute to inter-agency safeguarding and child protection arrangements
- Promote healthy and safe relationships
- Discuss concerns with the Designated Safeguarding Lead and agree a course of action.

## Sexually active youth

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. Sexual activity involving a child **under** 13 is *always* a criminal offence and Jones Tuiton will always refer such concerns to the Police.

**Procedure:** Report your concerns to your DSL who will use their professional judgement, and seek advice from the Head of Safeguarding to determine whether a concern about sexual activity involving a child **over** the age of 13 is exploitative or abusive, and whether the matter should be referred to Children’s Social Care or the Police.

### **Female Genital mutilation (FGM)**

A child who has undergone FGM should **always** be seen as a child protection issue.

**Definition:** “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.”

*It is the law that any ‘teacher’ in the UK reports known acts of FGM (or has evidence to suggest that FGM is likely to occur) to the Police via 101.*

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

- Prolonged absence from camp with noticeable change in behaviour, especially after a return from holiday.
- Spending long periods of time away from the sessions during the day e.g. extended toilet breaks.
- Discomfort on return from toilets, sitting, or changing clothes
- Not visiting the toilet
- Talk of a significant family event, often involving only the female members of the family

### **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 (or excitement) about a special ceremony.
- The child may talk or have anxieties about forthcoming holidays to their country of origin.
- Parents or guardians may comment on overseas travel.
- If a girl 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 should be made to the Designated Safeguarding Lead who will decide on the most appropriate course of action.

### **Procedure**

- All staff to undertake free government/other FGM training every two years.
- Take proactive action to protect and prevent girls from being forced to undertake FGM.
- Have a robust attendance policy and identify any unexplained absences from lessons and sessions.
- Staff should report any concerns to the Designated Safeguarding Lead who will seek advice from Children’s Social Care and the Police via 101

- Record all intervention accurately.

## **Emotional Wellbeing and Mental Health**

**Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.**

**All staff should also be aware that deteriorating emotional wellbeing and escalation of mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Please note, however, only appropriately trained health professionals should attempt to make a diagnosis of a mental health problem.**

**Staff, however, are well placed to observe children 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 a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the DSL.**

**The Department of Education has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. In addition, Public Health England has produced a range of resources to support staff to promote positive health, wellbeing and resilience among young people including its guidance, Promoting Children and Young People's Emotional Health and Wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol.**

## **Self-harm**

### **Definition**

- It is behaviour in which deliberate harm is caused to one's own body. There is a higher incidence amongst children with special educational needs.
- It can happen when a child is dealing with difficult experiences and emotions e.g. being bullied, difficult relationships with family or friends, experiencing depression or anxiety, having low self-esteem, experiencing some form of abuse. They harm themselves as a way of coping and relieving tension. Examples include cutting, picking skin, swallowing inedible objects or hazardous substances, taking an overdose of drugs, burning or scolding, hair-pulling, hitting parts of the body. It can also include eating disorders and excessive physical activity.
- Factors relating to the individual (depression, low self-esteem, substance abuse), their family (unreasonable expectations, abuse, parental relationships), their social situation (difficulty socialising, loneliness, being bullied), can contribute to making a child self-harming.

**Indications that self-harm has taken place** should be taken seriously and could include:

- Becoming withdrawn
- Wearing long sleeves during warm weather
- Avoiding friends and family
- Lower academic attainment
- Unexplained cuts, bruises, burns
- Changes in clothing
- Abuse of substances
- Changes in eating or sleeping habits
- Changes in behaviour and mood
- Expressing feelings of failure

- Talking about self-harm and suicide

### **Procedure**

Maintain a supportive and open attitude, regardless of how you might feel about what you are hearing or seeing. Be non-judgmental. The fact that the child is talking to you shows that they are courageous and trust you.

Do not promise to keep what you are being told confidential.

Report the incident to the Designated Safeguarding Lead who will decide the best course of action which may include:

- the immediate safety of the child is of paramount importance; if they are acutely distressed, ensure that they are safe and that an adult remains with them at all times
- if a child has self-harmed whilst attending an Jones Tuition activity, a first aider should be called immediately
- arranging professional assistance if needed e.g. nurse, doctor, social care
- informing the parents of what has occurred unless to do so will heighten the risk of harm to the child, or the child escalating their self-harm ( always seek advice)
- removing the child from activities if remaining on site would cause them more distress
- contacting the Group Leader and/or the agent
- recording what the child said, any concerns, dates and times, details of who was informed and what action was taken. Head Office should be notified.
- offering emotional support to the peer group, if they have been affected, as appropriate.

### **Whistleblowing**

Jones Tuition is committed to the highest standard of openness, inclusiveness and accountability. Once you have passed on any concerns to the Designated Safeguarding Lead, and if you are unhappy with how it is being dealt with please speak with your line manager in the first instance so that your concerns can be addressed.

If you are still unhappy you should contact the DSL - Claire Jones, and/or the Camp Director – Nick Jones via [jonestuition.online@gmail.com](mailto:jonestuition.online@gmail.com).

You do not have to carry worries on your own.

Please see our Whistleblowing Policy for more information.

## **APPENDICES**

### **Designated Safeguarding Lead**

#### **Purpose of role**

- Ensure that child protection and safeguarding policies are in place, clearly laid out and accessible to staff, parents and guardians.
- Ensure that all staff, children, parents and guardians are familiar with and understand all aspects of Jones Tuition safeguarding provision.
- Ensure that the camps operate in line with, and staff are updated with, all safeguarding legislation and that information, support and resources on the topic of child protection and safeguarding are accessible to staff, parents and guardian.
- Be a personal advisor to all staff, children, parents and guardians and promote their role to ensure that everyone knows who they are and how to contact them.
- Be the first point of contact for any staff, children, parents and guardians who have concerns about a child's welfare.
- Refer concerns to the relevant agencies, as required, and dependent on the specific circumstances.

- Use their specialist skills and training in child protection to support the identification of possible abuse/neglect/extremism/terrorism and decide on the most appropriate action”.
- Ensure that all staff are taking responsibility and follow the correct procedure for safeguarding the children in the care of Jones Tuition.

## Definitions

### Types of abuse and possible indicators

The term ‘abuse’ is often used as an umbrella term. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Abuse and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.



### Neglect

The persistent failure to meet a child’s basic physical and psychological needs which is likely to result in serious impairments to their health and development. This may involve a parent or carer failing to provide food, shelter, clothing or a failure to protect from physical harm or danger or allow access to medical treatment. (Keeping Children Safe in Education, 2018)

Obvious signs of lack of care including:

- Problems with personal hygiene
- Constant hunger
- Inadequate clothing
- Poor relationship with peers
- Emaciation
- Untreated medical problems
- Repetitive discipline issues, lateness, compulsive stealing

### Physical Abuse

Actual or likely physical injury or failure to prevent physical injury or suffering to a child including hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. (Keeping Children Safe in Education, 2018)

- Physical signs do not tally with the given account of the occurrence
- Conflicting /unrealistic explanations of the cause
- Repeated injuries
- Bruising in unusual places
- Symmetry in injuries
- Delay in reporting or seeking medical advice.
- Unexpected covering up (e.g. long sleeves when previously short –sleeves were worn)
- Reluctance to take part in activities requiring exposing body, e.g. swimming or some sports

### Sexual Abuse

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration or non-penetrative acts. May also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual

abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. (Keeping Children Safe in Education, 2018)

- Sudden changes in behaviour
- Displays of affection which are sexual and age inappropriate
- Tendency to cling or need constant reassurance
- Tendency to cry easily
- Regression to younger behaviour (thumb sucking, acting like a baby etc)
- Unexplained gifts or money
- Wetting/soiling day or night

### **Emotional Abuse**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. (Keeping Children Safe in Education, 2018)

- Rejection
- Low self-esteem
- Being withdrawn/ isolation
- Rocking, hair twisting, thumb sucking
- Child being blamed for actions of adults
- Child being used as a carer for younger siblings
- Affection and basic emotional care giving/warmth persistently absent or withheld
- Being angry and aggressive
- Swinging between withdrawn and angry/aggressive in short space of time
- Self-harm (in extreme cases)

### **Term**

#### **Children In Need**

- They are unlikely to have the opportunity to achieve or maintain a reasonable standard of health or development without provision of services from the local authority.
- Their health or development is likely to be significantly impaired without the provision of services from the local authority.
- They have a disability. They may be blind, deaf or dumb, have a mental health disorder, permanent illness or injury or a congenital deformity.
- Children in Need may have special educational needs and disabilities, be asylum seekers, be young carers, have committed a crime, have parents in prison.

#### **Sexual Violence and Sexual Harassment between Children**

- Peer on peer abuse can *include* two specific forms, known as Sexual Violence and Sexual Harassment. Any response to these should fall within, and be consistent with our safeguarding procedures.
- Sexual Violence includes sexual offences which fall under the Sexual Offences Act 2003.
- Sexual Harassment refers to 'unwanted conduct of a sexual nature'. This can occur online (including, but not limited to non-consensual sharing of images, making sexual comments on social media) and offline (including but not limited to making sexual comments, sexual taunting or 'jokes', and physical contact, for example, brushing against someone deliberately or interfering with their clothes).

Sexual Violence and Sexual Harassment can:

- occur between any two children, or a group of children against one individual or group;
- be perpetrated by a child of any age against a child of any age;
- be perpetrated by a child of any sexual orientation against a child of any sexual orientation;
- include behaviours that exist on an often progressive continuum and may overlap; and/or
- be online and offline (physical or verbal).
- sexual violence and sexual harassment are not acceptable, will never be tolerated, and are not an inevitable part of growing up

### Up skirting

The Voyeurism Act 2019 states that “up skirting” is a new criminal offence and typically refers to the taking of a photograph under someone’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or to cause the victim humiliation, distress or alarm.”

Children with special educational needs and those who are or are perceived to be lesbian, gay, bisexual or transgender are particularly vulnerable to this act.

### Jones Tuition CONTACT LIST

TITLE	NAME	CONTACT DETAILS
Designated Safeguarding Lead	Claire Jones	<b>07702 596535</b>
Deputy Safeguarding Designated Person	Nick Jones	<b>07707883392</b>
Local Authority Designated Officer	Variable pending on camps location. Please see individual signage at camp.	
Local Authority Children’s Social Care (MASH)	Variable pending on camps location. Please see individual signage at camp.	
Prevent National Duty Helpline		<b>0207 340 7264</b>

## 4.0 E-Safety Policy

### Policy

All Jones Tuition staff have a duty to ensure that children are protected from potential harm both within and beyond the camp environment. Every effort will be made to safeguard against all risks, however it is likely that Jones Tuition will never be able to completely eliminate them. Any incidents that do arise will be dealt with quickly and according to this policy to ensure that children and staff continue to be protected.

E-safety is a framework of policy, practice, education and technological support that ensures a safe e-learning environment in order to maximise the educational benefits of Information and Communications Technology (ICT) whilst minimising the associated risks.



## **Aims**

- \* To offer valuable guidance and resources to Jones Tuition staff to ensure that they can provide a safe and secure online environment for all children in their care.
- \* To raise awareness to staff and the parent(s)/guardian(s) of the potential risks associated with online technologies.
- \* To provide safeguards and rules for acceptable use to guide all users in their online experiences.
- \* To ensure staff and the parent(s)/guardian(s) are clear about procedures for misuse of any technologies both within and beyond the Early Year's environment on camp.

