



Football Family Ltd: Safeguarding and Prevent Policy

Document Type	Revision No	Date Created	Renewed on	Approved By
Policy	005	18.08.2023	11/04/2024	Craig Parry

Contents

Important contacts.....	3
1. Introduction Positional Statement & Statement of Intent	4
2. Legislation and statutory guidance	6
3. Definitions.....	6
4. Prevent	7
5. Equality statement.....	9
6. Roles and Responsibilities.....	10
7. Confidentiality.....	11
8. Recognising abuse and taking action	18
9. Online safety and the use of mobile technology	19
10. Notifying parents and carers	19
11. Learners with special educational needs, disabilities or health issues	20
12. Learners with a social worker.....	19
13. Complaints and concerns.....	20
14. Record-keeping	20
15. Training	21
16. Monitoring arrangements	22
17. Links with other policies	22
Appendix 1: types of abuse.....	22
Appendix 2: safer recruitment and DBS checks – policy and procedures.....	24
Appendix 3: allegations of abuse made against staff	27
Appendix 4: specific safeguarding issues	34

Safeguarding and Prevent Protection Policy

Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Elizabeth Naylor	07424 474193 01709 763272 elizabeth.naylor@footballfamily.org.uk safeguarding@footballfamily.org.uk
Deputy DSL	Rachel Lappage	07424 474193 01709 763272 rachel.lappage@footballfamily.org.uk safeguarding@footballfamily.org.uk
Director	Craig Parry	07387 392639 craig.parry@footballfamily.org.uk
Channel helpline		020 7340 7264

1 Introduction

This policy aims to set out Football Family's position regarding the safeguarding of children and adults, this has been updated for the period of the Covid-19 Restrictions Operational Guidance Sept 2021.

Football Family is a privately-owned government funded organization that undertakes work- based learning programs both on site and in remote working locations.

This policy applies to all staff including senior managers, paid staff, volunteers and sessional workers, agency staff, students or anyone working on behalf of the Football Family. It shows a commitment to protecting and safeguarding children and adults against potential harm or actual harm. It fully accepts and promotes the principle enshrined in the Children Act 2004 that the welfare of the child is paramount. Alongside this, we strictly follow the government guidelines for safeguarding adults inclusive of the Equality and Diversity Act 2010.

The policy also demonstrates a commitment to working with statutory bodies, voluntary agencies, and other faith communities to promote the safety and welfare of all and acting promptly whenever a concern is raised about a child, or adult, or about the behaviour of an adult; Football Family will work with the appropriate statutory bodies to investigate abuse where necessary. We will promote this policy via staff and learner inductions, staff CPD (including mandatory refresher training with DSL), via learner and employer handbooks published on our website and learner and employer handbooks published on our website and on SharePoint for staff and associates. We will publish and promote the policy along with its associated aims within our premises. We will gain commitment from staff, associates, employers, and learners to this policy by our Governors and Management working with our staff to ensure these aims of the policy are a living part of our ways of working.

The consideration of this policy will be included in our recruitment, training and support for staff and learners, and our support employer and associates. We will have a named Designated Safeguarding Lead and Senior Manager that are responsible for leading Safeguarding and Prevent, who will actively promote awareness and ensure adherence to our policy and processes with staff, learners, suppliers, employers' associates, and work with external bodies ensuring feedback is used to improve our policy and processes.

1. Positional Statement & Statement of Intent

Positional Statement

We firmly believe that it is unacceptable for any learner or staff member, volunteer or visitor to encounter and experience abuse or harm of any sort and as such, we are committed to our responsibility to provide adequate safeguarding provisions for all.

We understand and recognise that the welfare of all apprentices, regardless of socio-economic background, personal circumstance or protected characteristic is paramount.

This policy outlines the provisions that have been made, to create a safe environment for all, and to ensure that any staff member or volunteer receives access to up-to-date information and training to enable them to appropriately respond to any learner who may be experiencing harm.

To ensure the safeguarding of all apprentices, staff, volunteers, and visitors, we will regularly revise our policies and procedures.

