



# Policies & Procedures



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## **1. Introduction**

Xkeys Ltd's Policies & Procedures are a guide to making our camps safe, compliant and organised. In the writing (and revision) of this document, guidance has been taken from a range of sources, most notably:

- Ofsted and other significant childcare organisations
- Relevant Local Authorities
- Acts of Parliament and Government Legislation
- The Health and Safety Executive

This document will be held in the main office and made available to parents / carers, staff, schools, instructors, Ofsted and anyone accessing our website.

All staff must read and be familiar with our Policies and follow our Procedures. Parents / carers will also be encouraged to read them. In this document 'parents / carers' refer to the camper's parents, carers or adults taking responsibly for campers in our care.

Other documents essential for the running of our camps include:

1. Policies & Procedures Operational Forms
2. Staff job descriptions, handbook and contracts
3. Staff system
4. Staff manuals & folders
5. Registers
6. Medical lists
7. Promotional Material (including [booking forms & terms and conditions](#))
8. Contracts with schools
9. Our Philosophy (on our [website](#))

If staff or parents / carers require further information on certain Policies and Procedures, they may contact our office or refer to the following websites:

1. Health and Safety can be found [here](#)
2. First aid at work can be found [here](#)
3. RIDDOR can be found [here](#)
4. COSHH – can be found [here](#)
5. Managing Health and Safety in pools can be found [here](#)
6. Manual Handling at Work can be found [here](#)
7. Noise at Work can be found [here](#)
8. Life-threatening Allergic Reactions can be found [here](#)
9. Safeguarding can be found [here](#)
10. General Fire Safety can be found [here](#)
11. Fire Safety in Schools can be found [here](#)

If staff or parents / carers require more information and we cannot help, we will signpost them to the corresponding local authority.

## **2. Our Aims and Objectives**

### **Values**

We are committed to providing outstanding childcare safely and compassionately.

### **Camps**

- Mini Minors & XUK Day enjoy days brim-full with activities for in the Easter and Summer holidays.
- XUK Activity provides an opportunity for campers to enjoy multi-activities in the beautiful English countryside
- XUK English enables international students aged to improve their English on a residential programme.
- XUK Excel provides an opportunity for campers aged to focus on their passions and hobbies.

### **Children**

Children are able to participate in challenging and enjoyable tasks within a safe, focused and relaxed environment. This is to be achieved by:

- Ensuring that staff are of a high quality and fulfil all our relevant criteria
- Developing an awareness of every child's individual needs
- Setting them achievable but challenging goals
- Ensuring that there is a variety of activities suitable for all children
- Encouraging children to be free thinking whilst ensuring that staff are always available to offer help and guidance.

### **Staff**

All staff must cultivate an atmosphere of trust, friendship and respect. They must be aware of and implement the camp's Policies and Procedures at all times. This is to be achieved by:

- Ensuring the health and safety of children at all times
- Full knowledge and implementation of all Policies and Procedures
- Awareness of every child's individual needs (social, medical, behavioural and educational)
- Working as a team
- Acting 'in loco parentis' during the time that campers are in our care.
- The Camp Manager will monitor each member of staff to assess training needs and future work for the company.

### **Our company (Xkeys Ltd)**

It is our aim to ensure that the aims and objectives for children and staff are fulfilled. In the main office, we strive to deal promptly and efficiently with all types of correspondence from clients and others whilst always promoting the cosy, friendly image we project through our camps. We will endeavour to develop and improve at every opportunity.

This will be achieved by:

- Talking to parents / carers and children
- Email links to our [website](#)
- Staff appraisals
- Suggestion box for the staff
- Comments book/sheets at the camp for parents / carers
- End of camp questionnaires
- Staying abreast of regulation and legislation.

### **3. Equality, Special Educational Needs and Disabilities (SEND)**

#### **POLICY**

All children, their families and our staff will be treated as individuals. We will endeavour to meet any specific needs, in accordance with Equality Act 2010, with regard to:

- age
- disability
- gender reassignment
- marriage or civil partnership (in employment only)
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation.

*For further reference visit: [Equality Act Guidance](#)*

We aim to create an inclusive environment, free from discrimination, harassment or victimisation, where all people are treated with dignity and respect. XUK aims to anticipate and respond positively to all person's needs so that everyone feels welcome, safe, valued and supported. No person will be treated less favourably than any other whether before, during or after their time at XUK.

#### **PROCEDURE**

##### **3.1. Statement of Intent**

We are committed to removing and countering discrimination in all aspects of our work and encouraging each child to develop their full potential whilst interacting and respecting each other's cultural and innate differences. We aim to maintain equal opportunities for all by ensuring that:

- We promote a greater awareness within the organisation of the needs of those experiencing discrimination and develop strategies to ensure that we are doing everything we can to meet those needs.
- **Campers**
  - Activities and equipment are appropriate to the children's needs. All books and other materials must show positive images of people of all races, cultures and abilities and avoid racial and gender stereotyping.
  - If someone wants to book our camps and does not have the means to pay they will be referred to the local council who have been made aware that we give a quota of places at each camp to those who cannot pay. We will coordinate this with the council and try and fit each parent / carer in.

- Children will be advised of our equal opportunities policy during their introduction to the camp in terms that they will understand.
- We encourage children to be individuals and help raise their sense of self-esteem through praise and being positive.
- Xkeys Ltd will endeavour to accommodate the needs of every individual so long as this does not jeopardise the safety and integrity of the whole camp. As such, in exceptional circumstances, it might be concluded that a child is unable to attend.
- **Staff**
  - We carry out reviews of our employment practices and procedures to identify potential areas of discrimination and to analyse and act on this information to bring about change.
  - All staff employed by the company read and work according to this Policies and Procedures document.
  - To ensure that we are compliant with all relevant Childcare, Early Years requirements and our own stringent safeguarding expectations, only 18 year olds and over will be consider for employment.

### 3.2. **Special Educational Needs & Disabilities (SEND)**

Every effort is made at our camps to accommodate children with special medical, educational and behavioural needs. We are committed to working with parents / carers and children to offer the support and help required to facilitate these special educational needs.

#### **Before Camp:**

- Xkeys Ltd must be notified in writing about all the child's medical or behavioural needs of which the parent / carer is aware. (There is a space on the booking form for this).
- Parents / carers may be contacted prior to the camp starting to discuss facilities and accessibility at the venue.
- Xkeys Ltd will assess whether the specific needs of children can be met before the start of the camp. If they cannot be fulfilled, the parents / carers will be informed. If the child needs to be withdrawn from the camp a full refund will be provided.
- Xkeys Ltd will not change nappies at camp. Campers must be **fully toilet trained** and out of nappies. While we would never discriminate against a child's needs, the environment at our day camps, which are hygienic and safe, do not facilitate a sensitive approach to meeting the needs of our children, should they require assistance in the changing of a nappy.



- Should a parent / carer be aware that their child will need such assistance we recommend that they do not attend our Day Camps.

### **During Camp:**

- Parents / carers, if circumstances permit, may be allowed to stay with their children if we cannot provide the specialist care that is required. In this event, a member of staff must accompany them at all times.
- A member of staff with the relevant experience will be appointed Special Educational Needs Co-ordinator (SENCO). The SENCO will be used to guide the setting in ensuring that all children receive the required appropriate guidance.
- Staff will be informed of the child's special educational needs in order to provide consistency of care.
  - Staff will deal privately and sensitively with children who have special needs.
- Staff will adapt or change activities to include all children.
- For the Procedures we will follow if a child requires medication during camp, refer to the '**Medication Brought to Camp**' section.

**If we have any concern about a child (such as learning difficulties or other special educational needs) and believe it is not being dealt with or is a matter that has not been noticed, we will contact the parent / carer to discuss our concerns.**

### **3.3. Gender & Biological Sex**

We will comply with the guidance provided in [The Equality Act 2010](#) and The [EHRC \(Equality and Human Rights Commission\)](#) regarding communal accommodation provision.

- Campers & Staff who identify or express their gender as contrary to their anatomical sexual classification (e.g. transgender, gender non-conforming or lived gender identity) should discuss their needs with Xkeys Ltd prior to enrolment and be aware of the following:
  - We will want to discuss which camp / facilities may be most suitable.
  - We will want to agree names and pronouns to ensure everyone is comfortable and welcome.
  - We will share information as we see fit.
  - Campers
    - will be accommodated in same biological sex dormitories or in single rooms located in same sex areas.

- will be asked to use bathroom and changing facilities corresponding to their biological sex, unless unisex or single facilities are available.
- Staff in the process of transitioning, or are gender fluid or non-binary, will be placed in a dorm according to birth sex and asked to use the matching facilities.

### 3.4. **Responsibility for Implementation**

Any incident involving prejudiced actions or comments will be addressed in the following ways:

- Prejudice actions such as (but not limited to) harassment, abuse & intolerance are unacceptable whether it is by staff, children, parents or third parties. All employees should be alert to and report any form of harassment.
- All involved parties must be supported and reassured. Under no circumstances must any action be taken that is meant to cause pain to or humiliate a child.
- The correct report form (eg: incident) must be completed in full.
- The Camp Manager will speak to all concerned parties
- The Camp Manager will follow the 'rules' and 'disciplinary procedures' to decide what we do. Serious cases will be shared with Directors.

## **4. Regulation and Inspection**

### **4.1. OFSTED**

We are registered with and inspected by the Office for Standards in Education (Ofsted). We must comply with the compulsory and voluntary parts of the Childcare Register. Where applicable we will also be guided by the Early Years Foundation Stage (EYFS) Statutory Framework.

If staff or parents / carers require further information they may contact our office or refer to the following links:

- [Statutory Framework for the Early Years Foundation Stage](#)
- [Childcare Registration Requirements](#)
- [Children Act Regulations](#)

## **5. COSHH**

### **POLICY**

COSHH stands for Control of Substances Hazardous to Health Regulations 2002.

We will follow all [COSHH](#) guidelines to ensure we are operating safely.

### **PROCEDURE**

Hazardous substances can cause serious illness or death if they are not controlled properly. Hazardous substances include:

- Oils
- Paints and adhesives
- Toxic fumes
- Toxic liquids
- Biological agents.

We will:

- Assess all risks to health arising from work
- Decide what precautions are needed
- Not carry out work which could expose employees and children to hazardous substances
- Prevent or control the exposure
- Ensure that all control measures are used and maintained properly. All safety Procedures in place should be followed
- Continue to monitor exposure to hazardous substances

If hazardous substances are found on the premises they must be disposed of appropriately, following manufacturer's guidelines. Materials for use by children must be non-toxic.

Further information on can be found on the Health and Safety Executive's [website](#).

## **6. RIDDOR**

### **What is RIDDOR?**

RIDDOR, the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 requires the reporting of work-related accidents, diseases and dangerous occurrences. It applies to all work activities, but not to all incidents.

### **Why should I report?**

Reporting accidents and ill health at work is a legal requirement.

The enforcing authorities can then help and advise on preventive action to reduce injury, ill health and accidental loss.

### **When do I need to act?**

We need to report:

- Deaths (including a result of physical violence, excluding suicides)
- Certain injuries (including a result of physical violence)
- Accidents resulting in an 'Over-seven-day incapacitation of a worker'. (An over-3-day injury must be recorded but not reported.)
- Accidents to members of the public or others who are not at work if they result in an injury and the person is taken directly from the scene of the accident to hospital for treatment to that injury
- Occupational diseases.

There is no need to report incidents where people are taken to hospital purely as a precaution when no injury is apparent.

This list is not exhaustive. Detailed information on what must be reported can be found on the Health and Safety Executive's [website](#).

### **Who should Submit Reports?**

Only 'responsible persons' including employers, the self-employed and people in control of work premises should submit reports under RIDDOR.

If a member of staff is concerned about Health and Safety at one of Xkeys Ltd's camps they can seek advice from the HSE's [website](#).

### **Who do I report to?**

We can report incidents by any of the following routes:

- **Online** – by completing the relevant form on the HSE's [website](#).
- **Telephone** – +44 (0) 333 202 5070

This service should only be used for reporting fatal and [specified incidents](#).

### **Keeping records**

Xkeys Ltd will keep records of any reportable injury, disease or dangerous occurrence. This must include the date and method of reporting; the date, time and place of the event, personal details of those involved and a brief description of the nature of the event or disease.

Telephone enquiries to HSE Advisory Team on 0300 003 1747 during office hours - 8.30 am to 5.00 pm, Monday to Friday.

Information can also be found on HSE's [website](#).

Email enquiries to HSE Information Centre: [hseinformationservices@natbrit.com](mailto:hseinformationservices@natbrit.com)

## **7. Information and Administration**

### **POLICY**

It is vital that we have relevant information about children attending our camps. This is for their safety as well as organisational and administrative purposes.

### **PROCEDURE**

Children cannot attend our camps if sufficient information has not been provided. Full payment must also have been received (unless other arrangements have been made).

All administration forms and records are to be kept on site. The Camp Manager and the management team oversee these records. It is their responsibility to make staff aware of their location and contents.

#### **The following information will be recorded for each child attending:**

- Their full name and address
- Their date of birth
- The name, address and contact numbers of their parent(s) or carer(s)
- The parent(s) and/or carer(s) the child normally lives with
- Information about any other person who has parental responsibility for the child
- Emergency contact names and numbers. Parents / carers must sign a declaration granting permission for their child to be taken to hospital in an emergency if they cannot be immediately contacted
- Medical problems and allergies. Including any medication that is administered
- Dietary needs
- Any other information that could enhance the child/ren's time at camp
- Parents / carers must agree to Xkeys Ltd's Terms and Conditions. Bookings taken over the telephone will be followed up by a confirmation email, which should be checked and agreed to. Failure to do so may result in a cancellation of the booking.

**The following administration will be kept on site:**

- Child registers to be taken every morning and afternoon, with the arrival and departure times to be noted
- The name, address and contact phone number of all staff on site as well as the company directors
- Staff must sign in and out with the arrival and departure times to be noted
- Accident and Incident report forms
- Details of the person / people collecting the child
- A list of emergency numbers including Fire Service, Police, Casualty, Ofsted, Local Safeguarding Children Partnerships, Local MASH/MAST (Multi-Agency Safeguarding Hub/Teams, and the LADO (Local Authority Designated Officer).

**The following records will be held for a minimum of 2 years:**

1. Application forms & Confirmation letters
2. Registers
3. Camp Medical Administration
4. Accident forms
5. Incident forms
6. Trip consent letters
7. Complaint Forms
8. Information that other organisations, e.g. the Inland Revenue, require us to keep.

There is no information held on site or written about a child that the parent / carer has not seen or cannot gain access to by calling, writing or emailing the Main Office.

**Data Protection Act 2018**

The company is registered under the [2018 Data Protection Act](#), which incorporates GDPR.

Our [Privacy Policy](#) describes further how and why we obtain, store and process data.



## **8. Parental Involvement**

### **POLICY**

A professional relationship needs to be forged between parents / carers and staff.

We are aware that parents and their children are our clients and we will do our utmost to please them. However, we will never compromise our rules and regulations. These are in place to protect children.

