



Football Family Ltd: Safeguarding and Child Protection Policy

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Positional Statement

Football Family Ltd 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, Football Family Ltd is committed to its responsibility to provide adequate safeguarding provisions for all.

Football Family Ltd understands and recognises that the welfare of all learners, 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 learners, staff, volunteers, and visitors, Football Family Ltd will regularly revise its policies and procedures.

Statement of Intent

Football Family Ltd fully recognises its responsibilities for safeguarding vulnerable adults and young people and understand that it has 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 to highlight the measures that Football Family Ltd has taken, to mitigate against it.

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

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

Who the Policy Relates to;

Children/Young people (under the age of 18 at enrolment), vulnerable adults, staff, volunteers, and visitors.

In relation to children and young people, Football Family Ltd adopt the definition used in the Children Act, the guidance document Working Together to Safeguard Children and Keeping Children Safe in Education, which define safeguarding and promoting children and young people's welfare as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Taking action to enable all children to have the best outcomes.
- All staff will be given a copy of Part 1 and Annex A of Keeping Children Safe in Education and will sign to say they have read and understood it.

All staff working with children and young people including vulnerable adults (the new definition no longer refers to the word "vulnerable" for regulated activity relating to adults) must:

- Give highest priority to their safety and welfare
- Recognise, identify, and respond to signs of abuse, neglect and other safeguarding concerns relating to children and vulnerable adults
- Respond appropriately to a disclosure by a child, or young person of abuse
- Respond appropriately to allegations against staff and /or other adults
- Understand and implement safe practice in carrying out their duties
- Be alert to the risks which abusers, or potential abusers, may pose.

Definitions

The terms "children" and "child" refer to anyone under the age of 18.

For the purposes of this policy, "safeguarding and protecting the welfare of children and vulnerable adult's" is defined as:

- Protecting children and vulnerable adults from maltreatment.

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- Preventing the impairment of children and vulnerable adult's health or development.
- Ensuring that children and vulnerable adults grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children and vulnerable adults to have the best outcomes.

For the purposes of this policy, the term "harmful sexual behaviour" includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults

In accordance with the DfE's guidance, 'Sexual violence and sexual harassment between children in schools and colleges', and for the purposes of this policy, the term "sexual harassment" is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

For this policy, the term "sexual violence" encompasses the definitions provided in the Sexual Offences Act, including those pertaining to rape, assault by penetration and sexual assault.

For the purposes of this policy, "upskirting" refers to the act of taking a picture or video under another person's clothing, without their knowledge or consent, with the intention of viewing that person's genitals or buttocks (with or without clothing). Despite the name, anyone (including both learners and tutors), and any gender, can be a victim of upskirting.

The term "tutor role" is defined as planning and preparing lessons and courses for learners; delivering lessons to learners; assessing the development, progress, and attainment of learners; and reporting on the development, progress, and attainment of learners.

Designated Persons of Safeguarding

The responsibilities of the designated person are as follows, but not limited to:

- First point of contact for any safeguarding issues and coordinating action accordingly
- Liaising with Children's and Adult Social Services, and any other agencies, on individual cases of suspected or identified abuse
- Ensuring all staff, volunteers, learners, and providers know the Safeguarding policy and procedure
- Ensuring Disclosure and Barring Service (DBS) checks for all new staff and updated checks for all current staff including those of providers who may have regular unsupervised contact with vulnerable adults and children are completed and ensure that the single central record holding these DBS checks is regularly monitored and updated
- Continual awareness raising of safeguarding vulnerable adults and children including training
- Review and revise safeguarding policies.

The named Designated Safeguarding Lead is: **Dave Simms (Head of Partnerships)**- Please contact him on **07808 800207** or email david.simms@footballfamily.org.uk

If not available concerns should be passed onto the Deputy Designated Safeguarding Lead (DDSL), **Laura Morton** on **07488 275267** or email laura.morton@footballfamily.org.uk

Alerts

All staff are responsible for reporting harm to the DSL or DDSL.

