

# Safeguarding and Child Protection Policy 2026

## Introduction

### Roles and responsibilities

Throughout this policy, the Designated Safeguarding Leads (DSL) for all issues pertaining to child protection for **Discovery Summer Ltd** are:

<b>Designated Safeguarding Lead (DSL)</b>	<b>Mary Shipley</b>	<b>020 7937 1199</b> (during office hours) <b>07753 612 342</b> (24 hours)
<b>Deputy DSL</b>	<b>Prem Sourek</b>	<b>07543 221 153</b> (whilst summer courses are operating only)

The DSL and deputy DSL are jointly responsible for dealing with day-to-day safeguarding concerns, safer recruitment, staff training and ensuring adequate safeguarding training is in place.

**Jeremy Johnson (Director) and Jane Merrick (Founder/Managing Director)** are trained to Advanced Level (Level 2).

All staff have a safeguarding responsibility which is outlined in their job description and at induction.

At every centre, there are **at least two Designated Safeguarding Person(s) (DSP), one of whom is normally the Course Director**, who have advanced safeguarding training (Level 2).

The DSPs have a specific job description which outlines their safeguarding responsibilities.

The role of the DSP is explained to staff, students and group leaders as appropriate via induction, posters, meetings etc.

The safeguarding of online students is managed directly by the DSL and Deputy DSL. For the purposes of this policy the Deputy DSL is also the Course Director (CD) for all online courses.

## Safeguarding

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all adults (staff, group leaders and service providers e.g. external sports coaches) should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

No single person can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

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

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children's mental and physical 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

**Child Protection** refers to the reactive processes undertaken to ensure that children are protected from suffering or direct, harmful behaviour which results in significant harm.

**Staff** refers to all those employed by Discovery Summer, full time or part time. Outside providers, who provide additional services for Discovery Summer, are expected to comply with Discovery Summer policy and are asked to sign that they agree to do so.

**Child/Student** refers to all young people who are not yet 18 years old. This includes English Student Hosts, as well as the international students.

The main guidelines regarding the safeguarding of children are outlined in The Children's Act (1989), Every Child Matters (2004), Working Together to Safeguard Children (2023) and Keeping Children Safe in Education (2025).

An abridged version of this policy is available to all on our website. The relevant parts of the policy are included in the staff handbook and highlighted in the induction of staff, students and Group Leaders. Visitors receive basic information when signing in.

## Policy

The Policy should be read in conjunction with the following:

- Health & Safety, Mental Health and Well-Being, Behaviour Policies
- Safeguarding Agreements for Hirers (from each host centre)
- Risk Assessments including those for campuses, off-site visits, sports

These are reviewed annually in October, and more often if necessary, by the DSL, Deputy DSL and other senior staff, taking into account any feedback from staff and course participants unless an incident or new legislation suggests the need for an interim review.

Discovery Summer is committed to **safeguarding children from direct and indirect harm** and is responsible for safeguarding children in its care whether they be on a face-to-face or online course.

The welfare of the child is paramount and all adults (staff members, associated adults, group leaders, visitors, outside providers) have a **legal duty of care** to safeguard children as carefully as a responsible UK parent would.

All children, without exception, have the **right to protection from abuse**, regardless of age, culture, gender, language, racial origin, disability, sexual identity or beliefs.

## Safer recruitment

Multiple steps are taken to ensure that we deter and prevent people who are unsuitable for work with children from applying for or being offered a role at Discovery Summer.

Safeguarding and child protection measures are enforced throughout the recruitment processes, during the training of staff and through the information provided before staff begin employment.

## Whistleblowing

If staff have any concerns about malpractice, especially inappropriate staff behaviour with children within Discovery Summer they are legally required to raise it immediately with a DSP at their centre.

If they do not feel this is appropriate or feel that their concerns are ignored they should raise them immediately with the **DSL (Mary Shipley) Deputy DSL (Prem Sourek)** or Managing Director (Jane Merrick).

Staff can also contact the local authority safeguarding team for their area (see Appendix 1) and the **NSPCC Whistleblowing Helpline if necessary 0800 028 0285**.

Under the terms of our British Council Accreditation, if a student, parent or staff member wishes to make an official complaint they should contact English UK: [complaints@englishuk.com](mailto:complaints@englishuk.com)

Staff who report concerns will not be penalised and their report will remain confidential.

## 24-hour emergency contact number for face-to-face students

The 24-hour emergency contact number is **020 7937 1199** (forwarded to a mobile out of hours).

Students (and parents) are provided with the 24-hour emergency contact number in the Joining Instructions, the travel consent letter, the flight confirmation letter and the airport arrival guide. Students are provided with the Course Director's mobile (on the back of their ID cards) in case they need immediate support.

Before any off-site visits, students are reminded of the emergency contact numbers printed on their ID card, to call if necessary.

## STAFF CODE OF CONDUCT

The following provide guidelines and expectations for staff, associated adults (e.g. group leaders, outside providers).

- **Be friendly to students, but remember you are not their friend.** Maintain professional boundaries in person and online during and after the course (see “Communication with students”)
- Be an **excellent role model** for students. Be punctual, polite, use appropriate language and respect others
- Be **kind and positive** towards students. Talk to students, listen to them and praise them when appropriate
- Put students’ interests before your own and **their safety before your convenience**
- **Always maintain a calm manner with students.** Follow the Behaviour Policy
- **Focus on your work** and the care of students during working hours
- **Understand and exemplify the core British Values** (as defined by the UK government) of democracy, rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs. (see "Staff responsibilities under Prevent" below)
- Protect students and yourself. **Never be on your own with a student.** Stay in an area with other people and, if in a room, keep the door open. If you need to attend to a student in their room, ensure another staff member is always with you. Respect students’ privacy – knock and ask permission before entering a student’s bedroom
- Do not engage in any behaviour during or after your term of employment which could harm the reputation of Discovery Summer
- You are in a **position of trust**. Under the Sexual Offences Act 2003, it is an **offence for a person aged 18 or over who is in a position of trust to engage in any form of sexual activity / have a sexual relationship with an under 18, even if the relationship is consensual.** If convicted of such an offence, a person is likely to serve a custodial sentence and have their name added to the sex offender’s register, which would bar them from working with under 18s again.

### Staff Dress Code

Ensure your appearance/clothing promote an appropriate professional image:

- Always look presentable: brushed hair, clean clothes, clean shaven/trimmed facial hair for men
- Wear minimal rings, earrings, body piercings and other jewellery. You may be asked to remove them for health and safety reasons.
- Always dress with an awareness and sensitivity to cultural practices: no revealing clothes or clothes which might distract or cause embarrassment (i.e. no short shorts, ripped clothing, vest tops, transparent or excessively tight clothing)
- In accommodation, cover up e.g. when going to the toilet at night
- Teachers should wear smart casual for classroom teaching e.g. shirt/blouse, smart trousers/chinos, smart shoes/trainers. No T-shirts, jeans, shorts, flip-flops etc
- You may be asked to cover tattoos if they are deemed inappropriate
- Dress appropriately when leading activities/excursions e.g. wear trainers not flip flops/sliders.

### Maintaining a positive, professional relationship with staff

- Maintain positive, professional relationships with other staff members
- Remember that we have a zero-tolerance policy towards sexual harassment. (**See Sexual Harassment policy** **pError: Reference source not found**)
- Be aware that intimate relations between adults on campus are not acceptable under any circumstances
- If a member of a senior management team is in a relationship with another staff member this must be declared to the Discovery Summer Manager so that a change of line manager can be arranged if appropriate.