### **PROCEDURE**

- At our residential camps children are welcomed by staff and then advised of what will happen next.
- At the day camps, children are registered by the Leader Playworker or Playworker when they arrive. On their first day they may be given a name-label. The time of arrival and departure is also marked in the register.
- We will act 'in loco parentis' during the time that campers are in our care. This means we will make informed decisions about a camper's welfare during their stay. It is ultimately the responsibility of the parents to ensure that Xkeys Ltd is informed about all the needs of their children. This will ensure staff are able to care for and carry out their day-to-day responsibilities effectively.
- If visiting the site at any other time parents / carers / visitors must report to the office/Camp Manager and follow the procedure outlined in **Section 19: H&S: Security**
- In instances where parents are separated, both custodial and non-custodial parents have the right to visit, unless a court order is placed restricting such contact or accessibility. In this case, XKeys Ltd must be given evidence (eg: the court order) and cannot rely on the say so of one parent.
- Staff must make themselves available for communication with parents / carers. Staff must be receptive to parental concerns and be professional and confidential in their response.
- Parents / carers will be asked not to smoke on the premises.
- Dogs and other animals are not allowed on site. The Manager can make certain exceptions (eg: guide dogs, residential boarding family pets)
- If the camp is holding a presentation, play or open hour, then parents / carers may be invited to attend.

- Parents / carers should sign the booking form and/or follow the online confirmation procedure, thus agreeing to the Terms and Conditions; failure to do so may result in a cancellation of the booking.
- All information about a child is available for their parents / carers to view, otherwise it is treated in confidentiality.
- The company is registered under the 2018 Data Protection Act.
- Any forms signed by parents / carers (i.e. medical administration, accident reports etc.) are kept at the main office and can be accessed by parents / carers up to three years after the end of the camp. After this time, they may be destroyed.
- If staff are worried about a child's behaviour or development they should discuss the issue with their Age Group Manager (where appropriate) or Camp Manager who may consult the child's parents / carers.
- Parents / carers are encouraged to discuss any concerns they may have and the camp staff will consult with them to resolve any problems.
- Parents / carers will be made aware of any new developments within the camp either through formal correspondence from the camp or discussions with staff.
- Comments, suggestions and questions from parents / carers are welcome.

## **9. Staff Behaviour & Code of Conduct**

### **POLICY**

The purpose of this policy is to provide a Code of Conduct framework for safe, professional practice and effective partnerships between staff, children (anyone aged under 18) and parents / carers. Our staff team are ambassadors for Xkeys Ltd and we expect them to conduct themselves professionally at all times.

### **PROCEDURE**

#### **Professional Conduct**

- Staff should treat anyone attending our provisions courteously and with respect.
- We expect staff to value all the children as individuals and to comply with our Equality, Special Educational Needs and Disabilities (SEND) policy at all times.
- Swearing and abusive behaviour are not tolerated from anyone. If any member of staff exhibits such behaviour they will be subject to the disciplinary procedures.
- Drinking alcohol, smoking (including e-cigarettes/vaping) and taking recreational drugs are strictly forbidden.
- Staff must consistently act with honesty and integrity, ensuring the safety and welfare of children are accorded the highest priority.
- Staff should show fairness in their treatment of children and avoid behaviours such as embarrassing or humiliating them, making jokes at their expense, discrimination, favouritism and sarcasm.
- Staff must not use confidential or sensitive information about a child or their family for their own benefit, or to humiliate or embarrass a child.
- Information that might suggest that a child is in need or at risk of significant harm must be shared with the Designated Safeguarding Lead (DSL), in accordance with the safeguarding / child protection procedures. (Refer to **'Child Protection' policy** for further details).
- The Staff Disciplinary Sheet will be used by Camp Managers after a serious disciplinary breach.

#### **Standards of Dress**

Xkeys Ltd recognises that dress and appearance are matters of personal choice and self-expression. However, all staff must dress in a professional manner. Appropriate clothing and footwear should be chosen, taking into account comfort, health and safety, and practicality.

Please refer to the [Staff Handbook](#) for further details.

### **Camper / Staff Relations**

- Staff must maintain professional boundaries with campers, but due to the nature of our holiday provisions (at three of which, staff are acting 'in loco parentis'), children can feel affection towards them. To protect themselves:
  - Staff must maintain professional boundaries with children / parents / carers appropriate to their position and must always consider whether their actions are warranted, proportionate, safe and applied equitably
  - Staff should act in an open and transparent way that would not lead any reasonable person to question their actions or intent.
  - Staff should think carefully about their conduct so that misinterpretations are minimised.
- Staff must not develop personal or sexual relationships with campers (irrelevant of their age) and must not engage in any sexual activity with a camper.
- Any indications of a child's infatuation towards a member of staff, or another member of staff must be reported to the Designated Safeguarding Lead (DSL).
- Staff need to take care that they do not accept any gift/offer of hospitality that might be construed as a bribe by others, or lead the giver to expect preferential treatment. However, there may be occasions where campers or parents / carers wish to give a small token of appreciation to staff.
- Money must not be accepted as a gift. If in doubt whether to accept a gift, staff should speak to the camp manager.
- Further details can be found in our '**Safeguarding**' policy.

### **Physical Contact**

Please refer to the physical contact section of our '**How staff can safeguard themselves and each other**' and '**Physical Intervention & Restraint**' policies.

### **Phones and Cameras**

Details of our phones and camera policy can be found in the '**How staff can Safeguard themselves and each other**' policy.

### **Social Media & E-Safety**

Details of how staff can protect themselves when online can be found in our '**How staff can Safeguard themselves and each other**' policy.

### **One to One Interactions**

- Staff interacting with children on an individual basis should be aware of the potential vulnerability of all parties in such situations. Staff should always have regard to safety and professionalism.
- Where necessary, if one to one interaction is unavoidable staff must ensure the area is not isolated and has external viewing panels (e.g. glass paned door or windows).
- Where it is necessary to close doors for reasons of confidentiality / concentration, a colleague should be made aware of this and asked to remain vigilant.

## **10. An Introduction to Safeguarding at Xkeys Ltd**

Safeguarding and promoting the welfare of our children and staff will be at the centre of Xkeys Ltd's Policies and Procedures.

Xkeys Ltd fully recognises its responsibility and is committed to safeguarding children and staff, regardless of age, gender, race, culture or disability. We aim to make children happy and secure in their environment, so that they may develop socially, emotionally, intellectually and morally. The health, safety and well-being of all our staff are of paramount importance to that of all children.

At camp, we respect our children and the atmosphere is one that encourages and enables children to respect each other, keep them safe and do their best.

We recognise our responsibility for training and supporting staff to equip them with the tools to support children who are vulnerable and may be in need of safeguarding. Staff will be trained to recognise, respond, record, refer and reflect. Xkeys Ltd encourages 'professional curiosity' as a healthy way to keep our community safe.

We build relations with and follow the procedures set out by the local authorities in which our camps operate, taking into account guidance issued by the Department for Children, Schools and Families, in particular the most recent edition of ['Working Together to Safeguard Children'](#).

Xkeys Ltd's Safeguarding Policy will cover:

- Safer Recruitment
- Child Protection and the role our staff play
- Health and Safety
- Managing Behaviour

We will regularly review our Safeguarding Policy and comply with regulations and guidance by:

- Regularly reviewing regulatory updates from the authorities
- Attending crucial training from external providers
- Referring to Serious Case Reviews, experience and guidance from the authorities
- Annually updating our Policies and Procedures
- Implementing any new updates in staff training and development.

Positive relationships with relevant agencies have been built and we will always co-operate as required with their enquiries regarding child protection matters. This could include attending case conferences and the provision of relevant reports.

We will always strive to assist when children and families are seeking support and help under Common Assessment Framework (CAF) arrangements or under Children in Need planning.

## **11. Safeguarding: Promoting Mental & Physical Health and Emotional Wellbeing**

### **POLICY**

It is important for staff to be alert to signs that a child or adult might be suffering from mental health issues, for everyone to know there is support available and for the correct action to be taken when needed.

### **PROCEDURE**

Xkeys Ltd will endeavour to ensure all our staff are equipped with the necessary tools to provide support. This will include:

- Appropriate training
- Accessible information published in the staff rooms
- Clear channels of communication and responsibility
- Creating a comfortable environment in which individuals can discuss concerns

#### **If you have concerns about campers:**

- Listen to concerns
- Ask what help they need, if any
- Share information with the pastoral team / DSL
- Follow Xkeys Ltd's safeguarding procedures.

#### **If you have concerns about staff:**

- Listen to concerns
- Ask what help they need, if any, and if anyone else should be informed
- Follow Xkeys Ltd's safeguarding procedures.

#### **Useful support networks:**

- [Childline](#)
- [Mind](#)
- [NHS](#)
- [b-eat](#)
- [Stem4](#)
- [Helplines](#)

## **12. Safeguarding: Safer Recruitment**

### **POLICY**

Xkeys Ltd recognises our responsibility for hiring suitable staff, training and supporting them, thus equipping them to appropriately recognise, respond to and support children who are vulnerable and may be in need of safeguarding.

A consistent and thorough process of safer recruitment must be adopted to deter unsuitable individuals and attract the best possible candidates. It should include:

- Robust recruitment and selection processes
- Rigorous vetting and checking processes
- Strong induction, probation, appraisal and performance management systems including regular supervision and appraisals
- Creating a culture in which staff can voice concerns or challenge unsafe practice.

All staff must hold a valid Disclosure and Barring Service (DBS) check to work at our camps. If, in the rare occasion, a check has not been returned by the start of employment, a risk assessment will be carried out.

### **PROCEDURE**

Great care will be taken to ensure that all staff are of the highest quality. We look for the following attributes:

- Experience of working with children
- Kind, trustworthy, reliable, energetic and focused

To ensure a robust recruitment process the below steps will be taken:

- All **vacancies** and **job descriptions** advertised internally and externally will include a statement about our **commitment to safeguarding children** to deter unsuitable candidates.
- External agencies will be vetted to ensure suitability before vacancies are placed.
- Key staff will complete Safer Recruitment training.
- The mandatory **application forms** which are reviewed by the Company Director or Recruitment Manager include:
  - A declaration regarding suitability to work with children - this encompasses past criminal convictions
  - A section to confirm their eligibility to work in the United Kingdom
  - A request for qualification details which must be supported with original documents.

- Successful applicants will be invited to **interviews** overseen by the Company Directors and supported by senior members of staff. Applicants must bring original identification and letters documenting their proof of address.
- Successful candidates will receive an offer, pending a sufficient reply from two referees.
  - **References** from educational contacts may be accepted.
  - At least one referee must have a professional email address.
- The camp will ensure that staff identity checks are carried out, that DBS (Disclosure and Barring Service) checks have been completed as appropriate with the date recorded. Required qualifications for any post are recorded, alongside any professional registration details.
- Where required, all qualifications will be checked against the National College for Teaching and Leadership's criteria.
- A Contract, Staff Handbook and Job Description will be included with the job offer.

XUK's candidate **Assessment Criteria** is published on the [jobs section](#) of the website and is used during the entire recruitment process from application to job offer:

**Do you align with XUK's values and have what it takes? You...**

- have an awareness of safeguarding & will follow XUK's Policies & Procedures
- are passionate about working with children
- have the necessary experience and expertise
- are polite and friendly
- interact and communicate maturely, showing great teamwork
- deliver quality activities and show control
- show initiative and resilience
- have the ability to lead when appropriate

**It's also important you...**

- are eligible to work
- are available to work
- complete tasks correctly
- have knowledge of your selected role/s & the camp
- provide accurate and complete answers
- complete and submit paperwork efficiently
- select reliable and responsive referees
- are cleared to work by the DBS



## 12.1. **Staff Induction and Continued Supervision**

### **POLICY**

Safer Recruitment and continued supervision ensures best practice and should begin with applications and continue throughout successful applicants' employment.

### **PROCEDURE**

Following the recruitment process the key elements of supervision are coaching, training, personal development. Opportunities to meet at regular intervals to discuss and provide support are vital.

Our 'Staff System' is an in-depth guide to staff induction. It is kept in the main office. This document describes the whole procedure together with all the necessary forms required.

All staff will be required to adhere to our Policies and Procedures, their Contract, and their Job Description. They will also be required to attend a training day prior to the camp (in the case of half-term camps this will be refresher training on the first morning of the camp).

#### **During each training day:**

- Staff will have completed any compulsory online elements beforehand
- Staff will be introduced to the Management team and each other; the management structure will be outlined. The named Deputy (who will take over in an emergency) will be identified
- Staff will be introduced to the appropriately qualified Designated Safeguarding Lead (DSL). The DSL will have lead responsibility for all safeguarding issues. They will guide and support the staff. The Manager will usually take the role of the DSL. The DSL or their deputy will be available to all staff for the duration of camp.
- The DSL will hold an in-date (2 years old) Level 3 designated safeguarding certificate.
- Key employees will have completed Prevent training every 2 years.
- All employees will be made aware of how to ensure every child is safeguarded efficiently. This will also cover child protection. Further information can be found in the 'Child Protection' section of this document
- There will be a refresher about our camps, their objectives and their values
- There will be an introduction to the Policies and Procedures including Safeguarding, Health and Safety, and Emergency procedures
- Staff will be shown around the premises including indoor and outdoor activity areas, equipment stores and the location of fire exits and first aid equipment
- Details of Camp specific processes will be outlined including registration processes, timetables and activities
- Some activity orientation will also be given where appropriate.

At the end of the training day staff must sign the Training, Policies and Procedures form to say that they have understood the training and will adhere to the Policies and Procedures. They will be required to state the contact details of their next of kin on the Staff Register.

As per the [Childcare \(Disqualification\) Regulations](#) and the [EYFS Statutory Framework](#), should it come to our attention that a member of staff falls within the disqualification criteria we will liaise with Ofsted and/or the local relevant agencies to determine how we should proceed. Prior to the start of camp, staff are made aware of their obligation to disclose any relevant information throughout their employment.

Following a **thorough induction**, staff will receive regular '**refresher**' training, **observations** and **appraisals**.

We will aim to contact staff throughout the year should the opportunity for places on suitable training courses arise.

### **13. Safeguarding: Allegations against Xkeys Ltd Staff**

#### **POLICY**

A child, staff member or parent / carer may make an allegation against a member of staff. In order to minimise any risk of an allegation we will train and support staff to safeguard themselves.

#### **PROCEDURE**

- If an allegation against a member of staff is made, the member of staff being informed, or making the allegation, will immediately inform the Designated Safeguarding Lead who will complete a 'Record of an Allegation Made Against a Member of Staff' with their support.
- The manager must be alerted immediately and directly. At this point he/she will take over any investigation and others must follow instructions.
- If the allegation made to a member of staff concerns the DSL, the person receiving/making the allegation will immediately inform the Company Director, without notifying the involved individuals.
- The Company Director will follow the Local Authority procedures for managing allegations against staff. Staff can take complaints straight to the Local Authority Designated Officer if they cannot discuss the allegation with the DSL, Deputy or the Company Director.
- Allegations should be reported to Ofsted within one working day by the DSL or a Director.
- Other than discussing the incident with the authorities, witnesses and camp manager/directors the incident will be treated in confidence. The practitioner will always be notified that an allegation has been made about them.
- Suspension of the member of staff against whom an allegation has been made requires careful consideration, and we will consult the Local Authority Designated Safeguarding Officer in making this decision.
- Should we proceed with a staff dismissal (within the context of Safeguarding), or would have, had the person not left the setting first, we shall make a referral to the Disclosure and Barring Service, as per the Safeguarding Vulnerable Groups Act 2006.

