AE SAFEGUARDING & CHILD PROTECTION POLICY

SAFEGUARDING AND CHILD PROTECTION

AE's SAFEGUARDING POLICY STATEMENT

- AE's paramount commitment in operating programmes is that no staff member, instructor or volunteer will inflict physical or psychological harm on a child or young person. This is a priority throughout all programme development and delivery;
- AE will ensure that the welfare of participants is given paramount consideration when developing and delivering all programmes;
- All participants, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection;
- All AE staff, instructors and volunteers have an equal responsibility to act on any suspicion or disclosure that may suggest a participant is at risk of harm in accordance with this guidance;
- All participants and staff/instructors/volunteers involved in child protection issues will receive appropriate support from AE with AE senior staff team following this policy guidance in doing so.

AIMS OF THIS POLICY

- To provide all AE staff, instructors and volunteers with the necessary information to enable them to meet their statutory responsibilities to promote and safeguard the wellbeing of participants;
- To ensure consistent good practice across all AE administration and operations;
- To demonstrate AE's commitment to safeguarding and the wellbeing of AE's community.

SAFEGUARDING LEADS & CONTACT INFORMATION

DSLs/DSDs should be suitably trained and have a good understanding of:

- Specific safeguarding issues including: bullying, physical abuse, neglect, emotional abuse, child sexual abuse, child-on-child harmful sexual behaviour, online safety, substance abuse, extremism and radicalisation;
- Child protection;
- What abuse and neglect look like;
- Referral processes into the local authority children's social care team;
- What to expect when they make a referral to children's social care.

Detailed information on a DSL's duties and relevant training can be found in **Keeping Children Safe in Education (KCSIE)**. KCSIE applies to schools and colleges but is useful as 'best practice' standard for out-of-school settings such as AE.

AE ensures that the DSL (Designated Safeguarding Lead) and Designated Safeguarding Deputies (DSDs):

- are appropriately trained and/or take immediate advice from the appropriate LADO and relevant advisory bodies;
- act as a source of support and expertise to the AE community;
- have an understanding of AE procedures;
- keep written records of all safeguarding concerns via AE Safeguarding Matter Report forms and ensure that records are stored securely and reported onward in accordance with this policy;
- refer cases of suspected neglect and/or abuse to children's social care or police in accordance with this policy and local procedure for the area that the child lives in or comes from;
- ensure that this policy is reviewed and updated annually;
- keep a record of core team staff attendance at safeguarding training and that Operations Managers keep note of freelance instructor attendance at safeguarding training where this information is volunteered or provided by freelance instructors;
- make this policy available to parents, schools and any others requesting a copy for inspection, including on the AE website for download.

DSDs are appropriately qualified to carry out the functions of the DSL in their absence to ensure the ongoing safety and protection of children and young people on AE courses and programmes. In the event of the long-term absence of the DSL, the deputy will assume all of the functions above.

DSLs/DSDs:

- ensure that the safeguarding and child protection policy and procedures are implemented and followed by all staff/instructors;
- ensure that all staff/instructors feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with AE' whistle blowing procedures.

AE staff with a designated responsibility for safeguarding and child protection:

ROLE	**NAME**	**CONTACT NUMBER**
Designated Safeguarding Lead (DSL) and AE Joint Head of Operations	Cat Charlton	01433 651449 / 07866137012
Designated Safeguarding Deputy (DSD)	Lindy Smith	01433 651449
Designated Safeguarding Deputy (DSD)	Tom Brooman	01433 651449

AE Office Manager (for all complaints regarding DSL / DSDs	Jess Hodgson	01433 651449

CONTACT DETAILS FOR RELEVANT GOVERNING BODIES / ASSOCIATIONS & LOCAL SAFEGUARDING SERVICES

DSLs/DSDs should familiarise themselves with the local arrangements and relevant agencies in case of a safeguarding matter. They should make staff, freelancers and volunteers aware of the local referral route into children's social care.

AE is based in Derbyshire. The following contacts should be used for referrals that take place within Derbyshire, although it should be borne in mind that AE operates in a range of locations and a different local authority might need to be involved depending on where an incident takes place etc depending on circumstances:

Derbyshire Local Authority Designated Officer (LADO)	Derbyshire Professional Allegations Team	01629 531299
Derbyshire Children's Social Care / Social Services	Referrals to be made via Starting Point	01629 533190 starting.point@derbyshire.gov.uk
Derbyshire Children's Social Care / Social Services – OUT OF HOURS	Starting Point – Out of Hours	01629 532600
Police	Where there is an immediate risk of harm	999
NSPCC	National helpline	0808 800 5000
Derby and Derbyshire Safeguarding Children Partnership	Procedures manual for full information and supporting documents e.g. forms for making referrals	https://derbyshirescbs.proceduresonline.com/contacts.html#

For details in other local authorities outside of Derbyshire, use www.gov.uk/find-local-council and looking for their "child safeguarding" or "child protection services" page.

Please also see AE's LADO spreadsheet which holds details of all LADO contacts for ease of reference or use in case of emergency or advice or guidance being needed.

LEGAL REQUIREMENTS AND STATUTORY GUIDANCE

When considering, updating and reviewing our Safeguarding and Child Protection Policy, AE takes regard of the following legislation and statutory guidance:

- **The Equality Act 2010:** this provides a basic framework of protection against direct and indirect discrimination, harassment and victimisation in services and public functions on the basis of protected characteristics an individual has or is perceived to have;
- **Working Together to Safeguard Children 2026:** this outlines that every voluntary community and social enterprise (VCSE), faith-based organisation and private sector organisation or agency should have policies and procedures in place to safeguard and protect children from harm. Organisations should be aware of how to work together with the safeguarding partners in a local area to collaborate to protect and promote the welfare of young people. **Working Together to Safeguard Children 2026** places outdoor providers within the wider safeguarding system alongside schools, health services, local authorities and the police. When a school or group brings a group to AE, responsibility for safeguarding does not transfer away from the school or group, but AE has responsibilities that sit concurrently throughout any programme - the 2026 guidance reinforces that every practitioner in contact in with children, regardless of employer, has a duty to respond. Further, the 2026 guidance references new harm types including group-based exploitation, contextual safeguarding and online harm - see more in this policy below;
- **Sexual Offences Act 2003 (s.22A):** the 'position of trust' provisions have been extended to capture those that lead activities in sporting and religious settings in addition to the roles and settings that were specified previously. This means that it is an offence for a person over the age of 18 to enter into a sexual relationship, or engage in certain other sexual activities with a young person (aged under 18) where they knowingly coach, teach, train, supervise or instruct them on a regular basis in a sport or religion setting.