To do this, learners must be given reasonable ability to protect themselves, by making their views known and being listened to, with subsequent action to be taken accordingly. Football Family Ltd will ensure all learners and their staff can talk to the DSL or DDSL about the service they are receiving.

The priority is to the welfare of the learner (children/young person/vulnerable adult) and as such any disclosures or concerns will not be ignored. Disclosures or concerns will not be treated confidentially, and the learner will be made aware that the member of staff / volunteer will need to report (the disclosure or concern) as per this policy.

What to do

Disclosure (by vulnerable adult, child or third party) must remain confidential and only passed to other persons on a 'need to know' basis.

Staff and volunteers will not investigate concerns themselves, as this is the role of the statutory agencies. However, if an adult or child does talk to you, it is vital that you listen carefully:

Listen – do not ask closed or leading questions, interrogate, or give opinions. You may wish to use TED; Tell me, explain to me, and describe to me.

Do not promise the vulnerable adult or child you will keep secrets but thank and congratulate them for coming forward.

Tell the adult or child that you will need to talk to someone else who can help.

Remain calm – be sensitive and sympathetic. You may feel shocked, angry or upset by what you have been told but if the vulnerable adult or child senses this, it may prevent them from disclosing.

Re-assure the vulnerable adult or child that they have done nothing wrong. Talk to the vulnerable adult or child in age appropriate language.

Record what you know – as soon as possible write down what you have been told, using the young person's exact language but not during the disclosure. Ensure you record the facts as soon as the person has left and avoid stating opinions.

Report to the DSL or DDSL as soon as possible after the disclosure and back this up with an email to the DSL.

Referral – will be made by the DSL to the relevant agencies/board/police etc.

Safer Recruitment

Guidance set out in the Safeguarding Vulnerable Groups (SVG) Act states that a Disclosure and Barring Service (DBS) check is only a priority for those members of staff, contractors or volunteers undertaking regulated activities, whilst it may be sufficient for employers to ensure that sufficient safeguards are in place for members of staff and volunteers undertaking controlled activities.

The changes in government policy and Ofsted regulations have stated that it is now illegal to blanket DBS check all staff members and only those who have regular unsupervised contact with vulnerable adults and children.

To ensure the welfare and protection of learners (children/ young people/ vulnerable adults), Football Family Ltd will ensure the relevant people hold a current and valid DBS check.

Staff waiting for DBS checks to be cleared can undergo training and induction and a risk assessment must be completed. But they cannot undertake any unsupervised face-to-face work with vulnerable adults or children.

Single central record (SCR)

Football Family keeps an SCR which records all staff who tutor children and vulnerable adults at the college.

All members of the company are also recorded on the SCR.

The following information is recorded on the SCR:

- An identity check
- An enhanced DBS check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK
- Prevent and Safeguarding certificate dates

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For agency and third-party supply staff, Football Family will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR.

If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded.

Staff Induction

All staff receive the following induction training when they first start at Football Family:

The induction training will cover:

- The Football Family Safeguarding and Child Protection Policy
- The Staff Code of Conduct
- The identity of the DSL and Deputy
- The role of the DSL and Deputy DSL
- A tutorial from our Designated Safeguarding Lead, covering policies, procedures for reporting safeguarding concerns and best practice
- On-line training including Safeguarding/Child Protection, Prevent, FGM (see below) and Online Safety.

It is each member of staff's responsibility to apply the training and must return their Certificates to the DSL.

All students receive the following induction training when they first start at Football Family:

- Code of conduct – covering do and don'ts
- Who to talk to and where to go for advice?

The DSL and deputy DSL will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up to date with any developments relevant to their role.

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The DSL and deputy DSL will also undergo biennial Prevent awareness training which will enable them to understand and support Football Family with regards to the Prevent duty and equip them with the knowledge needed to advise staff.