Any child protection issues will be met with the utmost urgency and priority. However, it is vital we gather all the facts to avoid making rash decisions.

### 13.1. **How staff can safeguard themselves and each other**

A key element in training staff how to safeguard themselves is **prevention**, i.e. how they can prevent placing themselves in vulnerable positions and leaving themselves open to false or mistaken allegations. Xkeys Ltd encourages an environment of 'professional curiosity', which includes fostering an openly diligent staff community.

#### 13.1.1. **Grooming**

##### **POLICY**

We must ensure our staff understand the concept of child grooming within the context of the four categories of abuse (sexual, physical, neglect & emotional); i.e. the act of deliberately establishing a close and trusting personal relationship with the aim of abuse.

##### **PROCEDURE**

Staff must not:

- Spend any money on a child/group of children, or purchase gifts for them without the prior consent of the onsite manager
- Demonstrate any signs of favouritism towards an individual child
- Spend time alone with a child outside of working hours that they have met through employment with Xkeys Ltd. E.g. taking a child alone in their car.
- Engage with campers personally on social media and messaging platforms or other media sources.

We empower our staff to make the correct choices with in-depth safeguarding training. As an ongoing precaution we encourage 'whistle blowing', i.e. maintaining an open line of communication to eliminate any risk, and to ensure that a staff member's innocent actions cannot be misconstrued. Staff must act on any concerns by speaking to their DSL.

#### 13.1.2. **Cameras and Mobile Devices**

##### **POLICY**

We are aware mobile devices are ever present in our lives. We are aware of our responsibility regarding the use of cameras and mobile devices in relation to safeguarding children and staff.

##### **PROCEDURE**

To minimise risk to both children and staff mobile phones must be used with extreme caution. Staff must keep phone use to an absolute minimum during

time spent with children, with use for essential/emergency purposes only. Staff may, only with permission from the Camp Manager, take photographs of groups of children, strictly for use by the business only.

Permission is gained from all parents / carers on enrolment to camp granting us permission to take photographs of children for marketing and other business purposes. Xkeys's [Privacy Policy](#) outlines how and why we use personal data in accordance with GDPR and Data Protection regulations.

No member of staff other than the official camp photographer may ever take photographs in bedrooms, bathrooms, Health Coordinator's offices, sick bays, changing rooms and swimming pool areas. They must always be supervised.

Areas where cameras are prohibited will be clearly signposted for all including parents / carers, children and staff.

Images must be checked by a designated member of staff prior to any publication. Images will be deleted if deemed inappropriate. This includes, but is not limited to, name label identification, unsuitable dress and behaviour.

### **13.1.3.Physical Contact**

#### **POLICY**

This policy refers to 'positive' physical contact. For information on using physical contact as intervention and protection, please refer to our '**Physical Intervention & Restraint**' Policy.

We will provide a safe, friendly and welcoming environment which enhances the emotional wellbeing of all the children in our care, and so we encourage our staff to allow some physical contact with the children at our camps. This may especially occur on occasions when children are young, or distressed and require emotional support.

#### **PROCEDURE**

Xkeys Ltd staff are trained to follow a set of guideline behaviours when interacting with children:

- Physical contact should usually be child-initiated
- Physical contact should only take place when there are other staff/adult witnesses in the area
- Physical contact must never be secretive, for the gratification of the adult or represent a misuse of authority
- In the occasional situation where child is sitting on a staff member's knee, the staff member should position themselves so that the child is sitting at right-angles to the staff member (in a position that makes it harder to have contact with the adult's genitals)

- Side hugs are always preferable to front hugs, in order to minimise bodily contact
- If a child starts to initiate physical contact, staff should verbalise what they are doing to ensure understanding. For example, if a child is coming towards a staff member with arms open, the staff member would say 'you'd like to give me a hug?' This should be said loud enough for other staff nearby to hear
- Always ascertain the wishes and feelings of the child
- If a member of staff feels at all uncomfortable with giving physical contact, they should calmly and professionally remove themselves from the situation
- We promote children personally managing their own basic hygiene. Some younger children may lack confidence in successfully using the toilet. Staff will be trained in verbally and positively instructing children on hygienically using such facilities, though they will not be expected to physically intervene. We suggest that children are taught how to use the toilet prior to camp, and if unable to do so suggest the child attends an alternative setting where suitable ratios are maintained to allow for such assistance. We can advise and support parents / carers
- If a member of staff believes that an action could be misinterpreted, the incident and circumstances should be reported to the DSL
- Our training enables staff to use their initiative and professional experience to assess each individual situation they encounter and address the needs of the particular child.

#### **13.1.4.Social Media & E-Safety**

#### **POLICY**

Xkeys Ltd acknowledges that increasing numbers of children and staff are using the internet, social media and social networking sites regularly. Examples of social media are: Facebook, Twitter, YouTube, Instagram and Pinterest. This is in no way an exhaustive list and is merely a sample of social media available.

Xkeys Ltd and any individuals associated with us must use the internet responsibly.

#### **PROCEDURE**

Staff are made aware of the following:

- No member of staff should interact with a child who is attending/has attended/will attend one of our camps through social media / personal emails / texts in any way, except through the official company social media 'pages' and emails, which are managed and regulated by Xkeys Ltd Directors.
- Staff should remain mindful of their digital footprint and exercise caution in all their use of social media or any other web based presence they have. This includes written content, videos, gaming or photographs and views expressed either directly or by 'liking' certain pages or posts or following certain individuals or groups. Staff should exercise care when using dating websites where staff could encounter campers.
- Staff should set their social networking sites to the highest level of security and avoid placing personal details such as phone numbers and personal addresses on these sites.
- During camp, if asked by children about social networking staff should direct children towards the camp business social media pages.
- Staff are not to mention the company on Social Media outlets without explicit permission.

## **14. Safeguarding: Child Protection & Disclosures**

In order to protect children, it is crucial that we understand and recognise the signs of Child Abuse and Neglect. This generic term encompasses all ill treatment of children including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child's health or development. They may be abused by an adult or adults, or another child or children.

The 4 main categories of abuse are listed below:

- **Physical abuse**
- **Emotional abuse**
- **Sexual abuse (including Child sexual exploitation)**
- **Neglect**

For further information about these definitions and types, consult [Working Together to Safeguard Children 2018](#)

### **POLICY**

Staff must be equipped to appropriately recognise, respond to and support children who are vulnerable and/or may be in need of safeguarding. They must be mindful not to jump to conclusions too quickly, as there may be reasonable explanations.

### **PROCEDURE**

Staff will be thoroughly trained in recognising signs of abuse as well as how to proceed, including the correct paperwork to complete and who to speak to if any concerns arise. If a child is absent for more than three consecutive days, staff will inform their manager, who will decide how to proceed. We will always refer to government legalisation and guidance such as 'The Prevent Duty' and 'Working Together to Safeguard Children'. The following system is implemented at training:

- Recognise
- Respond
- Record
- Refer
- Reflect

Staff training will include signs of abuse & neglect and specific safeguarding issues such as;

- Bullying – including cyberbullying, racism, gender & child-on-child abuse, sexual harassment
- Domestic Abuse
- Honour Based Violence – including Female Genital Mutilation (FGM)\*



- Mental health
- Preventing radicalisation and extremism
- Impact of technology – including sexting, gaming & voyeurism (inc upskirting)
- Child criminal exploitation
- Poor parenting

Staff training will also cover, in detail, the steps and staff member should take in the event of a disclosure. This includes but is not limited to:

- Stay calm.
- Listen to and believe the child
- Maintain eye contact
- Do not ask leading questions
- Note the dialogue
- Clarify to make sure you have understood the child correctly
- Not ask to see a bruise/injury covered by clothes or take photos if visible
  
- Show the child that:
  - They are sorry it happened
  - It is not the child's fault
  - It is right to tell
  - Things like this happen to other children
  - Everything will be done to protect, help and support the child
  
- Never promise to keep the disclosure a secret
- Inform the child other adults will be informed. And that he/she will be asked to go over the facts again
- Give choices and let the child make some decisions, i.e. "Would you like to go in now?" & "Do you want to have a drink while we are waiting?"
- Always discuss what has happened with the DSL as soon as possible, who will take the issue further by contacting the Local Authorities/ Multi Agency Safeguarding Hub, and, if necessary, report to Ofsted. They will also follow advice by the relevant local authority if completion of the Common Assessment Framework (CAF) is required
- Write up a detailed objective account using a 'Logging a Concern' form at the earliest opportunity, at the latest this should be at the end of the day. The DSL can assist with completing the form. All accounts will be kept in the strictest confidence and when not being refereed to will be securely stored. All written records must be kept securely and separate from all other camp records, where possible this will be at our head office
- Look after the child while arrangements are being made
- Make the rest of the day as normal as possible for everyone concerned (i.e. the child, other children and you).
- Having followed XUK procedures, if staff are still worried about a child, they can contact the [NSPCC Whistleblowing Advice Line](#) by phone or email (see operational forms).

#### 14.1. **Preventing Radicalisation and Extremism**

##### **POLICY**

Protecting children from the risk of radicalisation and extremism is seen as part the XUK's wider safeguarding duties and is similar in nature to protecting campers from other forms of harm and abuse.

##### **PROCEDURE**

- Staff are encouraged to use their judgement in identifying campers who might be at risk of radicalisation and speak to the D/DSL if they are concerned. The D/DSL will always act proportionately, and this may include making a Prevent referral to the Channel support programme or to the MASH.
- Alongside our safeguarding risk assessment a preventing radicalisation and extremism assessment will be carried out before camp.
- All full-time staff will undertake regular Prevent awareness training.
- All seasonal staff will undertake safeguarding training, including preventing radicalisation and extremism.
- The DSL will refer to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme.

#### 14.2. **Campers who have been subjected to or witnessed abuse**

##### **POLICY**

Children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. Camp may be the only stable, secure and predictable element in the lives of children at risk. We will endeavour to support any child who has been subjected to or witnessed abuse.

##### **PROCEDURE**

A child who has been the victim of, or witnessed abuse, may demonstrate challenging, withdrawn and/or defiant behaviour.

Staff will endeavour to support the camper through:

- The variety of activities available-which strive to be inclusive and engaging
- The camp ethos which promotes a positive, supportive and secure environment and gives children a sense of being valued

- The camp's Managing Behaviour Policy which is aimed at supporting children at camp. The camp will ensure that the child knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred
- Liaising with other agencies that support the camper such as children's social care, Child and Adolescent Mental Health Service (CAMH), Primary health care services, Local Safeguarding Children Partnerships, Multi-Agency Safeguarding Hub (MASH), Multi Agency Support Team (MAST) and Educational Psychology Service. The local police may also be contacted.

#### 14.3. **Equipping children with the skills needed to keep them safe**

##### **POLICY**

Xkeys Ltd intends to provide environments where children can have fun and develop. To achieve this the children, need to feel safe and secure.

##### **PROCEDURE**

Staff will be advised on how to enable children to prosper in the camp environment. We will:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to. Examples of this are: meal and snack times, story-telling sessions, arrival and introduction times and reflective sessions at departure times.
- Ensure children know that there are adults at camp whom they can approach if they are worried.
- Aim to include opportunities in the timetable for children to develop the skills they need to recognise and stay safe from abuse. Examples of this are: story-telling, drama workshops and role play.

##### **Campers & E safety**

Whether for the purpose of social media, communication or research, the Internet is an essential resource. Unmediated internet access brings with it the possibility of placing children in embarrassing, inappropriate and even dangerous situations.

When running camps where Wi-Fi access is accessible, we will work closely with the schools to filter as much inappropriate content as is possible. At all settings, we will ensure that children know how to ask for help if they come across material that makes them feel uncomfortable.

### **Mobile Phones & Cameras at Day Camps**

To encourage a safer and healthier environment at our day camps, it is advised that children do not bring mobile phones or cameras with them. Any phones or cameras brought to camp will be stored in the Camp Office and returned to parents / carers at the end of the day. Parents will not be notified unless deemed necessary. Devices will be placed in a clearly named bag. Different rules apply for residential camps.

## **15. Health & Safety Introduction**

As well as selecting and training a strong staffing team, to optimise the campers experience we will input the following measures with the intention to prevent accidents and injuries.

Our Health & Safety Policies and Procedures are also intended to secure a safe working environment.

### **15.1. Staffing and Ratio Requirements**

#### **POLICY**

In order to create a safe environment for all, as well as ensuring we have suitable staff, the children must be adequately supervised.

#### **PROCEDURE**

Camps will be planned with an appropriate level of childcare ratios, where staff will be suitably qualified where required. We will always comply with guidelines outlined by the Childcare Register and the Early Years Foundation Stage Statutory Framework. We will always aim for a minimum staff to child ratio of:

- 1:8 for pre-reception\*
- At least 1:16 for reception and above.

\*Paragraph 3.31 of the EYFS framework, provides some flexibility, within reason, as follows, *'Exceptionally, and where the quality of care and security of children is maintained, changes to the ratios may be made.'*

Management are supernumerary to staff ratios.

We will refer to the [DfE's qualifications checklist](#) to ensure the early years criteria is met.

## **16. H & S: Premises - Initial Risk Assessment**

### **POLICY**

Our premises will always be in a safe and hygienic state to receive children. We will not use unsafe areas. We will do all we can to minimise risks.

### **PROCEDURE**

- There will be a general risk assessment of each site carried out by a Manager before the first children arrive.
- All findings of this assessment will be recorded, including any actions that were taken to remove or decrease risks.
- Staff will be informed of the relevant results of this assessment during the training day and will take them into account when moving around the school and planning their activities.
- Fixed hazards must be clearly marked as out of bounds. The staff must be informed of the location and nature of these hazards so they can inform the children in their care.
- Staff will be aware of rooms in the building not being used by the camp. Some will be clearly signed and kept out of bounds.
- All staff must familiarise themselves with the layout of the premises, the fire exits and alarm Procedures as appropriate. Time will be allocated for this during the staff induction day. There will also be time allocated an hour before the children arrive at the camp.