Please also see: **Allegations made against a staff member p26**

## **Communication with students (in person and online)**

**Do not meet up/connect with students off campus or online during or after the course.**

This includes:

- Not connecting with or accepting 'friend' requests on social media/gaming sites
- Not giving out personal phone numbers/emails (DS will give you a company device where possible)
- Ensuring your social media profiles are appropriate and ideally private
- 'Unfriending' any DS students or English Student Hosts who you may have been friends with in the past. I.e. if you have previously been an English Student Host yourself. (The only exception to this rule is where you and the student/student host are members of the same family)
- Ignoring students if they call/message you after the course. Inform the DSL

Do not engage in any activity in person or online which could be viewed as illegal, offensive, obscene, defamatory, threatening, harassing, bullying, or discriminatory.

## **Smoking, vaping, alcohol and substance abuse**

- You are not permitted to consume alcohol or abuse substances at any time on campus or during working hours.
- When returning from time off, day or night, you must be fit to interact with students. i.e. be under the legal drink-driving limit in England.
- Do not attend work if you are under the influence of alcohol or recreational drugs or if your performance is adversely impacted by them
- We have strict no-smoking/vaping policies within all school buildings/on campus. You are not allowed to smoke/vape in front of students at any time even when off-site
- Residential staff must be in their accommodation between the hours of midnight and 06:00 (other than exceptional circumstances or when on duty)
- Please note that we reserve the right to test staff if alcohol or substance abuse is suspected. We also reserve the right to search staff rooms and possessions should we suspect theft or the presence of any prohibited items/substances.

If you do not abide by these guidelines, it will be treated as a serious disciplinary matter which could lead to immediate dismissal.

## **Favouritism, Infatuation and Gifts Policy**

- **Treat all students fairly to avoid perceptions of favouritism or unfair criticism** e.g. when selecting teams, awarding prizes, excluding a student from an activity.
- Do not give personal gifts to students but offer prizes in line with our rewards policy.
- To avoid allegations of favouritism, you can only accept **gifts** from a student/parent with a value of under approximately £20. If you receive a more expensive gift, report it to the DSL, who will decide if you can keep it.
- Occasionally, a student may develop an infatuation with a staff member. Deal with this situation sensitively so that your own behaviour is not misinterpreted, and the student is not unduly embarrassed by the situation.
- If you suspect a student is infatuated/has a crush on you or another member of staff, report it to the DSP who will pass it on to the DSL. Together they will decide on the best course of action e.g. ensure that the student has minimal contact with the staff member, make sure all students are aware of the correct way to behave with staff.
- Younger students may also be 'clingy' and want to spend a lot of time with a particular staff member. Deal with this sensitively and encourage the student to make friends with others of their own age.

## Policy for dealing with unacceptable staff conduct

- Everyone who joins a Discovery Summer course should experience a positive and harmonious environment where they are treated with respect.
- If you experience or see any examples of unacceptable behaviour by other staff you must challenge it if appropriate and report it immediately to a member of senior staff at the centre.
- Please read **Allegations made against a staff member p26** to understand the difference between a minor infringement of the staff code of conduct, a low-level safeguarding concern and an allegation of abuse. See **Staff Appraisals in the Senior Staff Handbook** for details of how to deal with **unsatisfactory performance**.

In the case of a **minor infringement of the staff code of conduct** (i.e. wearing inappropriate clothing, being rude to another member of staff) a line manager will:

- Explain what the unacceptable behaviour is
- Provide appropriate guidance/training to ensure it doesn't happen again
- Ask the staff member (if appropriate) to apologise to the person(s) affected.
- The Course Director must make a written record of the issue and how it has been addressed in the daily log.

More serious disciplinary issues will be dealt with by the Course Director in conjunction with the Managing Director. See **Disciplinary Procedure** **pError: Reference source not found**. These procedures do not form part of staff contracts of employment and Discovery Summer reserves the right not to use the disciplinary procedure.

## ***Physical contact with students and 'Reasonable Force'***

- It is now accepted that a 'no contact' policy can leave staff unable to fully support and protect their students. UK government policy encourages schools to adopt sensible policies, which allow and support their staff to make appropriate physical contact.
- Never touch a child in a way which may be considered indecent i.e. never touch a child below the shoulder level unless there is a justifiable reason. Do not take part in 'horseplay' such as tickling or other games involving physical contact.
- On occasions, for safety reasons, it is entirely appropriate for staff to have physical contact with students. e.g. to keep a young child safe by holding hands on an excursion, to prevent a child from injuring themselves or walking in a road
- A student may initiate a hug but do not encourage it and try to make sure it is in a public place and as brief as possible
- If you make physical contact with students, it should be in response to their needs at the time, be of limited duration, be appropriate and take place in an open environment (never secretive or to provide gratification to the staff member).
- Ask permission before touching a student and do not perform tasks of a personal nature that students are capable of doing for themselves e.g. Applying sun cream. If it is necessary, make sure it is done in a public place with other adults present. First aid e.g. give plaster to child to put on themselves, ask their permission before you touch them 'Can I put this plaster on your leg?'
- The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom, restraining a child to prevent violence or injury.
- Physical punishment is prohibited in all schools in the UK.

### **Reasonable force - Guidance for staff**

In extreme cases, where physical restraint is necessary to protect the lives of staff or students:

- Remain calm and try to use your voice to halt the incident
- If possible, call for additional help
- Remove other students from the area if possible
- Use only necessary and careful restraint to halt the danger. Do not use violent actions which may harm the student.

## **Photo/Video policy**

- **Staff are not permitted to use a personal device to take photos/videos of students** unless given express written permission by the Designated Safeguarding Lead.
- **Always use a Discovery Summer device** when taking photos/videos of students.
- Photos/videos of students are for use by Discovery Summer only and are not to be shared via personal email, WhatsApp, social media etc.
- **Group Leaders** are permitted to take photos/videos of their students only. If they wish to use images (for their own publicity purposes) of their students mixed with others, they can download photos published on Discovery Summer social media or provided by in the “Agent Photo Packs” on the Representatives page of our website.
- **Students** should be respectful and ask for consent before taking photos/videos of other students and/or sharing them.
- See also **Artificial Intelligence (AI) policy** **p Error: Reference source not found** regarding the use of photos in Generative AI

### **Use of photos for marketing purposes**

- Photos/videos of students cannot be used for publicity purposes unless their parents have opted-in
- If parents do not opt in, the student will have a **“no photo” graphic on their ID card** and will be listed on the portal under **“Publicity opt-outs” (Admin/Photos)**.
- If any “no photo” students ask to appear in photos/videos, the Course Director should contact Jeremy at Head Office. He will then contact their parents and report back to the Course Director.
- **Before taking any photos/videos ensure that any “no photo” students/staff are out of shot** (this rule does not apply for large group photos e.g. more than 50 people as faces can be blurred out if necessary).
- Students/staff may request that particular photos/videos are e.g. not published on the blog, or used in an end of week presentation and these requests must be respected.
- Take care when taking photos/videos to ensure that students are appropriately dressed and are not participating in activities that might bring the individuals or the school into disrepute. Ensure all images are appropriate so that they cannot be misconstrued.
- Students should not be identifiable from blog posts. i.e. Write “Here’s a photo of our prize winners this week” NOT “Here’s a photo of our prize winners: Javier Rodriguez, Vladimir Erimov”.

# **INFORMATION FOR STUDENTS AND VISITORS**

## **Rules for Students**

The following rules for students form part of our terms and conditions which are in our brochure and on our website.

The rules also form part of the Joining Instructions which are sent to each student at time of booking, they are displayed on student notice-boards, are printed in the student folder and are explained to students on arrival in a manner to suit their age and level of English.