The DSL and their deputy will undergo online safety training to help them recognise the additional risks that learners with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support pupils with SEND to stay safe online.

Radicalisation and Extremism

Football Family Ltd is fully committed to safeguarding and promoting the welfare of all its learners. It recognises that safeguarding against radicalisation is no different from safeguarding against any other vulnerability in line with the Prevent Strategy.

The main aims of this statement are to ensure that staff, including those of our providers, are fully engaged in being vigilant about radicalisation and extremism; we will work alongside other professional bodies and agencies to ensure that our learners are safe from harm.

The principle objectives are that:

- All tutoring and non-tutoring staff will understand what radicalisation and extremism are and why we need to be vigilant via Continued Professional Development
- All tutoring and non-tutoring staff and learners will know what the Football Family Ltd policy is on anti-radicalisation and extremism and will follow the procedures when issues arise
- All learners will know that the policies are in place to keep learners safe from harm and that Football Family Ltd regularly review their systems to ensure they are appropriate and effective.

Definitions and Indicators

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic, or social conditions, institutions, or habits of the mind.

Extremism is defined as the holding of extreme political or religious views.

Although serious incidents involving radicalisation have not occurred at Football Family Ltd to date, it is important for us to remain constantly vigilant and remain fully informed about the issues which affect the wider regions in which we educate.

As noted in the 'Prevent' report, 'extremism can flourish where different parts of a community remain isolated from each other'.

Concerns or allegations about staff or volunteers

Allegations or concerns about a member of staff or volunteer must be reported to the DSL immediately.

This could include that a member of staff has:

- Behaved in a way that has harmed an adult or young person
- Possibly committed a criminal offence against or related to an adult or young person
- Behaved in a way that is inappropriate or indicates that they are unsuitable to work with adults or young people.

The main priority is to access the situation and allegation first to ascertain whether a referral is required to incorporate the next steps in a multi-agency approach. Once the referral has been made then depending on the outcome of any investigation that may be undertaken externally, the concerns or allegations will normally be dealt with through Football Family Ltd.

It may be advisable depending on the situation to remove the vulnerable adult or child from any activity that would mean that they have direct contact with the member of staff or volunteer.

Code of Conduct

It is imperative that all staff and volunteers conduct themselves professionally and understand their responsibilities to not only keep themselves safe, but also the learners. Staff and volunteers are also responsible for ensuring any visitors receive the relevant information / inductions to enable them to keep themselves safe.

- Staff personal details are not to be shared with anyone, this includes personal email and phone numbers
- If learners email addresses have been taken within a course, they should be destroyed by staff once the course has been completed. Information relating to learners should only be kept by the student services team and again not to be shared with external parties unless in line with safeguarding concerns (further information on how data is collected and processed can be found in our Privacy Policy)

- Within courses learners must be aware of the risks they may encounter if they share personal information amongst themselves. Learners often do not know other peers outside of the classroom and potentially could be opening themselves up to risk
- Staff and learners are not to form personal relationships, if a member of their family, their partner or friend join a course, as good practice please inform the office who can keep a record of this. Forming relationships can potentially compromise professionalism and be putting learners at risk
- Staff should not add learners to any social media sites, this includes but not limited to, Instagram, Facebook, Twitter, and Tinder
- Staff are not permitted to sell any outside resources within the classroom unless given approval by their line manager as this could lead to allegations of financial abuse.

Learners within their induction and throughout their course will have their well-being highlighted as an important concern for Football Family Ltd

Football Family Ltd will take steps to minimise any difficulties which learners or staff / volunteers may experience as a result of raising a concern. For instance, if learners, staff, or volunteers are required to give evidence in criminal or disciplinary proceeding, Football Family Ltd will ensure they receive the relevant advice and support up-to and beyond proceedings.

Football Family Ltd will inform all parties of the outcome of any investigative decision.

Football Family Ltd will inform the relevant agencies straight away of any safeguarding issues.

