

Creative Sports Coaching CIC

Child Protection and Safeguarding Policy



Key safeguarding contacts

| Role | Name | Contact number | Email |
|--|---|--|--|
| Designated Safeguarding Lead | James Hatch | 07711270986 | James@creativesportscoaching.co.uk |
| Company Director | James Hatch | 07711270986 | James@creativesportscoaching.co.uk |
| Local Authority Designated Officer (LADO) | Stephen Lagan | 0300 300 4825 | stephen.lagan@centralbedfordshire.gov.uk |
| Deputy Safeguarding Leads | Scott Wilson Daniel Saunders | 07397161852 07956883678 | safeguarding@creativesportscoaching.co.uk |
| Central Bedfordshire Safeguarding Children Partnership | Access and Referral Out of Hours (Emergency) | 0300 300 8585 0300 330 8123 | |

Introduction

Safeguarding is defined as protecting children from maltreatment, preventing impairment of children's mental and physical health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care, and taking action to enable all children to have the best outcomes.

Child Protection is defined as the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm.

(Working Together to Safeguard Children, DfE, 2018)

This includes, but is not limited to, safeguarding children in specific circumstances.

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|---|--|
| Bullying, including online and prejudice-based bullying | Impact of new technologies on sexual behaviour e.g. Youth Produced Sexual Imagery |
| Children missing education | Neglect |
| Children missing from home or care | Online, including grooming via social networking, online gaming, video messaging |
| Child sexual exploitation (CSE) and trafficking | Peer on peer abuse |
| Children with mental health difficulties or illness | Physical abuse |
| Contextual / extra-familial risks | Poor parenting |
| Domestic abuse / violence | Private fostering |

| | |
|--|--|
| Drugs / substance abuse | Racist, disability and homophobic or transphobic abuse |
| Emotional abuse | Radicalisation and / or extremist behaviour |
| Fabricated or induced illness | Relationship abuse |
| Faith based abuse | Self-harm behaviours |
| Female genital mutilation (FGM) | Sexting |
| Forced marriage | Sexual abuse |
| Gang / youth violence, including initiation and hazing | Sexual violence and sexual harassment |
| Gender based violence / violence against women and girls | Teenage relationship abuse |
| Hate | Upskirting |

Creative Sports Coaching CIC is committed to safeguarding and promoting the welfare of all its children.

We believe that:

Every child should feel safe and protected from any form of abuse and we are committed to safeguarding and promoting the welfare of children and young people and expect all staff and volunteers to share this commitment.

‘Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who meets children and their families has a role to play. To fulfil this responsibility effectively, all professionals should make sure their approach is child centred. This means that they should consider, always, what is in the best interests of the child.’ (Keeping Children Safe in Education, 2019)

We understand that we are legally required to comply with the welfare requirements set out in the Statutory framework for the EYFS (2017).

We ensure that:

- Our settings are welcoming, safe and stimulating so that children can grow in confidence.
- Good health is promoted, and appropriate action is taken when children are ill.
- Behaviour is managed effectively in a manner appropriate for the children’s stage of development and individual needs.
- All adults who look after the children or who have unsupervised contact with them are suitable to do so.
- Our venues, furniture and equipment is safe and suitable for the purpose it was intended.
- Every child receives enjoyable and challenging learning and development experiences tailored to meet their needs.
- We maintain records, policies and procedures required for safe, efficient management of the setting and to meet the needs of the children.

‘Children learn best when they are healthy, safe and secure, when their individual needs are met and when they have positive relationships with adults caring for them.’

We maintain that:

- All children have an equal right to be protected from harm.
- Children need support which matches their individual needs, including those who may have experienced abuse.

- All children have the right to speak freely and voice their values and beliefs.
- All children must be encouraged to respect each other's values and support each other.
- All children have the right to be supported to meet their emotional and social needs as well as their educational needs.
- Creative Sports Coaching CIC can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk-taking behaviours.
- All staff, volunteers and visitors have an important role to play in safeguarding children and protecting them from abuse.

Creative Sports Coaching CIC will fulfil responsibilities as laid out in the following documents:

- Working together to safeguard children (DfE, 2018)
- Procedures of the Local Safeguarding Children and Adults Boards
- Children Act 1989 (as amended 2004)
- What to do if you are worried a child is being abused (DfE, 2015)
- Prevent Duty, Counter Terrorism and Security Act 2015
- Serious Crime Act 2015
- Criminal exploitation of children and vulnerable adults: county lines (Home office guidance)
- Child sexual exploitation: definition and guide for practitioners (DfE, 2017)

Aims

This policy will contribute to safeguarding our children and promoting their welfare by:

- Clarifying standards of behaviour for staff and children.
- Contributing to the establishment of a safe, resilient and robust ethos built on mutual respect and shared values.
- Creating an organisational culture that is safe for children.
- Introducing appropriate work within the programme.
- Encouraging children and parents to participate.
- Developing staff's awareness of the risks and vulnerabilities children face to enable them to recognise and respond to concerns.
- Addressing concerns at the earliest possible stage in the least intrusive way.