### **DO**

- Speak English
- Listen to staff and follow their instructions
- Be on time (always)
- Be kind and friendly to others
- Attend and join in all the lessons and activities
- Look after your belongings and the school
- Keep the school tidy
- Follow the school guidelines relating to the use of phones, cameras, games consoles. These must not be used during classes, meals or activities
- Have your Discovery ID card with you at all times
- **Residential courses:** Keep your room tidy and make your own bed
- **Residential courses:** Stay in your bedroom after bedtime and remain quiet
- **Residential courses:** Give all your money, medication and valuables to the course office to look after

### **DON'T**

- Leave the school unless with a member of staff/parent/guardian
- Buy or consume alcohol, take drugs or smoke (cigarettes or e-cigarettes)
- Bring unnecessary valuables
- Bring or buy knives, weapons or toy guns
- Swear, fight or bully, use inappropriate language or gestures
- Drop litter, or chew gum
- Access or share illegal/inappropriate online material
- Damage school property (please note any damage, accidental or deliberate must be paid for)
- Steal or shoplift
- Use fire escapes unless for emergency exit
- **Residential courses:** Swim without a lifeguard being present
- **Residential courses:** Go into boys' accommodation if you are a girl or go into girls' accommodation if you are a boy without agreement of the Course Director.

Good behaviour is encouraged and rewarded. If rules are broken you will be given a warning and we will discuss how you should improve your behaviour. We may contact your parents and you may miss an activity or excursion.

### **VERY IMPORTANT**

The safety and well-being of our students is our primary concern. Students who break British Law, do not obey the course rules, who repeatedly misbehave, do not follow the instructions of the course staff or otherwise disrupt or adversely affect the smooth running of the course will be asked to leave **immediately** at their own expense and without refund of fees.

## **Search policy (students)**

Under our Terms and Conditions, we state that we reserve the right to search a student's room and belongings in the event of suspected theft or any other reasonable circumstances.

### **Body searching**

Never body search a student or staff member. Only the Police have authority to do this.

## **Educating students about safeguarding**

Students on face-to-face courses are made aware of the term "safeguarding" and what it means for them – in an age-appropriate manner.

E.g. In the Student Joining Instructions, in the student induction, and via student physical and online notice-boards.

They are made aware of how to keep themselves safe e.g. from on-line bullying, from strangers on excursions – as part of the curriculum or as part of pre-excursion briefings. They are encouraged to safeguard each other and be responsible and helpful towards peers.

Students are made aware that they must report any safeguarding and welfare concerns relating to themselves or another student (including e.g. bullying, self-harm, eating disorders and inappropriate staff behaviour) to a member of staff. It is made clear that they will be listened to and taken seriously.

Students on online courses are given guidelines on staying safe online as appropriate for their age.

## Online safety policy

Discovery Summer recognises that it has a duty of care to ensure that all students and staff use the internet and related communications technologies appropriately and safely. See also **Artificial Intelligence (AI) policy** **pError: Reference source not found**

Students and staff are made aware of online safety issues, what constitutes inappropriate and/or unacceptable use and the related sanctions.

We recognise that the best way to prevent, or at least minimise, inappropriate or unacceptable use is through online safety education.

Online-safety issues include but are not limited to:

- **content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism, misinformation, disinformation (fake news) and conspiracy theories
- **contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images including AI generated images (e.g consensual and non- consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. Further details at Anti-Phishing Working Group: <https://apwg.org/>

### **Monitoring student use of the internet/communication technologies:**

- Access to host centre IT facilities is supervised and monitored by staff members.
- Strong firewalls (put in place by the host centre) prevent staff and students accessing inappropriate websites. However, a firewall may not be able to screen every language and all staff members must be extremely vigilant when supervising IT sessions.
- At centres where students are very young (i.e. Benenden Young Learners, Marymount) students' phones/i-Pads etc. are stored safely by Discovery Summer and only given to students at specified times each day.
- On other courses students are not allowed to use their phones during lessons and activities and are discouraged from using them for excessive amounts of time during breaks, in accommodation etc. (Guidelines vary centre by centre and are explained in the Joining Instructions and again on arrival). This approach is designed to encourage students to communicate with those around them and to prevent home-sickness

### **Examples of unacceptable online behaviour by students and staff**

- **Viewing or attempting to view/share/send** offensive, sexually explicit or harassing material or any material which promotes radicalisation or extremism. (Remember that such websites will be blocked by the host centre firewall and Discovery Summer will be notified if any staff or students attempt to view such material)
- Publishing defamatory and/or knowingly false material about Discovery Summer or any of its course participants
- Engaging in any kind of illegal online activity including infringing copyright, or gambling
- See also **Artificial Intelligence (AI) policy** **pError: Reference source not found**

### **Staff responsibilities:**

1. Follow the staff code of conduct regarding social media and the sharing of email/phone numbers
2. Keep up to date with online safety matters and the current Discovery Summer policies.
3. Embed online safety education into classes, activities and student meetings as appropriate for students' age and level of English.
4. In lessons/activities where internet use is pre-planned students are guided to sites checked as suitable for their use.

5. Movies/clips shown to students during class or social activities must be appropriate for their age e.g. no 15-rated films for under-15-year-olds. Internet videos e.g. YouTube clips used in a class or activity must be checked all the way through in advance to ensure the content is suitable. Staff should also be aware that their previous search history, which may be inappropriate, may show up when they are sharing their screen.
6. Ensure any songs used in class/activities are the 'radio edits' which do not contain inappropriate language.
7. Monitor students' use of host centre IT facilities and never leave students unsupervised in IT sessions
8. Be alert to and aware of student behaviour when students are accessing personal IT devices (phones, tablets etc) and monitor if necessary. Student behaviour can indicate inappropriate use of IT and/or online bullying (see below).
9. Any inappropriate or unacceptable use of IT facilities (belonging to the host centre, Discovery Summer or students) should be reported immediately (see below for details).

**Student responsibilities (these are outlined in the student rules and/or should be explained by class teachers in an age-appropriate manner):**

**Follow the Discovery Summer rules regarding online behaviour**

If you're sharing information online **THINK**

**T** – Is it **true**? (Is what you are sharing factually correct)

**H** – Is it **helpful**? (Does the interaction serve a purpose?)

**I** – Is it **important**? (Does it need to be shared?)

**N** – Is it **necessary**? (Could you share this information another way?)

**K** – Is it **kind**?

- Understand why and how to report abuse, misuse or access to inappropriate materials
- Understand the rules relating to the taking and sharing of photos/videos and online bullying
- Understand the importance of online safety

**Responding to incidents of misuse:**

If a student or staff member is discovered accessing **inappropriate or illegal material**:

1. Ensure the student/staff member stops viewing it immediately
2. Report the incident to the Course Director who will decide whether it is appropriate to involve the DSL
3. The CD will speak to the student/staff member and ensure he/she understands why the material is inappropriate and that it should not be accessed again
4. If the incident was not flagged by the host centre IT manager, the CD must report it to them as their firewall may not be strong enough.
5. If the material is suspected of being illegal the DSL will take appropriate action which may include contacting the police, starting disciplinary procedures
6. Disciplinary action may be taken against the staff member if appropriate

## 9.2 **Anti-Bullying Policy**

Please also see: **Child on child abuse p19**

Every member of our staff and student population should be aware that everyone is different and other people's views, wishes and habits should be respected.

The purpose of this policy is to:

- prevent bullying from taking place
- make sure bullying is stopped as soon as possible if it does happen and that those involved receive the support they need
- provide information to all staff and students about what we should all do to prevent and deal with bullying.

### **Definition of Bullying vs Banter**

**Bullying** is:

- Deliberately hurtful behaviour
- Repeated over a period of time at a targeted individual/group
- Arising from and taking advantage of an imbalance of power

Bullying may be indirectly contributed to by others who do not inform staff that help is needed.

Bullying can arise from a lack of respect for others and can occur in a variety of ways.

- **Physical** - e.g. hitting, pushing or any act that invades personal space
- **Verbal** – e.g. name calling, teasing, taunting, playing cruel jokes on people. Racist or sexual harassment
- **Social** – e.g. ignoring people, embarrassing people in public, not including people (in real life or online). Discriminating on grounds of religion, culture, race, gender, disability or sexuality
- **Online** – e.g. posting hurtful or threatening messages/images on social media or messaging apps

**Banter** is:

- Playful
- Positive
- Reciprocal
- Involves mutual participation and understanding

We recognise that what may start as banter can become bullying. How might we know that bullying is taking place?