SAFEGUARDING PROCEDURES

These are the procedures that AE uses and enables AE as an organisation to keep children in our care safe.

Everyone working for AE needs to be aware of safeguarding issues that can put children and young people at risk, both on and offline. AE requests that all core team working with young people undertake safeguarding training and that all freelance staff do the same, forwarding evidence of completion to Operations Managers for record on AE's Freelance Instructor Database where possible.

ABUSE AND WHAT IT LOOKS LIKE

AE needs all staff, instructors and volunteers to be aware of what abuse does or may look like so that there can raise concerns where appropriate. Abuse can take many forms, including physical, emotional or sexual. It can also take place in a variety of settings (both online and offline), e.g. in

the family environment or the local community. Abuse includes child exploitation and child criminal exploitation. For the first time, children and young people are deemed to be victims of domestic abuse under the Domestic Abuse Act 2021 where they see, hear or experience the effects of abuse.

More information is available in:

- **Keeping Children Safe in Education (KCSIE);**
- **Working Together to Keep Children Safe 2026;**
- **Child abuse concerns: guide for practitioners;**
- **Domestic abuse: Statutory guidance**.

INFORMATION ABOUT THE DIFFERENT TYPES OF ABUSE, SIGNS AND INDICATORS

Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children. **(KCSIE, pg.10)**
Physical abuse	A form of abuse which may involve 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. **(KCSIE, pg.10)**
Emotional abuse	The persistent emotional maltreatment of a child such as to cause severe and 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 11 opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of

	emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. **(KCSIE, pg.10)**
Sexual abuse	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it. **(KCSIE, pg.11)**
Neglect	The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. **(KCSIE, pg.11)**

HOW TO RESPOND DIRECTLY TO A CHILD WHO DISCLOSES ABUSE

If a child discloses that they have been abused or that they feel at risk of harm during their time with AE, you should follow AE's safeguarding procedures immediately. If a child is at risk of immediate harm, you should call the police on 999.

When the child makes the disclosure, you should not confront the alleged abuser, but should:

- Listen carefully to the child so they know that you're taking the disclosure seriously;
- Take notes on what the child says as soon as possible after the disclosure;
- Reassure them that they have done the right thing in telling you;
- Explain what you'll do next (if age appropriate);
- Report the abuse without delay to AE DSL/DSD via an AE Safeguarding Matter Report Form. The DSL/DSD will then report the abuse without delay to the LADO, and as appropriate to the local authority children's social care and the police.

It is important **NOT** to investigate the disclosure yourself as this may jeopardise a police or social care investigation and possibly the prosecution of the offender. The DSL/DSD will take advice from children's social care and the police and we will co-operate with their investigations as a team as needed.

WHAT TO DO IF THERE IS A CONCERN THAT A CHILD HAS BEEN ABUSED OR MAY BE AT RISK OF ABUSE OR EXPLOITATION (INCLUDING ONLINE)

AE staff, instructors and volunteers should act on any concerns about a child *immediately*:

- Consider whether Police should be called immediately – call 999 if you think there is an immediate risk of harm to any party;
- Complete AE Safeguarding Matter Report form and speak to AE's DSL/DSDs **immediately** to chat through the contents of the form / discuss matters – speak face to face if possible but ensure you are in a confidential space if not;
- If Police have not already been called, DSL/DSDs to consider whether this should take place – is there an immediate risk of harm to the child?;
- DSL reports allegation to children's social care, the appropriate LADO and police as appropriate;
- If allegation is against an AE employee, freelance instructor or volunteer then DSL should refer to the DBS service as appropriate;
- DSL/DSDs to complete safeguarding matter report forms for other linked organisations e.g. DofE Safeguarding Matter Report form for DofE programmes as AE is licensed by the DofE to provide these programmes.

What to do if a child tells you they are being harmed

If a child in your setting discloses to you that they have been abused or that they feel at risk of harm, you should follow your safeguarding policies and procedures immediately.

If a child is at risk of immediate harm, call the police on 999.



Listen carefully to the child and take notes on what they have said. → **Store your notes securely** in line with your organisation's policy. → **Report the allegation** to your DSL.



The allegation happened **outside your setting**.

The allegation is **against your employee or volunteer**.

The DSL should **report the allegation to children's social care**, the LADO,[2] and police as appropriate.

The DSL should **refer the individual to the Disclosure and Barring Service** as appropriate.

2 Local Authority Designated Officer.

Knowing what to look for is vital to the early identification of abuse and neglect. If staff, instructors and volunteers are unsure, they should always speak to the DSL/DSDs.

Noticing abuse and neglect example: Two volunteers at a local art group for children notice a father shouting at his 8 year old daughter when he comes to collect her. He is shouting in another language and they're not sure what is being said. The volunteers have heard other parents worrying about the child saying the father is often nasty. They're concerned this may be emotional abuse, but they don't want to report it in case they have misunderstood due to the language barrier. They wonder if they should wait and see if the girl says anything to them about her father's behaviour.
Advice: You should never wait until a child or young person tells you directly that they're experiencing abuse before acting. You should also not let concerns about cultural sensitivity stand in the way of safeguarding and protecting children and young people. The two volunteers should report their concerns immediately to their DSL, who will then consider appropriate next steps. This may include making a referral to the local authority children's social care team.

ALLEGATIONS OR CONCERNS OF CHILD-ON-CHILD ABUSE

Child-on-child abuse (sometimes called peer-on-peer abuse) is a safeguarding issue. Such abuse can include:

- Abuse in intimate personal relationships between children – this is true of all forms of abuse including physical, emotional and sexual abuse;
- Bullying (including cyber bullying);
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;
- Harmful sexual behaviour which can include inappropriate sexual language, the sharing of nude or semi-nude images or videos (additional guidance on this can be found in **Sharing nudes and semi-nudes: advice for education settings working with children and young people (gov.uk)**, accessing age-inappropriate sexual material online, sexual activity without consent, sexual violence such as rape or sexual assault, upskirting (this typically refers to the practice of taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks. In England and Wales upskirting is a criminal offence under the Voyeurism Act), initiation or hazing type violence or rituals.

Child-on-child abuse example: A self-employed coach of a community football club notices that a 15 year old is unhappy and asks what has happened. The boy tells his coach that he sent an explicit photo of himself to his 16 year old boyfriend. He says he didn't feel pressured into sending the photo but then his boyfriend shared it with their friends, which he didn't

consent to. Friends are bullying him about it. Other children who attend the football club have seen the image.
Advice: Even when incidents happen outside of your organisation, you're responsible for taking action to protect the children and young people involved. If you're concerned for a child or young person in your group, report it to your DSL. In this example, the coach is the DSL as he is a lone provider. As the DSL, the coach should get advice from the local authority's children social care. The coach should inform the parents and involve them in the process unless doing so would put the child at risk of harm. The coach should not promise confidentiality at the initial stage but should only share the report with those necessary for its progression.