Legislation and statutory guidance

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

Legislation

- Children Act 1989
- Sexual Offences Act 2003
- Female Genital Mutilation Act 2003 (as inserted by the Serious Crime Act 2015)
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Apprenticeships, Children and Learning Act 2009
- Equality Act 2010
- Anti-social Behaviour, Crime and Policing Act 2014
- Counter-Terrorism and Security Act 2015
- The UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018

- Voyeurism (Offences) Act 2019
- Domestic Abuse Act 2021
- Marriage and Civil Partnership (Minimum Age) Act 2022

Statutory guidance

- Home Office (2023) 'Prevent duty guidance: Guidance for specified authorities in England and Wales'
- DfE (2023) 'Working Together to Safeguard Children 2023'
- DfE (2018) 'Disqualification under the Childcare Act 2006'
- DfE (2023) 'Keeping children safe in education 2023'
- HM Government (2020) 'Multi-agency statutory guidance on female genital mutilation'
- HM Government (2023) 'Channel Duty Guidance: Protecting people susceptible to radicalisation'
- Home Office and Foreign, Commonwealth and Development Office (2023) 'Multi-agency statutory guidance for dealing with forced marriage and Multi-agency practice guidelines: Handling cases of forced marriage'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Information sharing'
- DfE (2020) 'Sharing nudes and semi-nudes: advice for education settings working with children and young people'

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

Principles

- Creative Sports Coaching CIC always see the child first and consider what life is like for the child maintaining a culture of vigilance.
- Provide support and intervention at the earliest possible opportunity in the least intrusive way in accordance with the Local Safeguarding Children Board (LSCB) Thresholds Framework.
- Have conversations, build relationships and maintain professional curiosity.
- Focus on securing improved outcomes for children.
- Build a culture of openness and transparency where all staff can demonstrate understanding of their role and responsibility to safeguard and promote the welfare of children.
- Every child is entitled to a rich and rounded experience.
- When issues arise, staff should speak out, addressing them internally where possible and engaging in a multi-agency response when required in accordance with interagency procedures.

Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- 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
- Are missing from education

Expectations

All staff and regular visitors will:

- Be familiar with this policy and implement it consistently in the course of their work with children.
- Be aware of the role and identity of the designated safeguarding lead and deputies for the company.
- Undertake referrals of child protection concerns to Children's Services in the absence of the designated safeguarding officer and be aware of the statutory assessments under Section 17 and Section 47 of the Children Act 1989 that they may contribute to.
- Be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc.
- Be alert to signs and indicators of safeguarding concerns and possible abuse.
- Record concerns and pass the record to the designated safeguarding lead or a member of the safeguarding team.
- Recognise and respond to concerns about the behaviour of staff, participants and volunteers which indicates they may pose a risk of harm to children following interagency procedures agreed by the LSCB.
- Deal with a disclosure of abuse from a child in line with the guidance in Appendix 4.

All staff will receive single agency foundation training at the point of induction. This will be regularly updated at a minimum of three-year intervals.

The designated safeguarding lead together with the named deputies will undertake additional higher level training in order to ensure they have appropriate knowledge and skills to undertake the role and will utilise these training opportunities available from the LSCB and other organisations as agreed by the Company Directors. This training will be regularly updated at a minimum of two-yearly intervals.

In addition to the above, all staff will receive annual safeguarding updates which may include e-learning, circulation of information and guidance internally, staff meetings and INSET training. The subject / topics for training and updates will take into consideration LSCB priorities, local context, the needs of our participants and identified training needs of staff.

Designated Safeguarding Lead

Our designated safeguarding lead (DSL), James Hatch, is a Director of Creative Sports Coaching CIC and takes lead responsibility for promoting outcomes by knowing the welfare, safeguarding and child protection issues that children have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at arranged activities.

They will provide support to staff members in carrying out their safeguarding duties and will liaise closely with other services, such as the Early Help Hub, Children's Social Care, Health and the Police.

The DSL is supported by the deputy DSL's, Scott Wilson and Daniel Saunders. The deputy DSLs are trained to the same level as the DSL and will undertake this role operationally with direct oversight and management from the DSL who maintains lead responsibility for safeguarding and child protection (including online safety).

The DSL is supported in developing knowledge and skills to:

- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the Company puts in place to protect them.
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate conversation.

When Creative Sports Coaching CIC has concerns about a child, the DSL or deputy will decide what steps should be taken in accordance with the LSCB Thresholds Framework and initiate a response accordingly. This may include providing a singly agency Early Help response, undertaking an Early Help assessment or referral to Children's Social Care for a statutory social work assessment. The Company Directors will be kept apprised of cases as appropriate.

The DSL will refer to the Model Setting Concern Process in Appendix 6 if a concern becomes apparent regarding a child.

The DSL and deputies should liaise with and work with agencies in line with Working Together to Safeguard Children (2018). The NPCC guidance [when to call the police](#) should help the DSL understand when they should consider calling the police and what to expect if they do so.

For further information on the role and responsibilities of the DSL, see Appendix 1.

The DSL will not disclose to a parent any information held on a child if this would put the child at risk of significant harm. In such circumstances advice will be sought from Children's Social Care.