## **Scope of policy**

This policy applies to all staff, children, the parent(s)/guardian(s), visitors and contractors accessing the internet or using technological devices on camps. This includes the use of personal devices by all of the above mentioned groups, such as mobile phones or iPads/tablets which are brought onto a Jones Tuition camp. This policy is also applicable where staff or individuals have been provided with Jones Tuition issued devices for use off-site, such as a work laptop or mobile phone.

## **Definition**

The definition and purpose of e-safety forms part of the "staying safe" element of the Government's 'Every Child Matters' agenda, and all out of school providers have a responsibility under the Children Act 2004 to safeguard and promote the welfare of children, as well as owing a duty of care to children and their parent(s)/guardian(s) to provide a safe learning environment.

Safety awareness is vital so that children and staff are able to keep themselves and others safe and use the internet responsibly. As many children will have access to the internet at home and at schools, Jones Tuition need to ensure that the parent(s)/guardian(s) are fully aware of e-safety issues so that they can extend esafety strategies to the home environment.

## **Staff responsibilities procedure**

All staff (including visitors) have a shared responsibility to ensure that children are unable to use the internet and related technologies as per the **mobile phone policy (4.1 Pg.17)**. If any staff member suspects that a child is subject to abuse via an online platform, then this is categorised as a Child Protection concern and the **safeguarding policy (3.0 Pg.8)** must be followed.

## **E-mail use**

- \* Staff must not engage in any personal communications with children who they have a professional responsibility for. This prohibits contact with former children outside of camp.
- \* All e-mails should be professional in tone and checked carefully before sending, just as an official letter would be.

## **Use of Social Networking sites (advertising or parental contact)**

Due to the public nature of social networking and the inability to keep content truly private, great care must be taken in the management and use of such sites. Best practice guidance states that:

- \* Identifiable images of children should not be used on social networking sites.
  - \* Privacy settings are set to maximum and checked regularly.
  - \* For safeguarding purposes, photographs or videos of looked after children must not be shared on social networking sites without written consent of the parent/guardian.
- Please refer to the **social media policy (4.2 Pg.19)** for further guidance.

## **Mobile or smart phones**

Staff:

- \* As per the **mobile phone policy (4.1 Pg.17)**, personal mobile phones are permitted on camp, but are to be used during break times only, within designated areas away from children.

\* Personal mobile phones must never be used to contact children or their families, nor should they be used to take videos or photographs of children.

### **Photographs and video**

Staff:

\* Written consent must be obtained from the parent(s) or guardian(s) before photographs or videos of young people will be taken or used within the camp, including displays, learning journeys, Jones Tuition website and other marketing materials.

\* Staff will ensure that children are at ease and comfortable with images and videos being taken.

\* Staff must not use personal devices, such as cameras, video equipment or camera phones, to take photographs or videos of children.

### **Laptops and tablets**

Staff and visitor use:

Personal use of laptops or computing facilities, whilst on site, is left to the discretion of Jones Tuition and may be permissible if kept to a minimum. They must be used away from children.

\* Where staff have been issued with a device or have had approval to use their own device (e.g. laptop) for work purposes, personal use is not authorised by Jones Tuition. The laptop/devices should be used by the authorised person only, which in most cases is the Camp Manager.

\* Staff are advised not to bring laptops or tablets to camp and must advise the Camp Manager if they do.

### **Children's use:**

\* As per the **mobile phone policy (4.1 Pg.17)**, children are not permitted to have any electronic devices on camp. Any such device will be confiscated and stored securely until the child is signed out by an authorised adult.

### **Data storage and security**

\* Sensitive data, photographs and videos of children which leave the premises will only be stored on devices authorised by Jones Tuition.

## **4.1 Mobile phone policy**

### **For children**

The widespread ownership of mobile phones among young people requires that Jones Tuition staff, children and their parent(s)/guardian(s) take steps to ensure that mobile phones are used responsibly at camp.

### **Mobile phones are considered banned items and as such can be searched for and confiscated.**

Jones Tuition has established the following policy for mobile phones that provides staff, children and their parent(s)/guardian(s) guidelines and instructions for the appropriate use of mobile phones during camp hours.

Use of mobile phones presents a number of problems, including:

\* Mobile phones can be valuable items and might render a child vulnerable to theft.

\* Mobile phones (and their cost and level of sophistication - or otherwise) can make children objects of envy or disparagement and could have implications with regard to discipline and potential bullying.

\* Even when apparently silent, the use of mobile phones for texting purposes could be potentially undermining of group discipline and distract the enjoyment of others.

\* The use of newer phones with integrated cameras could lead to child protection and data protection issues with regard to inappropriate capture, use or distribution of images.

## Responsibility

- \* Mobile phones should not be brought to camp. Jones Tuition advises all parents/guardians to discourage children from bringing mobile phones to camps on the grounds that they are valuable and may be lost or stolen.
- \* Where a child is found, by a member of staff, to be in unauthorised possession of a mobile phone, the phone will be confiscated from the child and returned only to the authorised adult.
- \* The staff reserve the right to view the content of any child's mobile phone at any time in respect to issues regarding the safeguarding of children (two members of staff will be present).
- \* This policy is linked to the **behaviour policy (13.0 Pg. 42)**. Jones Tuition will treat breaches as they would treat any other breach of Jones Tuition rules and discipline accordingly.
- \* Children should protect their phone numbers by never giving their mobile phone number to anyone whilst at Jones Tuition. This helps protect the child's number from unwanted messages and calls.
- \* Jones Tuition accepts no responsibility for replacing lost, stolen or damaged mobile phones whilst on camp.

## Unacceptable use

- \* Children who bring a mobile phone to camp by mistake should **never** leave it in their coat/bag when they arrive. Mobile phones will be kept by the Camp Manager in a locked box.
- \* Mobile phones should not be used to make calls, send SMS messages, surf the internet, take photos or used for any other application during camp time.
- \* Using mobile phones to bully and threaten other children or staff is unacceptable and will not be tolerated. In some cases it can constitute criminal behaviour and the **behaviour policy (13.0 Pg.42)** will be followed.
- \* Using mobile phones to photograph or film any child or member of staff is unacceptable.

## For staff

Jones Tuition acknowledges that staff members will own a mobile phone device and that they will bring it with them to camp. Jones Tuition has established the following policy for mobile phones, providing staff with guidelines and instructions for the appropriate use of mobile phones during camp hours.

- \* **The use of a mobile phone must not detract from the quality of supervision and care of children. Staff members are forbidden from using non-approved devices i.e. personal mobile phones whilst leading a session with group of children. This will be treated as a case of misconduct if the staff member is caught doing so.**
- \* Mobile phones are not banned from being brought to camp however they must be left in an allocated Jones Tuition staff area. Mobile phones are only to be used away and out of sight of children.
- \* Jones Tuition staff will be supplied with radio sets to communicate with each other during camp time.
- \* Jones Tuition will only use a camera on camp if taking pictures for marketing reasons and this will be fully supervised by a member of the Head Office team. Jones Tuition will always ask permission from parent(s)/guardian(s) beforehand. If Jones Tuition employ an outside company, they will follow the **accompanied at all times when on camp**. If Jones Tuition run any competitions on camp, pictures can be taken but must not have any children in them and only the Camp Manager may do so.

## Unacceptable use

- \* Using mobile phones to bully and threaten other children or staff is unacceptable and will not be tolerated. In some cases it can constitute criminal behaviour.
- \* Cameras are not permitted on camp and staff should not use a mobile phone camera to take any pictures of children on camp. This will be treated as a case of misconduct if the staff member is caught doing so.

## **Accepted use**

For the purpose of child welfare, every Camp Manager on camp is equipped with a mobile phone. The safety of children in the care of Jones Tuition is paramount and the purpose of this phone is strictly for use in the following areas and for the following reasons:

- \* To allow Head Office to make contact with a Camp Manager or vice versa in order to share any important information regarding the running of the camp during that particular day.
- \* To allow the parent(s)/guardian(s) to make direct contact with a Camp Manager regarding their child. This could be to arrange a different pick up time or inform the camp about a late pick up or alternatively if the Camp Manager needs to contact an authorised adult regarding a child.

**Exception: The only exception is in a setting where the camp is spread across a very large area, and with permission from the Camp Manager, another staff member is asked to keep a Jones Tuition provided phone (without a camera) on them, so if an emergency situation occurs, contact can be made. In most instances radio communication devices are provided to account for this and if a situation arises the main priority is always the welfare of the children in their care.**

All parent(s)/guardian(s) and child contact numbers are kept only by Head Office and the Camp Manager. Contacts are not stored on the mobile phone but are presented to the Camp Manager as a report which is kept with them at all times.

## **4.2 Social media policy**

### **Policy**

- \* This policy is intended to help staff make appropriate decisions about the use of social media such as but not limited to blogs, wikis, social networks, podcasts, forums, message boards and comments on web-articles.
- \* This policy outlines the standards Jones Tuition require staff to observe when using social media, the circumstances in which Jones Tuition will monitor use of social media and take action in respect of breaches to this policy.
- \* This policy does not form part of any contract of employment and it may be amended at any time.

### **Who is covered by the policy?**

- \* This policy covers all individuals working at all levels including Directors, Senior Managers, staff, trainees, homeworkers, part-time and fixed-term, casual and agency staff (collectively referred to as staff in this policy).

### **The scope of the policy**

- \* All staff are expected to comply with this policy at all times to protect the privacy, confidentiality, and interests of Jones Tuition, its staff, partners and customers.
- \* A breach of this policy may be dealt with under Jones Tuition' disciplinary procedure and, in serious cases, may be treated as gross misconduct leading to summary dismissal.

### **Responsibility for implementation of the policy**

- \* The Directors have overall responsibility for the effective operation of this policy.
- \* The Directors are responsible for monitoring and reviewing the operation of this policy and making recommendations for changes to minimise risks to operations.
- \* All staff are responsible for their own compliance with this policy and for ensuring that it is consistently applied. All staff should ensure that they take the time to read and understand it. Any breach of this policy should be reported to the relevant Line Manager.
- \* Questions regarding the content or application of this policy should be directed to the staff member's Line Manager.

### **Representing Jones Tuition on social media**

Some staff represent Jones Tuition by handling corporate social media accounts or speaking on our behalf. We expect them to act carefully and responsibly to protect Jones Tuition' image and reputation. These staff should:

- \* Be respectful, polite and patient, when engaging in conversations on Jones Tuition' behalf. They should be extra careful when making declarations or promises towards customers.
- \* Follow our privacy policy and data protection policy and observe laws on copyright, trademarks, plagiarism and fair use.
- \* Avoid deleting or ignoring comments for no reason. They should listen and respond appropriately.
- \* Never post discriminatory, offensive or libellous content or comments.
- \* Correct or remove any misleading or false content as soon as they become aware of it.

### **Personal use of social media**

The use of social networking sites such as Facebook and Twitter is a part of daily life and they are frequently used as much by children attending camps as by adults. Staff should not conduct or portray themselves in social media in a manner that may:

- \* Bring Jones Tuition into disrepute.
- \* Lead to valid parental complaints.
- \* Be deemed as derogatory towards Jones Tuition or its customers.
- \* Be derogatory towards children and/or parent(s) and guardian(s).
- \* Bring into question their appropriateness to work with children and young people.