Alternative provision

Football Family will remain responsible for a child's or vulnerable adult's welfare during their time at an alternative provider.

When placing a child or vulnerable adult with an alternative provider, Football Family will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

Online safety

As part of a broad and balanced curriculum, all children and vulnerable learners will be made aware of online risks and taught how to stay safe online.

Through training, all staff members will be made aware of the following:

- Children and vulnerable adult's attitudes and behaviours which may indicate they are at risk of potential harm online

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- Football Family will ensure that suitable filtering systems are in place to prevent children and vulnerable adults accessing terrorist and extremist material.
- Football Family will ensure that the use of filtering and monitoring systems does not cause “over blocking” which may lead to unreasonable restrictions as to what children and vulnerable adults can be taught regarding online teaching.

Mobile phone and camera safety

Mobile phones will be safely stored with a passcode etc. and in silent mode.

Staff will use their professional judgement in emergency situations.

The sending of inappropriate messages or images from mobile devices is strictly prohibited.

Staff who do not adhere to this policy will face disciplinary action.

Photographs and videos of pupils will be carefully planned before any activity. The DSL will oversee the planning of any events where photographs and videos will be taken.

Staff will report any concerns about another staff member’s use of mobile phones to the DSL.

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 01226 758644

Examples of Safeguarding concerns

Abuse and neglect

All members of staff will be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another.

All staff members will be aware of the indicators of abuse and the appropriate action to take following a child or vulnerable adult being identified as at potential risk of abuse or neglect.

When identifying children or vulnerable adults at risk of potential harm, staff members will look out for several indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge.
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem

All members of staff will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults, and sexting.

All staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse.

All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy, and sexting, and will understand that these put children or vulnerable adults in danger.

Staff members will be aware of the effects of children or vulnerable adults witnessing an incident of abuse, such as witnessing domestic violence at home.

Types of abuse and neglect

To ensure that our children and vulnerable adults are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, for example by hitting them, or by failing to act to prevent harm, Abuse may be committed by adult men or women and by other children and vulnerable adults.

There are four categories of abuse: physical abuse, emotional abuse, sexual abuse, and neglect.

Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child or vulnerable adult.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable adult. (This used to be called Munchausen's Syndrome by Proxy but is now more usually referred to as fabricated or induced illness).

Emotional abuse

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

Sexual abuse

Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether the child or vulnerable adult is aware of what is happening or not. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children or vulnerable

adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging children or vulnerable adults to behave in sexually inappropriate ways, or grooming a child or vulnerable adult 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 or vulnerable adults.

Neglect

Neglect is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's or vulnerable adult's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment) protect a child or vulnerable adult from physical and emotional harm or danger ensure adequate supervision (including the use of inadequate care-givers) or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's or vulnerable adult basic emotional needs. Definitions taken from Keeping Children Safe in Education.

Indicators of abuse

Physical signs define some types of abuse, for example, bruising, bleeding, or broken bones resulting from physical or sexual abuse, or injuries sustained while a child or vulnerable adult has been inadequately supervised. The identification of physical signs is complicated, as children or vulnerable adults may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.

It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child or vulnerable adult has been abused.

A child or vulnerable adult who is being abused or neglected may: have bruises, bleeding, burns, fractures, or other injuries

- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- look unkempt and uncared for
- change their eating habits
- have difficulty in making or sustaining friendships
- appear fearful

- be reckless about their own or other's safety
- self-harm
- frequently miss college or arrive late
- show signs of not wanting to go home
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn
- challenge authority
- become disinterested in their college work
- be constantly tired or preoccupied
- be wary of physical contact
- be involved in, or particularly knowledgeable about drugs or alcohol
- display sexual knowledge or behaviour beyond that normally expected for their age.
- acquire gifts such as money or a mobile phone from new 'friends'

Further advice on child protection is available from:

NSPCC: <http://www.nspcc.org.uk/>

Childline: <http://www.childline.org.uk/pages/home.aspx>

CEOPSThinkuknow: <https://www.thinkuknow.co.uk/>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Beat Bullying: <http://www.beatbullying.org/>

DFE - Working together to safeguard Children

DFE – Keeping Children Safe in Education

DFE – Prevent Duty

DFE – What to Do if You're worried a Child is being abused.