The Directors and DSL James Hatch (Director) is responsible for the implementation of this policy, including:

- Ensuring that staff (including part-time 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.
- Communicating this policy to parents when their child joins activities and via the company website.
- 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 and child protection training and updating the content of this training regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

Safer Organisation Culture

The culture of our organisation is one that is safe for children and unsafe for adults that may pose a risk to children. There is a belief that safeguarding is the responsibility of all adults working or volunteering within the organisation and that all concerns will be reported to the DSL when concerns relate to an adult. The organisation has a culture of listening to and hearing the voice of the child.

Relay

Creative Sports Coaching CIC works in partnership with Central Bedfordshire Council and Bedfordshire Police to identify and provide appropriate support to pupils who may have experienced domestic abuse in their household; nationally this scheme is called Operation Encompass and locally as Relay. In order to achieve this, Central Bedfordshire Council will share police information with the Nominated Relay Single Point of Contact (SPOC) of all domestic incidents where one of our participants has been affected. On receipt of any information, the Nominated Relay SPOC will decide on the appropriate support the child requires. This could be silent or overt.

We will record and store this information in accordance with the record keeping procedures outlined in this policy.

Safer Recruitment and Selection

Creative Sports Coaching CIC pays full regard to Keeping Children Safe in Education (2021). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

It also includes undertaking interviews and appropriate enhanced checks through the Disclosure and Barring Service (DBS).

All recruitment materials will include reference to the Company's commitment to safeguarding and promoting the wellbeing of children.

The DSL has undertaken safer recruitment training and will be involved in all staff and volunteer recruitment processes and sit on the recruitment panel.

Our Role in the Prevention of Abuse

In accordance with Working Together to Safeguard Children (2018), the company recognises the need to safeguard children from:

- Neglect
- Emotional Abuse
- Physical Abuse
- Sexual Abuse

Appendix 3 contains more information about definitions and indicators. Our safeguarding policy cannot be separated from the general ethos of the Company, which should ensure that children are treated with dignity and respect, taught to treat each other with respect, feel safe, have a voice, and are listened to.

Safeguarding in specific circumstances

Staff must be aware of and alert to specific safeguarding issues.

Children who are vulnerable to extremism

The school seeks to protect children against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

In accordance with the Prevent Duty placed upon the Company by the Counter Terrorism and Security Act 2015 we understand the specific need to safeguard children, young people and families from violent extremism. The Company is clear that this exploitation and radicalisation should be viewed as a safeguarding concern.

The Company values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Both children and staff have the right to speak freely and voice their opinions. However, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion. Essential to our company are the fundamental British values of Democracy, Rule of Law, Equality of Opportunity, Freedom of Speech and the rights of all women and men to live free from persecution of any kind, and it would be expected that views and opinions expressed would be commensurate with these.

In accordance with the Prevent Duty, James Hatch is the Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the DSL if this is not the same person. Concerns must be recorded on the Company's safeguarding referral form. If a child is thought to be at risk of radicalisation, advice will be sought from the LADO.

In all cases, in accordance with advice provided from the LADO, the Company will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children assessed as being vulnerable to radicalisation. If staff are concerned that a child may be at risk of significant harm in relation to radicalisation or involvement in violent extremism, a child protection referral will be made to the LADO.

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.

FGM is illegal in the UK and it is also illegal to take a British national or permanent resident abroad for FGM, or help someone trying to do this. The Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a duty upon staff (along with social workers and healthcare professionals) **to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. This is in addition to following the Company's safeguarding reporting procedures.

If the Company is concerned that a child has experienced or is at risk of FGM, a child protection referral will be made to the LADO.

Forced Marriage

A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they are bringing shame on their family). Financial abuse (taking your wages or not giving you any money) can also be a factor.

The Anti-Social Behaviour, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. This includes:

- Taking someone overseas to force them to marry (whether or not the forced marriage takes place)
- Marrying someone who lacks the mental capacity to consent to marriage (whether they're pressured to or not)
- Breaching a Forced Marriage Protection Order

Modern Slavery

Modern slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol).

Modern slavery crimes include holding a person in a position of slavery, servitude forced or compulsory labour or facilitating their travel with the intention of exploiting them soon after. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

Types of human trafficking

There are several broad categories of exploitation linked to human trafficking, including:

- Sexual exploitation
- Forced labour
- Domestic servitude
- Organ harvesting
- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc.
- Forced marriage and illegal adoption (if other constituent elements are present)

Peer on peer abuse

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the specific Company activities and/or can occur between children outside of these environments. All staff, but especially the DSL and deputies, should consider whether children are at risk of exploitation or abuse outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual exploitation, criminal exploitation and serious youth violence.

Creative Sports Coaching CIC recognises that children can abuse other children, and such behaviours are never viewed simply as 'banter' or as part of growing up. We recognise that peer on peer abuse can take many different forms such as:

- Cyber-bullying
- Sending or posting sexually suggestive images, including nude or semi-nude photographs via mobiles or over the internet by persons aged under 18 (referred to as Youth Produced Sexual Imagery)
- Sexual assault
- Sexual violence or harassment
- Upskirting *
- Sexually harmful or problematic behaviour
- Gang initiation or hazing type violence
- Harassing messages and misogynistic messages
- Non-consensual sharing of indecent images
- Sharing of abusive images and pornography to those who do not want to receive such content

* Upskirting is an illegal offence which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification or cause the victim humiliation, distress or alarm.