Any communication between children/parent(s)/guardian(s) and staff, by whatever method, should take place within clear and explicit professional boundaries. This includes the use of text messages, digital cameras, video, web-cams, websites and blogs. Staff should ensure that all communications are transparent and open to scrutiny. In summary this means that staff:

- \* Should not share any personal information online with a child in Jones Tuition care.
- \* Should not form on-line "friendships" or enter into communication with children in Jones Tuition care using social media.
- \* Should never use or access social networking profiles of children in Jones Tuition care.
- \* Should not give their personal contact details to children in Jones Tuition care, including mobile numbers.
- \* Should not use the internet or web-based communication channels to send personal messages to children in Jones Tuition care.

We advise our staff to:

- \* Ensure others know that posts on personal social media accounts do not represent Jones Tuition and that personal opinions and content are not endorsed by Jones Tuition.
- \* Not use any intellectual property such as logos on a personal account without permission.
- \* Not upload, post, forward or post a link to any abusive, obscene, discriminatory, harassing, derogatory or defamatory content.
- \* Never disclose commercially sensitive, anti-competitive, private or confidential information, or upload, post or forward any content belonging to a third party unless of third party's consent.
- \* Do not discuss colleagues, competitors, customers or suppliers without their approval.

### **Monitoring the use of social media sites**

- \* Staff should be aware that any use of social media sites (whether or not accessed for work purposes) may be monitored and, where breaches of this policy are found, action may be taken under Jones Tuition Disciplinary Procedure.
- \* Jones Tuition reserves the right to restrict or prevent access to certain social media sites if it considers personal use to be excessive. Monitoring is only carried out to the extent permitted or as required by law and as necessary and justifiable for business purposes.
- \* Misuse of social media sites can, in certain circumstances, constitute a criminal offence or otherwise give rise to legal liability against the staff member and Jones Tuition.
- \* In particular uploading, posting or forwarding a link to any of the following types of material on a social media site, whether in a professional or personal capacity, will amount to gross misconduct (this list is not exhaustive):
  - Pornographic material (that is, writing, pictures, films and video clips of a sexually explicit or arousing nature):
  - A false and defamatory statement about any person or organisation:

- Material which is offensive, obscene, criminal, discriminatory, derogatory or may cause embarrassment to Jones Tuition, host camps or staff:
  - Confidential information about Jones Tuition or any members of staff or host camps (which you do not have express authority to disseminate):
  - Any other statement which is likely to create any liability (whether criminal or civil, and whether for you or us): or
  - Material in breach of copyright or other intellectual property rights, or which invades the privacy of any person.
- \* Any such action will be addressed under the Jones Tuition Disciplinary Procedure and is likely to result in summary dismissal.
- \* Where evidence of misuse is found, Jones Tuition may undertake a more detailed investigation in accordance with the Jones Tuition Disciplinary Procedure, involving the examination and disclosure of monitoring records to those nominated to undertake the investigation and any witnesses or managers involved in the investigation. If necessary, such information may be handed to the police in connection with a criminal investigation.

## **5.0 Intimate Care Policy**

### **Definition**

Intimate care is any care which involves washing, touching or carrying out an invasive procedure (such as cleaning up a child after they have soiled themselves) to intimate personal areas. In most cases such care will involve cleaning for hygiene purposes as part of a staff member's duty of care.

### **Responsibility**

The issue of intimate care is a sensitive one and will require staff to be respectful of the child's needs. The child's dignity should always be preserved with a high level of privacy, choice and control. There shall be a high awareness of child protection issues. Staff behaviour must be open to scrutiny and staff must work in partnership with the parent(s)/guardian(s) to provide continuity of care to children/young people wherever possible.

Jones Tuition is committed to ensuring that all staff responsible for the intimate care of children will undertake their duties in a professional manner at all times. Jones Tuition recognises that there is a need to treat all children with respect when intimate care is given. No child should be attended to in a way that causes distress or pain.

### **5.1 Best practice**

- \* The management of all children with intimate care needs will be carefully planned. The child who requires intimate care is treated with respect at all times: the child's welfare and dignity is of paramount importance.
- \* Staff who provide intimate care are trained to do so (including Child Protection and Health and Safety training in lifting and moving) and are fully aware of best practice.
- \* Staff will be supported to adapt their practice in relation to the needs of individual children taking into account developmental changes such as the onset of puberty and menstruation.
- \* The child will be supported to achieve the highest level of autonomy that is possible given their age and abilities. Staff will encourage each child to do as much for him/her as he/she can. This may mean, for example, giving the child responsibility for washing themselves.
- \* Each child's right to privacy will be respected. Careful consideration will be given to each child's situation to determine how many staff might need to be present when a child is toileted. Where possible one child will be catered for by one adult however will be supervised by a second member of staff. Each case of intimate care must be clearly documented.
- \* Wherever possible the same child will not be cared for by the same adult on a regular basis: this will ensure, as far as possible, that over-familiar relationships are discouraged from developing, whilst at the same time guarding against the care being carried out by a succession of completely different carers.
- \* Wherever possible staff should only care intimately for an individual of the same sex. However, in certain circumstances this principle may need to be waived where failure to provide appropriate

care would result in negligence for example, female staff supporting boys on camp, if no male staff are available.

\* Intimate care arrangements will be discussed with the parent(s)/guardian(s) on a regular basis and recorded on the child's care plan. The needs and wishes of children and the parent(s)/guardian(s) will be taken into account wherever possible within the constraints of staffing and equal opportunities legislation.

### **Health and safety of intimate care**

- \* Blood, vomit, urine and faeces will be cleaned up immediately and disposed of safely by double bagging the waste and removing it from the premises. When dealing with body fluids, staff will wear personal protective clothing (disposable plastic gloves and aprons) and will wash themselves thoroughly afterwards. Soiled children's clothing will be bagged to go home – staff will not rinse it. Children will be kept away from the affected area until the incident has been dealt with fully.
- \* Staff at Jones Tuition will maintain high standards of personal hygiene, and will take all practicable steps to prevent and control the spread of infection.

### **First aid with intimate care**

- \* Staff who administer first aid should ensure wherever possible that another adult or other children are present. The child's dignity must always be considered and where contact of a more intimate nature is required (e.g. assisting with toileting or the removal of wet/soiled clothing), another member of staff should be in the vicinity and should be made aware of the task being undertaken.
- \* Regular requirements of first aid with an intimate nature should be planned for. Agreements between those with parental responsibility and the camp should be documented and easily understood on an **Administration of Medicine Form**. The necessity for such requirements should be reviewed regularly. The child's views must also be actively sought and, in particular, any discomfort with the arrangements addressed.

## **5.2 Toilet training**

- \* Jones Tuition asks that children attending camp have been toilet-trained. If a child is still in nappies, he/she is unsuitable for camp activities, and Jones Tuition asks that the child is not booked onto camp.
- \* Jones Tuition understand that accidents can happen, and suggest that younger children bring a change of clothes. If a child is to soil themselves whilst on camp then the **intimate Care Policy (5.0 pg. 22)** will be followed.

## **6.0 Safer Recruitment and Employment Policy**

Jones Tuition's reputation for high quality childcare depends on the professionalism and hard work of all staff. Jones Tuition 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.

### **6.1 Recruitment**

Jones Tuition 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:

- \* Camp Director
- \* Camp Manager
- \* Activity Instructor

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

- \* Relevant childcare qualifications or applicants studying towards a relevant qualification.
- \* Paediatric 12 hour First Aid - Essential for Camp Managers, preferable for all other roles.
- \* Experience working with children in similar environments.

- \* Additional skills such as emergency first aid or lifeguarding.
- \* Personality and enthusiasm.

### 6.1a Advertising

At Jones Tuition, 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 Jones Tuition attracts the best talent.

### 6.2 Selection and appointment

In appointing staff, Jones Tuition use the following procedures:

- \* **Application Form:** All new candidates and returning staff are required to complete the extensive Online Application Form via the Jones Tuition website. This gathers information required by Ofsted including contact information, relevant experience, qualifications, references and DBS information.
- \* **Interview:** Candidates with a strong application will be invited to take part in a telephone or Skype/Zoom interview with the Camp Director for a suitable role. Camp Manager applicants may be required to attend an assessment day. At least one member of the Assessment Panel will have completed Safer Recruitment Training.

Jones Tuition 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 Jones Tuition, any gaps in employment, ability to adapt to on-camp scenarios, personality and safeguarding experience amongst other factors.

- \* **References:** Jones Tuition require two professional or academic references covering the past 5 years for every candidate as sufficient evidence to establish a candidate's employment and educational history.

- \* **Health Declaration:** All staff are required to complete an annual self-assessed Health Declaration for Jones Tuition to ensure they are fit for work and declare any medical issues that may impact their role on camp. Where any concerns are raised, further discussion will take place with the Camp Director.

- \* **Certificates and Qualifications:** Staff appointed in specialist roles (e.g. Camp Managers) are required to send evidence of their qualification to Jones Tuition. These records are kept on file centrally at Head Office; the staff member is required to have the originals on camp for inspection, if required.

- \* **Photo ID and Right to Work in the UK:** All staff members are required to evidence that they are eligible to work in the UK, by providing at least 1 form of photo ID, which will be kept on file centrally at Head Office.

In addition, staff members are also required to provide another form of ID, for example a bank statement showing their current address. Staff members are required to show photo ID when they arrive at any training day and on their first day on camp.

- \* **DBS Checks:** In line with Ofsted guidance. Staff are required to hold a DBS certificate, which may be registered on the DBS Update Service. DBS certificates can be obtained and issued via Jones Tuition and are valid for three years. Non Jones Tuition DBS certificates will be accepted if they are either on the Update Service, were issued within the last 12 months, or were obtained



within the last three years with a current employer, so that Jones Tuition can make checks regarding this period of time.

\* **Contract Paperwork:** All staff will be sent a contract of work, which they are asked to read, understand and sign. Contracts should be returned to the Camp Director within 7 days of issue, along with the staff declaration, bank details, new starter checklist (tax position) and any other relevant information.

\* **Jones Tuition Reserve Staff Members:** Where an applicant is strong, but no position is currently available, that applicant will be invited to training and appointed as a trained reserve staff member. They are subject to the same background checks and training as appointed staff members 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.

\* **Returners:** Returning members of staff are asked to re-apply each season to inform Jones Tuition of any change in circumstances. This ensures Jones Tuition records are kept up to date and employment gaps are monitored. Jones Tuition will not re-employ anyone that has previously been dismissed from the Company.

\* **Performance Management & Appraisals:** All 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, Camp Director and may affect future work with Jones Tuition.

If a staff member without a Jones Tuition issued DBS Check is signed up to the DBS Update Service, Jones Tuition is required to see an original copy of the Disclosure to check that it is authentic and relevant to the correct workforce. The DBS Update Service allows Jones Tuition to check that nothing has been added to a disclosure since it was issued.