Statement of Intent

Football Family Ltd fully recognises its responsibility for safeguarding all our apprentices and understands that we have a duty of care to prevent harm and take effective action when harm is suspected or disclosed in a timely manner.

The purpose of this policy is to recognise the potential for harm and to highlight measures that Football Family Ltd has taken, to mitigate against it.

This policy outlines the measures that Football Family Ltd will take to safeguard apprentices who are at risk of harm or neglect and the responsibilities of all tutors, assessors, providers, and employees in recognising and reporting suspected abuse or neglect.

Football Family Ltd believes that all apprentices and staff are entitled to be treated with dignity, courtesy, and respect regardless of their protected characteristics and it strives to demonstrate the strength of values incorporated in the learning environment.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains education providers duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- <https://www.gov.uk/government/statistics/safeguarding-adults-england-2021-22> which outlines the guidance supporting safeguarding adults.

3. Definitions

Safeguarding and promoting the welfare of all means:

- Protecting all from maltreatment
- Preventing impairment of all mental and physical health or development
- Ensuring that all develop in circumstances consistent with the provision of safe and effective care
- Taking action to enable all to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Safeguarding and Prevent Protection Policy

Abuse is a form of maltreatment and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet basic physical and/or psychological needs, likely to result in the serious impairment of all (usually children's) health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where all share nude or semi-nude images, videos or live streams.

Children include everyone under the age of 18. **Adults** include all aged 18 or above.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- Children's Social Care
- The chief officer of police for West Yorkshire Police.

4 Prevent

Part of Football Family safeguarding duty also includes protecting vulnerable individuals from the risk of radicalisation and extremism. This is called the 'Prevent Duty'. Prevent is a government initiative aimed at stopping people becoming involved with (radicalised) or supporting violent extremism.

What is Radicalisation?

The government defines radicalisation as a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or reject and/or undermine contemporary ideas and expressions of freedom of choice.

What is Extremism?

The government has defined extremism as: "vocal or active opposition to British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs". Football Family shares and promotes these values across our community.

British Values, Equality & Diversity:

We follow governmental principles on promoting British Values throughout Football Family these are:

- Democracy
- Rule of Law
- Mutual Respect & Tolerance

- Individual Liberty

Channel Panel

Channel is a multi-agency approach to safeguarding, supporting and protecting children, young people and vulnerable adults at risk of radicalisation, extremism or terrorist related activity.

Channel Panel aims to:

- find individuals at risk of being drawn into extremism
- look at the nature and extent of the risk
- develop the most appropriate support plan for the people concerned

Further support and advice is available by contacting Barnsley Council's Prevent Team on 01226 770 770 or South Yorkshire Police Prevent Team on 101.

Useful Websites

- [ACT Early – for support and guidance on radicalisation and terrorism](#)
- [GOV.UK's extremist materials](#)
- [Northeast Counter Terrorism Unit – counter terrorism policing](#)

To report a Prevent referral or concern, you follow our own Safeguarding referral procedure this will allow the DSL to action with immediate effect.

5. Equality statement

Some learners have an increased risk of abuse, and additional barriers can exist for some learners with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise learner's diverse circumstances. We ensure that all learners have the same protection, regardless of any barriers they may face.

We give special consideration to learners who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers

- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from education to be home educated.

6. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and directors in the organisations and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended activities and off-site activities.

6.1 All staff

Staff who work directly with learners are expected to read at least part 1 of Keeping Children Safe in Education (KCSIE). Alongside this, they will be expected to read all company policies, including the Electronic Communications Policy, SEND Policy, Learner Handbook & Code of Conduct Policy, Maladministration/Malpractice/Misconduct & Plagiarism Policy, Acceptable Use of IT Policy, Bullying & Harassment Policy, Whilst Blowing Policy, External Assessment Policy and Privacy Policy.