ALLEGATIONS OR CONCERNS THAT AN ADULT WORKING WITH CHILDREN AND YOUNG PEOPLE AT AE MAY PRESENT A RISK OF ABUSE

Any allegation OR concern about an adult working with children and young person in connection with AE should be reported on AE Safeguarding Matter Report forms. This includes:

- Any AE staff, freelance instructors or volunteers;
- School staff working with or accompanying groups on AE programmes;
- Disclosures about an adult that works with a child or young person but is not present at or during an AE programme.

'May present a risk of abuse' includes any information that you pick up on or is disclosed to you that you think could amount to a potential risk of abuse.

Over-reporting to AE's DSL/DSDs, rather than under-reporting, is KEY to keeping children safe. Things will not get escalated if they do not meet threshold requirements but your information could be vital in helping to build a picture and keep a child/children safe. **Please report using the procedure outlined above.**

ADULTS TRESPASSING FOR THE PURPOSES OF ABUSE, E.G. MEMBERS OF THE PUBLIC

AE works in a variety of different locations and all staff, instructors and volunteers need to be vigilant to the potential for adults trespassing on to locations that AE uses for the purposes of abuse – particularly so due to the overnight nature of a lot of the programmes that AE runs.

All AE staff, instructors and volunteers that work on AE programmes should be aware of the potential for adults to trespass onto programme sites or accommodation venues for the purposes of perpetrating abuse. Safety and security should be risk assessed dynamically by staff and instructors on the ground and any potential weaknesses in security or safety, including the likelihood or ability to trespass at a venue or accommodation site, should be reported back to AE Ops Managers via Programme Report forms so that site specific risk assessments or accommodation information can be updated and a view taken about suitability for future programmes.

It should be very clear to staff and instructors working on programmes where the limits of the venue / accommodation used are and firm perimeters should be established – this is particularly relevant when using accommodation such as campsites and larger sites where there are potentially shared areas or zones for use by different groups e.g. large scout sites.

Young people should know where AE staff and instructors are at all times and how they can be contacted overnight and/or in case of emergency.

Trespassers onto sites or accommodation should be reported **immediately:**

- If there is an immediate risk to anyone or abuse has actually taken place, call police on 999 immediately;
- Call AE DSL/DSDs as soon as practicably possible. Complete an AE Safeguarding Matter Report form AND an AE Incident, Accident, Near Miss form. If abuse from the trespasser has taken place, follow reporting procedure as outlined above;
- If police haven't been called immediately, DSL/DSDs to report the incident to police;
- AE Ops Managers to assess safety and security of venues with DSL/DSDs and take a view on future use of venue / accommodation using AE Incident, Accident, Near Miss form information;
- DSL/DSDs log AE Safeguarding Matter Report form and complete any related safeguarding follow up as needed.

HOW CHILDREN, YOUNG PEOPLE AND FAMILIES CAN RAISE A SAFEGUARDING CONCERN AT AE

Children, young people and their families or carers need to be able to raise a safeguarding concern with AE. Children and young people may join AE for a programme and then go back to their families, parents or carers, schools or friends and disclose safeguarding concerns that relate to AE staff, instructors or volunteers – they need to be able to raise and report these easily and without worry.

AE's Complaints Procedure has a section that details how a safeguarding matter can be raised confidentially with AE and the Safeguarding pages on AE's website (this can be found both through the 'About – Safety, Licences and Quality Assurance' pages and the Safeguarding section of the Knowledgebase area of AE's website) detail how a safeguarding matter can be raised as well.

Any safeguarding concerns received by AE should be dealt with by the DSL/DSDs in the same way as any other safeguarding concern that is reported internally at AE. An AE Safeguarding Matter Report form should be completed by the DSL/DSDs from the information provided about the concern and then acted on accordingly, as outlined above.

MENTAL HEALTH AND WELLBEING

Mental health problems and suicidal thoughts can affect anyone, of any age and of any background. Mental health problems are common among children and young people, but they can be difficult to identify.

It is important that everyone working at AE knows the signs and symptoms of mental health problems that may affect young people. These will differ from child to child but some common signs include:

- Becoming withdrawn from friends and family;
- Persistent low mood and unhappiness;
- Tearfulness and irritability;
- Sudden outbursts of anger;
- Loss of interest in activities they once enjoyed;
- Problems eating or sleeping.

Children suffering from mental health problems may also be more vulnerable to harm e.g. exploitation, grooming and radicalisation.

Mental health problems may also be indicators of:

- Abuse and neglect;
- Child-on-child abuse;
- Exploitation;
- Grooming;
- Radicalisation.

If anyone at AE is worried that a child who is attending/has attended a programme with AE may be suffering from a mental health problem, this should be reported to their school/organisation if appropriate via the Team Leader or DSL/DSDs (as most appropriate in the individual case). The **NSPCC** has guidance on **children's mental health** and on **preventing self-harm.**

If there is a suggestion that a child has been harmed or is at risk of harm, this should be raised with the DSL/DSDs.

AE also requests that all core team members undertake the 20-minute training with the Zero Suicide Alliance on an annual basis and all freelance instructors and volunteers are encouraged to do the same. In addition, Mental Health First Aid Aware courses are provided on a regular basis to all core team members as part of looking out for the mental health of both the young people and adults that we work with and work alongside.

CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES (SEND)

AE is required by the **Equality Act 2010** to ensure that we do not discriminate on the grounds of disability (including in relation to admission) and that you make reasonable adjustments to ensure that a child is not placed at a disadvantage compared to non-disabled children in the ways that we organise and deliver our provision. Where we have specific cases, AE sources external

guidance to ensure that we are tailoring our provision appropriate to individuals and their individual needs.

Children with SEND can face additional safeguarding difficulties. AE recognises that these additional risks and barriers can exist when recognising abuse and neglect among such children and young people. These can include:

- Assumptions that signs of possible abuse such as behaviour, mood and injury relate to the child's disability, without further exploration;
- Being more prone to peer group isolation than other children;
- The potential for these children to be disproportionately affected by behaviours such as bullying, without showing any outward signs;
- Communication barriers and difficulties in managing or reporting these challenges;
- Difficulty in being unable to understand the difference between fact and fiction in online content;
- Repeating content or behaviours without understanding the consequences of doing so.

AE requires all staff, instructors and volunteers to be aware of this via child protection training undertaken and the information outlined in brief in this section should serve as a reminder of these factors when working for/with AE.