Jones Tuition 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 Camp 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 work. 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.
- \* Jones Tuition volunteers are subject to the same pre-hiring checks as paid staff members. This includes satisfactory DBS status and references.
- \* Jones Tuition takes its responsibility to safeguard children seriously and acts on 'Keeping children safe in education' guidance referring to 'Disqualification by Association'. Jones Tuition 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 Jones Tuition care.

### 6.3 Training

Jones Tuition believe pre-camp and ongoing training is vital in ensuring the safe and smooth running and delivery of the Jones Tuition product and all safeguarding practices. Jones Tuition will endeavour to ensure all staff complete 3 stages of training before working with children. Returning

staff all have regular training updates during their work with Jones Tuition. Although Jones Tuition preference is to hire qualified staff in childcare studies or teaching, Jones Tuition understands the importance of Jones Tuition specific training to ensure all staff members are aware of Jones Tuition Policies and Procedures and the on-going updates in the childcare industry.

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

1. Online training: Jones Tuition has an online training platform which requires staff to watch various videos and read literature which gives an introduction to Jones Tuition 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. Jones Tuition keeps a central record of all staff that complete the online training.
2. Central Training & Assessment Day: This is the core element of training for all camp staff. This face to face training is led by the Jones Tuition Operations Team. It builds on the lessons from the Online Training programme through team building games, workshops and exercises. There is also specific Safeguard training. Camp Manager Central training comprises of two full days.
3. Camp Induction Day: This takes place at the specific Jones Tuition camp at which a staff member is hired. It is compulsory for all staff to complete a Camp Induction Form at each different Jones Tuition 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, Jones Tuition defines a returning member of staff as someone that has worked on camp previously and has had Jones Tuition training within the past two years.

Returning members of staff receive training in the following ways:

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

### **Records of training**

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

### **Other Camp Staff Training**

In addition to the Camp Manager training programme, Jones Tuition provides a training programme for all positions on camp, which are:

- \* LEGO® Play Leader
- \* Senior Activity Instructors
- \* Activity Instructors

### **Jones Tuition Recruitment and Training Schedule:**

#### **6.4 Allegations against a member of staff**

Jones Tuition 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 Jones Tuition 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 Jones Tuition investigates. **(3.2 Pg.8)** 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 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)** who will take charge of the situation and commence the investigation process.
- \* The **Designated Safeguarding Lead (3.2 Pg.8)** 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)** 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)** 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, Jones Tuition will inform all the appropriate regulatory bodies, including Ofsted.
- \* Jones Tuition 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. Jones Tuition 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 Jones Tuition 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, Jones Tuition will suspend the staff member whilst the investigation takes place.

\* If allegations of misconduct are made against a staff member and are investigated internally, Jones Tuition will make any decisions regarding suspension during the investigation in accordance with Jones Tuition' Disciplinary Procedures.

\* Jones Tuition 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 Jones Tuition 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 Jones Tuition Head Office, Ofsted, Local Safeguarding Board or the police**

## **7.0 Alcohol and Substance Misuse Policy**

### **Policy**

To protect the safety and well-being of all children and staff, illegal drugs, unauthorised drugs or alcohol must not be possessed or bought, sold, or otherwise obtained on camp at all. This policy applies to all staff and children and anyone else present on camp.

Illegal or unauthorised drugs and alcohol have no place at Jones Tuition and are not acceptable within the boundaries of any of our camps or venues. Authorised drugs in the form of prescribed medicines, for both staff and children, are to be stored in a secure place (out of reach of the public and children) and are to be administered by the Camp Manager following the Administration to Medicine procedure. **(11.0 Pg.39)**

Jones Tuition realise that the children that attend camp are young and unlikely to be exposed to the misuse of drugs, alcohol or tobacco however it cannot ignore the dangers to which they are exposed through the media and older children within the range of their acquaintance.

Where any member of the Jones Tuition community, staff, parent(s)/guardian(s) or visitor is or appears to be under the influence of alcohol or illegal drugs, they will be asked to leave immediately and action taken to ensure their safety, with supervision.

### **Staff misuse**

It is the aim of Jones Tuition to provide the highest possible quality of childcare delivered by its staff. The contract sent to every staff member highlights that it is the staff member's responsibility to ensure that they are fit for duty and free of any substances that may impair their performance each day. Under section 7 of the Health and Safety at Work Act 1974, staff are required to take reasonable care of themselves and others who would be affected by what they do.

The following declaration is written in every contract which each member of staff is expected to read, sign and return to Head Office:

'If offered work with Jones Tuition you will not at any time be under the influence of drugs or be compromised by alcohol consumed during or prior to your shift'.

Camp Managers are trained in what is considered acceptable conduct from their staff members. If they have any cause for concern and feel that the welfare of the children is in any way at risk they are trained to deal with the situation immediately by following the **allegations against a member of staff (6.4 Pg.27)**.

#### **Procedure for dealing with incidents involving staff**

- \* Substance misuse related incidents involving staff is subject to Jones Tuition Disciplinary Policy and Procedures.
- \* Substance misuse outside camp hours could adversely affect job performance and so trigger competency procedures. If the effects of misuse are such that child or staff safety is at risk, the member of staff can be suspended pending disciplinary action. This may include dismissal.
- \* Staff are obliged to cooperate with testing procedures, including giving biological samples for analysis when there is reasonable suspicion of substance abuse. Refusal to cooperate is a disciplinary offence that could result in disciplinary action including dismissal.

#### **Procedure for dealing with children after an incident**

- \* Drugs and alcohol affect behaviour. The fact that drugs or alcohol have caused a child to behave inappropriately will not be seen as a mitigating factor – the behaviour will be dealt with using the **behaviour policy (13.0 pg.42)**.
- \* It would be normal practice to contact the police according to the agreed protocol if a search is required or if there is a concern about dealing in illegal drugs.
- \* Exclusion may be an appropriate action for using alcohol or drugs on camp, but each case will depend on circumstances. Longer exclusions could be used for situations where accompanying behaviour is sited.
- \* A child must not be released to walk, cycle or catch the bus home if there is concern about mental impairment resulting from drink or drugs. If necessary, reasonable force may be used to restrain the child - the behaviour will be dealt with using the **behaviour policy (13.0 pg.42)**.

#### **Informing the parent(s)/guardian(s)**

- \* Parent(s)/guardian(s) should be informed of any drug related incident unless there are child protection concerns.
- \* Parent(s)/guardian(s) would normally be contacted directly by telephone in the event of proven drug usage.

#### **Procedure for dealing with adults (not staff)**

- \* Jones Tuition is not able to release children into the care of other adults where there is a possibility of harm to that child.
- \* Where there is evidence that the parent(s)/guardian(s) or authorised adult(s) arriving at camp to collect children are under the influence of drugs or alcohol, either social services or the police will be contacted in line with the **safeguarding policy (3.0 Pg.8)**.

### **8.0 Whistleblowing Policy**

#### **Policy**

Jones Tuition is committed to the highest possible standards of:

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

#### **Aims**

- \* Encourage those working in a Jones Tuition 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.

Jones Tuition will provide all reasonable protection for those who raise concerns “made in the public interest”. Jones Tuition 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 Jones Tuition. 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 Jones Tuition 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 whistleblower 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. Jones Tuition 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 Lead**
- \* **Camp Director**
- \* **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 Group Head of People 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 Group Head of People.
- \* 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 Jones Tuition not to disclose confidential information. This does not prevent you from seeking independent advice at any stage.

## **9.0 Health and Safety Policy**

Jones Tuition aims to meet the Health and Safety requirements as much as reasonably possible in order to safeguard the well-being of all children, the parent(s)/guardian(s) and staff on camp. Jones Tuition complies with The Health and Safety at Work Act 1974 and the Workplace (Health, Safety and Welfare) Regulations 1992 at all times. Jones Tuition has appropriate insurance cover, including Employer's Liability Insurance and Public Liability Insurance.

Staff members are required to follow Jones Tuition's Health and Safety Procedures and are responsible for:

- \* Maintaining a safe environment.
- \* Taking reasonable care for the health and safety of themselves and others attending the camp.
- \* Reporting all accidents, incidents and near misses which have caused injury or damage or may do so in the future.
- \* Undertaking relevant health and safety training when required to do so by the manager.

Any member of staff who disregards safety instructions or recognised safe practices will be subject to disciplinary procedures.

### **Responsibilities of the registered person**

Jones Tuition designated health and safety officer is the Health and Safety Manager and this individual will ensure that:

- \* All staff receive information on health and safety matters, and receive training where necessary
- \* The Health and Safety policy and procedures are reviewed regularly.
- \* Staff understand and follow health and safety procedures.
- \* Resources are provided to meet the camp's health and safety responsibilities.
- \* All accidents, incidents and dangerous occurrences are properly reported and recorded. This includes informing Ofsted, child protection agencies and the Health and Safety Executive under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995) when appropriate.
- \* All reported accidents, incidents and dangerous occurrences are reviewed, so that preventative measures can be taken.

The Camp Manager holds ultimate responsibility and liability for the safe operation of the camp they manage.

### **The Camp Manager is responsible for ensuring**

- \* The premises are clean, well lit, adequately ventilated and maintained at an appropriate temperature.
- \* Camp equipment is safely and securely stored.
- \* Children are only allowed in Jones Tuition approved areas which have the necessary risk assessments.
- \* A working telephone is available on the premises at all times.
- \* Chemicals and cleaning materials are stored appropriately, and in accordance with COSHH data sheets (Control of Substances Hazardous to Health).
- \* Daily risk assessment checks are carried out to ensure the premise does not have any additional risks.

### **Security**

The safety and security of children and staff are extremely important to Jones Tuition. To ensure the all children and staff are secure with as minimal risk as possible, Jones Tuition aims to restrict all external access to the public by locking doors and gates. When it is impossible to lock all external access, Jones Tuition will endeavour to have all external/class room doors closed to prevent unwanted visitors. Staff are responsible for monitoring the entrances and exits to the premises throughout the session.

All visitors to camp must follow the **visitor policy (2.0 Pg.5)**.

Children are not permitted to leave camp, unless prior permission has been given by the parent(s)/ guardian(s) for a child to sign themselves out as per the **unaccompanied child (1.4 Pg.4)**. Security procedures will be regularly reviewed by the Camp Manager, in consultation with staff and the parent(s)/guardian(s).

### **Equipment**

All furniture, toys and equipment are kept clean, well maintained and in good repair. All equipment is appropriately risk assessed before children or staff are allowed to use them. Broken/damaged



equipment is to be decommissioned and returned to Jones Tuition Head Office or appropriately disposed of at the camp.

Jones Tuition store flammable equipment in safe and secure places, away from potential risks or hazards.

### **9.1 Food and personal hygiene**

It is part of the employment contract that all Jones Tuition staff members are to maintain high standards of personal hygiene, and take all practicable steps to prevent and control the spread of infection. To reduce the potential spread of infection Jones Tuition do the following:

- \* Toilets are checked at regular intervals throughout the days and cleaned when necessary.
- \* Waste is disposed of appropriately and all bins are changed before they overflow.
- \* Staff are to ensure that children wash their hands before handling food or drink and after using the toilet.
- \* Cuts and abrasions (whether on children or staff) are kept covered.
- \* The responsibility for daily cleanliness checks is held by the Camp Manager.
- \* Dealing with body fluids, spillages of blood, vomit, urine and faeces will be cleaned up immediately in accordance with the **intimate care policy (5.0 pg.21)**.