All staff will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2022](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, all relevant policies listed above and the role and identity of the designated safeguarding lead (DSL) deputy and assisting.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a learner tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as Child on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- All staff will be aware of ongoing issues and updates relating to safeguarding and prevent due to attending mandatory training set out by DSL

6.2 The designated safeguarding lead (DSL)

Our DSL is Elizabeth Naylor. The DSL takes lead responsibility for child protection and wider safeguarding in the organisations.

Safeguarding and Prevent Protection Policy

DSL contact details- elizabeth.naylor@footballfamily.org.uk/safeguarding@footballfamily.org.uk 07424 474193

When the DSL is absent, the deputy, Rachel Lappage – rachel.lappage@footballfamily.org.uk/safeguarding@footballfamily.org.uk – will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of learners
- Complete training on the referral procedure for all staff.
- Complete refresher training on topics seen as relevant to the DSL for all staff, as and when required.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

6.3 The Governors and Senior Management Team

Are responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding/prevent and child protection training, and updating the content of the training regularly
- Acting as the SMT in the event of an allegation of abuse made against another member of staff, where appropriate (see appendix 3).

7. Confidentiality

It is very important to treat conversations and correspondence with discretion. It is vital that complainants feel confident that their complaint will not mean that they will be penalised. However, from the outset, all parties to a complaint should be made aware that some information may have to be shared with others involved in the operation of the complaint's procedure. It is usually a procedure to disregard anonymous complaints unless somebody is prepared to substantiate them, but the danger in this is that they may relate to something quite serious. If the forewarned eventuality occurs, to the detriment of Football Family

Ltd, the complainant may come forward subsequently and say that she/he/they alerted us even though the complaint was unsigned. It will be at the discretion of the DSL to decide whether the gravity of an anonymous complaint warrants an investigation.

8. Recognising abuse and taking action

All Staff must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

8.1 If a Learner is suffering or likely to suffer harm, or in immediate danger

Make a referral to children social services / the police immediately if you believe a child is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral. Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

8.2 If a learner makes a disclosure to you

If a learner discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the learner they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the learner own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and email it to safeguarding@footballfamily.org.uk as soon as possible. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

8.3 If you discover that FGM has taken place, or a pupil is at risk of FGM

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a learner has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in appendix 4 of this policy.

Any tutor/assessor or staff who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

You must immediately report this to the police, personally. This is a mandatory statutory duty, and Football Family staff will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

The duty for staff mentioned above does not apply in cases where a child is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine learners.

Any member of staff who suspects a learner is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

8.4 If you have concerns about a learner (as opposed to believing a learner is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a learner's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to the head Elizabeth Naylor and/or take advice from local authority and children services if under the age of 18. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the learner's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the learner's situation improves.

8.5 If you have concerns about extremism

If a learner is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to Rachel Lappage and/or seek advice from local authority children's social care if under the

Safeguarding and Prevent Protection Policy

age of 18. Make a referral to local authority children’s social care directly, if appropriate (see ‘Referral’ above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which staff can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

8.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a learner has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a learner may be experiencing a mental health problem or be at risk of developing one.