### 16.1. Safety Checking

- Inspections must be made at the beginning of each day to ensure that all areas are safe and secure and that all potential hazards are recognised and eliminated.
- Completing these checks shows that an activity area is safe for general use by staff and children.
- We have a **Safety First Poster** for all common areas such as dining areas, halls and toilets. This serves as a reminder for all staff to check constantly that key areas are safe and secure. They should be especially vigilant when checking that:
  - Doors and gates are closed
  - Ponds, drains, pools or any natural water are safe or inaccessible
  - Sharp objects or protrusions within reach of children are removed or protected
  - Potentially hazardous equipment is stored securely away from the reach of children
  - Tables are cleaned after an activity and before eating
  - Gas taps, electric points, (in areas where children aged three and four are active at the same height as the plug socket) and electric heaters must have guards or covers to protect children. **Paraffin heaters, fires and liquid petroleum gas heaters are not permitted.**
- Staff must always be responsive to any dangers found on the premises:
  - Staff must either remove any danger or inform the Camp Manager or caretaker immediately
  - If the danger is resulting from damage to premises or equipment, a maintenance report must be completed
  - Examples of such dangers include:  
leakages, unsteady tables and chairs, damaged power points, faulty floor, loose wires, broken/sharp edges, strangers, boiling water.
  - In the case of suspected explosive devices the emergency services must be contacted immediately and the premises evacuated.

## 16.2. **Activity & Equipment Risk Assessments**

### **POLICY**

The risk factor in all activities must be assessed and not go ahead if deemed unsafe.

### **PROCEDURES**

#### **Residential Camps**

Staff must carry out visual risk assessments for every activity they run.

For 'high risk' activities hard copied risk assessments will be made. Examples of such activities are:

- Those that take place in the swimming pool
- Air Rifles
- Fire Pit Activities
- Adventure Sports

#### **Day Camps**

Thorough, suitable and sufficient risk assessments must be completed for every activity. Refer to the Operational Forms to find the correct forms to use. Staff must:

1. Check that every activity is safe to partake in the area chosen or allocated (even though it has already been safety checked)
2. Identify further help needed to address any problems identified
3. Show the precautions taken to make sure the activity is safe.

**The 'Activity Safety & Quality Overview Form' will be used at all camps to monitor the activities taking place.**



## **17. H & S: Equipment**

### **POLICY**

Our equipment will be:

1. Looked after and replaced before it becomes a danger.
2. Appropriate to the age of the child using it.

### **PROCEDURE**

- All equipment must be suitable and safe for the purpose of use. If it is not, it must be removed with a maintenance report form filled out and handed to the manager or person in charge.
- Equipment must be correctly assembled, sited and inspected by staff before and during use.
- People responsible for ordering equipment must check that it is suitable for children and conforms to BS EN Safety Standards or the Toys (Safety) Regulations (2011).
- All equipment will be stored safely and appropriately. All potentially dangerous equipment will be kept in a locked store when it is not being used.

### 17.1. **Climbing frames and Outward Bound equipment**

#### **POLICY**

Some equipment is only suitable for use under adult supervision. Only sufficiently trained staff may supervise specialist equipment.

#### **PROCEDURE**

Any equipment used by a child that has been signed out of one of our day camps is done so at the risk of the person collecting them. Xkeys Ltd can take no responsibility for any accident or injury caused at this point.

#### **Information on Specialist Equipment**

- Climbing Frames and Traverse Walls:
  - Are out of bounds to children unless accompanied by an adult
  - Are to be treated with respect and appropriate ratios
  - Staff must be around the frame ensuring children are being sensible, not showing off and using equipment properly
  - Children misusing the equipment must not be allowed to use it
  - If it is wet staff/management will make a decision as to whether it is safe to use
  - At all times any specific school rules must be adhered to
  - Should never be used in a storm.
- Rules for the Climbing Wall, High and Low Ropes, Jacob's Ladder & Leap of Faith:
  - Children misusing the equipment must not be allowed to use it
  - The areas are out of bounds to children unless accompanied by an adult
  - If it is wet staff/management will make a decision as to whether it is safe to use
  - Only trained staff to instruct children
  - At least one member of staff on each section so all groups are supervised
  - A Walkie-talkie should always be situated in the outward bound area
  - Safety hats are always to be worn in the outward bound area
  - The equipment should never to be used in a storm.

## 17.2. **Drones**

### **POLICY**

Drones may be used from time to time, particularly to take pictures & videos of our camps in action. Only sufficiently trained and qualified staff may use this specialist equipment. See the section on cameras and mobile devices and our Privacy Policy regarding the use of images.

### **PROCEDURE**

Only designated staff will have access to the drone. They will hold a valid CAA (Civil Aviation Authority) issued 'Drone Pilot License'.

- They must pass a theory test to obtain a flyer ID
- The person responsible for the drone or model aircraft must register to obtain an operator ID.

Designated staff will follow the Drone and Model Aircraft Code & Air Navigation Order 2016, which provide guidance on flying safely and legally. This includes:

- Flying safely and responsibly
- Where you can fly
- Making every flight safe
- What to do before, during and after a flight
- Protecting people's privacy
- Making sure that you don't invade anyone's privacy when you're out flying.
- No drone will fly beyond the 400 feet height limit.
- No drone will fly in a controlled airspace or an Aerodrome Traffic Zone without air traffic control permission.

For further information, click here: [CAA Drone Advice](#)

## **18. H & S: Swimming**

### **Pool Safety Operating Procedures (PSOP)**

#### **Normal Operating Procedures (NOP)**

##### **Staff qualifications/training**

All lifeguards must hold a current RLSS National Pool Lifeguard qualification and teachers an STA or ASA Swimming Teacher qualification.

##### **Individual Pool Details:**

##### **XUK Residential Camps (Dauntsey's)**

Dauntsey's will provide lifeguards for XUK swim sessions and will follow the Dauntsey's [Normal and Emergency Operating Procedures](#).

##### **In addition:**

- XUK will comply at all times with the school's NOP & EOP.
- **The following also must be applied for water sport activities (eg: water polo, inflatables):**
  - Children must be strong swimmers (they must prove by means of a test that they can swim a length of the pool with ease)
  - Where appropriate safety equipment will be provided (i.e. buoyancy aids, armbands)
- A walkie-talkie must be taken to the swimming area before any pool session commences.
- The relevant XUK pool risk assessments are completed by XUK staff before every session.

##### **Swimwear (clothing)**

Camp is attended by children, teens and adults of all ages and XUK have a duty of care to all.

Appropriate swimwear must be worn. Swim suits must be suitable for active participation. Beach/fashion wear may not be suitable.

All pool users must bear in mind the safety of all. Staff will not allow campers to swim if their costumes / outfits are not deemed safe.

## **19. H & S: Security**

### **POLICY**

All persons on site during camp hours must be accounted for.

### **PROCEDURE**

Any adult who is not a parent, a member of staff or third party affiliated with the camp or school in which it is operating, will be approached. School staff will usually be responsible for monitoring parties on site not connected to the camps.

#### **Visitors**

The Directors / Camp Manager have the authority to determine which visits are permitted.

Xkeys Ltd reserves the right to refuse entry to any person, which we may have reasonable doubt of their identity.

Professionals and regular visitors must have submitted their DBS number and the date validity must be checked.

All visitors must report to the office / Camp Manager. They must:

- Complete the visitor's register
- Wear a visitor's lanyard at all times
- Be informed of key safeguarding and evacuation information
- Not enter rooms unless escorted by a member of staff or by prior arrangement.

#### **Day Camps**

- If staff do not recognise a person, they should challenge them and ask for identification.
- The Camp Manager and caretaker must be made aware of unauthorised people on the premises.
- If necessary, a member of staff or a security guard will be placed outside the building to ensure everyone who enters is authorised. This will be at the discretion of the manager if he/she believes that the particular site needs it.

#### **Residential Camps**

- If staff do not recognise a person, they must challenge them and ask for identification.

- The Camp Manager must be made aware of unauthorised people on the premises.
- Duty Staff will patrol and risk assess the school and grounds on a day-to-day basis.
  - It is the responsibility of these staff members to ensure that no unauthorised persons enter the school or the grounds, that people who have business with either the camp or the school are directed to the appropriate office, and that non-police checked people are always accompanied onsite.
  - It is also the Duty staff's responsibility to ensure that all the children are in the right place at the right time and accounted for and to alert the Camp Manager if in doubt.
  - After the children go to bed, duty staff patrol each area of the school to ensure all the children are safe and comfortable.

- Before s/he goes to bed a member of the management team will carry out a lock up. They will ensure all external doors are locked and that the building is secure. They will also check that the duty staff are in place and doing their jobs correctly.
- Once the lock up is complete, there will be a member of staff in bed in each area. At this point, a Manager will agree that the Duty staff may come off duty. Care of the children overnight is the responsibility of the pastoral leader who will be sleeping nearby.

#### 19.1. **Camp Collection**

##### **POLICY**

We need to work with parents / carers to ensure that collection time is as safe as possible. Each child should arrive and depart with someone nominated by the adult who made the booking, usually a parent / carer.

##### **PROCEDURE**

No camper under 8 will be allowed to leave by themselves. While we do not run open access provisions, if parents / carers of children aged 8 and over wish for them to leave the premises unaccompanied they must state this explicitly in writing (using our permission form). All correspondence of this nature must be hand signed and dated.

XKeys Ltd will only allow a responsible individual aged 16 years or over to pick up a camper under the age of 8.

Campers who are 8 or over can be picked up by a nominated person between ages 13 & 15 (inclusive), if we have received written consent from their carer / parent in advance.

To safeguard our campers no child will depart with an individual who has not been nominated by their parents / carers in advance of collection.

Should an unauthorised person arrive to collect a child, staff must notify their manager. Any person collecting a child may be asked to produce identification.

At **residential** camps a **Residential unplanned pick up form** will be completed if necessary and the office notified before a decision is made to release a child.

XKeys Ltd reserves the right not to release a camper to a person if we believe the child's safety is at risk.

#### 19.2. **Uncollected Child**

Parents are regularly encouraged to inform Xkeys Ltd of any changes in collection arrangements.

**If a child is not collected by fifteen minutes after the end of their day:**

- The Office Coordinator will check whether any relevant information is on file.
- Parents/carers will be contacted.
- Adults who are authorised by the parents to collect their child may also be contacted.
- All reasonable attempts are made to contact the parents or nominated carers.
- The child does not leave the premises unless an authorised adult arrives.

**If no-one collects the child after one hour and there is no-one who can be contacted to collect the child:**

- The Camp Manager will contact the local authority and a Director.
- The child will remain in the care of two staff members until safely collected either by the parents or by a Social Care worker.
- Social Care will aim to find the parent or relative. If they are unable to do so, the child will become looked after by the local authority.
- A full written report of the incident is recorded including all attempts to contact the parents / carers, and a log of all other calls and responses.
- Depending on circumstances, we reserve the right to charge parents for the additional hours worked by our staff.
- Ofsted should be informed.



## **20.H & S: Fire Drill/Emergency Evacuation**

### **POLICY**

The possibility of fire or another danger creates one of the main hazards in any building. In the event of a possible fire or other danger we will evacuate the building as quickly and calmly as possible. Our first priority will always be the safety of children and staff.

- We must appoint a competent person to carry out any preventive and protective measures required. A competent person is someone with enough training and experience or knowledge and other qualities to be able to implement these measures properly.
- We must provide employees with clear and relevant information on the risks to them identified by the fire risk assessment, about the measures we have taken to prevent fires, and how these measures will protect them if a fire breaks out.
- We must consult employees about nominating people to carry out particular roles in connection with fire safety and about proposals for improving the fire precautions.
- We must inform non-employees, such as residents, temporary or contract workers, of the relevant risks to them, and provide them with information about who are the nominated competent persons, and about the fire safety procedures for the premises.
- We must co-operate and co-ordinate with other responsible persons who also have premises in the building, inform them of any significant risks we find and how you will seek to reduce/control those risks which might affect the safety of their employees.
- We must provide the employer of any person from an outside organisation who is working in your premises (e.g. an agency providing temporary staff) with clear and relevant information on the risks to those employees and the preventive and protective measures taken. We must also provide those employees with appropriate instructions and relevant information about the risks to them.
- The manager of the site is responsible for ensuring that requirements are complied with on site.
- We must consider the presence of any dangerous substances and the risk this presents to relevant persons from fire.
- We must establish a suitable means of contacting the emergency services and provide them with any relevant information about dangerous substances.
- We must provide appropriate information, instruction and training to our employees, during their normal working hours, about the fire precautions in your workplace, when they start working for us, and from time to time throughout the period they work.
- We must ensure that the premises and any equipment provided in connection with firefighting, fire detection and warning, or emergency routes and exits are covered by a suitable system of maintenance and are maintained by a competent person in an efficient state, in efficient working order and in good repair.

- Our employees must co-operate with us to ensure the workplace is safe from fire and its effects, and must not do anything that will place themselves or other people at risk.

### **PROCEDURE**

There is a 5 step process in the risk assessment of fire. These are:

- Identify fire hazards
  - Identify people at risk
  - Evaluate, remove, reduce and protect from risk
  - Record, plan, inform, instruct and train
  - Review
- Each camp will have their own tailored procedure, of which everyone on site must be familiar.
  - Staff must be made aware of all fire drill Procedures and must familiarise themselves with the location of fire exits and the muster point during the induction day.
  - Children must be made aware of all fire drill Procedures and will be told the location of fire exits and muster points during their introduction to the camp.
  - A fire drill with the children should be carried out each week. The date and time of evacuation, together with a record of the length of time taken to evacuate the building should be recorded.
  - A review should be carried out following any evacuation. Any improvements identified should be communicated to staff and campers.
  - It is the school/facilities management's responsibility to ensure that a Fire Safety Officer regularly check all fire extinguishers, alarms and detectors.

### **Key On-Camp Instructions**

AS SOON AS YOU HEAR THE FIRE ALARM:

- KEEP CALM. DO NOT PANIC. GET THE CHILDREN INTO AN ORDERLY LINE AND CHECK THAT NO CHILDREN ARE LEFT BEHIND.
- TAKE THE CHILDREN IN AN ORDERLY LINE OUT OF THE CLASSROOM VIA THE NEAREST FIRE EXIT.
- TAKE NOTHING WITH YOU EXCEPT YOUR REGISTER.
- ASSEMBLE OUTSIDE AT THE MUSTER POINT.
- COUNT YOUR CHILDREN. YOU WILL BE ASKED FOR THE NUMBER.
- WAIT QUIETLY FOR FURTHER INSTRUCTIONS.
- FIRE EXITS MUST BE KEPT CLEAR AT ALL TIMES.

## **21. H & S: Lifting and Handling**

### **POLICY**

It is important for staff to employ good handling techniques to avoid the risk of injury in the workplace.

### **PROCEDURE**

Employees should not attempt to lift any load that they think could cause injury. All employees should be aware of the following good handling technique as recommended by the Health and Safety Executive:

- **Stop and think.** Use appropriate handling aids if possible. Do you need help with the load? Remove any obstructions and consider resting the load midway on a table or bench to adjust grip.
- **Position the feet apart,** giving a balanced and stable base for lifting. Your legs should be comfortable and if possible, pointing in the direction that you intend to go.
- **Adopt a good posture.** When lifting from a low level, bend the knees (do not over flex the knees). Keep the back straight, maintaining its natural curve. Keep the shoulders level and facing in the same direction as the hips.
- **Get a firm grip.** If you need to vary the grip as the lift proceeds, do it as smoothly as possible.
- **Don't jerk.** Lift smoothly, raising the chin as the lift begins, keeping control of the load.
- **Move the feet,** don't twist the trunk when turning to the side.
- **Put down, and then adjust.** If precise positioning of the load is necessary, put it down first, then slide it into the desired position.
- When stacking chairs or tables safely consideration must be taken.
- Chairs must be stacked no more than 5 high. Stacked tables must be secure.
- If possible, all stacked chairs and tables must be cordoned off.