The Company understands serious violence and what may signal that children are at risk from or are involved in serious violent crime. Indicators may include increased a change in friendships/relationships with older individuals or groups, a significant decline in performance, self-harm, significant changes in well-being or signs of assault/unexplained injuries. Unexplained gifts or new possessions could indicate that children have been appropriated, or are involved with, individuals associated with criminal networks or gangs.

Contextual safeguarding can also be known as '*risk outside the home*' (Working Together to Safeguard Children). The Company has a thorough understanding of contextual safeguarding and will make a referral in the first instance if apparent.

Sexualised behaviours

Where children display sexualised behaviours, the behaviours will be considered in accordance with the child's developmental understanding, age and impact on the alleged victim. The Company will follow the Sexual Violence and Sexual Harassment guidance (2021) when responding to such issues. This includes responding to any reports in a child centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children.

We will seek specialist advice, guidance and assessment, and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.

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

In all cases of peer on peer abuse, the Company will consider the vulnerability of all children including those alleged to have caused the harm and those alleged to be victims, and provide a safeguarding response consistent with the Central Bedfordshire Thresholds Framework.

(https://www.safeguardingbedfordshire.org.uk/assets/b3a83ecf/thresholds_document_cbscb_october_2023_final.docx)

Consideration will be given to violence in young people's relationships.

Where necessary, the school's behaviour policy will be invoked and any sanctions applied will be consistent with these procedures. Where issues indicate that a criminal offence may have been committed, a report will be made to Bedfordshire Police.

Gang related violence (Contextual/Extra-familial risk)

The school recognises the risks posed to children in relation to involvement in gang related activity, which may be street gangs, peer group or organised crime. Children who are involved in gangs are more likely to suffer harm themselves, through retaliatory violence, displaced retaliation, and territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children may experience violence as part of an initiation or hazing practice.

The school understands that Early Help can be crucial in the early identification of children who may need additional support due to gang related activity and as such will provide an Early Help response when concerns are raised about indicators of gang activity. If, however, information suggests a child may be at risk of significant harm due to gang related activity, a referral will be made to the LADO.

Youth Generated Sexualised Imagery

Creative Sports Coaching CIC recognises the impact of online social communication and the issue of sending or posting sexually suggestive images, including nude or semi-nude photographs via mobiles or over the internet. We pay due regard to the guidance issued by the UK Council for Child Internet Safety in relation to how we respond to incidents.

In all cases where an incident of youth produced sexual imagery is reported, the following actions will be undertaken:

- The incident should be reported to the DSL as soon as possible.
- The DSL should hold an initial review discussion or meeting with appropriate staff.
- There should be subsequent interviews with the children involved (if appropriate).
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the child at risk of harm.
- At any point in the process, if there is a concern a child has been harmed or is at risk of harm, a referral should be made to LADO and/or Bedfordshire Police immediately.

An immediate referral will be made to Bedfordshire Police and LADO in the following circumstances:

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

If none of the above applies the Company may choose to deal with the incident without involving Bedfordshire Police or LADO. This will usually be the case where the DSL is confident that they have enough information to assess the risks to the participants involved and the risks can be managed within the Company's pastoral support and disciplinary framework. All decisions will be based on the best interests of the child/children.

Adults in the Company will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible the DSL will respond to an incident based on what they have been told about the imagery. All incidents will be recorded.

Child Sexual Exploitation and Child Criminal Exploitation

Both Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious factor, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. This abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child Sexual Exploitation (CSE) does not always involve physical contact; it can also occur through the use of technology.

Child Criminal Exploitation (CCE) does not always involve physical contact; it can also occur through the use of technology without the child's immediate recognition, for example the persuasion to post sexual images on the internet/mobile phones with no immediate payment or gain. In all cases those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the child's limited availability of choice resulting from their social, economic and/or emotional vulnerability.

Creative Sports Coaching CIC recognises that both boys and girls can be vulnerable to CSE and as such ensures staff are alert to signs and indicators. The school recognises that there are various 'models' of Child Sexual Exploitation (CSE) which include, but are not limited to:

- Abuse of authority
- Boyfriend / girlfriend model

- Familial
- Gangs and groups
- Online
- Peer on peer

Where concerns are identified in relation to CSE, the Central Bedfordshire Thresholds Framework will be consulted in order to ensure the child receives support at the earliest possible opportunity.

If a child is thought to be at risk of significant harm through CSE, a referral will be made to the LADO. Advice will be sought to establish if a [National Referral Mechanism](#) is appropriate. In all cases, intelligence will be shared with Bedfordshire Police.

Children in specific circumstances

Further guidance in relation to safeguarding children in specific circumstances can be found in the LSCB/Central Bedfordshire Council procedures as listed below:

- Abuse linked to spiritual belief
- Child sexual exploitation
- Safeguarding children vulnerable to gang activity
- Supporting individuals vulnerable to violent extremism
- Private fostering
- Children missing from home or care
- Children missing education
- Children of parents who misuse substances
- Children of parents with learning difficulties
- Working with parents/carers with mental health problems
- Working with parents/carers with disabilities
- Disabled children
- Protocol for dealing with domestic violence when children are involved
- Online – children exposed to abuse through digital media
- Fabricated or induced illness
- Female genital mutilation
- Forced marriage / honour-based violence
- Modern day slavery / human trafficking
- Criminal exploitation of children across county lines
- Practice guidance and procedures to distinguish between healthy and abusive sexual behaviours in children and young people
- Safeguarding children who may have been trafficked
- Protocol and guidance; working with sexually active young people
- Working with hostile, non-compliant clients and those who use disguised compliance
- Safeguarding children on the autism spectrum

Mental Health

All staff are aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. However, staff will observe children day to day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are aware of how these experiences can impact on children's mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken in line with this policy, including discussion with the DSL or deputy.