- Crying repeatedly
- Not wanting to attend a certain class or activity
- Isolation in free time/in the dining room
- Diminished levels of confidence
- Withdrawn and quiet, displays of excessive anxiety
- Belongings go missing or are damaged
- Unexplained cuts or bruises
- Frequently complaining of stomach pains, headaches etc.
- Choosing the company of adults/clinging to adults
- Difficulty in sleeping/nightmares
- Eating too much/too little
- Talking of suicide or running away
- A student telling an adult about bullying directly or via a parent, another student, an English Student Host or via a survey or portal comment

These are indicators only and may occur for some individuals without bullying being present or being the cause. However, any of these would need to be considered and investigated so that the student can be supported.

### **How do we try to prevent bullying from taking place?**

- Explain the basic Discovery Summer rules to students
- Agree class rules/class contract and display it in the classroom
- Ensure students are adequately supervised at all times
- Ensure students feel comfortable approaching staff if they have a problem. Have an open-door policy
- Reduce the amount of time students can spend on their phones
- Report any concerns to senior members of staff who will act on them as necessary and keep written records on the portal
- Read student feedback (SurveyMonkey, portal comments etc) and act on it as necessary

### **Response to Bullying**

The response to bullying must principally ensure that both sides are aware that bullying is occurring, that it is viewed as a serious issue, and that if it continues the bully may be asked to leave the course.

The following steps are to be taken when cases of bullying arise. **N.B at all stages, a written record should be kept on the portal** (or on a **Major Concerns Reporting Form p16** if the incident is not classed as a minor concern)

1. If you become aware of bullying, listen carefully to the student(s), question but do not ask leading questions, speak to the Course Director.
2. The Course Director will decide if this is a minor incident and will deal with it accordingly (see Behaviour Policy).
3. If the Course Director decides that this is a case of bullying the incident(s) will be further investigated and classed as a Major Concern and reported to the DSL.
4. The Course Director will speak to the bully and the bullied separately.
5. The CD may speak to other staff and/or students who may be aware of other instances of bullying/significant issues.
6. The victim will be offered immediate support and staff will explain what will happen next.
7. Following the Course Director's investigation, a 'no blame' approach may be offered to both parties if e.g. the bully is apologetic. The Course Director will talk to the victim and bully and try to find a mutually agreeable solution. During or following this, agents/parents are to be contacted, and the outcome of the discussion is to be made clear. Information will be confidential although other members of staff may be informed where appropriate.
8. If the Course Director decides that a 'no blame' approach is not appropriate, or the bullying continues after the 'no blame' approach a more severe approach will be taken. The Course Director will liaise with the DSL and the Managing Director (if this has not already occurred) who is likely to recommend the suspension of the perpetrator(s) if it continues.
9. If the bullying continues after these steps, the Course Director in conjunction with the Managing Director may require the perpetrator(s) to leave the school. All expenses will be borne by the perpetrator's family. The final decision is to be taken by the Managing Director.

## **Information for visitors and adult students**

All visitors (and adult students at Collingham) must sign in at the course office/reception desk on arrival and complete a Safeguarding for visitors form:

*As we are looking after under-18s we have a duty to safeguard them. This means ensuring their safety and well-being.*

*All adults on-site have a **Duty of Care** towards young people, so please follow our rules for visitors and adult students:*

1. *Sign in and out with our staff*
2. *Wear your **Discovery Summer student/visitor lanyard** when on-site and return it when you leave*
3. *Only use the **designated toilets for adults***
4. *Be polite and respectful to all and don't use bad language*
5. ***Don't mix with any under-18-year-old students** (apart from your own family members)*
6. *If you have children on our courses, you may take photos of them but **must NOT share them on social media** if they contain images of other students or staff. This is because some students and staff do not want their image shared on social media.*
7. *If you see any students who seem to be unhappy or you have any concerns about our students and their safety, tell Discovery Summer staff immediately*
8. *Further information about safeguarding can be found on our student noticeboard and on our safeguarding policy. <https://www.discoverysummer.com/safeguarding-policy/>*

## **REPORTING PROCEDURES + TYPES OF ABUSE**

### **Procedure for reporting a safeguarding concern/incident**

All staff have a responsibility to ensure that students are well and happy and that any concerns and incidents are reported to a Designated Safeguarding Person (DSP) (normally the Course Director) so that they can respond accordingly.

Different reporting procedures should be followed depending on whether the concern is **Minor, Major or is a Child Protection issue involving actual or suspected abuse.**

### **What is a minor concern?**

A minor concern includes, but is not limited to, the following:

- Minor medical problem e.g. headache, cold
- Feeling sad or homesickness
- Low-level disruptive behaviour
- First use of offensive language/gestures (e.g. racist, homophobic, sexually explicit or misogynistic)  
N.B Repeated offences are classed as a Major Concern
- Student is 10 mins late for an activity

### **Minor Concerns - reporting procedure**

1. Staff should report minor incidents/concerns by entering information onto the relevant student's comment section of the Discovery Summer portal. (What happened? When? Whether others were involved?)
2. **Remember you can also note positive incidents.** e.g. "Well-behaved in class today. Worked really hard and helped a new student"
3. The comments will be checked regularly (at least daily) by the Course Director.
4. The Course Director will then take appropriate action (e.g. asking staff member for more detail, speaking to the student direct, informing parents/representatives, keeping an eye on the student to see if there are other concerns or the issue escalates)
5. If a member of staff feels that the incident/concern requires immediate action or is unsure of how to respond, they must speak to the CD immediately. The CD will decide what to write on the portal and/or liaise with the DSL to decide if a Major Concerns Reporting Form needs to be completed.

### **What is a major concern?**

A major concern includes, but is not limited to, the following:

- Child Protection concern – report of abuse or suspected abuse
- Mental health issue e.g. eating disorder, self-harm, mention of suicide
- Illness/accident requiring hospital visit
- Missing student – student missing for more than 30 mins/student leaves campus
- Repeated use of offensive language/gestures (e.g. racist, homophobic or misogynistic)
- Any serious behaviour issue (see **Behaviour Policy pError: Reference source not found**)
- Suspicion of radicalisation
- Bullying
- Student expulsion

## Major Concerns - Reporting Procedure

If there is a Child Protection concern relating to reported or suspected abuse:

1. The staff member in conjunction with the CD (or other DSP at the centre if the CD is not available) completes a **Major Concerns Reporting Form** which can be found on the Discovery Summer Cloud
2. The CD saves the form in the (confidential) Safeguarding folder on the Gdrive
3. **The CD notifies the DSL immediately so that she can read and act on the report**
4. The CD should write "see Major Concerns Reporting Form" on the comments section of the student's profile on the portal. Do not include other details unless directed to by the DSL.
5. Once the DSL has read the Major Concerns Reporting Form, she will contact the CD to discuss the concern and decide on the next steps (e.g. asking staff member for more detail, speaking to the student direct, informing parents, keeping an eye on the student to see if there are other concerns or the issue escalates)

## RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations)

**When is a RIDDOR accident report needed?**

- Serious injury of a **staff member** e.g. head injury, broken limb, serious burns
- Serious injury of a **student** if it is related to an accident e.g. electrocuted by faulty equipment.
- You **DO NOT** need to report a student injury related to taking part in normal "school" activities e.g. a sports injury.

**RIDDOR procedure:**

1. The staff member concerned in conjunction with the CD completes a **RIDDOR Accident Report Form** which can be found on the Discovery Summer Cloud.
2. The CD saves the form to the RIDDOR folder on the Google Drive and informs the DSL immediately.
3. The CD writes "see RIDDOR Accident Report Form" on the student/staff comments section of the portal.
4. The DSL will read the report and contact the CD to discuss the accident and the next steps.
5. If necessary, the DSL will submit a RIDDOR report via their website.