Preventing radicalisation

For the purpose of this policy, “radicalisation” refers to the process by which a person comes to support terrorism and extremist ideologies.

Protecting children or vulnerable adults from the risk of radicalisation is part of Football Family's wider safeguarding duties.

Football Family will actively assess the risk of pupils being drawn into terrorism.

Staff will be alert to changes in behaviour which could indicate that children or vulnerable adults may be in need of help or protection.

Staff will use their professional judgement to identify children or vulnerable adults who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. Football Family will work with local safeguarding arrangements as appropriate.

Football Family will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, Football will assist and advise family members who raise concerns and provide information for support mechanisms.

Any concerns over radicalisation will be discussed with a child's or vulnerable adult's parents, unless we have reason to believe that the child would be placed at risk as a result.

Training

All delivery staff will undertake Prevent awareness training.

Risk indicators of vulnerable children or vulnerable adults

Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

Indicators of a personal crisis include the following:

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

Indicators of vulnerability through personal circumstances includes the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life

Indicators of vulnerability through criminality:

- Experiences of dealing with the police
- Involvement with criminal groups

Making a judgement

When making a judgement, staff will ask themselves the following questions:

- Does the child or vulnerable adult have access to extremist influences?
- Does the child or vulnerable adult access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing, or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the child or vulnerable adult has been, or is likely to be, involved with extremist organisations?
- Is the child or vulnerable adult known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the child or vulnerable adult sympathise with or support illegal/illicit groups?
- Does the child or vulnerable adult support groups with links to extremist activity?
- Has the child or vulnerable adult encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political, or religious influence on the child or vulnerable adult?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the child or vulnerable adult?
- Has there been a significant shift in the child's or vulnerable adult's outward appearance that suggests a new social, political, or religious influence?
- Has the child or vulnerable adult come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the child or vulnerable adult vocally support terrorist attacks, either verbally or in their written work?
- Has the child or vulnerable adult witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the child or vulnerable adult travelled for extended periods of time to international locations?

- Has the child or vulnerable adult employed any methods to disguise their identity?
- Does the child or vulnerable adult have experience of poverty, disadvantage, discrimination, or social exclusion?
- Does the child or vulnerable adult display a lack of affinity or understanding for others?
- Is the child or vulnerable adult the victim of social isolation?
- Does the child or vulnerable adult demonstrate a simplistic or flawed understanding of religion or politics?
- Is the child or vulnerable adult a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the child or vulnerable adult have insecure, conflicted, or absent family relationships?
- Has the child or vulnerable adult experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the child's or vulnerable adult's life has extremist views or sympathies?

Critical indicators include where the child or vulnerable adult is:

- In contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

Channel programme

Safeguarding children or vulnerable adults is a key role for both Football Family and the Wakefield LA, which is implemented using the Channel programme. This service shall be used where a vulnerable child or vulnerable adult is at risk of being involved in terrorist activities.

In cases where Football Family believes a child or vulnerable adult is potentially at serious risk of being radicalised, the DSL will contact the Channel programme.

The DSL will also support any staff making referrals to the Channel programme.

The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from Football Family.

The delivery of the Channel programme may often overlap with the implementation of the LA's or Football Family's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

Extremist speakers

Football Family will prevent speakers who may promote extremist views from using Football Family premises.

Building children's and vulnerable adult's resilience

Football Family will:

- Provide a safe environment for debating controversial issues
- Promote fundamental British values, alongside spiritual, moral, social, and cultural development
- Allow children or vulnerable adults time to explore sensitive and controversial issues
- Provide children or vulnerable adults with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing

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- Equip children or vulnerable adults to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments
- Teach children or vulnerable adults about how democracy, government and law making/enforcement occur.
- Teach children or vulnerable adults about mutual respect and understanding for the diverse national, regional, religious, and ethnic identities of the UK.