### **Promoting good health**

Jones Tuition staff will ensure that children in their care uphold high standards of cleanliness in regards to hand washing before handling food or after using the toilet, litter, and the equipment they use for the activities.

Jones Tuition strongly believes in promoting good health through giving children an opportunity to be active via a wide variety of fun, sporting activities during school holidays. Each child is encouraged to participate in the wide variety of sports on offer which will not only teach them new skills but will also keep them fit and healthy.

Jones Tuition encourages children and their parent(s)/guardian(s) to pack healthy lunchboxes with a balance of food groups and healthy snacks for morning and afternoon breaks. Additionally, Jones Tuition advises a refillable water bottle is brought to camp each day to keep the children hydrated. A water station is always available for them to fill their bottles from. Jones Tuition tries to discourage unhealthy eating by not offering a tuck shop or by offering sweets as prizes. Healthy play in the sun is also encouraged by requesting sun hats and sun cream be worn. Time is allowed for sun cream to be applied before outdoor activities and will be applied using the **intimate care policy (5.0 pg.21)**.

### **9.2 Food and drink**

Jones Tuition believes that in order to participate effectively whilst on camp, children need to have a full and balanced diet. Whilst Jones Tuition does not provide meals on camp, it actively encourages the parent(s)/guardian(s) to provide a healthy packed lunch for their child/children in a self-chilled container. Jones Tuition will ensure:

- \* Drinking water is available on all camps, which the children may access at all times.
- \* Children are welcome to access their lunch-boxes at morning and afternoon break time as well as the lunch break.
- \* Children are encouraged to bring from home and carry with them a refillable drink bottle.
- \* Jones Tuition members of staff will encourage children to take drink breaks at frequent intervals. This is a high priority for all staff, especially on hot days throughout the summer.
- \* Jones Tuition staff receive training in recognising signs of dehydration and the appropriate course of action.
- \* Packed lunches must be provided in a clearly named lunch-box. Although Jones Tuition endeavour to store the lunch-boxes in a cool, dry environment they do not provide refrigeration so advise all food is brought on camp in a self-chilled container.

- \* Jones Tuition recommends strongly that the parent(s)/guardian(s) give careful consideration to the contents of the packed lunch, especially to any high risk foods such as cooked meats and dairy products, which are best kept chilled.
- \* Children should also be provided with a mid-morning and afternoon snack for break times.
- \* At lunch time children will be supervised at all times whilst eating and will be encouraged to eat what is in their lunch-box.
- \* At no time will children be forced or punished in any way for not eating what is in their lunch-box. Should a child refuse to eat what is in their lunch-box it will be returned home uneaten or part eaten so that the parent(s)/guardian(s) can see for themselves. The child's Camp Manager will highlight this to the parent/guardian concerned at collection time.
- \* Allergy and special dietary requirements are requested at the time of booking and recorded. Every staff member has a full list of these requirements.
- \* Due to the seriousness of food allergies and special dietary requirements Jones Tuition has a policy of never allowing children to share or swap food, regardless of whether the children have any known allergies or special dietary requirements or not.
- \* Although Jones Tuition does not enforce a No Nut or other allergy Policy it does take all allergies very seriously. If it is made known to Jones Tuition that a child on camp has a specific allergy, Jones Tuition will make every attempt to prevent any spread of the allergen. This may result in the child with the allergy being separated during break and lunchtimes.
- \* If the allergy is severe, Jones Tuition reserves the right to enforce a ban on the offending allergen at that camp.

Ofsted will be notified of any food poisoning affecting 2 or more children looked after on the premises. Notification will be made as soon as is reasonably practicable, but in any event within 14 days of the incident. Jones Tuition may also involve other agencies.

### 9.3 Health and sickness

Jones Tuition requires that all children who are ill or infectious are kept home for the full duration of their ailment, and for 48 hours after the last symptom occurs. If the Camp Manager or staff has any suspicions regarding a child's health they should first refer to the HSE the infectious diseases chart to compare symptoms. The Camp Manager will then make a decision as to whether the child should be allowed to remain on camp or whether to seek further medical advice.

In the event of a child becoming ill whilst at camp, the following procedure will be followed:

- \* The child will be removed from the group and made comfortable in an area where they can rest and be supervised until they can be collected.
- \* The Camp Manager will contact the child's parent(s)/guardian(s) and inform them that their child is ill and needs to be collected as soon as possible.
- \* The Camp Manager and first aider will continue to monitor the condition of the child and make them comfortable until the parent(s)/guardian(s) comes to collect them.
- \* If at any time the child's condition deteriorates and requires immediate medical attention the Camp Manager will call for an ambulance and follow the **serious accident procedure (10.4 Pg.37)**.

Jones Tuition will inform parents/guardians if an outbreak of any infectious diseases or illnesses occurs. Although head lice can be easily passed from one individual to another, Jones Tuition are bound by government policy not to exclude a child suspected to have head lice, or disclose the identity of the child affected. Jones Tuition will however inform parent(s)/guardian(s) if an outbreak occurs on camp, recommending that they check their children for any signs and apply the appropriate treatment if necessary.

### Illness Protection Scheme

To provide cover against illness, Jones Tuition offer an Illness Protection Scheme which must be added to an order no later than 28 days before the start of camp. If the parent(s)/guardian(s) opt not to take the Illness Protection Scheme, there is no refund available in case of illness or injury.

Any claim made under the Illness Protection Scheme must be made within four weeks of the first date of illness or injury on completion of the **Illness Protection Scheme Claim Form**.

All claims need to be supported by a doctor's note. If this is not possible, Jones Tuition will accept self-certification for a maximum of 3 days within one camp season. (A season is defined as an individual school holiday break be it half term or between terms). If the claim is successful, Jones Tuition will hold the value of the claim as a credit on the parent(s)/guardian(s) account.

#### **9.4 Coronavirus (Covid-19) Pandemic**

Jones Tuition, in line with the guidance set out by HSE, DfE, Ofsted, PHE and Cognita will where reasonably practicable, will take reasonable steps to protect staff, customers and bystanders from Coronavirus. A record of these steps will form the COVID-19 risk assessment, operational produces and supported with training.

Camps will be operational according to the relevant government guidelines at the time. As part of the Jones Tuition Covid-19 secure policy, a number of operational changes are in place:

- Temperature checks
- Reduced contact sign In/out
- Consistent Group Bubbles
- Advance booking
- Lower student to staff ratios
- Designated camp coordinators at each venue
- Programme/Activity adjustments
- Enhanced cleaning measures
- Additional training for all staff
- PPE for staff and increase social distancing signage

In the instance of an outbreak at a camp, the DfE will be contacted as well as any relevant local authority departments, the school and Ofsted.

As part of track and trace all attendance records, risk assessments and temperature check logs are stored centrally at Head Office for a minimum of 21 days.

#### **Personal Protective Equipment**

Jones Tuition are aware that there are certain activities or situations where hazards cannot be eliminated by other means and PPE is the only method of controlling the risk. Under the Personal Protective Equipment at Work Regulations 1992, Jones Tuition applies the following.

- Provision of appropriate PPE for all staff that require it.
- Assess the suitability of the PPE
- Maintains and when requires replaces all PPE
- Ensures PPE is compatible
- Replaces lost or damaged PPE
- Trains all appropriate staff if the use of PPE and monitors and records the use of PPE.

Under the same regulations, staff will;

- Use PPE correctly
- Wear PPE correctly
- Not misuse or abuse the supplied PPE
- Report any loss or defect.

#### **9.5 Sun Protection Policy**

The aim is for staff and children to enjoy the sun safely by implementing suitable control measures, particularly at peak periods of the year. This will be achieved by:

- Continual review of existing facilities to ensure suitable shading is provided in key areas
- The ongoing provision of information through curricular activities

- Guidance frequently issued to parents/carers regarding suitable clothing to be provided and procedures for the application of sun screen
- Ensuring outdoor activities are conducted in shaded zones where possible
- Asking children to wear hats that protect the face, neck and ears when they are outside
- Keeping our youngest children inside or dedicated shade areas during the danger time between 11am – 3pm when the sunlight is strong

### **9.6 Risk Assessment Policy**

Jones Tuition is under a duty to safeguard and promote the welfare and health and safety of all children attending camp. Duties include

- Supporting children’s physical and mental health and emotional well-being
- Protecting children from harm and neglect
- Ensuring all forms of corporal punishment are prohibited
- Encouraging children to contribute positively to society
- Providing a safe and healthy environment
- Improving the provision for disabled children
- Managing welfare concerns effectively

Risk assessments are reviewed and updated regularly. At the beginning of each season, camp staff conduct site specific risk assessments and also complete daily risk assessment checks which are logged by the Camp Manager.

All staff receive training to ensure they are competent and confident in assessing and managing risk. Induction and refresher training also covers safe working practices, communication and health and safety notices and protective equipment.

### **10.0 Incident and Accident Policy**

Jones Tuition is committed to providing an environment which is as healthy and as safe as possible for its children, staff and visitors. However, accidents do happen and there is a statutory requirement to report all serious accidents, dangerous occurrences and instances of occupational ill health to the Health and safety Executive (HSE) and Ofsted. Jones Tuition also has a duty to investigate and report all accidents and incidents affecting children, staff and visitors. All accidents and incidents must be reported for monitoring and investigation to ensure that procedures are in place to prevent, as far as possible, similar accidents happening in the future. All Incidents and Accidents will be recorded in the relevant Accident and Incident Books. These books are duplicated to allow the Parents / Guardian to have a copy of the report.

**The reporting of work related accidents is a statutory requirement under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995).**

#### **Incident reporting**

Any incident that occurs involving children, staff or the parent(s)/guardian(s) that falls outside the normal every day running of camp should be recorded in the Incident Book. If substantial, the information on this form should be reported to Jones Tuition Head Office at the earliest convenience. Jones Tuition Head Office will then be responsible for informing any relevant authorities of the incident that occurred.

Ofsted will be notified of all significant illness (incl. food poisoning), accidents, injuries and incidents that occur on camp. Notification will be made as soon as is reasonably practicable, but in any event within 14 days of the incident. Jones Tuition may also involve other agencies such as the local safeguarding board or the HSE (Health and Safety Executive).

#### **10.1 Ofsted notification categories**

Broken bones or a fracture.

Loss of consciousness.

Pain that is not relieved by simple pain killers.

Acute confused state: persistent, severe chest pain or breathing difficulties.

Amputation.

Dislocation of any major joint including the shoulder, hip, knee, elbow or spine.

Loss of sight (temporary or permanent).

Chemical or hot metal burn to the eye or any penetrating injury to the eye.

Injury resulting from an electric shock or electrical burn leading to unconsciousness, or requiring resuscitation or admittance to hospital for more than 24 hours.

Any other injury leading to hypothermia, heat-induced illness or unconsciousness.

Or requiring resuscitation.

Or requiring admittance to hospital for more than 24 hours.

Unconsciousness caused by asphyxia or exposure to harmful substance or biological agent.

Medical treatment or loss of consciousness arising from absorption of any substance by inhalation, ingestion, or through the skin.