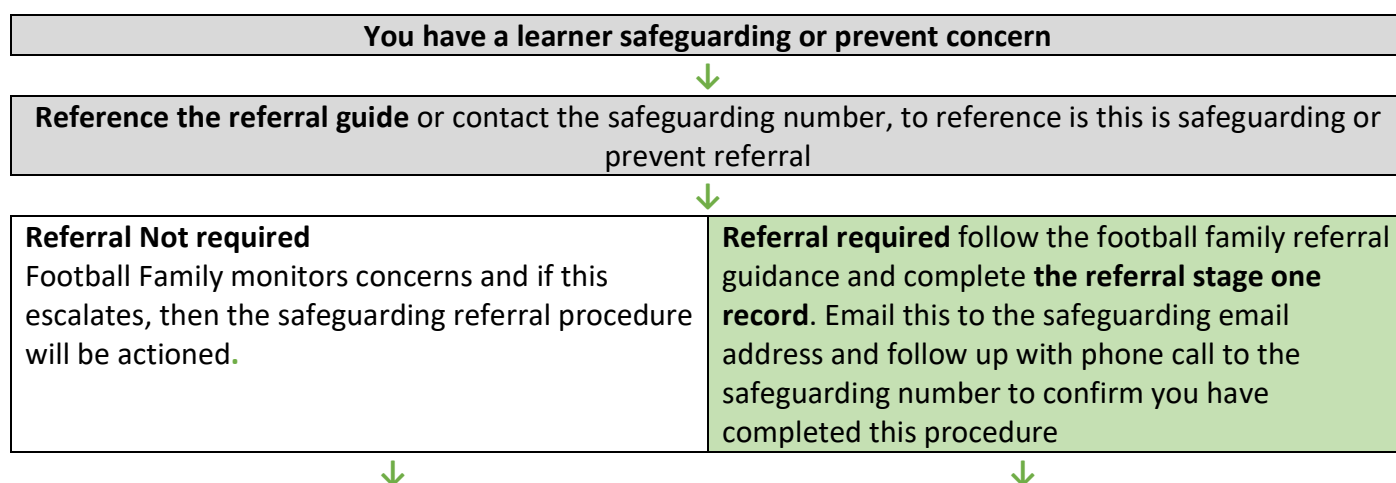
If you have a mental health concern about a learner that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

Figure 1: procedure if you have concerns about learner welfare (as opposed to believing a learner is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 8.4 for what to do.)



DSL actions the Referral and follows up with the required steps documenting the response using the Stage **two referral form**. Signpost and takes ownership of this safeguarding /prevent concern following this policy, until the matter is satisfactorily concluded.



All Staff must keep the Learner circumstances under review and refer if appropriate to ensure the learner circumstances improve. The learners' best interests must always come first at all stages.

8.7 Concerns about a staff member, or contractor

If you have concerns about a member of staff, or an allegation is made about a member of staff (including volunteer or contractor) posing a risk of harm to learners, speak to the DSL as soon as possible. If the concerns/allegations are about the DSL, speak to Rachel Lappage, who will then follow the procedures set out in appendix 3, if appropriate.

8.8 Allegations of abuse made against other Learners

We recognize that learners can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviour’s and an unsafe environment for learners.

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Most cases of learners hurting other learners will be dealt with under our behaviour policy, but this learners protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put learners at risk
- Is violent
- Involves learners being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

If a pupil makes an allegation of abuse against another pupil:

Safeguarding and Prevent Protection Policy

- You must record the allegation on referral stage 1 form and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the learners against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the learners and adolescent mental health services (CAMHS), if appropriate

Creating a supportive environment and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk child on child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female learners, and initiation or hazing type violence with respect to boys
- Ensure learners can easily and confidently report abuse using our reporting systems (as described in section 8.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a learner's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - learners can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A learners behaviour might indicate that something is wrong
 - That certain learner may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a learner harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

- The important role they have to play in preventing child-on-child abuse and responding where they believe a learner may be at risk from it
- That they should speak to the DSL if they have any concerns.

8.9 Sharing of nudes and semi-nudes ('sexting')

This is a suggested approach based on [guidance from the UK Council for Internet Safety](#) for [all staff](#) and for [DSLs and senior leaders](#).

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a learner to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the learner to delete it
- Ask the learner who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the learners(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

You should explain that you need to report the incident and reassure the learner(s) that they will receive support and help from our DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate staff – this may include the staff member who reported the incident and the safeguarding team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to learners(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Safeguarding and Prevent Protection Policy

- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the learners involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the learners involved (in most cases parents/carers should be involved)

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any learners in the images or videos is under 13
- The DSL has reason to believe a learner is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the SMT and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage, a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks.

They will hold interviews with the learners involved (if appropriate).

If at any point in the process, there is a concern that a learner has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

The DSL will inform parents/carers at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the learners at risk of harm.

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

8.10 Reporting systems for our learners

Where there is a safeguarding concern, we will take the learner's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring learners feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for learners to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for learners and employers
- Make it clear to learners that their concerns will be taken seriously, and that they can safely express their views and give feedback.