Homelessness

The school recognises that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputies are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

The school recognises that whilst in most cases school staff will be considering homelessness in the context of children who live with their families, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's Services will be the lead agency for these young people and the DSL (or deputy) should ensure appropriate referrals are made based on the child's circumstances.

Staff are aware of the indicators that a family may be at risk of homelessness, such as household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Referrals and/or discussion with the Local Housing Authority will be progressed as appropriate but will not replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.

The Local Authority has a legal duty to address concerns under the Homelessness Reduction Act 2017. The focus is early intervention and to encourage those at risk to seek support as soon as possible before they are facing a homelessness crisis.

Domestic Abuse

All staff are aware of the Domestic Abuse Act 2021 which introduced the first statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

Staff will continue to develop their understanding of domestic abuse and how all children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Staff are aware exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Creative Sports Coaching CIC recognises that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. Domestic abuse is not limited to physical acts of violence or threatening behaviour, and can include emotional, psychological, controlling or coercive behaviour, sexual and/or economic abuse.

Staff understand that anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and adolescent to parent violence.

Young people can also experience domestic abuse within their own intimate relationships. This form of peer-on-peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young person, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence 24 hours a day on 0808 2000 247.

Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).

Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking').
- Denial of Service (Dos or DDoS) attacks or 'booting'- attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.
- Making, supplying or obtaining malware such as viruses, with the intent to commit further offences.

Children with a particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the DSL (or deputy) should consider referring into the Cyber Choices programme.

Cyber Choices is a nationwide police programme supported by the Home Office and led by the National Crime Agency which aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences. Additional advice can be found at [Cyber Choices](#).

Children with additional needs

Creative Sports Coaching CIC recognises that while all children have a right to be safe, some children may be more vulnerable to abuse, for example a young carer, a child frequently missing from home/care, children with special educational needs or disabilities, a child living with domestic abuse, parental mental ill health or substance abuse, or a child who has returned home to their family from care.

We recognise that additional barriers can exist when recognising abuse and neglect in children with special educational needs and disabilities or physical health issues. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges

Children with a social worker

Children may need a social worker due to safeguarding or welfare needs. We recognise that a child'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 participant has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the child'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

What we do when we are concerned about a child

All concerns will be viewed alongside the Central Bedfordshire Thresholds Framework https://www.safeguardingbedfordshire.org.uk/assets/b3a83ecf/thresholds_document_cbscb_october_2023_final.docx in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way.

In consultation with the Central Bedfordshire Thresholds Framework, if the concerns about the child indicate that they may be at risk of or suffering significant harm, a referral will be made to the Multi Agency Safeguarding Hub. The parent/carers will be informed of the referral unless informing the parent may place the child at increased risk of harm

Record keeping

Staff will record any welfare concerns that they have about a child and alert the DSL and deputies without delay. Records must be completed by the member of staff as soon as possible after the incident or event, using the child's words. If there is an immediate concern, the member of staff should consult with the DSL as this takes priority.

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. 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 children will be retained for a reasonable period of time after they have left the activities programme.

Involving parents/carers

In general, we will discuss any safeguarding and child protection concerns with parents/carers before approaching other agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL. However, there may be occasions when the company will contact another agency **before** informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child. Parents/carers will be informed about this policy through the school website, newsletter etc.

Training

All members of staff will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the company's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the Company's safeguarding approach and wider staff training, and course planning.
- Be in line with advice from the DSL and Company Directors.
- Have regard to the Staffs' Standards to support the expectation that all staff manage behaviour effectively to ensure a good and safe environment, and have a clear understanding of the needs of all participants

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 (for example, through emails, e-bulletins and staff meetings).

Volunteers will receive appropriate training, if applicable.

Designated Safeguarding Lead and Deputies

The DSL and deputies will undertake additional higher level child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regularly 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.

Directors

All Directors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

Responding to an allegation or concern about a member of staff

Creative Sports Coaching CIC will comply with the LSCB procedures for managing allegations and concerns about adults that work or volunteer with children in all circumstances.

These procedures should be used in any case in which it is alleged that a member of staff (**including part-time staff**), director, visiting professional or volunteer has:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a child; or
- Behaved in a way that indicates they may pose a risk of harm to children.
- Behaved in a way that indicated they may not be suitable to work with children.

We will consult with the LADO when an allegation is made against a member of staff to agree how to progress this.

Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff to abuse or mistreat children. All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.

Allegations or concerns about colleagues and visitors must be reported directly to the DSL. If the concern relates to the DSL, it must be reported immediately to the remaining directors of the company. Alternatively, concerns can be reported directly to the Local Authority Designated Officer (LADO) in Children's Social Care, who will liaise with the directors, and they will decide on any action required.