EXTREMISM AND RADICALISATION

All AE staff, instructors and volunteers need to be vigilant of children vulnerable to radicalisation. Children can become exposed to extremist material and views associated with terrorist groups online. There is a risk that they will share this harmful content with their peers. There is also a need to be vigilant to the risk of other staff members being vulnerable to radicalisation or staff members promoting extremist views to children and young people attending AE programmes.

Exposure could be through the distribution of inflammatory materials or information that:

- Glorifies or incites terrorism;
- Calls for the deaths of members of the British armed forces;
- Actively promote hatred towards other people or groups based on their belief, opinion or background.

If any extremism-related concerns are raised across any programmes, an AE Safeguarding Matter Report form should be completed and forward to AE's DSL/DSDs. They can then contact AE's local authority and seek guidance from their Prevent lead or designated officer.

Educate Against Hate has resources that are available to help support understanding on how to keep young people attending AE safe from extremism and radicalisation and should be referred to for guidance and to access additional training if any AE core team or freelance instructors would benefit from this.

The **Netmums' Action Counters Terrorism (ACT) early resources** may also be useful to signpost parents and carers to should the need arise or this is something that might be useful for any parents or carers that AE works with.

GROUP-BASED EXPLOITATION & GROOMING

Group-based exploitation often takes the form of a person approaching a vulnerable adolescent child (this can often be those in care or those with SEND), grooming them into thinking that they are a special friend, romantic partner or love interest or replacement family member. The young person is often showered with attention and/or gifts. The young person is then passed on to others (usually men) for sexual exploitation. Drugs and alcohol are commonly used to make children compliant and then coercion and violence are used to control them. Principles of misogyny or 'othering' allows perpetrators to disregard their victims and acting in groups where background and thinking is largely homogenous likely has a disinhibiting effect on perpetrators.

Group-based exploitation can also be closely linked to modern slavery (including any situations of forced labour) and sexual exploitation of girls within street gangs where the motive is the sexual gratification of gang members and/or to lure the girls into working for them.

ONLINE SAFETY ISSUES & ONLINE HARM

It is important for all AE staff, instructors and volunteers to recognise that children are at risk of abuse online as well as face to face. In many cases, abuse can take place concurrently both on and offline. AE does not routinely work with participants in an online capacity but it is necessary that all AE staff, instructors and volunteers understand the risks that young people can face online and have positive, supportive conversations about online safety with young people when appropriate.

Staying safe online includes a wide range of issues. However, the four main risk areas are:

Content: seeing illegal, inappropriate or harmful material	This might include: ● Pornography; ● Fake news; ● Racist views; ● Misogyny; ● Self-harm and suicide; ● Extremist views; ● The glamorisation of drugs or gang lifestyles; ● Eating disorders.
Contact: harmful online interaction with others users	This might include: ● Child-to-child pressures; ● Commercial advertising; ● Adults posing as children or young adults.

Conduct: personal online behaviour that increases the likelihood of, or causes, harm	This might include: ● Making, sending and/or receiving explicit images; ● Online bullying.
Commercialisation: the risk of people exploiting children for financial gain	This might include: ● Being offered 'quick cash' and fake job opportunities as a way of criminals gaining access to young people; ● Trafficking / prostitution of children; ● Commercial sexual activity using children; ● Commercial production of child pornography or live videos / streaming of children engaging in sexual activity.

It is important to bear in mind the growth in online sexual abuse offending which now accounts for 40% of all sexual abuse crime.

MOBILE PHONES

AE recognises the potential for use of mobile phones on AE programmes to present a safeguarding concern. This may be in the form of:

- Accessing inappropriate, unlawful or explicit content online;
- Taking, sending or receiving inappropriate or explicit images;
- Child-to-child pressures or bullying.

The nature of an outdoor programme and programmes that include residential stays can increase opportunities for safeguarding concerns around mobile phones and mobile phone use.

AE works in partnership with each visiting school or group to determine mobile phone use policies in line with group / organisation policies. In the absence of a school/group policy and/or when working outside of programmes with established mobile phone policies (e.g. DofE Expedition Guide for DofE Expeditions), AE discourages mobile phone use and sets policies on a programme-by-programme basis in the context of the programme and group worked with. Safeguarding is always a key factor to consider in setting mobile phone use boundaries on programmes.

Instructors may need to contact participants on programmes such as DofE expeditions. Instructors are given processes and procedures to follow around participant data, conduct and contact with participants and deletion of any data held at the end of a programme as part of programme closing procedures on Programme Report Forms. AE Instructor Handbook details conduct required of instructors around having no contact with participants or former participants in any way (including social media or direct contact in any form) and any approaches made by participants should be reported to AE immediately so that the information can be logged and followed up as appropriate for the safety of all parties.

PHOTOGRAPHY, VIDEO AND SHARING IMAGES

AE has a video and photo statement that is present on all Consent Forms for programmes. All participants attending AE in any capacity MUST complete a Consent Form and therefore all participants joining AE will have either accepted or rejected the video and photo statement. The statement explains to participants and parents/carers how AE will use the images and where they may be used if they are use by AE in printed or online / digital format.

A record of any participant where photo and video consent is NOT given is recorded on consent matrixes which are given to staff, instructors and volunteers operating programmes with participants. They can then ensure that the contents of Consent Forms are complied with and respected for the individuals that they work with.

CONTEXTUAL SAFEGUARDING - PLACE-BASED ABUSE

Sometimes just the home and what goes on there (including the people that come and go from the home) is the focus for safeguarding concerns. Contextual safeguarding asks us to think about places that are wider than this - how might a young person be at risk of harm from their friends or other people they know outside the home? What other places may present a safeguarding risk for this young person e.g. school, parks, neighbourhoods, other houses, sports clubs or gathering places. The risks include in person and online.

Physical harm can be easier to spot, contextual safeguarding, however, might include, blackmail, coercion and control or being made to do things that they don't want to do, that is not easy to see. It is also made harder by the fact that these things are often done by someone that scares a young person - this can make them secretive and not likely to tell anyone what is going on.

- Where young people are being harmed or are at risk of harm **outside of their home**, they are **less likely to tell the people that care for them** - this can make relationships with family or care givers more difficult;
- Where young people are being harmed or are at risk of harm **at home,** they are **more likely to be involved in a contextual safeguarding issue in their community.**

Being on a programme with AE and out of usual patterns and routines where harm may be taking place, can make it easier for young people to confide in instructors. Instructors need to be alert to disclosures around contextual safeguarding for this reason and report back to AE on matters, however small they may seem. A small matter reported via AE's Safeguarding systems could have a big impact when this is followed up on in a multi-agency context.

OVERNIGHT STAYS

Much of AE's work involves overnight stays and parent/carer consent is obtained for all programmes. Programme information makes it clear that overnight stays are part of the programme and emergency contact information is obtained for each participant – this might be a parent, carer or a separate emergency contact who is available during the time that the child is with AE in case of emergency or incident.