9. Online safety and the use of mobile technology

We recognise the importance of safeguarding learners from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, we aim to:

- Have robust processes in place to ensure the online safety of learners, staff, volunteers and directors
- Protect and educate the whole community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Safeguarding and Prevent Protection Policy

➤ **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

➤ **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Make all learners, parents/carers, staff and SMT aware that they are expected to sign an agreement regarding the acceptable use of the internet, use of the ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a learner is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, learners and parents/carers are aware that staff have the power to search learners' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit learners exposure to the 4 key categories of risk (described above) from the IT systems.

10. Notifying parents or carers

Where appropriate, we will discuss any concerns about a learner with the learners' parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL. If we believe that notifying the parents or carers would increase the risk to the learner, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other learners, we will normally notify the parents or carers of all the children involved.

11. Learners with special educational needs, disabilities or health issues

We recognise that learners with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's condition without further exploration

- Learners being more prone to child group isolation or bullying (including prejudice-based bullying) than other learners.
- The potential for learners with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges.

12. Learners with a social worker

Learners may need a social worker due to safeguarding or welfare needs. We recognise that a learner's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a learner has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the learner's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support.

13. Complaints and concerns

13.1 Complaints against staff

Complaints against staff that are likely to require a learner investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

All other complaints are covered by our Complaints and Appeals Procedure.

13.3 Whistle-blowing

We also have a whistle-blowing policy that covers concerns regarding the way that we safeguard learners

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome
- Concerns and referrals covering stage one and two documents will be kept in a separate learners protection file for each learner
- Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
- Safeguarding records relating to individual learners will be retained for a reasonable period after they have competed or left their Apprenticeship.
- Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15. Training

15.1 All staff

All staff members will undertake safeguarding, prevent and child protection training, to ensure they understand the organisations safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

Our referral recording and reporting a safeguarding prevent referral will be delivered during new staff induction, this new procedure will also be delivered to existing staff and documented.

This training will be regularly updated and will:

- Be integrated, aligned, and considered as part of the whole organisation safeguarding approach and wider staff training

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually.

Safeguarding and Prevent Protection Policy

All staff are also required to attend quarterly mandatory training requested by the DSL, as well as interim training if required. Refusal to attend will result in the member of staff being non-compliant with company policy which will result in a formal documented discussion. If staff continue not to comply with company policy, further escalation will continue and could result in possible dismissal.

15.2 The DSL

The DSL will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

15.3 Recruitment – interview panels

At least one person conducting any interview for any post at the organisations will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

16. Monitoring arrangements

This policy will be reviewed **annually** by Craig Parry.

17. Links with other policies

This policy links to the following policies and procedures:

- Learner Handbook and Code of Conduct
- Complaints and Appeals Procedure
- Health and Safety Policy
- Attendance Policy
- Equality and Diversity Policy
- Safer Recruitment Policy
- Bullying and Harassment Policy
- Whistle Blowing Policy.

These appendices are based on the Department for Education’s statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse is the persistent emotional maltreatment of a child such as causing severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the learner participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing learners frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging learners to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a learner's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger

- Ensure adequate supervision
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 2: safer recruitment and DBS checks – policy and procedures

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with learners have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our organisations commitment to safeguarding and promoting the welfare of our learners
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with learners
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our prevent and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Safeguarding and Prevent Protection Policy

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with our learners, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

Seeking references and checking employment history

We will obtain two references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is football Family based, we will ask for the reference to be confirmed by SMT as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with learners if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

Safeguarding and Prevent Protection Policy

We will record all information on the checks carried out in the organisations single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a tutor/assessor.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK.
- Where available, these will include:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
 - For tutor/assessor positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school, college or education organisation, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school, college or education organisation where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with learners; or

Safeguarding and Prevent Protection Policy

- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a learner or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff who, has:

- Behaved in a way that has harmed a learner, or may have harmed a learner, and/or
- Possibly committed a criminal offence against or related to a learner, and/or
- Behaved towards a learner in a way that indicates he or she may pose a risk of harm to learners, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with learners – this includes behaviour taking place both inside and outside of the organisation.