If a director is not available, the member of staff should report their concerns to the most senior member of staff available who will contact the LADO and discuss the concerns. Contact with the LADO should happen at the earliest possible opportunity and within one working day.

The LADO in Central Bedfordshire can be contacted on 0300 300 4825.

The LADO may request a referral which must be completed and submitted within one working day. Creative Sports Coaching CIC will engage with the LADO at all stages of the management of the allegation/concern and comply with local procedures published by the LSCB.

In this regard, the company will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated, however all reasonable alternatives to manage the risk will be considered. Due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards while a matter is investigated.

Should the company dismiss a member of staff/volunteer as a result of a substantiated allegation or should a member of staff/volunteer resign before an investigation has been completed, in accordance with statutory duty, a referral to the Disclosure and Barring Service will be made

Creative Sports Coaching CIC has appropriate policies and processes in place to manage and record any such concerns that do not meet the harm threshold and take appropriate action to safeguard children. Please see Appendix 5 for more information.

If a member of staff, participant or volunteer has any concerns about poor, unsafe practice, or failures of the safeguarding regime, they are encouraged to raise this with the DSL or company directors, following the confidential reporting (whistleblowing) policy of the company.

The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school. Staff can call 0800 028 0285, Monday to Friday from 8:00am to 8:00pm, or email help@nspcc.org.uk.

Mobile phones and cameras

Staff (including volunteers, contractors and anyone else otherwise engaged by the school) are not permitted to make or receive calls, or send texts, while children are present unless in assisting with the running of the activity. Use of personal mobile phones must be restricted to non-contact time and to areas of the school where children are not present, such as the staffroom.

Staff must refrain from giving their personal contact details to parents or pupils, including connecting through social media and messaging apps. Staff must avoid publicising their contact details on any social media platform or website to avoid unwanted contact by parents or pupils.

Staff must not use their mobile phones to take photographs or recordings of pupils, their work or anything else which could identify a participant. If it is necessary to take photos or recordings as part of an activity, this must be done using company approved equipment.

In some circumstances, it may be appropriate for staff to use personal mobile phones for work. Such circumstances may include, but are not limited to:

- Emergency evacuations
- Supervising off-site trips
- Supervising residential visits

In these circumstances, staff will:

- Use their mobile phones in an appropriate and professional manner, in line with our staff code of conduct.
- Not use their phones to take photographs or recordings of participants, their work, or anything else which could identify a participant
- Refrain from using their phones to contact parents. If necessary, contact must be made via the DSL.

Security

All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.

Appropriate checks will be undertaken in respect of visitors and volunteers coming onto premises. All visitors are expected to wear a visitors' badge whilst on the premises and will be accompanied at all times by a member of staff. Any individual who is not known or identifiable will be challenged.

Monitoring arrangements

This policy will be reviewed annually by the DSL. At each review, the policy will be approved by the full board of directors.

Links with other policies

This policy is linked to the following policies and procedures:

- Acceptable Use
- Anti-Bullying
- Behaviour
- Complaints
- Confidential Reporting (Whistleblowing)
- Data Protection
- Dealing with allegations of abuse against staff
- E-Safety
- First Aid
- Health and Safety
- Privacy Notices
- Safer Recruitment
- Special Educational Needs and Disabilities
- Staff Code of Conduct
- Supporting Pupils with Medical Conditions

Policy Review

This policy was approved by the DSL in August 2024. It will be reviewed annually or earlier if changes need to be made.

Signed: James Hatch, Director Creative Sports Coaching CIC, 4 Millwright Way, Flitwick, Bedfordshire MK45 1LB

Website: www.creativesportscoaching.co.uk

J Hatch

..... Date: 30th August 2024

Reviewable on annual basis

Next Review Date: 30th August 2025

Appendix 1

The Designated Safeguarding Lead will:

- Support staff who make referrals to the Local Authority Children's Social Care and act as a source of support, advice and expertise for all staff.
- Refer cases to the police where a crime may have been committed.
- Seek advice about safeguarding matters related to radicalisation and make referrals as required.
- Liaise with the board of directors for allegations to ensure, where necessary, referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child.
- Liaise with the Mental Health Support team, where safeguarding concerns are linked to mental health.
- Lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-making, will be recorded in case files.
- Ensure safeguarding and child protection information is dealt with in a confidential manner and in accordance with the LSCB's information sharing guidance.
- Ensure staff are informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual child and/or family.
- Ensure a written record is made of what information has been shared with whom and when.
- Ensure that child protection files are kept up to date.
- Ensure safeguarding and child protection records are stored securely in a central place separate from academic records.
- Ensure individual files are kept for each child:
- Ensure access to safeguarding and child protection records by staff other than the DSL is restricted, and a written record kept of who has had access to them and when.
- Ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff.
- Ensure general communications with parents are in line with any company policies and give due regard to which adults have parental responsibility.