Resources

Football Family will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The Educate Against Hate website

Female genital mutilation (FGM)

The following You Tube video is excellent in explaining FGM

<https://www.youtube.com/watch?v=Wj6W66RniJ8> and the following training should be completed: <https://www.fgmelearning.co.uk/>.

For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs.

FGM is considered a form of abuse in the UK and is illegal.

All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police.

Tutor staff are legally required to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Tutors failing to report such cases will face disciplinary action.

NB. The above does not apply to any suspected or at-risk cases, nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

There are a range of potential indicators that a child or vulnerable adults may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk.

Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the pupil may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

Indicators that may show a heightened risk of FGM include the following:

- The socio-economic position of the family and their level of integration into UK society
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE

Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

Indicators that FGM may have already taken place include the following:

- Difficulty walking, sitting, or standing
- Spending longer than normal in the bathroom or toilet
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from school followed by withdrawal or depression
- Reluctance to undergo normal medical examinations

Tutors will not examine children or vulnerable adults, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless

the tutor has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

FGM is also included in the definition of 'honour-based' violence (HBV), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage, and breast ironing.

All forms of HBV are forms of abuse and will be treated and escalated as such.

Staff will be alert to the signs of HBV, including concerns that a child or vulnerable adult is at risk of HBV, or has already suffered from HBV, and will consult with the DSO who will activate local safeguarding procedures if concerns arise.

Sexting

The sending of sexually explicit messages or images by electronic methods. All cases of sexting MUST be reported to DSL ASAP.

Mental Health

Mental Health must be very carefully managed. We are not experts and should only pass on concerns about a student's mental health to DSL. We can however promote mental wellbeing.

Child Sexual Exploitation (CSE)

Involves exploitative situations, contexts, and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

All staff are alert to possible indicators and will raise concerns as appropriate We take a proactive approach to preventative work Any concerns around grooming of young people, must be reported to the DSL ASAP.

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For the purpose of this policy, “child sexual exploitation” is defined as: a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status of the perpetrator or facilitator

CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

Football Family has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

Identifying cases

Staff members are aware of and look for the key indicators of CSE; these are as follows:

- Going missing for periods of time or regularly going home late
- Regularly missing lessons
- Appearing with unexplained gifts and new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Undergoing mood swings or drastic changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying changes in emotional wellbeing
- Misusing drugs or alcohol

Referring cases

Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern remains, local safeguarding procedures will be triggered, including referral to the LA.

Support

The LA and all other necessary authorities will then handle the matter to conclusion. Football Family will cooperate as needed.

Forced Marriage (FM)

For the purpose of this policy, a “forced marriage” is defined as a marriage that is 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 the marriage. Forced marriage is classed as a crime in the UK.

As part of HBV, staff will be alert to the signs of forced marriage including, but not limited to, the following:

- Becoming anxious, depressed, and emotionally withdrawn with low self-esteem
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia
- Displaying a sudden decline in their educational performance, aspirations, or motivation
- Regularly being absent from school
- Displaying a decline in punctuality
- An obvious family history of older siblings leaving education early and marrying early

If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

The DSL will:

- Speak to the child or vulnerable adult 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

Domestic abuse/violence

All our children and vulnerable adults have the right to be safe at Football Family premises and in their own homes. We are aware that some children and vulnerable adults may be living in situations where they are directly or indirectly affected by incidents of domestic abuse or violence. If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, domestic abuse/violence, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS and the police.

Cared for children (Looked after children)

At Football Family we ensure that staff have the skills, knowledge and understanding necessary to keep cared for children and vulnerable adults safe as we are aware that children and vulnerable adults often become looked after as a result of abuse and/or neglect and for children and vulnerable adults who have

left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

Children and vulnerable adults with SEND

We ensure that staff have knowledge and understanding of the additional barriers which can exist when recognising abuse and neglect in children and vulnerable adults with special needs/disabilities.