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

This will be the DSL, or the other DSL where the DSL is the subject of the allegation. The SMT will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

Safeguarding and Prevent Protection Policy

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a learner or other learner is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the organisations so that the individual does not have direct contact with learner.
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the organisations so that they do not have unsupervised access to learners
- Moving the Learner or learners to classes where they will not come into contact with the individual, making it clear that this is not a punishment.

If in doubt, the SMT manager will seek views from the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the SMT manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The SMT manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to learners or there is evidence of a possible criminal offence. In such cases, the SMT manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where

Safeguarding and Prevent Protection Policy

necessary). Where the police and/or children's social care services are involved, the SMT manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the organisations is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the SMT manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the organisations and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Keep the parents or carers of the learner/learners involved informed of the progress of the case (only in relation to their learner – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a learner

Where the police are involved, wherever possible the DSL will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the organisations disciplinary process, should this be required at a later point.

Additional considerations for contracted staff

If there are concerns or an allegation is made against someone not directly employed by the organisations, such as a contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- We will involve the agency fully, but the DSL will take the lead in collecting the necessary information and providing it to the LADO as required.

Safeguarding and Prevent Protection Policy

- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met; we will endeavor to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

The SMT Manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the organisations cease to use their services, or the individual resigns or otherwise ceases to provide their services, the DSL will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the SMT manager will consider how best to facilitate this.

The SMT manager will also consider how best to manage the individual's contact with the learner or learners who made the allegation, if they are still attending the organisations.

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the learner and/or person who made the allegation is in need of help, or the allegation may have been a cry for help.
- Shown to be deliberately invented, or malicious, the DSL will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false, or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the SMT manager will consider the appropriate next steps. If they consider that the learner and/or person who made the allegation is in need of help, or the allegation may have been a cry for help.
- Shown to be deliberately invented, or malicious, the DSL will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The DSL will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The SMT manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a learner and learners involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

Learning lessons

After any cases where the allegations are *substantiated*, the Manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the organisations procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a learner to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the organisations that they were abused as a child, we will advise the individual to report the allegation to the police.

Appendix 4: specific safeguarding issues

Learners missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a learner may become missing from education, but some learners are particularly at risk.

These include; learners who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend an education setting
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with learners who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

Child criminal exploitation

Safeguarding and Prevent Protection Policy

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a learner into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a learner:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a learner into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Learners or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a Learner:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

Learners can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a learner may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older learners may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on learners.

The DSL will provide support according to the learners needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a learners welfare.

The DSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a learner has been harmed or is at risk of harm, the DSL will also make a referral to learner social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

Safeguarding and Prevent Protection Policy

The DSL will make sure that staff have access to appropriate training to equip them to be alert to learners affected by FGM or at risk of FGM.

Section 8.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A learner confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/learner already being known to social services in relation to other safeguarding issues
- A girl:
 - Having difficulty walking, sitting or standing, or looking uncomfortable
 - Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - Having frequent urinary, menstrual or stomach problems
 - Avoiding physical exercise or missing PE
 - Being repeatedly absent from education, or absent for a prolonged period
 - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - Being reluctant to undergo any medical examinations
 - Asking for help, but not being explicit about the problem
 - Talking about pain or discomfort between her legs

Potential signs that a learner may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society
 - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

Safeguarding and Prevent Protection Policy

- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from education
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a learner is being forced into marriage, they will speak to the learner about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the learner about the concerns in a secure and private place
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or fm@fco.gov.uk
- Refer the pupil to an education welfare officer.

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or

Safeguarding and Prevent Protection Policy

- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We all have a duty to prevent learners from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify learners at risk.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in learners' behavior.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalized can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

learners who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a learner, they will follow our procedures set out in section 8.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried

Child on Child abuse

Safeguarding and Prevent Protection Policy

Child on child abuse is when children abuse other children. This type of abuse can take place inside and outside of education and online.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where learners abuse their child online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a learner makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 and 8.9 set out more detail about our organisations approach to this type of abuse.