## Vulnerable Students

**When is a Vulnerable Student Risk Assessment needed?**

Certain students may need more support with academic study, welfare and/or to protect them from abuse and/or bullying. These include but are not limited to students who have:

- a disability or medical condition
- a special educational need
- a mental health problem
- trouble making friends
- recently experienced problems at home i.e. bereavement, divorce
- a very low level of English and/or are the only students speaking a certain language
- any other kind of factor which makes them stand out from the group due to i.e. race, religion, nationality

**Procedure:**

1. If Discovery Summer receives information about a vulnerable student at the time of booking, the DSL will contact the parent to discuss the issue and complete a Vulnerable Student Risk Assessment. This will be saved to the Vulnerable Student Folder in the Gdrive which is accessible by the Course

Director and Administrator at the centre only. If appropriate the information will also be added to the student's profile on the student databases.

2. Depending on the nature of the issue, the Course Director may keep the information confidential or may share it with other staff on a need-to-know basis to ensure that the student's needs are met. A student with a disability and/or serious medical condition may be travelling with a Group Leader who has been briefed by the parents regarding the student's needs.
3. If the CD believes there is a serious issue which the parents have not informed us about, he/she should speak to the DSL who will decide the best way to proceed i.e. liaise with the parents/representative to gather more information. The CD and DSL will then complete a **Vulnerable Student Risk Assessment**.
4. The CD in conjunction with the rest of the senior team should decide on the relevant support which can be provided to any vulnerable students. I.e. providing them with a suitable English Student Host as their buddy; planning lessons, activities and excursions to suit the student's needs

## **Child Protection Policy**

All Discovery Summer staff, as well as all other adults (e.g. Group Leaders, outside providers) play a crucial role in protecting students on our courses, and in not making themselves unnecessarily vulnerable to suspicion of any form of abuse.

Discovery Summer staff and other adults must understand that they are in a **position of trust**. Under the Sexual Offences Act 2003, **it is an offence for a person aged 18 or over who is in a position of trust to engage in any form of sexual activity / have a sexual relationship with an under 18, even if the relationship is consensual.**

Sexual activity in this context is not exclusively physical contact including penetrative or non-penetrative acts. It may also involve other activities such as causing an under 18 to watch or engage in sexual activity through the sending of explicit images or messages.

Staff need to be aware that, if convicted of such an offence, a person is likely to serve a custodial sentence and have their name added to the sex offender's register, which would bar them from working with under 18s again.

Staff are made aware during training that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach at all times.

## **Defining Child Abuse**

The term "child abuse" is used to describe ways in which children and young people are harmed – usually by adults – with damage to their physical or mental health.

There are four broad categories of abuse:

- **Physical abuse:** through hitting, shaking, squeezing, administering inappropriate drugs etc or allowing activities that are disproportionate with the child's physical development.
- **Sexual abuse:** through inappropriate touching or contact with a child and through any form of bodily contact that has a sexual content.
- **Emotional abuse:** through persistent lack of love and affection, constant shouting, taunting and bullying or adult demands for unrealistic expectations to be met.
- **Neglect:** through failure to meet a child's basic needs, e.g. food, warm clothing, safety.

## **Recognition of Abuse**

Staff must have an attitude of **"it could happen here"**

Abuse can be difficult to predict, and to recognise when it has taken place or is currently happening. There are a number of generalised indicators:

- Unexplained or suspicious injuries, particularly on parts of the body not prone to injuries
- An injury for which the explanation seems inconsistent
- The child describes what appears to be an abusive act involving him or her
- Another person expresses concern about the welfare of another child
- Unexplained changes in behaviour over time; e.g. becoming withdrawn, temper tantrums, showing disproportionate, unexpected aggression or swinging rapidly between withdrawn and aggressive states
- Unexplainable and/or persistent absence from education
- Inappropriate sexual awareness
- Engages in sexually explicit behaviour in games and activities
- Distrust of adults, particularly those with whom a close relationship could be expected
- Difficulty in making friends/failure to socialise with other children
- Displaying variations in eating patterns, overeating, loss of appetite
- Becoming increasingly dirty or unkempt
- Mental health problems

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

For example, children may feel embarrassed, humiliated, or are being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the designated safeguarding lead (DSL) if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with students which facilitate communication.

## Impact of Abuse

Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact which can affect a children's mental health, behaviour and education.

## Specific Types of Abuse

### Child-on-child

Sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It can occur online or face to face (both physically and verbally) and is never acceptable.

All staff must have an attitude of '**it could happen here**'.

- We recognise that even if there are no reports of child-on-child abuse it doesn't mean it isn't happening, it may just be that it isn't being reported.
- Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will be particularly distressing if the perpetrator is present in the same school.
- Any report of sexual violence or sexual harassment should be taken seriously but staff should be aware it is more likely that girls will be the victims and boys the perpetrators. Children with disabilities are also three times more likely to be abused than their peers (KCSE 2025. para 453).
- It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report (e.g. a friend may make a report or a staff member may overhear a conversation that suggests a child has been harmed or a child's behaviour may indicate something is wrong).

Child on child abuse is likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based or discriminatory bullying)
- Abuse in intimate personal relationships between children (see **Child Sexual Exploitation** below)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration, and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual assault)
- Sexual harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi-nudes images and or videos - this includes deep-fake (AI produced) imagery. This practise is also known as sexting or youth produced sexual imagery. For further information see below and <https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-how-to-respond-to-an-incident-overview>

- Up-skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

### **What to do if you become aware of an incident of sexting/sharing nudes or semi-nudes**

- Report it to the Designated Safeguarding Lead (DSL) immediately
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal
- If you have already viewed the imagery by accident (e.g. if the child has shown it to you before you could ask them not to), report this to the DSL.
- **Do not delete** the imagery or ask the child to delete it.
- Do not ask the child/children involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident with other members of staff, the child/children it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any child involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.

### **Action following a report of sexual violence or harassment**

- A report of sexual violence or harassment must be treated and reported in the same way as for any other safeguarding concern. See **Reporting a Major Concern p16**
- A decision may be made (by the DSL in conjunction with other senior staff) to manage the case internally if, for example, it is a one-off incident and the children concerned are not in need of early help. In such instances it may be treated as a behaviour issue or by providing welfare support
- Whatever the response, there must be a **zero-tolerance** approach to sexual violence and sexual harassment. It cannot be passed off as 'banter', 'having a laugh', 'boys being boys' as this can lead to a culture of unacceptable behaviours and an unsafe environment for our students
- If the perpetrator(s) is a Discovery Summer student and currently present at the centre, whilst Discovery Summer liaise with children's social care and the police, the alleged perpetrator(s) should be removed from any classes/activities etc that they share with the victim and the careful consideration should be given to how to keep the perpetrator(s) and victim(s) apart. These actions are in the best interests of all children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator(s).
- If a report is made to children's social care, they will advise on how to proceed and how to advise the perpetrator of the allegations.
- As always when concerned about the welfare of a child, all staff should act in the best interests of the child. **Immediate** consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).
- It is essential that **all** victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.
- Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously.
- A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

- It is important to explain that the law is in place to protect children rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them.

Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour (HSB) has been displayed
- the ages and developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, or staff
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

### **Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

- Staff need to be aware of CSE and CCE although we recognise they are unlikely to occur in the context of an international summer school as the students are only with us for a short time and are supervised by Discovery Summer or (on non-residential courses) by their parents at all times.
- CSE and CCE are defined as forms of abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity
- CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficked) for the purpose of exploitation and/or through violence or the threat of violence
- The abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (i.e. increased status) of the perpetrator or facilitator
- The abuse may be a one-off or a series of incidents and range from opportunistic to complex organised abuse
- Abuse can happen online as well as in person.