Overseas programmes are subject to Foreign and Commonwealth Office (FCO) advice.

Overnight accommodation arrangements are made according to:

- Sex – AE has a Gender Identity policy that covers overnight accommodation and sleeping arrangements where necessary;
- Age – separate sleeping arrangements are made for adults and older and younger children.

Participants are made aware of how to get help from AE staff, instructors or volunteers during the night if there is an incident. Where mixed sex groups of participants attend AE courses, AE aims to have at least one supervisor of each sex where reasonably practicable.

GDPR & DATA PROTECTION

AE has a Data Protection policy in place to ensure that information that AE holds about children and young people is not shared inappropriately or in a way that might lead to its misuse. AE does not keep information longer than is necessary - all information held by AE is kept in line with the Statute of Limitations 1980 for the type of activities that AE undertakes (e.g. outdoor adventurous activities and/or similar as per AE programme itineraries).

GDPR does not prevent:

- The legitimate sharing of information for the purpose of keeping children safe;
- An employer from asking questions on safeguarding grounds about the suitability of an individual employed.

Concerns about sharing information must not obstruct the promotion and protection of children's safety and welfare.

When AE works with schools, groups or similar organisations, AE has a **School, Group & Organisation Data Sharing Agreement** in place so that important data can be shared between AE and organisations commissioning AE programmes for the benefit of participants and all parties to the programme. This Data Sharing Agreement is made to ensure GDPR and Data Protection without compromise to the health, safety and wellbeing of any party involved in AE programmes. Copies of the Data Sharing Agreement can be found in AE's website 'School Portal' along with all other documentation for your programme.

Useful information resources for AE on this are:

- A GDPR myth buster in Chapter 1 of the **Working together to safeguard children** guidance, under the information sharing section.

FOOD SAFETY

AE sometimes provides food as part of residential programmes – either in a picnic style, via packed lunches or by providing ingredients and then supervising / working with groups to prepare meals as part of programme activities.

As such, staff, instructors and volunteers involved in these programmes where food preparation and/or serving takes place undertake a Basic Food Hygiene certificate to ensure that food safety standards are met.

Based on the limited food provision that AE undertakes, there is no current need for AE to register as a food business with the local authority. The **Food Standards Agency** provides information and guidance if anything changes in future or any food related guidance needs arise.

RESPONSIBILITIES AND CODE OF CONDUCT FOR STAFF, VOLUNTEERS AND FREELANCE INSTRUCTORS

Safeguarding and child protection is **everyone's responsibility** at AE. The statutory guidance on **Working together to safeguard children** applies to all organisations that have functions relating to children. Anyone working with children and young people at AE should make their approach **child-centred**. E.g. give priority to the needs and interests of the child.

All staff and instructors working on AE programmes must act in line with **AE's Code of Conduct** – this is included in annual staff/instructor update documentation packs and forms part of an annual sign off / Instructor Handbook that must be completed each year before a staff member / instructor is deployed on any programme.

Staff, instructors and volunteers should be aware that they should raise all safeguarding concerns with AE's DSL/DSDs immediately.

All staff, instructors and volunteers should consider the context in which safeguarding incidents occur. E.g. threats to children's welfare could arise:

- In school, other educational establishments or when joining AE for a programme;
- From external visitors to AE programmes or courses;
- In peer groups;
- From the wider or online community.

When concerned about a child's welfare, AE staff, instructors and volunteers should always act in the child's best interests. Everyone should know and understand the AE's safeguarding processes and the appropriate escalation route.

All AE staff, instructors and volunteers should be appropriately trained in safeguarding and child protection – the **NSPCC** offers an **introductory online training course on child protection** and core team, freelance instructors and volunteers should be directed towards this, **UK Coaching's Duty to Care Toolkit** (or similar) training if they have not undertaken training. Training should be repeated every three years as a minimum.

INFORMATION RECORDED ON AE SAFEGUARDING MATTER REPORT FORMS

All safeguarding incident information will be stored securely on AE's cloud system. Access to this documentation is limited to the DSL/DSDs and any other relevant senior colleagues on a 'need to know' basis. Records are only kept for as long as necessary and in line with the Statute of Limitations as a backstop. Information is not shared with any other parties without the child's consent (or parental consent if the child is under 13) except for the legitimate sharing of safeguarding information.

WORKING WITH CHILDREN ALONE (e.g. lone working with one participant)

It is generally best practice not to work alone with a child. However, there are circumstances where this might be unavoidable – this guidance should be followed in this case.

Consider if it is appropriate for a parent, carer or another trusted adult to be present during the session. If parents/carers are happy for you to work alone, you should get written consent. If you typically work alone with children on certain types of programme (e.g. if you are doing any 1:1 coaching or guiding for example) then it is good practice to arrange a meeting with the child and their parent or carer so that you can agree on what will happen during the sessions. Parents should also be given a copy of AE's Safeguarding and Child Protection Policy.

When working alone with a child (without their parent or carer in the room), it is important that AE obtains appropriate parental consent, particularly in the child is under 16. If they are 16 or 17, carefully consider whether we need to obtain parental consent – e.g. is the child happy to work alone with the you/the instructor? It is best practice to have at least 2 adults present. This adult should preferably be someone with safeguarding responsibility e.g. the DSL or DSD.

If you're working unsupervised with a child, you're likely to be undertaking a **regulated activity** – see definitions of Regulated Activity in **Schedule 4 to the Safeguarding Vulnerable Groups Act 2006 (as amended by Part 5 of the Protection of Freedoms Act 2012)**. This means that AE requires you to have an enhanced DBS check. AE requires all staff / instructors working with young people or vulnerable adults to have an enhanced DBS check.

If you're working alone **unexpectedly with a child or young person,** make sure you're somewhere where other people can see you. You should also tell another adult such as your line manager or DSL/DSD that you're alone with the child by calling in to the AE office or using the AE Duty Mobile system which is available 24/7.

SUITABILITY OF STAFF AND VOLUNTEERS

LEGAL AND STATUTORY REQUIREMENTS

When considering the suitability of staff, instructors and/or volunteers at AE, AE must comply with the following legal requirements:

- **Immigration, Asylum and Nationality Act 2006:** sections 15 to 25 sets out that an employer may be liable for a civil penalty if they employ someone who does not have the right to undertake the work in question for immigration reasons;
- **Safeguarding Vulnerable Groups Act 2006 (as amended):** provides the legislative framework for the vetting and barring system for people who work with children and vulnerable adults.

RECRUITMENT

AE needs to have robust procedures in place to prevent unsuitable people from working or volunteering within AE or on AE programmes. It is important that a **single check is NOT relied upon** e.g. using a DBS check alone.