Sexual violence and sexual harassment between learners in education

Sexual violence and sexual harassment can occur:

- Between 2 learners of any age and sex
- Through a group of learners sexually assaulting or sexually harassing a single learner or group of learners
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

learners who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same education setting.

Safeguarding and Prevent Protection Policy

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

If staff have any concerns about sexual violence or sexual harassment, or a learner makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 8.9 set out more detail about our organisations approach to this type of abuse.

Serious violence

Indicators which may signal that a learner is at risk from, or involved with, serious violent crime may include:

- Increased absence from education
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the learner has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from another education provider
- Having experienced learners' maltreatment

Safeguarding and Prevent Protection Policy

➤ Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book.

All visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the organisations any speaker who is known to disseminate extremist views

Reporting arrangements

The arrangements continue in line with our safeguarding & child protection policy.

The Designated Safeguarding Lead is: Elizabeth Naylor, elizabeth.naylor@footballfamily.org.uk / safeguarding@footballfamily.org.uk , 07424 474193

The Deputy DSL is: Rachel Lappage, rachel.lappage@footballfamily.org.uk / safeguarding@footballfamily.org.uk, 07424 474193

Football Family Ltd ensures that the DSL, or deputy are always contactable. All staff were re-issued with contact details for the DSL's and should report any concerns in line with the current policy.

Staff will continue to follow the Child Protection procedure and advise the safeguarding leads

We have continued to follow statutory guidance on inter-agency working, set out in [working together to safeguard children](#). We have also referred to [keeping children safe in education](#).

Mental health and wellbeing

Many apprentices and staff members will be feeling uncertain and anxious at this time. It is important to support positive mental health and wellbeing, which is necessary for young people to engage in learning.

We will identify young people and members of staff that may need additional support and ensure that there is appropriate mental health and wellbeing support in place. Vulnerable young people are particularly likely to need additional support with their mental health and wellbeing. The guidance on [mental health and behaviour in schools](#) might be helpful with this.

We will work with local authorities and voluntary sector mental health organisations to ensure that support is in place.

Support can be:

Safeguarding and Prevent Protection Policy

- over the phone for any apprentices self-isolating
- from specialist staff or support services

NHS children and young people's mental health services (CYPMHS) may be able to provide support remotely. We will continue referring young people to their local CYPMHS where needed. Young people or their parents or carers can also contact their GP or refer to NHS 111 online.

NHS trusts have also established 24-hour urgent mental health helplines in most parts of England for people of all ages. If we have urgent concerns about a young person, we will find the local helpline to discuss our concerns with a mental health professional. PHE have published more extensive guidance on [supporting children and young people's mental health and wellbeing](#).

Staff can find resources to promote and support mental wellbeing in the list of [online resources](#) to help young people to learn at home.

Other resources include:

- the [Every Mind Matters](#) platform which has specific advice for adults and young people on maintaining good mental wellbeing during the coronavirus (COVID-19) outbreak
- the Association of College's (AoC) [coronavirus \(COVID-19\) resource hub](#), which includes advice for apprentices and staff
- the Education and Training Foundation's [mental health and emotional wellbeing](#) advice for FE staff
- [Education Support](#) provide mental health and wellbeing support services to all education staff
- free apps available on the [NHS App Store](#) for mental health and wellbeing support

Mental health is also covered in the [interim safeguarding guidance](#), and the principles in [keeping children safe in education](#) continue to apply.

We will also consider if necessary supporting apprentices with their mental health and wellbeing through:

- remote one-to-one counselling
- encouraging young people to identify their own self-care strategies during this uncertain time - online resources can help with this
- Completing welfare reviews every eight weeks with our learners

Policy Reviews

This Policy will be renewed annually.

For further information or to discuss any concerns regarding this, or any of our other Policies and Procedures, please contact: info@footballfamily.org.uk

Safeguarding and Prevent Protection Policy

Signature: <i>Craig Parry</i>	Title: <i>Managing Director</i>	Date: 11/04/2023
-------------------------------	---------------------------------	------------------