### **Child Criminal Exploitation (CCE) including County Lines**

- CCE includes recruitment of children and young people to deal and traffic drugs or money often between urban and rural areas (**county lines**), working in cannabis factories, shoplifting or pick-pocketing, having their bank account used to facilitate drug dealing.
- Children are increasingly being targeted and recruited online using social media.
- Children can become trapped in this kind of exploitation as they build up drug debts and are threatened with violence towards themselves or their family if they try to leave the gang/county line. The imbalance can be due to age, as well as other factors like gender, sexual identity, cognitive ability, physical strength, status, access to economic or other resources.
- Children may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.
- As children (particularly older children) involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, and

they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to

- It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## Child Sexual Exploitation (CSE)

- CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration or non-penetrative acts. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.
- CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.
- CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

## Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

## So-called 'Honour' Based Abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- Infringements may include a girl having a boyfriend; rejecting a forced marriage; interfaith relationships; inappropriate dress or make-up, kissing in a public place etc. This is not an exhaustive list.
- Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.
- Whatever the motivation, these are abuse according to UK law.
- In a summer school context, signs might be decline in engagement/behaviour/performance, depression, family member keeping a close eye on student.

## Female Genital Mutilation (FGM)

- Non-medical, partial or total removal of external female genital organs, typically done to young girls from African countries.
- Illegal if done in the UK, or if a UK resident is taken overseas to have it done.
- Staff should speak to the DSL if they have any concerns about female genital mutilation (FGM) but there is a specific **legal duty for teachers**. If a teacher, in the course of their work in the profession, discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher **must** report this to the police. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining students.
- Visit the government website for more information: <https://www.gov.uk/government/collections/female-genital-mutilation>

## Serious Violent Crime

Staff need to be aware of the signs that students may be involved in serious violent crime i.e. unacceptable or persistent absences from education, absence from school, friendships with older individuals or groups, decline in academic performance, signs of self-harm, signs of assault, unexplained injuries, unexplained gifts or new possessions.

## Duties under Prevent: Radicalisation and Extremism

Children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.

**Extremism** is the vocal or active opposition to our fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs

**Radicalisation** is the process of a person legitimising support for, or use of, terrorist violence.

**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.

Whilst this is not a high-risk area for Discovery Summer, staff need to be aware that **'it could happen here'**.

Any concerns relating to radicalisation or extremism should be reported to the DSL in the same way as any other safeguarding concern using the **Major Concerns Form p15**. The DSL will report them to the Local Authority Safeguarding Board and local police Prevent officers if appropriate.

## Recognising extremism:

Early indicators of radicalisation or extremism may include:

- being drawn to conspiracy theories
- beginning to isolate themselves from family and friends
- viewing or engaging with inappropriate online content and having uncontrolled or unsupervised access to the internet
- expressing concerns about being victimised, for example feeling under attack
- discriminating against other individuals or groups of people
- a sudden change in behaviour
- showing interest in extremists or extreme groups
- expressing views that divide us, for example talking about 'us' and 'them'

More information on how to manage the risk of radicalisation available here:

<https://www.gov.uk/government/publications/the-prevent-duty-safeguarding-learners-vulnerable-to-radicalisation/managing-risk-of-radicalisation-in-your-education-setting>

## The following measures are in place to minimise the risk of radicalisation:

- We acknowledge that radical and extremist opinions may be expressed by staff, students and/or other adults, e.g. group leaders, host centre staff
- Staff and students are made aware of DS values and core British Values (democracy, rule of law, mutual respect, individual liberty, tolerance of those of different faiths or beliefs) and the importance of living harmoniously in an international community in which all members should show tolerance

and respect of other nationalities and religions. Staff are trained to challenge any statements made that are counter to core British values and how to do that

- Staff training includes awareness of what is meant by radicalisation and extremism and how to report any concerns to the DSP
- Student rules state that accessing inappropriate or illegal sites is prohibited whilst on a DS course.

## **Children who are lesbian, gay, bisexual or are gender questioning**

N.B. This section remains under review, pending the publication of a new section of Keeping Children Safe in Education (published by the UK government) related to children who are questioning their gender.

### **According to the current guidelines (March 2026) schools must not allow:**

- children over the age of 8 to access toilets designated for the opposite biological sex
- children over the age of 11 to access changing rooms designated for the opposite biological sex
- children to share boarding or overnight accommodation with those of the opposite sex

This is to comply with applicable legislation, including safeguarding duties, and maintain the privacy and dignity of children.

The guidance advises that schools and colleges should look to provide suitable alternatives for children who do not want to use the facilities designated for their biological sex, while also being clear that this should not compromise the provision of single-sex facilities.

- A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.
- However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism and/or attention deficit hyperactivity disorder.
- It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre- pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.
- As such, when supporting a gender questioning child, the Department for Education (DfE) states that schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. (Refer to [DfE Guidance for Schools and Colleges in relation to Gender Questioning Children](#), when deciding how to proceed).
- Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

## Reporting a Child Protection Concern

In the event of abuse being reported, staff must reassure victims that they are being **taken seriously** and that they will be **supported and kept safe**. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

What to do if you suspect child abuse			
<b>Step 1</b>  RECEIVE	If you notice physical or behavioural indications	If a child informs you that they are being abused in some way.	If you suspect that an adult is a threat to a child in some way OR another person informs you about suspicions they may have.
<b>Step 2</b>  RESPOND REASSURE RECORD	Contact the Designated Safeguarding Person (DSP) and tell them of your suspicion.	<b>React calmly. Listen to and reassure the child. Record the information immediately,</b> make note of exactly what the child has told you using their words. If you add your opinion make it clear it is your opinion.  <b>Do not ask leading questions.</b> Instead ask them to "Tell, Explain, Describe"  <b>Do not promise confidentiality to the student.</b> Tell the child that others will only be informed if there is a need.	Maintain surveillance of the adult and contact the Designated Safeguarding Person (DSP) to discuss your suspicions.
<b>Step 3</b>  REPORT	Maintain confidentiality in all cases. Do not discuss with anybody except the DSP. Use the <b>Major Concerns Reporting Form</b> (from the Discovery Summer Cloud) to record dates, times, what was witnessed/disclosed, what aroused suspicions and any action taken.		
<b>Step 4</b>	The DSP must contact the DSL by phone immediately to discuss the situation.		
<b>Step 5</b>	The DSL and Managing Director will discuss the next appropriate steps which may include contacting the LSCP (Local Safeguarding Children Partnership) for advice.		
<b>Step 6</b>	Child Protection information will be stored and handled in line with General Data Protection Regulation 2018 principles: Information is to be accurate, kept no longer than necessary and secure at all times.		
<b>Step 7</b>	The DSL and Managing Director, in conjunction with the external authorities, if they have been consulted, decide on how/whether to involve the parents/guardians.		
<b>Step 8</b>	The DSL will record the decision made and the next steps.		
<b>Step 9</b>	The DSL in conjunction with the DSP will monitor the situation and seek further assistance if necessary or until no further action is needed.		
<b>Step 10</b>	The DSL will review incidents to see if changes to policies, procedures or staff training need to be made immediately or before the next summer season.		
<b>Important:</b>			
If you suspect the DSP of inappropriate behaviour, contact the DSL			
If you suspect the DSL of inappropriate behaviour, contact the deputy DSL or Managing Director			
If you feel your concerns have been ignored, contact the <b>LSCP (Local Safeguarding Children Partnership)</b> direct (contact details on the staff and student noticeboards and the Nexus) OR contact the <b>NSPCC (National Society for the Prevention of Cruelty to Children) Whistle-blowing helpline 0800 028 0285</b>			

## Allegations made against a student

In most situations, the conduct of students is covered by the DS '**Rules for students' p 8 and Behaviour Policy Error: Reference source not found.** See also '**Child on child abuse' p19.** Certain behaviours may fall into the area of safeguarding; for example: pre-planned violence, threats and intimidation or blackmail, indecent touching or sexual assault, forcing others to watch pornography or to take part in sexting.