These barriers can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's and vulnerable adult's disability without further exploration
- children and vulnerable adults with SEN and disabilities being disproportionately impacted by things like bullying - without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers

We aim to build the necessary skills in staff so that they can safeguard and respond to the specific needs of this group of children and vulnerable adults.

Homelessness

The DSL will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because "they have to"

Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

For 16- and 17-year-olds, homelessness may not be family-based and referrals to children's services will be made as necessary where concerns are raised.

County lines criminal activity

County lines criminal activity refers to drug networks or gangs grooming and exploiting children and vulnerable adults to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.

Staff will be made aware of children and vulnerable adults with missing episodes who may have been trafficked for the purpose of transporting drugs.

Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.

The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.

Children and vulnerable adults with family members in prison

Children and vulnerable adults with a family member in prison will be offered pastoral support, as necessary.

They will receive a copy of '[Are you a young person with a family member in prison](#)' from Action for Prisoners Families where appropriate and allowed the opportunity to discuss questions and concerns.

Children and vulnerable adults required to give evidence in court

Children and vulnerable adults required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

Children and vulnerable adults will also be provided with the booklet '[Going to Court and being a witness](#)' from HM Courts and Tribunals Service where appropriate and allowed the opportunity to discuss questions and concerns.

Private Fostering

We recognise that Football Family has a mandatory duty to report to the local authority when we become aware of, or suspect that, a child or vulnerable adult is subject to a private fostering arrangement. To aid our awareness we ensure that we establish parental responsibility for each child and vulnerable adult; we take steps to verify the relationship of the adults to the child and vulnerable when we register them.

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A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and stepparents; it does not include great-aunts or uncles, great grandparents, or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, we recognise that they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or are involved in trafficking, child sexual exploitation or modern-day slavery.

Where a member of staff becomes aware of private fostering arrangements they must notify the Designated Safeguarding Lead. The DSL will then speak to the family of the child involved to check that they are aware of their duty to inform Children's Services.

Children Missing out on Education and Missing from Education

Under section 175 of the Education Act we have a duty to investigate any unexplained absences especially as a child going missing from education is a potential indicator of abuse or neglect.

Contextual safeguarding

Safeguarding incidents can occur outside of college and can be associated with outside factors. Members of staff, particularly the DSL, will always consider the context of incidents – this is known as contextual safeguarding.

Assessment of a child's and vulnerable adult's behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

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We would see these incidents as

- Domestic Violence
- Parent's mental health
- Deprivation / poverty
- Addictions, such as alcohol /drugs
- Cultural differences
- Aspirations
- Attitudes towards education
- County lines
- Prevent
- Children Missing in Education
- Peer on Peer abuse

The school will provide as much contextual information as possible when making referrals to CSCS

Annex to the Safeguarding & Child Protection Policy

COVID-19 changes to our Safeguarding & Child Protection Policy- Updated 11/09/20

Response to COVID-19

There are significant changes within Football Family in response to the outbreak and in line with government guidance. Initially our tutors were working from home to ensure that Social Distancing as were many of our learners, most of which were also Furloughed. Regardless of whether they are still working or not, all our learners had access to online distance learning. Our lessons were and still are in some cases delivered via the Microsoft Teams app.

Despite the changes, the Football Family Safeguarding & Child Protection Policy remains fundamentally the same: children and young adults always come first, staff should respond robustly to safeguarding concerns and contact the DSL in line with our established safeguarding procedure.

This annex sets out some of the adjustments we made and are making in line with the changed arrangements in Football Family and following advice from the government and local agencies.

Reporting arrangements

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

The Designated Safeguarding Lead is Dave Simms, David.simms@footballfamily.org.uk, 07808 800207.