Appendix 2

The board of directors will ensure that:

- The company contribute to inter-agency working in line with statutory guidance Working Together to Safeguard Children (2018). This includes providing a co-ordinated offer of Early Help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to Child Protection plans.
- The company provides an appropriate safeguarding response in accordance with the Central Bedfordshire Thresholds Framework in order to safeguard children.
- Online safety is considered with increasing work online, which poses concerns around potentially harmful and inappropriate online material. Governing bodies will ensure that appropriate filters and monitoring systems are in place.
- The board of directors pays due regard to the need to safeguard children in specific circumstances, such as Child Sexual Exploitation (CSE), Child Criminal Exploitation (CCE), vulnerability to radicalisation, Female Genital Mutilation (FGM) or peer on peer abuse which can include gang related violence, cyberbullying, sexually harmful behaviours, sexual violence, sexual harassment, upskirting or youth produced sexual imagery.
- The child protection policy reflects and addresses additional challenges exist for those children with special educational needs and disabilities and physical and mental health needs, and the company should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place.
- The company's safeguarding arrangements take into account the procedures and practice of the Local Authority as part of the inter-procedures, set up by the Local Multi Agency Safeguarding Board (LSCB). This includes working with Children's Social Care from other areas when children attend school in Central Bedfordshire but live outside of Central Bedfordshire.
- The company shares information with other professionals in the interests of safeguarding children in accordance with the guidance within Working Together to Safeguard Children (2018) and Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2015).
- They recognise the importance of information sharing between practitioners and local agencies. This should include ensuring arrangements are in place that clearly set out the processes and principles for sharing information within the company and with Children's Social Care, the safeguarding partners, other organisations, agencies, and practitioners as required.
- That company staff are proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging or where a child is already known to the Local Authority Children's Social Care.
- They are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- Relevant staff have due regard to the relevant data protection principles.
- The company will follow local procedures for sharing intelligence in relation to Child Sexual Exploitation and Child Criminal Exploitation, with Bedfordshire Police and the Single Point of Contact within Central Bedfordshire Council.

- The DSL ensures that safeguarding policies and procedures which have been adopted by the governing body are consistently implemented.
- The company has a staff code of conduct which should amongst other things includes staff/child relationships and communications, including the use of social media and other online platforms.
- The company has procedures for managing allegations and concerns about adults that work or volunteer with children and that these include the procedures for making referrals to the Disclosure and Barring Service where appropriate.
- The company operates Safer Recruitment procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with Keeping Children Safe in Education (2021).
- The DSL is a member of the senior leadership team and has lead responsibility for safeguarding which is not delegated. This is clearly defined within the role holder's job description and that this person has the appropriate authority, time, training, funding and resources to undertake this role, as per Appendix B of Keeping Children Safe in Education (2021).
- The DSL maintains management oversight of any work undertaken by the deputy DSLs
- Any deputy DSLs have the appropriate training, skills and knowledge to undertake the operational function of the DSL, as per appendix B of Keeping Children Safe in Education (2021).
- The DSL and deputies undertake LSCB higher level training to ensure they have the appropriate training, skills and knowledge to carry out this role.
- In addition, the DSL and deputies update their knowledge by receiving safeguarding updates via the designated safeguarding officer network events, attendance at training and learning events offered by the LSCB, online updates via NSPCC or attendance at professional development events.
- The DSL and all other staff who work with children undertake safeguarding training in accordance with Keeping Children Safe in Education (2021) and that they receive annual safeguarding updates to ensure their continued professional development.
- These updates take account of LSCB priorities, the local context, the needs of the participants and other identified training needs.
- All training will incorporate safeguarding children in specific circumstances, which includes, but is not limited to, Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and peer on peer abuse.
- The training will ensure that peer on peer abuse is never seen as 'banter' or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and gang initiation or hazing type violence. The training recognises how alcohol use, drug use, truanting and youth generated sexualised imagery increases risks of harm to children. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of looked-after children.
- Temporary staff and volunteers are made aware of the company's procedures for child protection and their responsibilities.
- The company remedies any deficiencies or weaknesses brought to its attention without delay and recognises the importance of utilising the expertise of the DSL and deputies in shaping safeguarding arrangements.

- The child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously and knowing they can safely express their views and give feedback.
- The directors reviews the policies/procedures annually.
- A member of the board of directors is nominated to liaise with the Designated Officer(s) from the relevant Local Authority and partner agencies in the event of allegations of abuse made against the DSL.

Appendix 3

Definitions and Indicators of Abuse

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

The following may be indicators of neglect:

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is regularly not collected or received from school
- The child is left at home alone or with inappropriate carers

Physical Abuse

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.

The following may be indicators of physical abuse:

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Bite marks
- Round burn marks

- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

Sexual Abuse

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 or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour, or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusual compliance
- Regressive behaviour, enuresis, soiling
- Frequent or open masturbation, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises or scratches in the genital area

Sexual exploitation

Child sexual exploitation occurs when a child, or another person, receives 'something' (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child performing sexual activities, or another person performing sexual activities on the child.

The presence of any significant indicator for sexual exploitation should trigger a referral to children's social care. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- Entering and/or leaving vehicles driven by an unknown adult
- Possessing unexplained amounts of money, expensive clothes or other items
- Frequenting areas known for risky activities

- Being groomed or abused via the internet and mobile technology
- Having unexplained contact with hotels, taxi companies or fast food outlets

The intelligence reporting form on the LSCB website will be used to share information with Bedfordshire Police and Children's Social Care that raises a concern around CSE.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children.