Confirmed cases of Covid-19 (Coronavirus)

### **When and how to report an accident**

If an accident happens to either a child or adult, an **Accident Form** found in the Accident Book should be filled in:

- \* All accidents to children and adults should be recorded in the **Accident Book**. These forms are in the Accident Book found in the Camp Support Box.
- \* Behaviour incidents and physical interventions should be recorded in the **Incident Book**.
- \* Incidents/near misses for children and adults are recorded on an **Incident Form** found in the **Incident Book**.
- \* All reports should be forwarded to the Camp Director

### **10.2 Minor accidents procedure - child**

If a child has a minor injury, (e.g. minor cuts, grazes or bruises):

- \* Check the **Special Details Form** for any allergies or illnesses.
- \* Administer first aid by a qualified first aider, if appropriate.
- \* Record details on the Accident Form detailing any injuries sustained and treatment administered.
- \* If necessary, allow the child time to recover in a quiet place with supervision.
- \* Place a capital 'A' in the child's sign out box to show there is an **Accident Form** that needs to be signed by the parent(s)/guardian(s) to acknowledge the accident and actions taken by the staff.
- \* Ensure that the parent(s)/guardian(s) reads, understands and countersigns the Accident Form.
- \* Once the form has been acknowledged and signed by the parent(s)/guardian(s), they receive the carbon copy and the top (white) copy is left in the book to be returned to Jones Tuition Head Office.

### **10.3 Head injury procedure - child**

- \* Check the Special Details form for any allergies or illnesses.
- \* Administer first aid by a qualified first aider, if appropriate.
- \* Any hard blow or fall involving the head should be regarded as a serious incident and professional medical advice must be sought from the NHS Help line on 111. Accident and incident forms must record and reflect the advice received, including timing.
- \* Record details on the Accident Form detailing any injuries sustained and treatment administered.
- \* If necessary, allow the child time to recover in a quiet place with supervision.
- \* Inform the parent(s)/guardian(s) by telephone of the accident.
- \* The general principle is that anyone who has a head injury needs observing for 24 hours.
- \* In the case of a serious head injury arrangements must be made for the child to be taken to hospital by ambulance (see below for the **serious accident procedure - child (10.4 Pg.37)**).
- \* Place a capital 'A' in the child's sign out box to show there is an Accident Form that needs to be signed by the parent(s)/guardian(s) to acknowledge the accident and actions taken by the staff.
- \* Ensure that the parent(s)/guardian(s) reads, understands and countersigns the Accident Form.
- \* Once the form has been acknowledged and signed by the parent(s)/guardian(s), they receive the carbon copy and the top (white) copy is left in the book to be returned to Jones Tuition Head Office

- \* Parents of any child with a head injury should receive a copy of the “Head Injuries Advice” sheet.

#### **10.4 Serious accident procedure - child**

- \* The first aider(s) should apply first aid whilst a member of staff or Camp Manager calls an ambulance providing the necessary details regarding the injury, location of site and child’s name.
- \* The Camp Manager will then inform Jones Tuition Head Office of the situation and continue to keep them informed.
- \* The Camp Manager or Jones Tuition Head Office will then call the parent(s)/guardian(s) and advise them of the situation.
- \* If the parent(s)/guardian(s) have not arrived on camp by the time the ambulance is ready to leave a member of staff will accompany the child to hospital.
- \* The injury should be reported on an Accident Form and a full detailed report must be written on an Incident Report Form (see incident and accident policy (10.0 pg.36)).
- \* Ensure that the parent(s)/guardian(s) read, understand and countersign the Accident and Incident Forms.
- \* Once the form has been acknowledged and signed by the parent(s)/guardian(s), they receive the carbon copy and the top (white) copy is left in the book to be returned to Jones Tuition Head Office
- \* A risk assessment surrounding the incident will be completed to try to prevent the same incident/accident occurring again.

#### **10.5 Accidents procedure – adult/child including visitors**

##### **Minor accidents procedure – adult/ child**

If an adult or child visiting the camp has a minor injury, (e.g. Minor cuts, grazes or bruises):

- \* Administer first aid by a qualified first aider, if appropriate.
- \* Record details on an Accident Form.
- \* The injured person will receive the carbon copy of the accident form.
- \* Once the form has been acknowledged and signed by the parent(s)/guardian(s), they receive the carbon copy and the top (white) copy is left in the book to be returned to Jones Tuition Head Office
- \* The Camp Manager must report any accident or incident that is due to the condition of the camp or its equipment to the camps management immediately, as well as Head Office.

##### **Head injury procedure – adult**

- \* Administer first aid by a qualified first aider, if appropriate.
- \* Record details on the Accident Form detailing any injuries sustained and treatment administered.
- \* Inform the next of kin by telephone of the accident.
- \* The general principle is that anyone who has a head injury needs observing for 24 hours.
- \* In the case of a serious head injury arrangements must be made for the adult to be taken to hospital by ambulance (see below the **serious accident procedure - adult 10.5 pg.38**).
- \* Ensure that the next of kin reads, understands and countersigns the Accident Form.
- \* Once the form has been acknowledged and signed by the parent(s)/guardian(s), they receive the carbon copy and the top (white) copy is left in the book to be returned to Jones Tuition Head Office

##### **Serious accident procedure - adult**

- \* The first aider(s) should apply first aid whilst a member of staff or Camp Manager calls an ambulance providing the necessary details regarding the injury, location of site and adult’s name.
- \* The Camp Manager will then inform Jones Tuition Head Office of the situation and continue to keep them informed.
- \* The Camp Manager or Jones Tuition Head Office will then call the next of kin and advise them of the situation.
- \* If the next of kin has not arrived on camp by the time the ambulance is ready to leave a member of staff will accompany the adult to hospital.
- \* The injury should be reported on an Accident Form and a full detailed report must be written on an Incident Report Form (see incident and accident policy (10.0 pg.36)).

- \* Once the form has been acknowledged and signed by the parent(s)/guardian(s), they receive the carbon copy and the top (white) copy is left in the book to be returned to Jones Tuition Head Office.
- \* Ensure that the next of kin reads, understands and countersigns the Accident and Incident Forms.
- \* A risk assessment surrounding the incident will be completed to try to prevent the same incident/accident occurring again.

**Accidents leading to major injuries resulting in more than seven days away from work must be reported to RIDDOR.**

### **10.6 Procedure for near misses**

Near misses which do not result in an injury should be recorded on Incident Forms and if substantial (e.g. if the near miss could have caused serious injury) should be reported to Jones Tuition Head Office.

### **10.7 Record management**

There are data protection regulations that apply to all accident/incident reports and these should be stored safely and securely. They are held at Jones Tuition Head Office. The retention period for accident/incident reports for adults is the date of incident + 7 yrs. The retention period for accident/incident reports for children is the date of birth of the child + 25 years. They will be shredded at the end of the retention period.

### **11.0 Medication and Treatment of Anaphylactic Shock Policy**

All Jones Tuition staff must be fully aware of the medical history of children in their care. Jones Tuition rely on the information provided by the parent(s)/guardian(s) in order to achieve this. Information provided by the parent(s)/guardian(s) is kept confidential and is relayed to site via the Booking Summary Forms and the Special Details Sheets.

#### **Administration of medicine**

Jones Tuition will only administer medication if it has been prescribed by a doctor or other health professional. The medicine must be in date and specific to the child in question.

The parent(s)/guardian(s) must also complete an Administration of Medicine Form and provide a signed letter of instruction.

- \* The parent(s)/guardian(s) must give full instruction to the Camp Manager and nominated Crew member regarding how to administer the medicine.
- \* The Camp Manager will then give the appropriate dosage of medicine at the appointed time with the nominated Crew member present as a witness.
- \* A record of the medicine being administered should be kept on the Administration to Medicine Form and signed at the end of the day when the child is collected by the parent(s)/guardian(s).
- \* If the child requires it for multiple days the same consent form can be used. The dates, time and actions need to be updated on a daily basis along with the parental signature in the boxes provided on the Consent Form.

**All medication, including Epipens must be handed to the Camp Manager for safe keeping.**

#### **Consent for First Aid**

\* Consent for permission to give a child first aid is completed either on line or over the phone at the time of booking.

#### **Treatment of anaphylactic shock**

- \* Any child on camp that suffers from allergies that can result in anaphylactic shock must be made known to Jones Tuition before their arrival on camp.
- \* On arrival at camp the parent(s)/guardian(s) must fill out an Anaphylactic Shock Consent Form and provide training in the use of the child's Epipen. The Epipen must be prescribed by a medical professional.

**It is the responsibility of the parent(s)/guardian(s) of the child to fully explain the actions required when dealing with their child and how to administer any treatment. Jones Tuition advise that the parent should have received their knowledge from a qualified medical professional such as the child's GP, Practice Nurse or Health Visitor. Jones Tuition accept that the parent(s)/guardian(s) giving the explanation to the First Aider(s), Crew Leader and the Camp Manager, are not professionals, but will have sufficient knowledge to enable staff to react in an emergency. This explanation must take place when the parent(s)/guardian(s) signs the child in on their first day at camp.**

## **12.0 Emergency Evacuation Policy**

In the event of an emergency, Jones Tuitions' primary concern will be to ensure that both children and staff are kept safe. Jones Tuition will make every effort to keep the camp open, however in exceptional circumstances Jones Tuition may be forced to close the camp at short notice.

Possible reasons for emergency closure include:

- \* Serious weather conditions.
- \* Heating system failure.
- \* Burst water pipes.
- \* Fire or bomb scare or explosion.
- \* Death of a member of staff or child.
- \* Assault on a staff member or child.
- \* Serious accident or illness.

It may be necessary to evacuate camp in the event of any of the above, if deemed necessary the following procedures will happen:

- \* The emergency services will be contacted at the earliest opportunity, only delaying if it will slow down the process in securing the safety and welfare of children and staff on camp.
- \* All children will be escorted from the building to the allocated Emergency Evacuation Assembly Point using the nearest safe exit. In the case of a bomb threat, this may be away from the site for some camps.
- \* At no point during an evacuation should the word bomb be used, as this often instils panic.
- \* No persons should re-enter a building unless given permission from the emergency services.
- \* No attempt should be made to collect personal belongings, or to re-enter the building after evacuation.
- \* A nominated member of staff will check the premises and will collect the register (including emergency contact details) providing that this does not put anyone at risk.
- \* Before leaving the building the nominated person will close all accessible doors and windows, if it is safe to do so.
- \* Once the all staff and children are out of harm's way, a register will be taken to ensure all children and staff are safe.
- \* If any person is missing from the register, the emergency services will be informed immediately. There will be no attempt to re-enter the building.
- \* Jones Tuition Head Office will be informed who will in turn device a plan to contact the parent(s)/guardian(s) for each child on camp. Parent(s)/guardian(s) may be asked to collect their child immediately.
- \* All children will be supervised until they are safely collected or until it is clear to re-enter the building, which can only be authorised by the emergency services or Camp Manager. In any event of structural damage, returning to the building can only be authorised by the emergency services or professional services provider dealing with the incident.
- \* If after every attempt, a child's parent(s) or guardian(s) cannot be contacted, Jones Tuition will follow its uncollected child procedure (1.4 Pg.4).