The Deputy DSL is: Laura Morton, laura.morton@footballfamily.org.uk, 07488 275267

Football Family 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 immediately about concerns they have about any young person. COVID-19 means a need for increased vigilance due to the pressures on services, families, and young people, rather than a reduction in our standards.

Children's services may be affected by the impact of the virus on staff and an increased demand for services. Where a child or vulnerable young adult is at risk of significant harm there may be a need to be persistent in referring concerns to the local authority by the DSL. The arrangements for contacting children's services are 0345 850 3503. Further details can be found at <https://www.wakefieldscp.org.uk/>

Please see the return to education risk assessments for August. We followed Government guidelines and only allowed 25% of any cohort into the classroom/learning environment at any one point. Some of our learners returned to face to face tuition whilst some lessons were still being conducted via Teams depending on the cohort/individual's situation. Most of our learners are now back to face to face delivery, please see the return to education risk assessments for September for how we are managing this whilst maintaining our learner's safety to the best of our ability.

<https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-further-education-provision/what-fe-colleges-and-providers-will-need-to-do-from-the-start-of-the-2020-autumn-term>

We have also created a separate risk assessment around travelling to and from our Centre's using the Government guidance- <https://www.gov.uk/government/publications/transport-to-school-and-other-places-of-education-autumn-term-2020/transport-to-school-and-other-places-of-education-autumn-term-2020>

Safeguarding young people

Our staff should be particularly vigilant to new and additional safeguarding concerns. Leaders have made staff and volunteers aware of what they should do if they have any concerns about a learner. It is important that they act immediately on any safeguarding concerns.

The Designated Safeguarding Leads (DSL) and his deputy have been given more time to support staff and learners with new safeguarding and welfare concerns as learners return to face to face tuition.

We will continue to work with and support where appropriate:

- young people's social workers
- the local authority virtual school head for looked-after and previously looked-after children
- personal advisors for care leavers
- any other relevant safeguarding and welfare partners

We have a statutory duty with regards to 16 and 17 year olds to provide information to local authority services to enable them to track and maintain contact with these young people. This will help local authorities to identify those not participating, so they can provide those learners with the support they need to reach their potential.

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](#).

There are also external resources available to support the safeguarding of young people, including:

- [SafeCall](#) which offers support to victims of exploitation - young people can contact SafeCall directly or can be referred to SafeCall by professionals
- the [See, Hear, Respond service](#) provided by Barnardo's to help young people in England who are experiencing harm and increased adversity during lockdown

Mental health and wellbeing

Many learners 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

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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:

- over the phone for any learners 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:

- [MindEd](#), which includes e-learning modules about young people's mental health
- 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 learners 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 learners 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 checks at the start of each lesson to ensure that all learners are engaged and supported
- delivering personal, social, health and economic (PHSE) lessons focused on topics including mental health awareness, healthy living, and online safety
- encouraging participation in sport, [AOC Sport](#) promotes and support sports in further education.

Safeguarding & Prevent Incident Report Form

This form should be used to record safeguarding or prevent concerns. The completed form should be sent by email to a member of the safeguarding team. (If the learner is in immediate danger call 999).

Your name	Your position
Department	Contact phone number
The learner's details	
Name	
Address/phone number	
Date of birth	
Other relevant details about the child: <i>E.g. family circumstances, physical and mental health, any communication difficulties.</i>	
Parent/Guardian/Carers details	
Details of the allegations/suspensions	
Are you recording: (Please put X in box for all relevant)	
<ul style="list-style-type: none"> • Disclosure made directly to you by the learner? <input type="checkbox"/> • Disclosure or suspicions from a third party? <input type="checkbox"/> • Your suspicions or concerns? <input type="checkbox"/> 	
Date and time of disclosure	
Date and time of incident	
Details of the allegation/suspensions. <i>State exactly what you were told/observed and what was said. Use the persons own words as much as possible.</i>	
Action taken so far:	
Signed	Date