PRE-EMPLOYMENT CHECKS

Before employing a person, employment law requires an employer to **prove and verify their identity** and that they have a **right to work** in the UK.

To then assess a person's suitability to work with children, before starting work, AE needs to:

- Check that applicants have the right skills;
- Ask for details of previous experience;
- As for references and make sure that they are checked – including following up any concerns with the referee;
- Run the appropriate level of DBS check – at AE this is an Enhanced DBS check (this check includes a check against the 'children's barred list').

If relevant to the role, prohibition checks should also be considered, e.g:

- Teacher prohibition (that prevents someone from being a teacher at a school) – this is not routinely applicable to AE's activities but might be appropriate for specialist roles or recruitment;
- Running an independent check (section 128 checks) – again these are not routinely applicable for the work that AE does but might be appropriate for specialist roles or recruitment. Section 128 checks look to ensure that individuals who have been barred from managing an independent school are not hired for a management or supervisory roles within this type of organisation.

REFERENCES

The purpose of obtaining references is to get objective information to support appointment decisions. AE senior team / recruitment leads should scrutinise references and resolve any concerns before confirming the appointment. It is important to check for information about employment history, qualifications and personal references and ensure that this information is consistent and complete. If a candidate does not have a career history, personal references from school or university should be sought. If a candidate is not currently working, verification of their most recent period of employment and reasons for leaving should be sought.

References should always be sought direct from the referee and preferably from a senior person with appropriate authority. Do not rely on:

- Open references e.g. 'to whom it may concern' testimonials;
- Information provided by the candidate as part of the application process without verifying it;
- References from friends or family members.

Information about past disciplinary action or allegations should be **considered carefully.**

Safer recruitment example: A football coach runs training sessions for children aged 7 – 15, 3 times a week alongside a volunteer assistant coach who helps her to supervise the children. The volunteer assistant coach is moving to another area, so the football coach will need to find a new assistant. One of the children's parents has mentioned the opportunity to her brother-in-law who is keen to do more voluntary work within the local community. The football coach has never met him, but he comes well-recommended by the child's parent for the assistance coach position.
Advice: The football coach should not rely on a recommendation from one of the children's parents. She should advertise the assistant coach position e.g. in a local newspaper or relevant websites, and recommend that he apply through the proper channels. The football coach should: ● Undertake the appropriate pre-employment checks on any applicants (such as identity checks); ● Invite short-listed applicants to an interview where she can ask them for details about relevant experience that would make them suitable for the role; ● Ask the successful candidate to provide her with references from previous voluntary experience, or employment; ● Check these references and follow up any concerns.

RESPONSIBILITIES OF REGULATED ACTIVITY PROVIDERS

Regulated activity is work that a person barred (e.g. where that person is not allowed to work with children or vulnerable adults due to their past behaviour or offences) must not do.

More information on regulated activity is found in **Guidance for regulated activity with children in England (DBS)**.

AE is classed as a regulated activity provider on the following (and sometimes other) grounds:

- Teaching, training or instruction, care or supervision of children: more than 3 days in a 30-day period OR overnight between 2am and 6am with the opportunity for face-to-face contact with children;
- Driving a vehicle for children: more than 3 days in a 30-day period ONLY.

Those not involved with direct contact with children and young people (e.g. those working in the office, cleaners potentially – depending on when this takes place at AE base, stores personnel and similar) are also covered by virtue of the work that AE does with alternative provision and the potential for young people to have contact with others working at AE other than their instructors.

AE's status therefore requires that all staff, instructors and volunteers, no matter what they do at AE, need to hold an Enhanced DBS check.

DISCLOSURE AND BARRING SERVICE (DBS) & BARRED LIST CHECKS

DBS checks are an essential part of AE's safer recruitment practices. Everyone working at and for AE, not matter what capacity this is in if they are working from AE base at any point, needs to undertake an Enhanced DBS check.

DBS checks should be regarded as a snapshot of a person's criminal or police record and/or barred list status at a particular point in time. These checks are most beneficial **only** when conducted in conjunction with other safe recruitment practices e.g. obtaining references from previous employers.

Individuals can be barred by the DBS from working with children and/or vulnerable adults if they are:

- Convicted or cautioned for a relevant offence (e.g. sexual or violent offences);
- Referred to the DBS by their employer who is concerned that the individual poses a risk of harm to children or vulnerable adults.

AE has a legal duty to make a referral to the DBS if a member of staff or freelance instructor is dismissed or removed from working in regulated activity after harm to a child or vulnerable adult OR where this is a risk of harm.

> ***AE would be breaking the law if someone is knowingly recruited to work in regulated activity who has been barred from working with children by the government.***

There are four levels of DBS check (basic, standard, enhanced, enhanced with a check of the barred lists). AE requests that all staff, instructor and volunteers have an **enhanced DBS check**. An enhanced DBS check covers all of the information gathered by Basic and Standard DBS checks and includes a check of:

- Unspent criminal convictions and condition cautions (Basic check contents);

- Spent and unspent criminal convictions and adult cautions from the Police National Computer which have not been filtered in line with legislation (Standard check contents);
- Any information held by local Police which is considered relevant to the role (Enhanced check contents).

Those working directly with young people at AE (in any capacity), also need to have a **check of the Barred List(s).** This is a **separate check to and enhanced DBS check** and looks at:

- Whether the applicant is on the Adults Barred List, Childrens Barred List or both.

To be clear, those working directly with young people in a delivery capacity at AE need to have BOTH:

- An Enhanced DBS Check;
- A Barred List(s) Check.

Those working with AE but not working directly with young people at any point are still requested to undertake an Enhanced DBS Check due to the proximity of young people around AE's offices, base and working sites. Work may include visits to clients in schools or other similar organisations and therefore this is required.

Those working with AE's Board of Directors and therefore indirectly working with AE and young people are also required to hold an Enhanced DBS Check to ensure AE upholds its reputation and commitment to safeguarding at all levels of the organisation.

AE STAFF CONDUCT

AE has Employee Conduct provisions contained in Employee Handbooks and Instructor Conduct provisions as part of joining and induction information at AE. This information is available to both employees and freelance instructors on an ongoing basis and they are alerted when updates are made.

Both documents relating to conduct provisions include the following:

- Acceptable use of technologies where relevant;
- Relationships and communications between parents, children, staff and volunteers including the use of social media;
- Rules on staff, instructor and volunteer contact with children by phone or messaging services;
- A commitment that under no circumstances should any staff member, instructor or volunteer inflict physical or psychological harm on a child.