If a safeguarding allegation is made against a student, similar procedures will be followed as outlined in 'Reporting a Child Protection Issue'.

The main concern will be the safety of the abused. At the same time, Discovery Summer will appoint a staff member (DSP/member of the designated safeguarding team) to support the under 18-year-old abuser through any contact with local authorities or the Police should that become necessary.

## Allegations made against a staff member

It is important to define an **allegation of abuse** as opposed to a **minor infringement of the staff code of conduct** or a **low-level concern related to safeguarding**.

### Minor infringement of the staff code of conduct

If there is a **minor infringement of the staff code of conduct** this should be dealt with as outlined on **p 5** (dealing with unacceptable staff conduct).

### Low-level concern relating to safeguarding

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold of an allegation of abuse (as defined below). A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that a staff member (including host centre staff or contractors) may have acted in a way that:

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

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

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door. It is vital that we have a culture of openness, trust and transparency to protect students and staff.

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

All low-level concerns must be recorded in writing by the DSP and stored in the Confidential section of the Google drive. The DSP must contact the DSL immediately so that the course of action can be discussed. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The record will be kept on file in accordance with our Data Protection policy.

It is important that written records are kept so that any patterns of behaviour regarding the staff member can be identified and addressed as necessary. It will also help us identify any wider issues that may be present across the organisation which can be dealt with through e.g. improved training, policy changes.

**Please note:** Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference.

## **Allegation of abuse**

An **allegation of abuse** is when a staff member has:

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

If an allegation is made against a staff member this must be dealt with swiftly and confidentially. The person raising the concern should report it to the DSP immediately. The DSP will report it to the DSL who will liaise with the Host Centre's DSL (as per the host centre's Safeguarding Agreement for Hirers) and Local Authority Designated Officer (LADO) and take their advice before investigating further. At each stage a written record must be made using the **Major Concerns Reporting Form. p16**

If a staff member is dismissed because he/she is considered unsuitable to work with children, the DSL will report to the **Barring Service** within one month of leaving. A referral to the **Teaching Regulation Agency (TRA)** may also be necessary.

A clear and comprehensive summary of any allegations made against a member of staff, and all details leading to and including a resolution, will be kept on the confidential personnel file and will be retained until the member of staff reaches retirement age, or for a period of 10 years after the allegation has been made. Discovery Summer will provide information regarding an allegation for the purposes of future references and DBS disclosures.

## Supervision Ratios (Residential courses)

**English Student Hosts** are classed as 'students' and included in ratios for all out of class activities and off site trips.

**Group Leaders** can be used to meet ratio requirements during out of class activities and off-site trips but must never be left in sole charge of students who are not in their group

**Additional adults** may be needed if students have special needs and/or additional risks are identified in the risk assessment

Location	Ages	Minimum staff: student supervision ratio
<b>On site classroom teaching</b>	All	1:12 international students* – Benenden, Marymount, Shrewsbury, Winchester English Plus  1:16 international students*- Winchester Pre- University, Winchester GYL  *In classes <b>English Student Hosts</b> are <u>excluded</u> from the published max class size. E.g. a class at Benenden can have 12 international students + an English Student Host
<b>On site during scheduled activities</b>	8-12 years	1:15
	13-17 years	1:15 (1:20 in exceptional circumstances)
<b>On site overnight in residences</b>	8-12 years	1:15
	13-17 years	1:20
<b>On site at other times</b> (e.g. break times, mealtimes, chill out in houses)	All	As appropriate to the space being used, the age and behaviour of the students and proximity of other staff.  Each centre has site specific rules as to what students may or may not <b>do</b> and where they may or may not <b>go</b>
<b>Off site during scheduled activities</b> (e.g. excursions, local study visits)	8-12 years	1:10 (2:20 – always have at least 2 adults)
	13-17 years	1:15 (2:30 – always have at least 2 adults)

### Supervision on excursions/off-site

**8-12 years** - and immature/insecure/irresponsible students of any age - are never unsupervised on an excursion.

**13-17 years** - may spend time unsupervised in groups of 3-5 provided that:

- parental permission has been granted (see below)
- staff are confident they can understand instructions and are mature and responsible enough to manage on their own in a relatively safe area with clear boundaries e.g. shopping centre
- they have clear instructions on how to contact staff, where and when to meet, what to do if they get lost
- staff have students' mobile numbers (students who don't have a mobile must be paired with one who does or remain with staff)
- at least one staff member is located at a strategic place (e.g. shopping centre exit, outside a cafe)
- students must report back after **max. 60 minutes** (time limit will depend on their age, behaviour, the location, any other relevant factors).

In **theme parks** students aged 13 and over may go off in small groups for **max 3 hours** as so much time is spent queuing for rides and the park has a clear boundary with manned exit points

## **Winchester (free time in the city centre)**

### **Pre-University (15-17 year olds)**

- *Responsible students may go out in small groups on 2-3 afternoons per week to visit the shops, cafes and sights in Winchester city centre. Students sign out/in at the course office.*
- *A risk assessment is carried out to ensure suitable measures are in place as appropriate for the students, the age group and location.*

### **Global Young Leaders / English Plus (13-16 year olds)**

- *Responsible students may go out in small groups on 1 afternoon per week to visit the shops, cafes and sights in Winchester city centre.*
- *Staff members will be present at certain locations around the city centre to supervise as necessary.*
- *A risk assessment is carried out to ensure suitable measures are in place as appropriate for the students, the age group and location.*

## **Parental consent for Students and English Student Hosts**

Parents are asked the following question when making a booking for a residential course and again on the Medical/Consent Form:

*I confirm that my child (aged 13 or over) may go shopping in small groups on excursions without the supervision of course staff (all 12s and under are always closely supervised).*

If a parent does not consent to their child aged 13 or over being unsupervised on excursion this is flagged up to the Social Director and Course Director so that the student can be supervised appropriately.

## **Transport during the course**

Staff cars should only be used to transport children in exceptional circumstances (e.g. a hospital visit). Students must wear seatbelts and sit in the back seat.

Staff must not use their car for business purposes unless this has been agreed with the DSL and the staff member has shown evidence of a valid driving licence, MOT certificate and business insurance.

## **Airport/Eurostar transfers**

On residential courses, unless students are being brought to the centre by their parents, we provide an airport meet and greet service. Students are not allowed to travel unaccompanied from/to the airport to/from the course centre (i.e. on public transport).

All transfers are arranged by Head Office who provide 24 hour support. Students are met by Discovery Summer staff or a pre-arranged taxi who are given detailed instructions on when/where to meet the student, where to take them and what to do in the event of an emergency.

Taxi providers must follow strict Discovery Summer protocols relating to vehicle safety, driver background checks and the driver code of conduct.

On departure students are checked in and accompanied until they are seen through to departures.

If a departing flight is cancelled/turns back, Discovery Summer reps at the airport will contact the DSL to decide the best course of action.

If the student is not able to travel that day, they will be taken back to their course centre (or another centre if it has closed) until a return flight can be arranged. If all centres have closed, they could be accommodated by Mary Shipley or Jane Merrick at their homes if appropriate.

## **Student and Staff Accommodation**

All residential students are accommodated in residences on campus. They are looked after by Discovery Summer staff 24 hours a day 7 days a week.

For Safeguarding reasons **male and female students are normally accommodated in separate residences**. If this is not possible, they are accommodated in separate areas of the same residence with strict rules to ensure that students do not enter areas for the opposite sex.

**Staff are normally accommodated in a house with students of the same sex** e.g. male staff with male students. For safeguarding and privacy reasons **staff and students have separate bathrooms**. If this is not possible we allocate separate times for staff to use the bathrooms.

We recognise that due to the gender imbalance of our staff teams female staff may be accommodated in the boys' house. If so, they will be accommodated in a separate area where possible and allocated a separate bathroom for female staff only.