These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment

The following may be indicators of emotional abuse:

- The child consistently describes themselves in very negative ways, such as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Behaviours such as rocking, banging head, regression, tics and twitches
- Self harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders, such as anorexia nervosa and bulimia
- Soiling, smearing faeces, enuresis

N.B. Some situations where children stop communication suddenly (known as 'traumatic mutism') can indicate maltreatment.

Responses from parents

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to their age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child

- Alcohol misuse or other drug / substance misuse
- Parents request removal of the child from home
- Violence between adults in the household

Children with Special Educational Needs and Disabilities

When working with children with special education needs and disabilities (SEND), practitioners need to be aware of additional vulnerabilities to abuse and neglect, such as:

- Assumptions that indicators of possible abuse, such as behaviour, mood and injury relate to the child's disability without further exploration.
- Pupils being more prone to peer group isolation than other pupils.
- The potential for pupils with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers.

Possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child.
- Not getting enough help with feeding, leading to malnourishment
- Poor toileting
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment, for example callipers, sleep boards, inappropriate splinting
- Misappropriation of a child's finances
- Inappropriate invasive procedures

Appendix 4

Dealing with a Disclosure of Abuse

When a child tells me about abuse they have suffered, what must I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child.
- Tell them you are pleased that they are speaking to you.
- Never enter into a pact of secrecy with the child.
- Assure them that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell them that you believe them. Children very rarely lie about abuse but they may have tried to tell others and not been heard or believed.
- Tell the child that it is not their fault.
- Encourage the child to talk but do not ask 'leading questions' or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you.

- Communicate that they have a right to be safe and protected.
- Do not tell the child that what they experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what they have told you. It is essential to record all you have heard.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.

N.B. It is not the role of staff to seek disclosures; their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or a disclosure of abuse must be reported to Children's Social Care without delay by the DSL.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL.

Appendix 5

Allegations about a member of staff, director or volunteer

Inappropriate behaviour by staff or volunteers could take the following forms:

Physical

For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or inappropriate physical handling.

Emotional

For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, excessive and/or aggressive shouting, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.

Sexual

For example, sexualised behaviour towards peers, sexual harassment, sexual communication including via social networking, email, text, grooming behaviour, sexual assault and rape.

Neglect

For example, failing to protect a child or children, failing to seek medical attention or failure to meet a child's basic needs

Behaviours which may pose a risk

Some behaviours which may take place outside of the workplace could present a transferable risk in an employee's professional role working with or in the vicinity of children. For example, alleged perpetrators of domestic abuse, offences demonstrating a sexual interest in children, abuse or neglect of their own children or behaviours that are incompatible with a professional role working with children.

If a child makes an allegation or raises a concern about a member of staff (including supply staff), director, visitor or volunteer, the headteacher should be informed immediately. If the allegation or concern falls within the following criteria, the LADO will be contacted at the earliest possible opportunity and within 1 working day.

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

The DSL will not carry out the investigation themselves or interview participants.

If a child makes an allegation of physical abuse against an adult that works with children and there are visible bruises, marks or injuries, or if a child makes an allegation of sexual abuse against an adult that works with children, child protection procedures will be followed and a referral made to the Multi Agency Safeguarding Hub. The LADO will also be informed.

The DSL must exercise, and be accountable for, their professional judgement on the action to be taken, as follows:

- If the actions of the member of staff are felt likely to fall within the scope of the Interagency Allegation Management Procedures, the DSL will notify the LADO (0300 300 4825).
- If the DSL is uncertain whether the concern or allegation falls within the scope of the Interagency Allegation Management Procedures, a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file.
- Where an allegation has been made against the DSL, then the board of directors takes on the role of liaising with the LADO in determining the appropriate way forward.

For details of this specific procedure see the section on [Allegations against Staff and Volunteers](#) in the procedures of the LSCB.

Concerns that do not meet the harm threshold

Creative Sports Coaching CIC has policies and processes to deal with concerns (including allegations) which do not meet the harm threshold.

We recognise that concerns may arise in several ways and from a number of sources, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside of the organisation
- As a result of vetting checks undertaken

We understand that the term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in paragraph 338 of Keeping Children Safe in Education (2021).

A low-level concern is any concern that an adult working in or on behalf of the company may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

The company has appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children. We understand that creating a culture in which **all** concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

As good practice, our board of directors will:

- Set out their low-level concerns policy within their staff code of conduct and safeguarding policies.
- Ensure procedures are implemented effectively.
- Ensure their staff are clear about what appropriate behaviour is and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others.
- Empower staff to share any low-level safeguarding concerns with the DSL (or a deputy).
- Address unprofessional behaviour and support the individual to correct it at an early stage.
- Provide a responsive, sensitive and proportionate handling of such concerns when they are raised.
- Help identify any weakness in the school safeguarding system.

Low-level concerns about a member of staff will be reported to the DSL (or a deputy). Where a low-level concern is raised about the DSL, it will be shared with the board of directors.

All low-level concerns will be recorded in writing by the DSL (or deputy). The record will include:

- Details of the concern
- The context in which the concern arose
- Action taken
- The name of the individual sharing their concerns will also be noted, however if the individual wishes to remain anonymous this will be respected as far as reasonably possible.

Records will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, be referred to the LADO. Low-level concerns would not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it would be referred to in a reference.

Appendix 6

Model Setting Concern Process 2021