## **22. H & S: First Aid, Sickness and Medication**

### **POLICY**

Good practice should reflect an awareness of the need to treat each child under our supervision with care and consideration.

### **PROCEDURE**

- Trained first aid personnel will be present at all times with a minimum ratio of one First Aider per one hundred children (in accordance with Health & Safety Executive guidelines).
- At least one member of staff with a Paediatric first aid certificate will be present and available at all times.
- Staff who are employed for more than a continuous 3 month period will hold an up-to-date Paediatric first aid qualification.
- Staff will be made aware of the qualified First Aiders on site.
- There shall be at least two First Aid kits on site at all times, depending on the size of the camp. They will be stocked according to [Health and Safety executive guidelines](#). Kits will not contain medication. All First Aid kits must be checked each week and the contents replaced regularly.
- One kit must be kept in the main office. Other First Aid kits must be kept in an accessible place out of children's reach. Sports groups and the quad bike tracks should carry an emergency first aid kit (including cold packs).
- All accidents must be recorded on an Accident Report form.
- First Aid materials must be taken on all trips and journeys.
- If a child obtains a serious injury whilst attending the camps he or she will be given emergency first aid whilst awaiting the arrival of an ambulance.
- In the event of an emergency follow emergency action and **RIDDOR** Policies (in this document).
- By booking with us, parents / carers consent for Xkeys Ltd staff to administer medication which includes but not limited to, sun cream, painkillers, insect repellents, antihistamines, skin healing cream, plasters, throat soothers, heat rub, ice spray, diarrhoea relief, anti-inflammatories and rehydration salts.
- All treatment and follow up from the Health Coordinator must be recorded directly on our database.

- Parents / carers will be requested to disclose any allergies or medical conditions that would prevent the administration of the above. Disclosure of this information is the parent's / carer's responsibility.

### **At the Day Camps**

- If a child feels unwell (e.g. head or stomach ache) their parents / carers or other available contacts will be called. The child will be removed from the class and will sit in the office under the supervision of the Health Coordinator until contact can be made.
- Sleeping children, in line with EYFS guidance, will be frequently checked by staff and the Health Coordinator informed.
- If a child develops serious symptoms an ambulance will be called, a Manager will accompany the child to hospital and the parents / carers will be notified.
- In addition to the stipulated first aid kits, liquid paracetamol and antihistamine will also be stocked and administered if required.

### **At the Residential Camp**

- The residential camp Health Coordinator / staff member overseeing first aid, will be in charge of all first aid, first aid paperwork and first aid kits.
- If a child is injured or unwell they will be cared for in the designated area, usually a sick bay.
- If necessary a child will be taken to a local Doctor or Hospital, a Health Coordinator / staff member overseeing first aid and/or the Camp Manager will accompany them and the parents / carers will be notified.

### **Medical Conditions**

- If a child has a medical condition their parent / carer will be asked to provide information about the condition at the time of booking, including symptoms, medication necessary and actions to be taken by staff. We then ask the parent / carer for further information when the child arrives at camp, if necessary.
- Campers with certain medical conditions (e.g. severe allergies, asthma, epilepsy) will be required to wear a coloured wrist band during their stay. These must not be removed whilst at camp and are there to help identify them in an emergency.
- Parents / carers are expected to disclose all medical information that may impact their child's experience.

- A camper might be withdrawn from camp if the correct and up-to-date medical information is not declared on the Health Form. This includes the correct and in-date medication (when applicable).

### **Allergies**

- Due to the locations and nature of our residential settings, we advise that children who have, or are suspected of having severe allergies to wasps, hornets and / bee's look into alternative provisions.

### **Recommended Contents for First Aid Kits**

- This list is based on [HSE recommended](#) contents for first aid kits.
- Each Health Team should be adequately equipped with all items listed.
- The Health Team should contact the Camp Manager for additional supplies.

<b>HSE Guidelines Essential Items</b>	<b>XUK Camps Additional Items</b>
Guidance Leaflet	EpiPen's 150mg (Emergency)
Disposable Gloves	EpiPen's 300mg (Emergency)
Moist Wipes	Inhalers (Emergency)
Sterile Plasters	Soiled items Bags
Sterile Eye Pads with Bandages	Bite/string Cream
Safety Pins	'I bumped my head' bands
Sterile Dressing with pad (Medium)	Cling film
Sterile Dressing with pad (Large)	Blue Plasters for Catering
Triangular Bandages	Biohazard Waste Kits
	Cool Packs (reusable)
	Saline eye wash
	Micropore Tape
	Gauze
	Bandages
	Sick Bags
	Sanitary Towels
	Spare medibands
	Steristrips
	Tweezers
	Thermometer (Electric)
	Thermometer covers

### **Emergency Action Plan/First Aid**

A first aid box containing basic equipment must be readily available to all staff but not accessible to children.

The First Aider or nominated person should keep prescribed medication and administrative details.

### **EMERGENCY ACTION**

The first priority is to save life, help recover and avoid complications.

1. Take charge, keep calm and get others to help.
2. Use the phone or walkie-talkie to contact the main office and ask them to call the appropriate emergency services and inform the patient's parent/carer.
3. Assess the situation. Do not put yourself in danger.
4. If several people are injured, then deal with those who will benefit most from treatment.
5. Commence with life threatening situations; start breathing, stop the bleeding, treat for shock, treat fracture injuries.
6. Do not move the victim unless imperative to safety.
7. Protect against the onset of exposure. Give reassurance until emergency services arrive.
8. Check the medical information sheet. If appropriate, administer prescribed medication.

**Where a major injury occurs it must be reported to the Environmental Health Department under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations (RIDDOR). Please see Policy for details.**



## 22.1. Medication brought to Camp

### POLICY

Parents/carers have prime responsibility for their child's health and wellbeing. This responsibility includes cooperating fully with Xkeys Ltd's medical procedures.

Detailed medical information (including Special Educational & Behavioural Needs) is required from all parents / carers of children attending any of our camps. It is the responsibility of the parents / carers to ensure that they disclose such details on the Health & Medication Form. Whether or not the camper should keep any medication on their person is at the Health Coordinator / Manager's discretion.

Staff members have prime responsibility for their own health, wellbeing & medication.

### PROCEDURE

Medication must be clearly labelled, not have expired and handed to staff on arrival. It will be made available when required and supported with the correct details/signed paperwork. Prescription medicines must not be administered unless they have been prescribed for a child by a doctor, dentist, nurse or pharmacist.

### Records

1. Written consent by the parent / carer **must** be obtained detailing;
  - a. **The name of the child**
  - b. **The name of the medicine**
  - c. **The dose and form of the medicine & how often it is given**
  - d. **Full administration instructions**
  - e. **The reason for administration**
  - f. **The duration and course of the medicine**
2. Parents / carers and staff must give all the information we require on the 'Health & Medication Form'
  - a. If, for whatever reason, a parent / carer does not have access to the form, they must complete the substitute medical administration form in these P & Ps.
3. All instructions must be clear and accurately indicate the quantity and regularity of each dose. This includes the correct dosage and administration information of emergency medication (e.g. adrenaline auto injectors).
4. Details on the label should correspond with the information on the written consent. If instructions are from a doctor and exceed the dose recommended on the packaging, we will ask parents / carers to confirm in writing their agreement to this dose being administered.

5. First aid personnel will assess if the medical needs of children can be met before the start of the camp. If the required medical responsibilities cannot be fulfilled, the parents / carers will be informed. If the child needs to be withdrawn from the camp a full refund will be given.
6. Any medication taken must be suitably recorded. A treatment log will also be kept to ensure thorough records and communication.
7. All records concerning medication are strictly confidential and shared only with the parent / carer, relevant staff & medics and regulatory inspection officers. These records will be kept in the main office for as long as is stated in our Privacy Policy.
8. Responsibility for administering medication lies with the Health Coordinator. We reserve the right to refuse to administer medication.
9. At Day Camp, parents who bring in any medication for their child must present it first to the office where it can be logged. All medication will be kept and administered in the office, unless it is required with the child (such as an epi pen or inhaler).
10. All medicines, must be stored away in a secure, private and clean place and away from sun and food. Unless required to be on their person (e.g. adrenaline auto injectors), all medicines must be kept out of the reach of children.
11. Staff must follow all of Xkeys Ltd's medical procedures. We strongly advise only bringing essential medication.
  - a. Staff must discuss their regular medication needs with the Health Coordinator.
  - b. 'As and When' medication (e.g paracetamol, anti-histamine) is the responsibility of the staff member to keep safe at all times. Only bring what you require.
    - i. Some common non-prescription medication may be available from the Health Coordinator, especially on residential sites.
  - c. Staff must never give their (or any) medication to campers.
  - d. Staff must sign the Medication Declaration Form.
12. If a medication requires specific training, staff should ask the child's parent / carer about suitable training as they may have health professionals they work with.
13. Medicines containing aspirin should only be given if prescribed by a doctor.
14. If a child brings medication to our day camps, it is the parent's / carer's responsibility to make sure it is taken home at the end of the day.
15. If parent / carers do not send medication we will not follow this up and it will be assumed the child does not need it.

## **Administration**

1. The Health & Medication Form must be consulted, and the label on the dispensed medicine to be checked to confirm that it corresponds to the information on the medical administration form.
2. Check the name of the child, ask, "What is your name?" do not ask "Are you \*\*\*?"
3. Offer the medicine to the child and give a drink of water if required. If more than one child has to receive a prescribed medication, only one medicine is to be administered at a time.
4. If for any reason the child is unable to take the medicine, or refuses the medicine the parent / carer should be contacted.
5. Medication administered will be appropriately logged to ensure thorough records and communication.
6. When administering medication staff must ensure that the child's privacy is respected at all times.

## 22.2. **Emergency Medication**

- Parents / carers must declare in advance of their child attending camp any emergency medication required (e.g. (adrenaline auto injector / epi pen / inhaler etc.). As stipulated above, this must be done on the specified medical form with all information honestly disclosed.
- Campers must bring two epi pens and/or two inhalers in accordance with UK and MHRA guidelines and our policies. This will enable us to provide suitable on the spot care in an emergency.
- Campers must bring their Action Plan or complete Xkey's proforma on arrival.
- For further information on UK and MHRA guidance on auto injector use, click here: [Auto injector guidance](#).
- For further information on Asthma UK guidance on inhaler use, click here: [Inhaler guidance](#).

### **At Day Camp:**

- Medication is kept with the camper's group at all times. Staff at day camps will, of course, help the younger campers with keeping them safe.

### **At Residential Camp:**

- Campers are expected to keep both doses of emergency medication with them at all times. Parents / carers therefore must be confident that the child is mature enough to do this. If they are not, they should not be attending XUK.
  - Campers should also bring a suitable carrier e.g. a container or a belt to camp. Both doses will also travel with the camper if they are off-site for an excursion or trip.
- If a child arrives at camp with only one dose of emergency medication parents / carers will be contacted immediately. If the second dose cannot be provided forthwith we will seek appropriate medical advice. We will be guided by healthcare professionals as to the best course of action to keep the child safe. We will use the Emergency Medication Waiver form when needed and on insistence from parent / carer.
- It is the parent / carer's responsibility to make sure the correct information has been disclosed and the correct medication is brought to camp. Admission to camp could be refused should a camper fail to bring the required emergency medication and/or correct dosage.

### 22.3. **On-site Emergency Auto Injector**

An auto injector will be available for emergency use at all our camps. It is intended to be used for children and staff, who:

- Have been diagnosed with allergens and risk factors for anaphylaxis and
- Have been prescribed an auto injector

**The emergency auto injector may only be used in circumstances such as when an injector has been misplaced, is out-of-date or malfunctions.**

All staff will be trained by the Health Coordinator to use an auto injector and will be made aware of its location on camp.

The Health Coordinator will also be responsible for the storage and care of the auto injector:

- They must ensure the dosage as per prescription is the same as our emergency dose: Usually the dosages are:
  - **Under 6 years:** a dose of 150 microgram (0.15 milligram) of adrenaline is used
  - **6-12 years:** a dose of 300 microgram (0.3 milligram) of adrenaline is used
  - **12+ years:** a dose of 300 or 500 microgram (Emerade 500) can be used.
- The auto injector is kept in a safe and suitable location, out of reach & sight of children
- It is stored at room temperature
- A replacement is obtained when expiry date approaches
- A replacement is available following use
- It must be disposed of according to manufacturer's guidelines

Further information from the government regarding the use of emergency auto injectors can be found here: [Emergency Auto Injector Use](#)

#### 22.4. **On-site Emergency Inhaler**

A salbutamol inhaler will be available for emergency use at all our camps. It is intended to be used for children and staff, who:

- Have been diagnosed with asthma
- Have been prescribed a reliever inhaler

It should not be used in response to other serious conditions/illnesses such as an allergic reaction, hyperventilation and choking, which can be mistaken for those of asthma, and the use of the emergency inhaler in such cases could lead to a delay in the child getting the treatment they need.

**The emergency inhaler may be used in circumstances such as when an inhaler has been misplaced, is out-of-date or malfunctions.**

All staff will be trained by the Health Coordinator to use the emergency inhaler and will be made aware of its location on camp.

The Health Coordinator will also be responsible for the storage and care of the inhaler. They must ensure:

- The inhaler (and spacer) is kept in a safe and suitable location, out of reach & sight of children
- The inhaler and spacer are in working order and stored below 30°C
- The inhaler has sufficient number of doses available
- A replacement inhaler is obtained when expiry date approaches
- A replacement spacer is available following use
- The plastic inhaler housing (which holds the canister) has been cleaned.

Further information from the government regarding the use of emergency inhalers can be found here: [Emergency Inhaler Use](#)

## 22.5. Infectious Diseases and Common Infections

### POLICY

We will strive to maintain high standards of personal hygiene, safe working practices and vigilance.

We will not accept children or staff on our camps if they will create a health risk to others.

### PROCEDURE

We will always refer to UK Health Security Agency '[Guidance on infection control in Schools and other childcare settings](#)'

It is the responsibility of parents / carers to assess their children's health prior to attending camp. Staff must do likewise.

**Children and staff are not permitted to attend camp if they are presenting with contagious conditions.**

Children and staff at camp presenting with infectious diseases or infections (e.g. Coronavirus, Measles, German Measles, Chicken Pox, Mumps, Whooping Cough and Meningitis) will be excluded from the camp in order to minimise risk to other children attending.

If any reportable disease is confirmed, it must be reported to the Health & Safety Executive under RIDDOR and Ofsted must be informed at the earliest possible moment.

See the RIDDOR section for further details on RIDDOR reporting Procedures and lists of reportable diseases and infections.

### Reducing disease / infections

We will endeavour to help minimise infection and spread of infection by encouraging:

- Hand washing
- Hand sanitiser use
- Ventilation in rooms where possible and practical
- Regular cleaning of surfaces

### Cleaning up body fluid spills

Body fluids, blood, faeces, vomit, saliva and nasal/eye discharges can contain infectious diseases such as HIV/AIDS and Hepatitis B & C.