### **Accommodation for non-binary and trans people**

If a student or staff member is transitioning, has transitioned or is non-binary we will **discuss their needs with them and allocate them to a separate, gender-neutral area of the residence** if one is available. See also **Guidance on students who are gender questioning** p24

## Supervision Ratios (Collingham)

Location	Age of students	Minimum staff: student supervision ratio
On site classroom teaching	5-6 years	1:10
	7-17 years	1:12 (depends on size of classroom)
On-site at breaktime	5-17 years	<p>More than 30 juniors on site:            1 staff in tuck shop            1 staff at top of stairs leading to ground floor            2 staff in Study room            1 member of senior staff to help if necessary</p> <p>Fewer than 30 juniors on site            At least 2 staff members on the first floor to supervise. Move the tuck shop into the Study room so that students can be supervised in one area.</p> <p>1 member of senior staff to help if necessary</p>
Off-site museum trips	<p><b>Group Leaders</b> can be used to meet ratio requirements but must <u>never</u> be left in sole charge of students who are not in their group</p> <p><b>Additional adults</b> may be needed if students have special needs and/or additional risks are identified in the risk assessment</p> <p>If necessary, the Centre Manager may ask the parent of a student with additional needs to assist on the trip.</p>	
	5-6 years	These students stay in the school and don't go on museum visits
	7-12 years	1:10 (2:20 – always have at least 2 adults)
	13-17 years	1:15 (2:30 – always have at least 2 adults)
Off-site afternoon trips for Full Day Teens Explore London trips	13-17 years	<p>1:15 (2:30 – always have at least 2 adults)</p> <p>1 staff member may be sufficient if there are 5 students or fewer and no additional needs are identified.</p>

### Accommodation

All under-18 students on **non-residential courses** are accommodated with their parents/family members who are responsible for dropping them off, collecting them and looking after them at all other times. We offer a list of accommodation ideas for families visiting London – these are not official recommendations as they have not been inspected by Discovery Summer.

**We do not recommend that non-residential under-18s stay with a host family unless the student is with a parent/guardian.**

## Appendix 1:

### Contact details for local authority safeguarding teams and LADOs

Every local authority has a legal responsibility to appoint a Local Authority Designated Officer (**LADO**) who is responsible for organising a response to concerns/allegations that an adult who works with children may have caused harm or could cause harm. They will be informed within one working day of any allegations and advice will be given to employers to ensure any allegation is dealt with fairly and quickly, ensuring that the child is protected effectively.

#### **Benenden**

**Kent Safeguarding Children Multi-Agency Partnership** (general enquiries (office hours))

Telephone: 03000 42 11 26 [kscmp@kent.gov.uk](mailto:kscmp@kent.gov.uk)

Room 2.71, Sessions House, Maidstone, ME14 1XQ Kent

Safeguarding Children Multi-Agency Partnership (emergency contact details) 03000 41 91 91

Designated Officers of the Local Authority 03301 651440, 07540 677200

Area Safeguarding Adviser (Education) Integrated Children's Services Front door: 03000 411111 Out of Hours Number: 03000 419 191

LADO Team 03000 410888 [kentpupilslado@kent.gov.uk](mailto:kentpupilslado@kent.gov.uk)

#### **Collingham and online courses**

**Kensington and Chelsea**

[socialservices@rbkc.gov.uk](mailto:socialservices@rbkc.gov.uk) 020 7361 3013 (Switchboard - 24 hours – ask to be put through to Social Services Department)

Different teams will respond depending on where the child is staying in the Kensington borough.

<https://www.rbkc.gov.uk/lscp/>

<https://www.rbkc.gov.uk/lscp/information-professionals-and-volunteers/useful-safeguarding-contacts-professionals>

**Elaine Campbell Bi-Borough Safeguarding Lead for Schools and Education**

1. Tel: 020 7361 3000 / Mobile: 07712 236 508
2. Email: [elaine.campbell@rbkc.gov.uk](mailto:elaine.campbell@rbkc.gov.uk)

**Kensington and Chelsea**

**Please contact duty LADO for consultations and referrals**

- 1 Telephone: 020 7361 2120
- 2 Email: [KCLADO.Enquiries@rbkc.gov.uk](mailto:KCLADO.Enquiries@rbkc.gov.uk)

#### **Marymount**

**Kingston and Richmond Safeguarding Children Partnership**

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/contact-krscp/>

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/worried-about-a-child-or-an-adult/>

- 8am – 5pm Monday to Friday 020 8547 5008
- Out of hours 020 8770 5000

- Make a referral online <https://afc-self.achieveservice.com/service/SPA> [Online Referral](#)

## **LADO**

<https://kingstonandrichmondsafeguardingchildrenpartnership.org.uk/resources-for-children-parents-and-carers/allegations-against-an-adult-working-or-volunteering-with-children/>

- Telephone: 07774 332675
- Online: [Submit LADO referral form](#)

## **Shrewsbury**

**Shropshire Safeguarding Children Board:** speak to First Point of Contact (FPOC) 0345 678 9021.  
For out of hours contact the [Emergency Social Work Team](#) on 0345 678 9040 selecting option 1

<http://www.shropshire.gov.uk/the-send-local-offer/social-care/childrens-social-care/safeguarding>

## **LADO**

Phone: 0345 678 9021

## **Winchester**

Hampshire County Council Children's Services:  
0300 555 1384

Monday to Thursday 8.30am to 5pm  
Friday 8.30am to 4.30pm

24 hours - 0300 555 1373

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/contacts>

## **LADO**

Report concerns online

<https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/allegations>

## Appendix 2:

### Contact details for host centre DSLs

#### **Benenden School**

DSL mobile: 07780 923413

**Designated Safeguarding Lead**, Anne Wakefield, Deputy Head Boarding and Pastoral Care 01580 236973

**Deputy Designated Safeguarding Lead**, Steve Miller, First Deputy 01580 236718

**Deputy Designated Safeguarding Lead**, Lucy Lynch, Assistant Head Boarding 01580 236828

**Deputy Designated Safeguarding Lead**, Kate Dobson, Housemistress 01580 236682

#### **Collingham**

##### **Designated Safeguarding Lead (DSL) and Prevent Officer for the College**

James Alder, Principal, is the Designated Safeguarding Lead (DSL) for the whole college

Contact details: telephone: 020 7244 7414; 07393 584162 (Twenty Four Hours) Email:

[james.alder@collingham.co.uk](mailto:james.alder@collingham.co.uk)

##### **Deputy Designated Safeguarding Lead (DDSL) and Deputy Prevent Officer for the College**

Kerim Aytac, Director of Studies, is a Deputy Designated Safeguarding Lead (DDSL) for the whole college.

Contact details: telephone: 020 7244 7414; Email: [kerim.aytac@collingham.co.uk](mailto:kerim.aytac@collingham.co.uk)

#### **Marymount School**

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

Ms Annah Langan (Deputy Head Pastoral)

020 8949 0571 x202 or 07557 271546 [langana@marymountlondon.com](mailto:langana@marymountlondon.com)

##### **Deputy Designated Safeguarding Officer**

Ms Paula Horton (Head of Boarding):

020 8949 0571 x268/242 [boardinghead@marymountlondon.com](mailto:boardinghead@marymountlondon.com)

#### **Shrewsbury School**

Shrewsbury School Trading Company (SSTC) Deputy Designated Safeguard Lead, Edward Moore

Tel 01743 280 628

Sports Facilities Management Team Tel 01743 280 625

[sstcsafeguarding@shrewsbury.org.uk](mailto:sstcsafeguarding@shrewsbury.org.uk)

#### **Winchester College**

[safeguarding@wincoll.ac.uk](mailto:safeguarding@wincoll.ac.uk)

DSL Office: 01962 621179

Duty Mobile: 07436 588321