### **In the event of a bomb threat**



\* In the event of a bomb threat or delivery of a suspicious package, children and staff should be evacuated to a designated safe area at the following distances:

- 100m Smaller items e.g. letters, parcels, rucksacks or briefcases
- 200m Medium objects e.g. suitcases, wheelie bins or small cars.
- 400m Large objects e.g. Vans or lorries

**If the Camp has to close, even temporarily, or operate from alternative premises as a result of the emergency, Jones Tuition will notify Ofsted. In the event that an alternative camp cannot be found, a full refund or credit for another day will be offered. If the camp re-opens, an alternative camp is found or the parent(s)/guardian(s) fail to bring the child on camp as a result of an emergency closure being declared, no refund will be applicable.**

### **12.1 Lock-down procedure**

Lock-down procedures should be seen as a sensible and proportionate response to any external or internal incident which has the potential to pose a threat to the safety of staff and children at the camp. Procedures should aim to minimise disruption to the camp environment whilst ensuring the safety of all children and staff.

**Where there has been a recent incident in the general location of our camps, all staff will receive extra advice and support, particularly in the large towns and cities we operate in.**

Lock-down procedures may be activated in response to any number of situations, but some of the more typical might be:

- \* A reported incident/civil disturbance in the local community (with the potential to pose a risk to staff and children on camp).
- \* An intruder on the camp premises (with the potential to pose a risk to staff and children) \* A warning being received regarding a risk locally, of air pollution (smoke plume, gas cloud etc.)
- \* A major fire in the vicinity of the camp
- \* The close proximity of a dangerous dog or animal roaming loose

In the case of an emergency at one of the Jones Tuition venues which requires a 'lock-down', Jones Tuition have three levels of lock-down procedures:

#### **Level 3 lock-down alert to staff: potential situation**

Staff will be alerted via the Camp Manager via the camp's radio communication systems.

- \* Level 3 lock-down is to make all staff aware of the possibility of a situation and to be ready to escalate to Level 2 or Level 1 lock-down.

#### **Level 2 lock-down alert to staff: partial lock-down**

Staff will be alerted by the Camp Manager via the camp's radio communication systems. This may be as a result of a reported incident/civil disturbance in the local community with the potential to pose a risk to staff and children on camp. It may also be as a result of a warning being received regarding the risk of air pollution. Immediate action:

- \* Jones Tuition will carry on as normal where possible except for any children or staff outdoors who must make their way to the main play area inside and lock all doors in the school/building.
- \* Be ready to escalate to Level 1 lockdown. All situations are different: once all staff and children are safely inside, the Camp Manager will conduct an on-going and dynamic risk assessment.

This can then be communicated to staff and children. 'Partial lock-down' is a precautionary measure but puts the Camp in a state of readiness (whilst retaining a degree of normality) should the situation escalate.

#### **Level 1 lock-down alert to staff: full lock-down**

Staff will be alerted by the Camp Manager via the camp's radio communication systems. This signifies an immediate threat to Jones Tuition. Lock-down level 1 procedure:

- \* All outside activity to cease immediately, children and staff to return to the designated meeting area inside.
- \* All staff and children to remain in the building with external doors and windows locked.
- \* Classroom doors to be blocked/locked.

- \* Blinds to be closed and children to sit quietly.
- \* Head count to be taken. The Camp Manager will contact Head Office.
- \* Staff and children remain in lock-down until Jones Tuition Head Office or the emergency services have lifted it.
- \* During the lock-down, staff will keep agreed lines of communication open, via mobiles, but will not make unnecessary calls as this could delay more important communication.
- \* **Staff will be trained in the Run, Hide, Tell procedure recommended by Counter Terrorism Policing and ACT (Action Counters Terrorism)**

### **Communication between the parent(s)/guardian(s) and Jones Tuition**

\* In the event of a Level 1 lock-down on camp, the parent(s)/guardian(s) will be contacted by Jones Tuition Head Office and reassured that the camp understands the concern for their child's welfare, and that everything possible is being done to ensure his/her safety.

\* Jones Tuition ask that the parent(s)/guardian(s) do not come to the camp during a Level 1 lock-down.

They could interfere with the emergency services access to the camp and may even put themselves and others in danger.

## **13.0 Behaviour Policy**

### **Policy**

Jones Tuition has a responsibility for ensuring the well-being and safety of all children whilst on camp. Jones Tuition recognises the importance of encouraging positive behaviour as well as clear guidelines for staff dealing with poor behaviour to ensure the well-being and safety of all children. It should be regarded as integral to the **health and safety policy (9.0 pg.35) and equal opportunities policy (16.0 pg.55).**

This behaviour policy offers guidelines to management, staff, the parent(s)/guardian(s) and children regarding acceptable behaviour whilst on camp. This policy also covers the course of action that will be taken if behaviour is deemed unacceptable. Jones Tuition strives to promote positive behaviour which should be honoured by every child and member of staff at camp.

**Staff are trained to pick up on bullying, which is defined as any persistent unpleasant behaviour which demeans or injures a person, either physically or mentally. Training consists of online child management training and a central training workshop on child management.**

### **Jones Tuition strategies for increasing desirable behaviour**

- \* Jones Tuition aims to provide a calm, relaxed atmosphere where children can feel safe and secure.
- \* Staff will strive to raise self-esteem among all children by rewarding positive behaviour and actively discouraging poor behaviour.
- \* Jones Tuition staff will reward positive behaviour using the Colour Points System and Daily Certificates.
- \* The staff will build a relationship with the children so that they feel valued and trusted, encouraging full involvement in all activities.
- \* Staff will provide a sense of community and belonging by recognising children who attend camp regularly and by remembering and using names of all children.
- \* Staff will speak appropriately to children and avoid shouting, swearing, offensive language and name-calling.
- \* Behave considerately and welcome newcomers to camp.
- \* Respect the environment, buildings, equipment and furniture, moving around the camp in a safe manner.
- \* Attend to the cleanliness of the camp and avoid causing litter.
- \* Encouraging children to design their own "Code of Behaviour" during art and AM/PM Club.

At times, some behaviour may be unacceptable and in such situations discipline may be required.

### **13.1 Code of Behaviour**

Upon signing a child into camp the authorised adult agrees that their child/children will follow the below points:

I will respect the property of others.

I will be patient, honest, fair and polite to others.

I will not use abusive or obscene language.

I will not be aggressive in the way I speak or behave to others.

I will be respectful and treat others as I would wish to be treated.

If a child fails to comply to the above points Jones Tuition will follow the **steps to dealing with poor behaviour (13.2 pg. 43)**.

### **13.2 Steps to deal with poor behaviour**

\* Jones Tuition does not use corporal punishment at any time on camp. Jones Tuition takes all reasonable steps to ensure that corporal punishment is not given by any person who cares for, or has contact with a child whilst at Jones Tuition. A person will not be taken to have used corporal punishment (and therefore will not have committed an offence), where physical intervention was taken for the purposes of averting immediate danger of personal injury to any person (including the child) or to manage a child's behaviour if absolutely necessary. Jones Tuition keeps a record of any occasion where physical intervention is used, and parents and/or carers must be informed on the same day, or as soon as reasonably practicable.

\* Physical intervention is where practitioners use reasonable force to prevent children from injuring themselves or others or damaging property

#### **Step 1**

If a child misbehaves the activity leader should take the child to one side and explain what they have done wrong and why it is not acceptable. Indicate the behaviour that is acceptable so they have the means to improve.

#### **Step 2**

If the poor behaviour continues the leader should give the child a timeout from the activity (the timeout should be no longer than the child's age in minutes). They should reinforce what behaviour is acceptable. The leader will then inform the Camp Manager who will in turn inform the authorised adult picking the child up, highlighting the situation that occurred.

#### **Step 3**

If after following steps 1 and 2, and discussion with the parent(s)/guardian(s), the child's behaviour does not show a marked improvement, the Camp Manager should discuss part exclusion with Head Office. If all are in agreement, the Camp Manager will contact the parent(s)/guardian(s) to request they pick the child up straight away. They will record what has happened on an Incident Report Form. This is referred to as 'Part Exclusion'. This is not a permanent exclusion: the child will be allowed back for any subsequent days booked however the parent(s)/guardian(s) needs to be clear that this is the child's final warning and without a significant improvement in behaviour he/she could be excluded permanently.

#### **Step 4**

If no improvement in the child's behaviour is seen, the Camp Manager and Head Office will review the situation. If deemed completely unmanageable or dangerous to others, the Camp Manager will contact the parent(s)/guardian(s) and the child will be excluded permanently from camp for the rest of the season.

If deemed necessary, Jones Tuition reserves the right to exercise any step of the steps to deal with poor behaviour above at any stage. In the event that a child is excluded from camp, no refund will be made for any remaining days booked, and any costs associated with the exclusion, will be the parent(s)/guardian(s) responsibility. The parents/guardian will be expected to collect when informed of the exclusion. All exclusions (Steps 3&4) will be recorded at Jones Tuition Head Office.

Any child permanently excluded from a camp may not be allowed to enrol on any future camp at any Jones Tuition venue.

### **13.3 Bullying and discrimination**

Jones Tuition is committed to providing a positive experience for all children on camp where they can have fun, make new friends and learn new skills in a safe and welcoming environment. Jones Tuition follow a zero tolerance policy on discrimination, bullying or persistent poor behaviour of any kind, irrespective of any special needs. Jones Tuition encourage any child to let us know if they see or experience this during their time on camp so it can be addressed immediately.

#### **Bullying**

Jones Tuition believe that bullying in any form is wrong and should not be tolerated, and that any environment that encourages bullying, or shows indifference to prejudice and discrimination is unacceptable.

\* Jones Tuition believe that bullying is a behaviour choice and that anyone can be encouraged to change their behaviour.

\* Jones Tuition believe that all children and young people have intrinsic value and worth and Jones Tuition embrace their uniqueness and autonomy.

\* Jones Tuition respect difference and welcome diversity in children, young people and in society in general, and believe camps should be inclusive of all.

\* Jones Tuition believe that children and young people should have the right to feel safe, secure and valued, and that creating a safe environment and dealing with bullying is everyone's responsibility.

\* Jones Tuition believe children and young people should actively participate in decisions that affect them and should be supported in taking responsibility for their choices and subsequent actions.

\* Jones Tuition believe every child at Jones Tuition should be treated with respect and courtesy and no-one should be bullied.

Bullying includes:

\* All kinds of name calling.

\* Taking or asking for money.

\* Ridiculing people with any kind of medical or physical condition, and, emotional, physical, homophobic, racial or electronic bullying.

\* Forcing racist or extremist views onto others.

#### **If a child is a victim of bullying**

\* If a child is being bullied they must let a member of the Jones Tuition staff team know. They will then inform the Camp Manager who will immediately investigate the allegation.

\* An Incident form will be filled out and the Camp Manager should inform the parent(s)/guardian(s) of the victim, highlighting what has happened and the actions they have taken to deal with the situation. The Camp Manager will ask the parent(s)/guardian(s) to sign the Incident Form.

\* The camp staff will continue to monitor the situation to ensure the child is not upset and can continue the day.

\* All cases of bullying will be reported to Jones Tuition Head Office and Designated Safeguarding Team (3.2 pg.8).

\* The bullying helpline provides a free and confidential service to all children in distress. The number is located on the Bullying UK poster which is on display in the sign in area on camp.