- Spills of any such body fluids should be cleaned up immediately, ensuring there is no splashing into the eyes, nose or open cuts or sores.
- Disposable gloves **must** be worn.
- In most cases a biohazard disposal kit must be used to clean up.
- Staff will cover any open wounds when dealing with such spills.
- Affected surface to be cleaned thoroughly and disinfected.
- Fluid contaminated material to be placed in a plastic bag sealed and stored safely and appropriately, out of the reach of children, until collected by the appropriate agency or council.
- Blood spills are to be cleaned with the correct solution.

### **Specific Action**

In the event that an infectious disease is confirmed at any one of the camps the following action must be taken quickly and calmly:

- A thorough cleaning and disinfecting will be performed on all areas of contact (WCs, sinks etc.)
- Soiled linen or clothing will be disposed of as a universal precaution
- Any spills will be contained using guidance above
- The child will be isolated with an adult until arrangements are made for transfer home
- Remaining children and staff will be monitored for symptoms
- Staff off duty will be informed that they are expected to notify the Camp Manager/Health Coordinator/ staff member overseeing first aid of any symptoms.



## **Exclusion Periods For Common Infectious Diseases**

(With reference to [UK Security Health Agency](#))

### **Rashes and skin infections**

<b>Infection or complaint</b>	<b>Recommended period to be kept away from school, nursery or childminders</b>	<b>Comments</b>
Athlete's foot	None Athlete's foot is not a serious condition.	Treatment is recommended
Chickenpox	Until all vesicles have crusted over	See: Vulnerable Children and Female Staff – Pregnancy
Cold sores , (Herpes simplex)	None	Avoid kissing and contact with the sores. Cold sores are generally mild and self-limiting
German measles (rubella)*	Four days from onset of rash (as per "Green Book")	Preventable by immunisation (MMR x2 doses). See: Female Staff – Pregnancy
Hand, foot and mouth	None	Contact your local HPT if a large number of children are affected.
Impetigo	Until lesions are crusted and healed, or 48 hours after starting antibiotic treatment	Exclusion may be considered in some circumstances Antibiotic treatment speeds healing and reduces the infectious period
Measles*	Four days from onset of rash	Preventable by vaccination (MMR x2). See: Vulnerable Children and Female Staff – Pregnancy
Molluscum contagiosum	None	A self-limiting condition
Ringworm	Exclusion not usually required	Treatment is required
Roseola (infantum)	None	None
Scabies	Child can return after first treatment	Household and close contacts require treatment
Scarlet fever*	Child can return 24 hours after starting appropriate antibiotic treatment	
Slapped cheek/fifth disease/ Parvovirus B19	None (once rash has developed)	See: Vulnerable Children and Female Staff – Pregnancy
Shingles	Exclude only if rash is weeping and cannot be covered	Can cause chickenpox in those who are not immune, i.e. have not had chickenpox. It is spread by very close contact and touch. If further information is required, contact your local PHE centre. See: Vulnerable Children and Female Staff – Pregnancy
Warts and verrucae	None	Verrucae should be covered in swimming pools, gymnasiums and changing rooms

### **Diarrhoea and vomiting illness**

Diarrhoea and/or vomiting	48 hours from last episode of diarrhoea or vomiting	
E. coli O157 VTEC Typhoid* [and paratyphoid*] (enteric fever) Shigella (dysentery)	Should be excluded for 48 hours from the last episode of diarrhoea. Further exclusion may be required for some children until they are no longer excreting	Further exclusion is required for children aged five years or younger and those who have difficulty in adhering to hygiene practices. Children in these categories should be excluded until there is evidence of microbiological clearance. This guidance may also apply to some contacts who may also require microbiological clearance. Please consult your local PHE centre for further advice
Cryptosporidiosis	Exclude for 48 hours from the last episode of diarrhoea	Exclusion from swimming is advisable for two weeks after the diarrhoea has settled

### **Respiratory infections**

Coronavirus (Covid-19)	If you have symptoms such as a high temperature or do not feel well, try to stay at home and avoid contact with other people. If you have a positive COVID-19 test result, try to stay at home and avoid contact with other people for 5 days after the day you took your test. If a child or young person has a positive result they should try to stay at home and avoid contact with other people for 3 days after the day they took the test, if they can.	<a href="#">Further guidance.</a>
Flu (influenza)	Until recovered	See: Vulnerable Children
Tuberculosis*	Always consult your local PHE centre	Requires prolonged close contact for spread
Whooping cough* (pertussis)	Five days from starting antibiotic treatment, or 21 days from onset of illness if no antibiotic treatment	Preventable by vaccination. After treatment, non-infectious coughing may continue for many weeks. Your local PHE centre will organise any contact tracing necessary

### **Other infections**

Conjunctivitis	None	If an outbreak/cluster occurs, consult your local PHE centre
Diphtheria *	Exclusion is essential. Always consult with your local HPT	Family contacts must be excluded until cleared to return by your local PHE centre. Preventable by vaccination. Your local PHE centre will organise any contact tracing necessary
Glandular fever	None	
Head lice	None	Treatment is recommended only in cases where live lice have been seen

Hepatitis A*	Exclude until seven days after onset of jaundice (or seven days after symptom onset if no jaundice)	In an outbreak of hepatitis A, your local PHE centre will advise on control measures
Hepatitis B*, C*, HIV/AIDS	None	Hepatitis B and C and HIV are bloodborne viruses that are not infectious through casual contact. For cleaning of body fluid spills see: Good Hygiene Practice
Meningococcal meningitis*/septicaemia*	Until recovered	Meningitis C is preventable by vaccination. There is no reason to exclude siblings or other close contacts of a case. In case of an outbreak, it may be necessary to provide antibiotics with or without meningococcal vaccination to close school contacts. Your local PHE centre will advise on any action is needed
Meningitis* due to other bacteria	Until recovered	Hib and pneumococcal meningitis are preventable by vaccination. There is no reason to exclude siblings or other close contacts of a case. Your local PHE centre will give advice on any action needed
Meningitis viral*	None	Milder illness. There is no reason to exclude siblings and other close contacts of a case. Contact tracing is not required
MRSA	None	Good hygiene, in particular handwashing and environmental cleaning, are important to minimise any danger of spread. If further information is required, contact your local PHE centre
Mumps*	Exclude child for five days after onset of swelling	Preventable by vaccination (MMR x2 doses)
Threadworms	None	Treatment is recommended for the child and household contacts
Tonsillitis	None	There are many causes, but most cases are due to viruses and do not need an antibiotic

\* denotes a notifiable disease. Regulating bodies (RIDDOR and Office for Standards in Education (Ofsted))

## **23.H & S: Accidents and Emergencies**

### **POLICY**

All accidents and emergencies will be dealt with as a matter of importance and with the utmost care.

### **PROCEDURE**

We will record details of all accidents that occur; the staff member dealing with the accident, Health Coordinator, a Manager and the child's parent / carer will sign these records. We will notify the early year's inspector of any serious injury or death to any child in our care or adult on our premises.

We will report all incidents to the authorities as outlined by **RIDDOR** and **Ofsted**.

In the event of an emergency or due to unforeseen circumstances, an agreement stands between XUK Activity, XUK Excel and XUK English camps that children may be moved between sites for their own safety.

In case of an emergency staff will have access to various contact details. These will include:

1. Parent or Carer contact numbers
2. Ofsted
3. Local Safeguarding Team
4. Local Casualty, Police and Fire departments
5. RIDDOR.

#### **23.1. Minor Accidents**

- For minor accidents such as minor bruising or cuts, the First Aider will treat appropriately
- Only the Health Coordinator / staff member overseeing first aid will be permitted to medicate.
- All accidents and injuries must be recorded on an Accident Report on the same day it has occurred. It must be signed by:
  - The staff member who wrote the report
  - A manager
  - The parent / carer on day camps
  - A Health Coordinator / staff member overseeing first aid on Residential camps.
- It is essential to administer appropriate first aid and offer reassurance to the child and acknowledge their feelings.
- If an accident occurs that does not cause injury but could have done, an Incident Form must be filled in and appropriate action taken to ensure that it does not occur again.

### 23.2. **Major Accidents**

If a major accident occurs, the rest of the group will need some reassurance and a level of understanding of what has happened and that the child is being looked after. Some children may be distressed and need extra care. It is the responsibility of all staff to look out for this.

In the event of all major accidents and emergencies all staff must follow the emergency action plan.

- For a major accident such as a break, dislocation or severe cut, call the First Aider to assess the situation and apply the appropriate first aid and comfort the patient.
- The emergency services must be called immediately and the manager and a director informed.
- The child's parent / carer must be contacted and arrangements made, where possible, to meet them at hospital.
- At least one member of staff (preferably known to the child and with knowledge of the accident) must accompany the child to hospital with all the child's medical information (and Accident Report forms if ready) available on site and should remain there until the parent / carer arrives. This member of staff should hand over to the parent / carer and ensure they are ok before he/she leaves. Time, patience and care must be given to the parent / carer. For example, offering them a drink and showing reassurance will make them feel less stressed and able to cope with the situation better.
- All details of the accident must be fully logged on the Accident Report forms.
- Injuries as stipulated by 'Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013' (RIDDOR), must be reported. Information on how to report incidents can be found in our RIDDOR procedure.
- Where necessary Xkeys Ltd will inform Ofsted of serious accidents.
- It is important to follow up the injury by contacting the parent / carer to see how the child is. For example, a get well card and a phone call.
- After a major accident it is very important for us to review and assess:
  1. What happened
  2. How it happened
  3. Whether we could we have done anything to avoid it
  4. Whether the activity is safe.

### 23.3. **Firearms / Weapons Attack and Bomb Threats**

#### **POLICY**

The safety of staff, children, parents, carers and members of the public is paramount. We do not need to be alarmist or cause undue fear or anxiety, but rather raise awareness amongst all employees of the need to be proactive, prepared and understand our roles and responsibilities should a situation arise.

Xkeys Ltd recognises its responsibilities in protecting employees, service users and the public from the perceived or real threat of terrorism. Although it is highly unlikely that we would be a direct target of an organised attack, there have been well documented cases where public serving organisations have been subject to attacks.

Further information can be found at the National Counter Terrorism Security Office under Guidance: Recognising the Terrorist Threat. [Government Guidance](#)

#### **PROCEDURE**

##### **Communication**

In the event of an incident it is expected that the Camp Manager will take charge and make decisions based on the available information at the time. Staff should alert the Camp Manager to a threat as quickly as possible by using a walkie-talkie, mobile or, if quicker and safer, speaking to them in person. The emergency services (999) must be contacted immediately if the threat is perceived to be real. The Camp Manager is expected to inform a Company Director of the incident as soon as possible.

In the event of an incident occurring off site, such as an excursion, the agreed trip procedure should be followed by the member of staff in charge. A designated telephone number will be agreed upon prior to departure, which will be the main source of communication during an incident. In order to communicate effectively with key individuals, once the incident is confirmed, this number will be used, as much as is realistically possible, solely for communications in relation to the incident.

Parents, carers and other parties will be suitably informed once the nature of the incident and well-being of all individuals has been ascertained.

## **Firearms and Weapons Attack**

Firearms and weapons attacks are rare in the UK. The 'STAY SAFE' principles tell you some simple actions to consider at an incident and the information that armed officers may need in the event of a weapons or firearm attack:

### **Run**

- Escape if you can
- Consider the safest options
- Is there a safe route? RUN. If not then HIDE
- Can you get there without exposing yourself to greater danger?
- Insist others leave with you
- Leave belongings behind

### **Hide**

- If you cannot RUN, HIDE
- Find cover from gunfire
- If you can see the attacker, they may be able to see you
- Cover from view does not mean you are safe, bullets go through glass, brick, wood and metal
- Find cover from gunfire e.g. substantial brickwork / heavy reinforced walls
- Be aware of your exits
- Try not to get trapped
- Be quiet, silence your phone and turn off vibrate
- Lock / barricade yourself in
- Move away from the door

### **Tell**

Call 999 - What do the police need to know? If you cannot speak or make a noise listen to the instructions given to you by the call taker.

- Location - Where are the suspects?
- Direction - Where did you last see the suspects?
- Descriptions – Describe the attacker, numbers, features, clothing, weapons etc.
- Further information – Casualties, type of injury, building information, entrances, exits, hostages etc.
- Stop other people entering the building if it is safe to do so

### **Armed Police Response**

- Follow officers instructions
- Remain calm
- Can you move to a safer area?
- Avoid sudden movements that may be considered a threat
- Keep your hands in view

### **Officers May**

- Point guns at you
- Treat you firmly
- Question you
- Be unable to distinguish you from the attacker
- Officers will evacuate you when it is safe to do so

### **You must STAY SAFE**

- What are your plans if there were an incident?
- What are the local plans? e.g. personal emergency evacuation plan

## **Bomb Threat**

### **Dealing with Suspect Packages**

A suspect package can be left anywhere by anyone, and can have any appearance. It should not be handled, moved or tampered with in any way. If you are in any doubt about a package, leave it alone and report it immediately to the Camp Manager.

Possible indications of a suspect package may include:

- Protruding wires
- Noise or smoke from the package
- Grease marks on the wrapping
- A letter that is unusually thick (or 5mm), excessively heavy, lop-sided or stiffened
- An inner envelope which is tightly taped or bound.

If a suspect package is found, the area around it must be kept clear of people until the package has been made safe by the relevant authorities.

### **Bomb Threat by Telephone**

Most bomb threats are made over the phone and the overwhelming majority are hoaxes, made with the intent of causing alarm and disruption. Any hoax is a crime and, no matter how ridiculous or unconvincing, must be reported to the police.

In the event of a bomb threat, the person who received the threat must complete the form – **‘Actions to be taken on receipt of a bomb threat’**. This checklist is designed to help staff deal with a telephone threat and to record vital information for the emergency services.

Immediately after the call, phone 999 to report it to the police. If the caller informs you that the bomb is in your building, report it to the Camp Manager, who will instigate the evacuation procedure.



## 23.4. Emergency Lockdown

### Policy

It is impossible to plan for every eventuality and in a real emergency events can happen very quickly. Xkeys Ltd recognises the need to react to potential situations in which we might apply a lockdown procedure. This might be in response to:

- A hostile intruder
- An attempted abduction
- A major incident in the immediate vicinity
- Out of control animals

### Procedure

The nature of the service we provide with a regular turnover of children and staff means our procedure needs to be flexible but straightforward.

Whatever the nature of the threat, we will follow the same principle across our camps:

**RUN** to a place of safety  
**HIDE** It's better to hide than to confront  
**TELL** the police by calling 999

- Raise the alarm and use the walkie talkies to communicate
- The Camp Manager should take the decision-making lead where possible
- Get all children and staff to a place of safety without delay
- If circumstances dictate, try to isolate yourselves from the problem
  - Secure all external doors and windows as is reasonably practical
  - Keep the children quiet, away from windows and doors and out of the line of sight
  - Keep phones on silent or vibrate
- Alert the emergency services at the earliest opportunity
- The Camp Manager should alert the Directors when safe to do so.