CONCERNS RAISED ABOUT STAFF, INSTRUCTORS OR VOLUNTEERS WHO MAY POSE A RISK OF HARM TO CHILDREN: 'LOW-LEVEL' CONCERNS

AE has a confidential 'low-level' concerns system of reporting and recording. In this case, 'low-level' means any concern or incident reported (either via AE Incident, Accident or Near Miss

report forms or via AE Safeguarding Matter Report forms) involving an adult working at or for AE that is inconsistent with AE's Employee or Instructor Conduct policies but is not serious enough to consider a referral to the LADO. While this type of behaviour is descried as 'low-level', AE recognises that this does not mean that this behaviour is insignificant.

If there is any doubt about whether information or behaviour shared about a member of staff, instructor or volunteer in fact meets the harm threshold for referring to the LADO, the LADO should be consulted for advice and guidance. Any low-level concerns that involve any safeguarding element should be reported to the DSL/DSDs immediately so that assessment regarding referrals can take place and the appropriate escalation made as necessary.

Low-level concerns are kept in a secure online document that is accessed by senior members of the AE with staffing responsibilities only. All members of staff with access to this document have signed a Non-Disclosure Agreement to preserve confidentiality of all parties, including situations or low-level reporting where information does not relate to safeguarding matters.

There is a **legal duty to refer to the DBS as a regulated activity provider** where:

- AE has withdrawn permission for a person to engage in regulated activity with children, or moved them to an area of work that isn't regulated activity (or both);
- AE feels that one or more of the following apply to the person:
    - Their action or inaction has harmed a child or put them at risk of harm, or if repeated against, or in relation to, a child would endanger the child (relevant conduct);
    - They have satisfied the harm test regarding children or vulnerable adults (or both) e.g. they have not harmed a child but there is a risk that they may cause harm to a child in the future;
    - They have been cautioned or convicted of a relevant offence.

Referrals should be made by AE's DSL/DSDs using the **DBS referrals form**. Failure to make a referral is a criminal offence.

Responding to a concern about a staff member example: A volunteer tells the DSL of a tuition centre that he witnessed another staff member slapping a child. It allegedly happened during a class, but the volunteer believes that he is the only adult who witnessed the incident. The volunteer has only been in his role for a few weeks, whereas the member of staff he is making his accusation against has been in his role for 2 years and the DSL has never received any complaints about his conduct before.
Advice: The DSL should take the concern seriously, regardless of who the person is. The DSL should follow the tuition centre's safeguarding procedures. Following these procedures, and based on the training they have received, the DSL should know that they must not attempt to investigate the allegation (e.g. they should not interview

the child concerned) but should keep written records of the allegations made and any other relevant information that comes to light.

The DSL should report the allegation immediately to children's social care, the LADO and the police. The DSL should call the parents of the child and give them details on how they're going to manage the allegation. The DSL should also explain to all parties involved that confidentiality is important while the concern is being investigated.

If the tuition centre removes the staff member from working with children, the DSL must also inform the DBS. Failure to do this would be a criminal offence.

HEALTH AND SAFETY

As a provider, AE has the **legal duty of care** to try to ensure that the environment that AE programmes take place in are safe for those that attend and/or take part in activities. This means that AE has a duty to **take reasonable steps** to ensure that people will be safe using the venues that AE uses for programmes, for the purpose that they are attending for.

This covers programmes that take place on the hill AND when visiting AE base and stores.

LEGAL REQUIREMENTS

AE must comply with the following legal requirements:

- **Health & Safety at Work etc. Act 1974:** this covers a wide range of duties that AE as an employer must abide by to ensure that their workplace is safe and that those who work in a particular environment are not in danger both physically and mentally;
- **The Regulatory Reform (Fire Safety) Order 2005:** requires the responsible person (the person having control of the building, or a degree of control) to take reasonable steps to reduce the risk from fire and makes sure people can safely escape if there is a fire and set out other fire-safety duties they should follow;
- **Occupiers' Liability Act 1957:** sets out the duty of care an occupier has to those who visit their premises and extends to the occupier's vehicles as well;
- **Employers' Liability (Compulsory Insurance) Act 1969:** requires employers to have at least a minimum level of insurance against liability for injury or disease to their employees arising out of their employment;
- **Food Safety Act 1990:** covers the responsibilities that all types of food businesses must follow;
- **General Data Protection Regulation 2018** and the **Data Protection Act 2018:** sets out the legal framework on data protection and the requirements for using it fairly and properly.

Documents are reviewed annually and treated as 'living documents' e.g. if circumstances within AE change, public health advice changes or in response to AE Incident, Accident, Near Miss Report forms or AE Safeguarding Matter Report forms received. Any incident report forms of any

type received are assessed by the relevant person (DSL/DSDs for safeguarding and Operations Managers for Incident/Accident/Near Miss reporting) and logged within the appropriate matter log. Policies and procedures are then updated in between annual reviews if needed and any changes disseminated to staff, instructors and volunteers are required so that updates are communicated and implemented effectively.

In addition, AE has the following in place:

- Emergency planning via AE's **Critical Incident Plan** – this includes establishment of a Critical Incident Management Team and procedures to follow in case of a large-scale emergency or critical incident arising;
- A fire safety and evacuation plan for AE base and any accommodation used by AE programmes / courses (this will usually be by following the accommodation providers established plans or as dynamically risk assessed by staff on the ground in case of absence or changes to the same in practice);
- Staff who are qualified first aiders on all programmes as a pre-requisite to work on the same as well as qualified first aid personnel at base;
- A full set of health and safety documentation including Standard Operating Procedures, Statement of Safety, Risk Management documentation and a variety of policies and procedures for all areas of work and activities, both on the hill and at AE base or similar indoor venues;
- All members of staff, instructors and volunteers have been trained in the above as necessary and relevant to their role and area/s of work or volunteering with AE.

AE does not work with children under 5 years of age. However, should this take place for any reason, AE is aware of the need to ensure that children of this age are adequately supervised (children should usually be within both sight and hearing of staff, instructors or volunteers and always within sight **or** hearing), including whilst eating.

AE's HEALTH & SAFETY DOCUMENTATION

Due to the nature of the activities that AE undertakes, AE has a large portfolio of health and safety documentation for the different locations, activities and settings that are used. Please refer to AE's Risk Management Summary and the particular area of operation for specific health and safety information e.g. for rock climbing, courses run from AE base training room, DofE expeditions, weaselling at Higgar Tor, etc.

All of the above are reviewed on an annual basis and when a change or incident occurs to ensure that both documentation is updated and this is disseminated in practice so that changes are made on the ground and everyone is aware of the update and reasons why.

MANAGING INFECTIOUS DISEASES AND OTHER ILLNESSES

AE's programmes can be sites for transmissions of infections and other illnesses.