#### **If a child commits an act of bullying**

\* The offending child should be taken to one side and be told why their actions are considered to be bullying and informed of the consequences should it continue.

\* The parent(s)/guardian(s) of the child will be informed of the allegation made against their child.

\* If it persists the Camp Manager will raise the issue with the person collecting the child as a case of bullying and the Camp Manager will follow the steps to deal with poor behaviour (13.2 pg.43)

\* An Incident Report should be completed should the situation require it following the incident and accident policy (10.0 pg.36).

If an allegation of an act of bullying is in the form of a formal complaint to Head Office, Jones Tuiton will follow the Jones Tuiton complaints procedure (14.0 Pg.45). Those who bully others must be aware that Jones Tuiton reserves the right to exclude a child without warning for bullying.

### **Language**

Any use of bad/foul language by any child will be stopped immediately. The staff will explain to the child that this is not polite and not accepted at Jones Tuiton, and also explain that children of a more naive nature may overhear such language and then start to use it.

### **13.4 Procedure when dealing with racial harassment**

An approach that supports diversity and equality involves creating a childcare setting where each child feels a sense of belonging. Jones Tuiton Staff should observe and listen to children's play and adult interaction to identify any bias or discrimination, and then develop methods to deal with issues that arise. Every aspect of the setting comes into play: how children relate to each other, how staff relate to minority and majority children, how language is used, how and what discussions take place, and what activities are undertaken.

Each Jones Tuiton camp has a duty to create and implement strategies to prevent and address racism and include:

- \* Recording all racist/discriminative incidents.
- \* Ensuring all recorded incidents are reported to the parent(s)/guardian(s), and when appropriate to the Camp Manager.

Parent(s)/guardian(s) have a right to know when racism occurs and the actions Jones Tuiton will take to tackle it.

### **Definition of racial harassment**

'Violence which may be verbal or physical and which includes attacks on property and people because of their race, nationality, ethnic origins – when the victim believes that the perpetrator was acting on racial grounds and/or there is evidence of racism' – (Commission for Racial Equality).

### **Examples of racial harassment**

- \* Physical assault against a person or group of people.
- \* Derogatory name calling, insults and racial jokes.
- \* Racist graffiti and other written insults.
- \* Provocative behaviour such as wearing racist badges and insignia and the distribution of racist literature.
- \* Threats against a person or group of people because of their colour or race.
- \* Discriminatory comment including ridicule made in the course of discussions or elsewhere.
- \* Patronising words or actions against a person or group of people.

### **Procedure when dealing with racial discrimination**

All staff working for Jones Tuiton should be constantly vigilant of any racial harassment taking place. If a staff member suspects racism or discrimination taking place in any form they must:

- \* Intervene firmly and quickly to prevent all forms of racial harassment. Any allegation should be taken seriously and reported to the Camp Manager.
- \* Each incident should be investigated and recorded in detail as accurately as possible using the incident and accident policy (10.0 pg. 36). This record should be available for inspection by staff, inspectors and the parent(s)/guardian(s) where appropriate.
- \* The Camp Manager is responsible for ensuring that incidents are handled appropriately and sensitively and recorded appropriately.
- \* Note any changes of behaviour. The perpetrator/victim's initials only may be used in the record as information on individuals is confidential to Jones Tuiton.
- \* Where an allegation is substantiated following an investigation, the parent(s)/guardian(s) of the perpetrators and victims should be informed of the incident and of the outcome.

\* Any form of racial abuse will be dealt with seriously in accordance with the steps to deal with poor behaviour (13.2 Pg.43).

## **14.0 Complaints Policy**

### **Policy**

Jones Tuition views all complaints as an opportunity to develop and improve our services, as well as a chance to put things right for the person that has made the complaint.

- \* To provide a fair complaints procedure that is clear and easy to use for anyone wishing to make a complaint.
- \* To publicise the existence of the complaints procedure so that people know how to contact us to make a complaint.
- \* To make sure everyone at Jones Tuition knows what to do if a complaint is received.
- \* To make sure all complaints are investigated fairly and in a timely way.
- \* To make sure that complaints are, wherever possible, resolved and that relationships are repaired.
- \* To gather information which helps us to improve what Jones Tuition do in the future.

### **Definition of a complaint**

A complaint is any expression of dissatisfaction, whether justified or not, about any aspect of Jones Tuition.

### **Confidentiality**

All complaint information will be handled sensitively, talking to those who need to know and following any relevant data protection requirements.

## **14.1 Complaints procedure**

Jones Tuition has a set procedure for addressing complaints. Removing children from a camp prior to a complaint being formally presented, forfeits access to or continuation with these procedures. The complaints procedure should be used only when informal attempts to resolve problems have been unsuccessful.

### **Step 1**

In the first instance, Jones Tuition encourages any issues to be discussed with the Camp Manager who is responsible for the day to day operations of the camp.

### **Step 2**

If there is still dissatisfaction after the response and feedback from the Camp Manager, Jones Tuition requests that the complaint is made to Jones Tuition Head Office by completing the camp related Complaints Form which can be obtained from [jonestuition.online@gmail.com](mailto:jonestuition.online@gmail.com).

The matter will be fully investigated. The investigation may include such elements as interviewing on-site staff and referring to external agencies such as local authority, environmental health departments or social services. A full response to the complaint will be sent to the parent(s)/ guardian(s) well within the 28 days stipulated by Ofsted – Jones Tuition' target response time is 7 days.

If there is a serious concern(s) Jones Tuition encourage the complainant to contact Jones Tuitions' Camp Director on 07707883392 so the team can begin to investigate immediately. The person carrying out the investigation will review the way the complaint has been handled by Jones Tuition and will ensure that the issues have been dealt with properly and fairly.

### **Step 3**

If the complainant is not satisfied with the result from Step 2, they may choose to refer the complaint to Step 3 of the procedure. This must be done in writing to Jones Tuition Head Office within 15 days of the completion of Step 2. At this stage, the complaint will be considered under the

guidance of the Camp Director of Jones Tuition. The complainant will be informed in writing of the results of this review:

The general principle is that Jones Tuition should be able to produce documentary evidence to show that the complaint has received fair and proper consideration within the procedure set out here. If the Managing Director has any concerns, he/she may ask the Senior Management Team of Jones Tuition to re-open the investigation. The complainant will be kept informed of any delay. If the issue is still not resolved the complainant may wish to put the complaint to Ofsted.

Parent(s)/guardian(s) have the right to contact Ofsted if they feel they have not received a satisfactory response to their complaint. Ofsted can be contacted on 0300 123 1231. Parent(s)/guardian(s) should provide the camp registration number to Ofsted. For Registration numbers call our customer services team or ask at the camp itself. Alternatively, they can write to: The National Business Unit, Ofsted, Piccadilly Gate, Store Street, Manchester, M1 2WD.

### **Monitoring and review**

Jones Tuition monitors the complaints procedure in order to ensure that all complaints are handled properly. Jones Tuition logs and records all formal complaints received which are stored at Head Office and against specific camps. The senior management team will examine how they were resolved, and on an annual basis, consider the need for changes if required.

## **15.0 Equal Opportunities Policy**

### **Policy**

Jones Tuition will ensure that a safe and caring environment is provided on camp, free from discrimination, including children with additional needs. As part of this policy people will:

- \* Respect the different racial origins, religions, cultures and languages in a multi-ethnic society so that each child is valued as an individual without racial or gender stereotyping.
- \* Not discriminate against children on the grounds of disability, sex, age, race, sexual orientation, class, family status or HIV/Aids status.
- \* Help all children to celebrate and express their cultural and religious identity by providing a wide range of appropriate resources and activities.
- \* Strive to ensure that children feel good about themselves and others, by celebrating the differences which make us all unique individuals.
- \* Ensure that its services are available to all the parent(s)/guardian(s) and children in the local community.
- \* Ensure that the camp's recruitment policies and procedures are open, fair and non-discriminatory. Work to fulfil all the legal requirements of the Equality Act.
- \* Monitor and review the effectiveness of its inclusive practice by conducting an Inclusion Audit on an annual basis.

### **Challenging inappropriate attitudes and practices**

Jones Tuition will challenge inappropriate attitudes and practices by engaging children and adults in discussion, by displaying positive images of race and disability, and through staff modelling antidiscriminatory behaviour at all times.

### **Children with additional needs**

Jones Tuition recognises that the needs of individual children vary, and will endeavour to accommodate children with specific needs and/or medical conditions within the camp environment. It is our policy not to exclude any child due to specific needs and/or medical conditions wherever possible.

**It is the responsibility of the parent/carer** to inform us of any medical conditions and special educational needs or disabilities, whether booking online or over the phone, so we can discuss how best to accommodate the child, and consider whether any reasonable adjustments can be made to ensure they are able to fully participate and enjoy the activities on camp within the staffing ratios provided for their age group. The needs of each child vary so decisions are made on a case-by-case basis and depend upon the level of support each individual child may require.

We are not able to provide additional staff to support a child above our standard ratios of 1:16 for 6-7 year olds and 1:20 for 8 years old and over, irrespective of any specific needs or medical conditions. Where we feel that a child is not coping within these ratios, we reserve the right to ask the parent/carer to come and collect their child. No refund will be available. Where a child does require one-to-one support, Jones Tuition will permit parents/carers to attend camp to support their child, providing the Jones Tuition safer recruitment standards are met. Jones Tuition does not provide one-to-one support.

We are happy to accommodate a child with specific needs on a paid trial basis and reserve the right to review further bookings.

## **16.0 Confidentiality Policy**

At Jones Tuition we respect the privacy of the children attending the Camp and the privacy of their parents or carers. Our aim is to ensure that all those using and working at Jones Tuition can do so with confidence.

We will respect confidentiality in the following ways:

- \* Parents can ask to see the records relating to their child, but will not have access to information about any other children.
- \* Staff only discuss individual children for purposes of planning and group management.
- \* Staff are made aware of the importance of confidentiality during their induction process.
- \* Information given by parents to Camp Manager will not be passed on to third parties without permission unless there is a safeguarding issue (as covered in our Safeguarding Policy).
- \* Issues relating to the employment of staff, whether paid or voluntary, will remain confidential to those making personnel decisions.
- \* Confidential records are stored securely.

## **17.0 Data Protection Act**

Jones Tuition is registered as a Data Controller under the Data Protection Act 1998 (GDPR from 25th May 2018). To process your booking, we need to collect personal details about you and your children. We will treat it as confidential and keep it secure, complying with all relevant UK legislation



The Camp Manager is responsible for ensuring the safe storage and access to any confidential documents relating to both parents and children. All staff are aware that the disclosure of any confidential information contravenes the Data Protection Act 1998 (GDPR from 25th May 2018) and any such disclosure may result in disciplinary action.

All parent and child paper information held on Camp is stored in a lockable box and accessed only the Camp Manager, if, due to emergency, another member of staff need to access the information they will ensure confidentiality of information at all times.

Data stored electronically will be password protected and accessed only by the Camp Manager.

It is not Jones Tuition Policy to disclose any client data to third parties unless such request are made by legal authorities.



Ownership		Signature	Date
Document Signatory	Nick Jones Jones Tuition - Director		06/05/2021
Document 2nd Signatory	Claire Jones Jones Tuition - DSL and Camp Tutor		06/05/2021