## **24. H & S: Hygiene**

### **POLICY**

Our premises and equipment must be kept in a clean and hygienic condition at all times. It is the responsibility of all staff to maintain high standards of hygiene in all areas.

### **PROCEDURE**

As the provider, we will ensure that children have access to adequate toilets and hand basins.

Staff must ensure that:

- They promote good practices (including hand washing & oral health)
- Children wash their hands after using the toilet
- Children wash their hands before and after eating snacks/lunches
- Tables are cleaned after an activity and/or before eating snacks/lunch
- Equipment is washed before a camp starts.

All areas we use will be:

- Checked for hygiene and cleanliness before the camp starts
- Swept every day
- Thoroughly cleaned at the end of each week

All toilets will be checked at the beginning, middle and end of each day for:

- Cleanliness and Hygiene
- Stocks of toilet paper
- Stocks of paper towels
- Stocks of soap.

## **25.H & S: Sun Exposure & Sun Cream**

### **POLICY**

There is increasing evidence that excessive sun exposure and particularly sunburn under the age of 15 can cause skin cancer in later life. In addition, excessive heat exposure can cause thermal stress such as heatstroke and/or dehydration.

We acknowledge the risks of the sun and will do our best to minimise the effects on the children under our care.

### **PROCEDURE**

It is important to ensure that children and staff take the following precautions:

- Where possible keep out of the sun when it is at its strongest
- Use the shade of trees and buildings
- **Cover up.** Parents / carers must be reminded to dress their children appropriately. Children should be kept out of the midday sun if possible, long sleeves are preferable and hats are essential for children taking part in outdoor activities (these should be provided by the parents / carers)
- We advise all children to wear hats or caps (with peaks) when exposed to the sun
- Ensure drinking water is readily available to children on a regular basis
- The Camp will provide a high factor sun cream at camp that is suitable for use on children. Parents / carers have, by sending their child to camp – see terms and conditions - agreed that we can administer this. It is the parent's responsibility to notify us about allergens that may cause an allergic reaction in their children.

### **Sun Cream Application**

- Parents / carers have signed our terms and conditions, which give permission for us to apply sun cream unless, otherwise stated.
- Staff members can assist younger children to apply sun cream in the presence of at least one other member of staff.
- Children who are able to apply their own sun cream, may do so but must be reminded to do so by our staff.

## **26. H & S: Travel Safety, Trips & Excursions**

### **POLICY**

When taking groups out on trips or transport we will:

1. Minimise risks for children on the trips
2. Do our best to minimise the impact from our children on the general public
3. Visit the site prior to the trip to conduct a Risk Assessment and assess it for suitability
4. Ensure that we are as well prepared as possible in case of an emergency.

### **PROCEDURE**

- Permission **must** be obtained from parents / carers before taking children out on excursions.
- All mini buses and coaches **must** have seat belts fitted. Staff must take responsibility for adjusting seat belts to fit the children in their care.
- First Aid materials must be taken on all trips and journeys.
- A powder fire extinguisher must be present on all coaches in use. This is the driver's responsibility.
- Ensure that children are supervised when boarding or leaving the bus. Never allow passengers to board/leave until the bus is at a complete standstill.
- There will be a designated Coach Leader on all journeys.
  - They will complete the Trip Risk Assessment the day before departure.
- Child ratios, outlined by the Childcare Register and the Early Years Foundation Stage Statutory Framework, will always be maintained.
- At least one member of staff must sit next to each exit/door during journeys.
- Staff must not allow boisterous activities and noise levels should be kept low.
- Adequate supplies of water must be taken on the trip. If possible, food will also be included in case of a vehicle or group becoming stranded.
- There must be at least 3 copies of the lists of children and staff attending an organised excursion, including medical details:
  - Copy to be held in the main office at the camp
  - Copy on the coach (held by the coach leader)
  - Copy (the main operational) list held by the Camp Manager or person in charge of trip.

Further additional lists may be made depending on the size and number of separate groups.

- Staff will be informed of any behavioural or medical information affecting any camper in their group.
- Unless aged 16 or over and with explicit signed permission to do otherwise- all campers are required to be supervised at all times.
- All children are to be given a list of contact numbers, rendezvous times and places whenever they go on a trip. Contact numbers include Xkeys Ltd. head office details- this is included in case an emergency arises which prevents our staff in the locality from being contactable.
- A copy of this Policies and Procedures document will be taken on trips.
- Staff will be briefed on emergency Procedures should one arise while on a trip.
  - In the event of a terrorist related incident staff will be briefed on our emergency procedures as follows:
    - The '*Trip Terrorist Attack Guidance*' document is given to all our staff with each trip register. This follows the RUN, HIDE, TELL strategy from the government. It is a clear and detailed step by step guide of what to do in the awful event of an attack. Each staff member has a print out for every one of their trips.
    - Groups should stay together where possible and safe to do so
    - Run to a place of safety
    - If running is not an option, staff and campers should hide, and where possible barricade themselves in, making sure all phones are turned to silent with vibrate switched off.

*All above guidance has been advised by the UK National Counter Terrorism Security.*

- Additionally:
  - Parents / carers should keep phone lines free and refer to our social media pages for updates
  - Staff / campers should only attempt contact when it is safe to do so. At this point they must call the police (999), and also try and contact the camp office.

## **27.H & S: Missing Child**

### **POLICY**

We aim to prevent children getting lost but are prepared to act quickly and calmly in case of this happening.

### **PROCEDURE**

- If a child is reported lost, the manager must be informed.
- The member of staff noticing a child missing from the group should search carefully all the areas used by that group since the child was last seen to eliminate misunderstanding.
- If a child is seen leaving the site without permission, where suitable, a member of staff should apprehend the camper. The office should be contacted as soon as possible. If apprehending / pursuing the camper is worsening the situation, then contact the office immediately and take further instruction.
- All supernumerary staff must split up (organised by manager) to look in all areas for the child.
- If the child cannot be found all staff members must be alerted and:
  - Told to remain calm
  - Count their children
  - If appropriate, friends of the missing child should be asked if they know where he/she may be.
- If the child is still missing the parents / carers should be contacted and a Director. They will liaise regarding calling the police.
- If the child is not found after 15 minutes, the police should be contacted and their lead followed.

In all circumstances, if a child goes missing, for however long, an incident report must be written and if a member of staff is responsible they must be reprimanded.

## **28.H & S: Food**

### **28.1. Food provided by Parents / Carers**

#### **POLICY**

We aim to promote healthy eating at all of our camps though understand that, as we do not provide food at our day camps we cannot dictate what a parent / carer should pack. We aim to minimise risks from foods that cause a danger to children and store food in the most appropriate way possible.

#### **PROCEDURE**

- Lunches provided by parents / carers should be stored in a cool, dry and hygienic environment away from windows and eaten in a suitable place with chairs provided.
- All tables used for eating before lunch/snack/meals will be clean.
- We have a very strict no sharing policy. Children must only eat their own food. If they do not finish, it must go back into lunchbox unless staff feel it could go off, in which case it can be disposed of.
- The camp provides advice on preparation and storage of packed lunches for parents / carers, which is available [here](#).
  - [NHS Lunchbox ideas](#) has some great tips on lunch boxes for children.
  - The NHS offers great advice on [food hygiene](#).
- We ask all parents / carers in advance to tell us of their child's allergies.
- If there is a child with a specific allergy we will do our best to minimise any risk to her/him and will work with parents / carers and staff to make them as safe as possible.
- Our First Aider staff will be trained on allergies and anaphylaxis and we will make all our staff aware of dangers and signs of serious attack.

## 28.2. **Food provided by us (Residential only)**

### **POLICY**

On our residential camps we provide three meals per day for children. We also use food during some creative activities at our residential and day camps. We aim to ensure food is safe, healthy and nutritious for all children.

### **PROCEDURE**

- All food provided by our staff will be prepared in a hygienic environment and by a staff member who has been correctly trained.
- We will work with the school to ensure that the meals are varied, healthy and nutritious.
- If any children have specific dietary requirements, we will endeavour to work with the school to meet them.
- We will have fruit and drinks available for children to eat throughout the day.
- We will always obtain consent from parents / carers, if using food in any activity at day camps.
- It is the child's responsibility to select meals and food appropriate to their declared dietary needs.
- Parents / carers will be informed of any ingredients, including allergens that are in use at our day camps, before providing written consent. We will always display information regarding information on the below allergens:
  - Cereals containing gluten, namely: wheat (such as spelt and Khorasan wheat), rye, barley, oats
  - Crustaceans for example prawns, crabs, lobster, crayfish
  - Eggs
  - Fish
  - Peanuts
  - Soybeans
  - Milk
  - Tree Nuts; namely almonds, hazelnuts, walnuts, cashews, pecan nuts, Brazil nuts, pistachio nuts, macadamia (or Queensland) nuts
  - Celery (including celeriac)
  - Mustard
  - Sesame
  - Sulphur dioxide/sulphites, where added and at a level above 10mg/kg in the finished product. This can be used as a preservative in dried fruit
  - Lupin which includes lupin seeds and flour and can be found in types of bread, pastries and pasta
  - Molluscs like clams, mussels, whelks, oysters, snails and squid.

[Allergen list](#) from Foods Standards Agency.



## **29. Managing Behaviour**

### **POLICY**

Our Managing Behaviour Procedures are positive and transparent. The causes behind unacceptable behaviour will be sought and discussed with the child if possible. Our experience tells us that praise and approval encourage children to want to co-operate.

We expect all the children under our care to follow the XUK way:

1. Be kind and courteous to others
2. Not to shout at others or swear
3. Treat equipment and other people's belongings with care
4. Take part in the activities provided for them.

And NOT to:

5. Cause danger to anyone including himself or herself
6. Intentionally hit/kick/bite/scratch anyone else
7. Leave the group without asking/telling someone
8. Resort to any form of bullying:

### **PROCEDURE**

We will always endeavour to prevent behavioural issues.

Information on the XUK Way and rules are available to view on the website. Parents / carers will be signposted at the time of booking and advised that they should go through them with their child before they arrive.

#### **XUK Rules**

All parents and children are asked to read our rules before arriving at Camp. It is crucial that they understand XKeys Ltd's expectations before arrival and have signed the declaration to confirm this.

- The full rules for residential camp can be found [here](#)
- The full rules for day camp can be found [here](#)

#### **Declaring Behavioural Needs**

All parents are obliged to declare any behavioural needs of their children before the start of camp. XKeys Ltd will work with parents, staff and the children to cater for all needs. However, this will be done with an understanding that our rules apply to all campers, which are there to protect the safety and integrity of camp

#### **Joint Contract of Behaviour**

All children are involved in a joint verbal contract regarding behaviour at the start of camp. This will cover bullying and promote the ethos of 'telling' if *you* are being bullied, or you see *anyone else* being bullied. This conversation will also cover camp rules. Campers are encouraged to suggest rules and ideas they think will enhance their time with us.

### Circle Time / Group Discussions Throughout Camp

Staff can use group discussions to highlight issues to whole groups, without mentioning a specific person/incident. This will usually halt escalation of minor issues.

### Supervision

All adults employed by the company must lead by example to all.

Staff will never take **any action, physical or verbal**, that is likely to cause pain or humiliation to a child.

Information on physical intervention can be found in our **Physical Intervention & Restraint** policy.

## 29.1. Bullying

Children can often hide the effects of bullying from adults for fear of not being taken seriously or because of threats made by the bully. Our staff are trained to be aware of the key signs to identify bullying early enough to be able to help a child.

### POLICY

We view bullying seriously. The principal aim is to foster an atmosphere where bullying is discouraged and is seen to be inappropriate and wrong.

It is identified in three different forms:

- **Physical:** hitting, kicking and stealing from an individual
- **Verbal:** name-calling, insults, racist remarks
- **Indirect/emotional:** spreading nasty stories, excluding from groups.

The aims of this Policy are to:

1. Prevent bullying
2. Deal with bullying if it occurs
3. Build on the company's Behavioural Policy

### PROCEDURE

During discussions about rules, campers will be told that bullying is unacceptable.

Staff are trained to be alert to the key signs of bullying. As most bullying occurs at playtime or during 'free time', members of staff will make themselves available and act as a visible deterrent to a bully.

## **Key Signs of Bullying**

These are only initial signs and are not conclusive evidence of bullying:

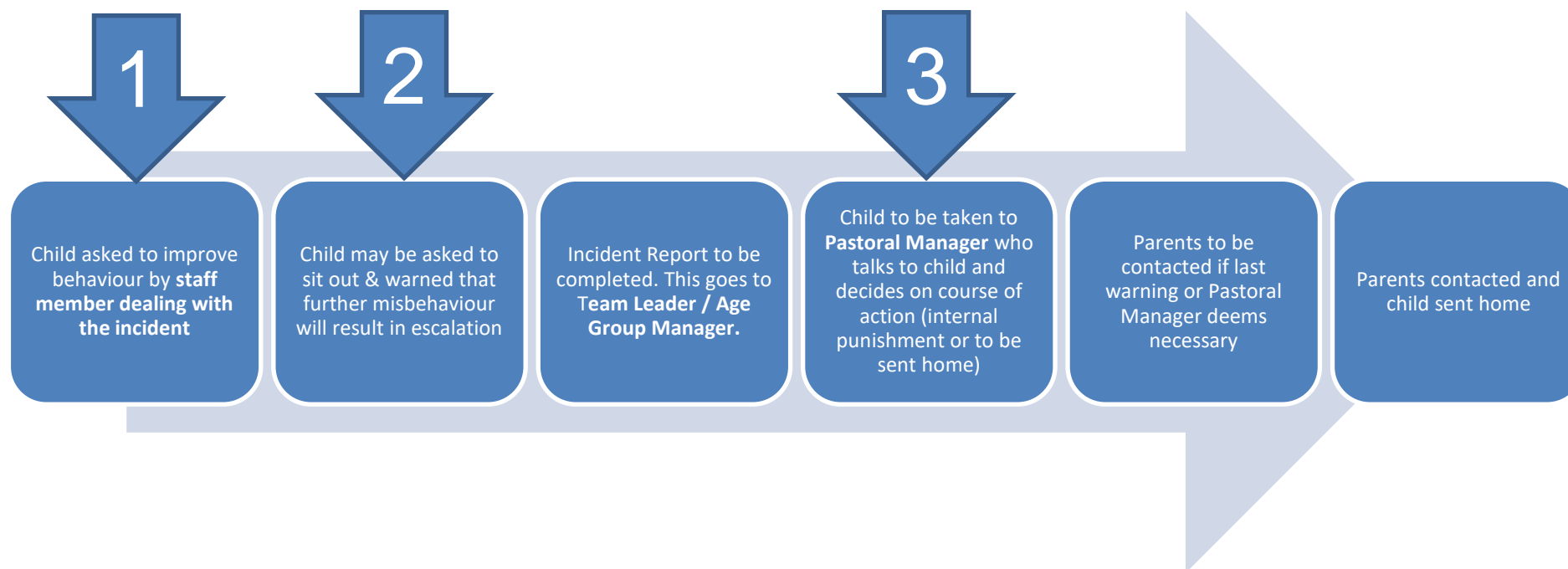
- Injury to child (e.g. cuts and bruises)
  - Damage to child's property (e.g. torn clothing, ripped work)
  - Abnormal behaviour
  - Unusual shyness or reticence
  - 'Clingy' behaviour towards adults
  - Moody/bad temper
  - Loss of money/property
  - Staff are not to see play-fighting or name-calling as 'a bit of fun' or 'part of growing up'
- 
- If staff identify a child who shows signs of being bullied, they will monitor the child, making sure that they are occupied and safe.
  - If a child reports that they suspect another child is being bullied, they must be listened to and praised for coming forward. Staff will discuss reasons for any concerns with line managers and where appropriate, the parent / carer.
  - Any incidents must be noted on an Incident Form.
  - Every allegation by a child is taken seriously. Staff must act responsibly.
  - If staff witness an incident of bullying, the following 'Discipline Steps' are to be followed.