AE staff, instructors and volunteers can reduce the risk of transmission of infectious diseases and other illnesses by:

- Ensuring that children and staff clean their hands regularly;
- Maintaining appropriate cleaning regimes using standard products such as detergents;
- Keeping occupied spaces well-ventilated by opening windows or doors.

AE's documentation relating to Covid-19 and procedures should be used as a template for putting systems in place in case of infectious disease, including pre-programme screening, admission to programmes by those infected, cleaning regimes and related documentation.

The following documentation should also be referred to:

- **Health protection in schools and other childcare facilities (gov.uk)**;
- **Managing specific infectious diseases: A to Z** within the **Health protection in children and young people settings (gov.uk)**

SUPPORTING AE PARTICIPANTS WITH MEDICAL CONDITIONS

AE has a great deal of experience in supporting participants who have a range of medical conditions. Ensuring the safety of young people on AE programmes depends heavily on the transparency of parents and carers in sharing information about a young person's medical conditions **prior** to the programme commencing so that AE can put in place the most appropriate measures.

Initial information is capture on Consent Forms for each individual joining AE – no participant can join an AE programme without having a completed, signed Consent Form. Any medical conditions highlighted by a Consent Form that may need support are highlighted and an Additional Medical Details form issued to capture full information. Additional Medical Details forms are then used by Operations Managers to put in place a personalised care plan for individuals on all programmes, as necessary for the information supplied and the participants individual needs.

AE has a Company Doctor (Consultant Paediatrician, Tim Saunders) who can be contacted for additional advice and guidance if needed. The Company Doctor also provides input, training and guidance on an as-needed or requested basis by Operations Managers and Technical Advisers.

PARENTAL CONSENT AND ATTENDANCE REGISTERS

All participants joining AE (of any age) **MUST** complete and have signed a Consent Form before joining a programme. Where this is missing at the start of a programme, verbal consent may be obtained from parents/carers in some extenuating cases but this is rare. Having a completed, signed Consent Form is a firm pre-requisite for joining an AE programme.

The information provided to AE on Consent Forms is subject to the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 – AE ensures compliance with both of these

via AE's Data Protection Policy. AE is registered with the Information Commissioner's Office for this purpose and appears on the Register of Data Controllers under reference A1023803.

Parents are requested on Consent Forms to let AE know about any updates to Consent Forms between completing them and a programme taking place – any updates should be emailed to info@adventure-expeditions.net or another Consent Form completed via the individual's account on AE's website.

Attendance registers **MUST** be completed for every programme that AE runs. The lead member of staff for each programme must ensure that this is completed and details of anyone leaving a programme early must be recorded on here, as well as the End of Programme Report Form so that a full and accurate record of attendance is present for each programme.

AE INCONTINENCE POLICY & INTIMATE CARE

AE has a full incontinence policy where AE works with younger children and in the case of unforeseen accidents e.g. through illness. This policy covers procedures for dealing with the incontinence from both a health and safety and safeguarding perspective and also includes dealing with cases of vomiting as well as urine/faeces. The policy should be followed and a record of incontinence made along with a Record of Intimate Care report form if any intimate care is needed. All incontinence matters should be treated with utmost respect and the situation appreciated as having a greater potential to give rise to a safeguarding incident that potentially other situations by all concerned. Reporting and recording all incidents of incontinence and intimate care is paramount.

MISSING CHILDREN

If it is discovered by an AE staff, instructor or volunteer that a child is missing then the DSL, DSDs or a senior staff member should be alerted **immediately**. The lead member of staff for the programme should search the venue thoroughly (both inside and outside, depending on location). Depending on the child's age, if there is no sign of the child, the child's parents or carer should be contacted to establish whether the child has returned home.

- **If the child is under 5 years old, the police should be contacted immediately**;
- Once the above checks (thorough search and contacting parents or carers) have taken place, if the child is still missing, AE will discuss with the parents or carer **whether it is appropriate to contact the police**;
- In most cases, parents and carers know the child gest and will be able to assess whether their child is likely to return of their own accord, or whether there are significant concerns for their safety;
- The **parents or carer are responsible for contacting the police** although AE can agree to contact the police on their behalf if they agree to this;
- If the police are contacted (by parents or carers, or AE), AE staff should wait for the police to arrive and follow their instructions. Due to the nature of some of the programmes that

AE operates in (e.g. away from tarmac roads, National Parks, remote terrain), it may be Mountain Rescue that is used – Mountain Rescue are contacted via the police on 999;
- The DSL, DSDs or senior staff member leading the programme should continue to search while waiting for the police or Mountain Rescue to arrive;
- If the parents or carer **do not wish to contact the police**, only proceed to contact the police against their wishes if you consider the parent's decision to be unreasonable and that the child is at significant risk of harm (e.g. in remote or mountainous terrain).

Where there is a missing child and an AE member of staff or instructor is lone working:
- Alert AE DSL/DSDs or senior staff member of the situation. Is anyone available to help in case of a local programme to AE base?;
- Inform child's parents and ask whether child has returned home – if child has not returned home and they are local to the programme it may be them that take responsibility for looking for their child. Discuss whether the police should be contacted;
- AE Operations Managers will have entered contingency information on the Ops Management spreadsheet document that covers potential need for support for lone workers for scenarios like this. Use this planning to put contingency in place where possible so that a second person can join the programme to search for the missing child while a member of staff remains with the other participants on the programme.

GOVERNANCE

Governance refers to the way that AE is run and the rules, practices and processes that AE puts in place to control this. Good governance is extremely important to AE to ensure that there is a clear process in place for making decisions on all aspects of AE's operations.

AE is an employer and has completed the following aspects of governance:
- Registered with HMRC under company number 10236556;
- Set up a Senior Management Team and Board of Directors;
- Has a clear and effective **Complaints Policy** – this is available to all clients upon request as well as on AE's website and School Portal, and all staff, volunteers and freelance instructors are aware of this;
- Has a clear and effective **Whistleblowing Policy** – this is available to all employees via AE's Employee Handbook and to all freelance members of staff and volunteers as part of AE's instructor documentation.

What to do if a child tells you they are being harmed

If a child in your setting discloses to you that they have been abused or that they feel at risk of harm, you should follow your safeguarding policies and procedures immediately.

If a child is at risk of immediate harm, call the police on 999.



Listen carefully to the child and take notes on what they have said.

→ **Store your notes securely** in line with your organisation's policy.

→ **Report the allegation** to your DSL.



The allegation happened **outside your setting**.

The allegation is **against your employee or volunteer**.

The DSL should **report the allegation to children's social care**, the LADO,[2] and police as appropriate.

The DSL should **refer the individual to the Disclosure and Barring Service** as appropriate.

2 Local Authority Designated Officer.