### **29.2. Discipline Steps**

Staff will follow our 'Discipline steps' if a child: fails to adhere to [our rules](#).

On the following page are our discipline steps. It is important to note that this is only for reference and will not be used to label a child as behavioural patterns do change and every child is unique.

Staff must use a degree of common sense when dealing with discipline. In most cases when following the Procedure, staff will not reach the later steps. At all times staff must behave in a calm way and be as positive as possible to reach a sensible conclusion. Should a staff member be concerned about a child's behaviour, they should consult their line manager.



Depending on what a child has done they may enter the above disciplinary steps at different stages. Below are examples of different types of behaviour and where in the list they would enter:

- 1) Speaking out of turn, being mildly rude, late to an activity, untidy dormitory, forgetting manners
- 2) Being disrespectful, not listening
- 3) Putting themselves or others in danger, leaving site without permission, racist comment, vandalising equipment, stealing, sexual harassment

Please note that if certain camp rules are broken, campers could automatically be sent home. Company Directors will use their discretion as and when they see fit.

### 29.3. **Physical Intervention & Restraint**

#### **POLICY**

The use of physical intervention and restraint will only be used when required to minimise possible harm to a child. The intervention must be appropriate to the level of perceived risk and only last as long as is necessary.

#### **PROCEDURE**

In emergency situations, i.e. where a child is potentially at risk of causing harm to themselves or others, and is unresponsive to verbal instruction, physical restraint may be applied. The intervention must take place as an act of care with the intention of re-establishing verbal control as soon as possible and will also allow the child to regain self-control.

Corporal punishment (smacking, slapping or shaking) must **not** be used, and this will be emphasised in training. It is only permissible to take necessary physical action in an emergency to prevent personal injury to the child or others or serious damage to property.

Staff will always act in the best interests of the children. Any use of physical intervention should be reported to the Manager and the relevant report form completed without delay. Physical Intervention will be discussed during staff training.

### 29.4. **Non-Participation in an Activity**

#### **POLICY**

Children may decide they do not wish to take part in an activity. We cannot force children to participate, but we would always strive to encourage and help the child take part in the specific activity.

#### **PROCEDURE**

The following steps act as a guide:

- Staff will take a proactive role in encouraging the child to initially have a go at the activity
- Staff may, if possible, consider friendship groups, tailor elements of the session to the child's strengths and utilise staff expertise within the activity.
- If a child does not take part, they should be encouraged to participate in different ways such as scoring sporting games, helping with equipment and being an active spectator.

- A non-participator must not be allowed to use mobile devices, move away from the activity or disrupt the successful delivery of the activity.
- Only if the child becomes uncooperative should further action be taken in line with XUK's behaviour policy. It is at this stage that the Activity / Pastoral Manager may be asked to intervene.

## 29.5. **Personal Searches and Prohibited Items**

### **POLICY**

In order to safeguard the children and staff on all Xkeys' sites, we reserve the right to search bags and other personal property of all campers if we think your child has prohibited items, including:

1. Alcohol
2. Drugs (including prescription medication)
3. Sharp objects or weapons
4. Cigarettes (including E-cigarettes)
5. Matches/lighter
6. Stolen property
7. Food that may contain a danger to others at camp
8. Pornographic images (of any kind, eg tabloid topless pictures and 'lads' mags' as well as extreme adult material, on paper or electronically)
9. Fireworks
10. Condoms\*
11. Anything that has been, or is likely to be, used to cause injury or commit an offence
12. Anything banned in the camp / school rules.

### **PROCEDURE**

- Searches should be done in conjunction with our rules and with the backing of the Manager.
- There should normally be 2 members of staff present during the search - the person doing the search and the search witness.
- Searches should normally be done by someone the same sex as your child.
  - If there's a risk of serious harm to a person if the search is not conducted immediately, a child may be searched by a person of the opposite sex and without another member of staff present
- Children must not be asked to remove clothes, other than outer clothing like a coat.
- An Incident Report form must be filled in detailing the reasons for and the outcome of the search.
- Parents / carers will also have been made aware that any camper engaging in sexual activity will be automatically sent home. \*For this reason condoms are not allowed at camp.

### **30. Lost Property**

#### **POLICY**

Throughout each and every camp various items get left behind. We will strive to minimise lost property.

#### **PROCEDURE**

Throughout camps we make lost property available to parents / carers and children. It is the responsibility of the parents / carers / children to retrieve such items, unless an Xkeys staff member is at fault.

Lost property should be claimed and collected before the 31<sup>st</sup> August following camp. Any lost property remaining will be disposed of or given to charity.

It is the responsibility of the parent / carer or child to retrieve lost property. Xkeys Ltd will not usually make contact regarding lost property. Parents / carers will be asked to collect lost property from the office or be charged for postage.

To help alleviate issues, we advise that campers:

- Name all their clothes and other items
- Do not bring clothes that may become ruined if dirty
- Bring a packing list to residential camps
- Inform staff and check lost property regularly, if an item has been lost
- Are discouraged from bringing valuable items
  - Xkeys Ltd takes no responsibility for any items, unless they are removed from the possession of the child by a staff member

## **31. Residential Camps**

### **POLICY**

The Procedures for Residential Camps are to be applied alongside all other Policies in this document.

### **PROCEDURE**

#### **31.1. Sleeping and Hygiene**

We will provide a minimum of:

- One washbasin (with hot + cold water) and mirror for every 10 children
- One bath/shower (with hot + cold water) for every 15 children
- One WC for every 10 children in close proximity to sleeping area

Sleeping areas must be adequately lit. Each room should have at least one external window and a minimum of 75cm (30 inches) between each bed. Each bedroom will have opaque blinds, curtains or equivalent.

At our residential camps we particularly advise that a child should be able independently to look after their own personal hygiene (e.g. showering, toilet use and teeth brushing) to reduce the risk of illness to themselves and others.

If unable to do so Xkeys Ltd suggests the child attends an alternative setting where suitable ratios are maintained to allow for such assistance. We can advise and support parents / carers as appropriate.

#### **31.2. Clothing**

We recognise that dress and appearance are matters of personal choice and self-expression. Appropriate clothing and footwear should be chosen, taking into account comfort, health and safety, practicality and the expectations of the staff.

#### **31.3. Evening Close Down**

Duty staff will ensure specific areas and items are checked and safe at night when everyone is asleep. See on-site forms for the checklist.

#### **31.4. Portable Electrical Appliance Checks**

The 'Portable Electrical Appliance Safety Checklist' will be used to make sure equipment (e.g. chargers, hairdryers etc) is safe to use on site. See Operational Forms for the checklist.

#### **31.5. Valuables**

Any valuables brought to camp are brought at the owner's risk. Parents / carers receive our recommended kit list prior to camp starting.



We advise children not to bring mobile phones to camp and we will not accept responsibility for their loss.

If campers bring phones they must take care of them. XUK take no responsibility for loss or breakage of anyone's phones.

Pocket money is 'banked' with a member of staff who will store it in the safe. This will be made available to the children at set times during each day.

### 31.6. **Mobile Phones & Electronic Devices Use**

XUK Camps does not operate a 'no mobile phone or electronic devices policy', however we have rules about their usage:

- Mobile phones & electronic devices **must not** be used in the dining hall
  - Devices will be removed and placed in a secure box by duty staff, if deemed necessary
- Mobile phones & electronic devices **must not** be used in activities and lessons
  - Devices will be placed in designated boxes before the start of the activity and returned at the end
- Mobile phones & electronic devices **must not** be used for sexting, distributing indecent images, voyeurism or for online bullying in accordance with our safeguarding policies.
- Mobile phones & electronic devices should be used appropriately during night time with consideration given to other campers.
- Taking photographs/videos of other campers or team members may only be done with their prior permission.
- Campers must tell a member of staff if they have a problem rather than contacting Parents/Carers on their phones first. It allows us to hear about problems and promptly address them.
- XUK Camps will not be responsible, for any reason, for the loss or damage to electronic equipment which includes, but is not limited to: mobile phones, tablets, laptops, headphones, e-readers, wires and chargers.

**Campers who do not follow our Mobile Phone & Electronic Devices Policy may have their device confiscated. Parents / Carers will be notified if deemed appropriate.**

### 31.7. **Fire**

A Fire Drill will be carried out each week.

### 31.8. **Medication / Sickness**

There will be a qualified First Aider / Health Coordinator on site to facilitate the temporary care of sick children. Contact numbers for local doctors are available. In the event of an emergency either the First Aider or Camp Manager will transport the child to hospital.

### 31.9. **Security**

- Any person not authorised to be on the premises must be asked to leave immediately.
- The caretaker and Camp Manager must be made aware of unauthorised people on the premises.
- If necessary, a member of staff or Security Guard will be situated outside the building to ensure everyone on the premises is authorised to be there.

A member of school or XUK staff must always accompany on site any adult who has not been police-checked by the company (these may include: trades people, parents / carers, suppliers and entertainers).

All external doors will be locked. Staff will have access to keypad-coded doors.

Fire doors are to be used in an emergency and can be opened from the inside without the use of a key.

### 31.10. **Contact with Home**

We will try to ensure that children, especially younger children and those travelling from abroad, phone home within the first 48 hours of the camp to 'check in'.

We will limit the amount of times that each child phones home. This is to help children gain the most from their camp experience, to ensure that everyone is able to call home, and to keep the lines as free as possible for emergencies.

We will encourage children to write to parents / carers, family and friends.

Parents / carers will be given the address and e-mail address of the camp so they can write to their children. They will also be given the camp telephone number to use in an emergency.

If a child is feeling upset or homesick, for any reason, they must talk to their pastoral leader or another member of staff. If they would like to talk to somebody at home, and it is not too late, the staff member will accompany the child to the office where the Manager will call home to explain the situation and then let the child speak.

If a child is upset or homesick, experience has shown that phoning home often makes the situation worse. For this reason, it is avoided unless absolutely necessary.

**We have a full staff folder and training manual which details exactly how the residential camps are run and details some of the above.**

## **32. Early Years Foundation Stage**

### **POLICY**

When necessary we will be guided by the most recent [Early Years Foundation Stage \(EYFS\) Statutory Framework](#).

### **PROCEDURES**

To ensure that children attending our camps in their early years thrive through play, we will provide a rich and varied timetable, promoting British values. Where required, our resources and the timetable offered will be guided by the 7 areas of learning and development:

#### Prime Areas

1. Communication and language
2. Physical Development
3. Personal, social and emotional development

#### Specific Areas

4. Literacy
5. Mathematics
6. Understanding the world
7. Expressive arts and design

Our staff receive training during their induction on the implementation of the EYFS and best practice, with particular emphasis on the safeguarding and welfare requirements as well as attention given to the learning & development requirements.

Staff have a key role to play in all aspects of children's development and welfare. The Key Person, usually the Lead Playworker, will take overall responsibility to ensure an individual child's needs are met, including engaging with their parent / carer.

Parents / carers will be signposted to our 'Getting to know your Child' form, both online and at camp. Any provided information will assist our staff in understanding the needs and interests of each individual child.

The following documents help us comply with the EYFS:

- **Activity Plan & Risk Assessment**  
Ensuring effective, safe & reflective activity planning.
- **EYFS Early Learning Areas Checklist & Mini Minors Timetable**  
Ensuring activities incorporate the full range of Early Learning Areas.
- **Staff & Activity Observation sheet**  
Ensuring activities are reviewed to maintain high standards.
- **EYFS Child Observation & Development Sheet**  
Ensuring helpful feedback to given to parents / carers.

### **33.Complaints**

#### **POLICY**

All complaints will be treated seriously and in the strictest of confidence. All complaints will be documented.

#### **PROCEDURE**

##### **33.1. Parents / Carers**

- Complaints about the camp and staff should be made to the Camp Manager. This may initially be verbal and the Camp Manager will then provide a complaint form.
  - These will be attended to immediately and an acknowledgement that the complaint is being addressed will be forthcoming within 48 hours.
  - If the complaint is made in writing or electronically and is regarding one of Ofsted national standards we will investigate and then respond within 28 days in writing. This response will show our account of findings and any actions taken.
  - We should keep all written complaints and keep a summary of them. Parents / carers and Ofsted can have access to this.
- If the complaint is about a child protection/safeguarding issue, see our child protection Policy. We will treat this with the utmost importance and urgency
- If a complaint regarding one of our OFSTED regulated camps is not dealt with appropriately please do request the number and address of Ofsted. This will be provided to the parent / carer by the camp and also available on the [OFSTED website](#)

##### **33.2. Staff**

###### **Complaints about children:**

- These should be made to the Age Group Manager or Pastoral Manager.
- Depending on the seriousness of the complaint the child will be spoken to by the relevant manager.
- Failing this, the Camp Manager will be consulted and, if appropriate, the child's parent / carer may be called. (See Managing Behaviour Policy).

#### Complaints about other members of staff:

- These should be made to the Camp Manager. The Camp Manager will obtain the full details from the complaining party. The Camp Manager will then investigate the matter in detail and decide on appropriate action.
- If the complaint is about a child protection issue, please see our child protection Policy. We will treat this with the utmost importance and urgency.

#### Complaints about the Camp Manager:

- These should be made to a Company Director. The Company Director will obtain the full details from the complaining party. The Company Director will then investigate the matter in detail and decide on appropriate action.

**If these steps fail, then a complaint should be filed to Ofsted. You can find details [here](#).**

#### 33.3. Children

Children will be made aware of their right to complain or express their concerns during their introduction to the camp by the Camp Manager/Age Group Manager.

- Complaints about other children should be made in confidence to a member of staff. In this case an appropriate staff member will be asked to monitor the situation.
- Complaints about staff should be made to the Camp Manager. These will be treated very seriously and will be dealt with immediately by talking to the member of staff involved. The Camp Manager will continue to monitor and deal with the situation in the most appropriate way.
- If the complaint is about a child protection issue, please see our child protection Policy. We will treat this with the utmost importance and urgency
- If the complaint is of a serious nature, then the Camp Manager should consult a Director.

### **34. Operational Forms**

Xkeys Ltd's operational forms associated with this document are available from the office.

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