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Safeguarding and Prevent Policy, Strategy and Procedures

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Policy Statement

Sport Structures is committed to safeguarding and aims to create a culture of vigilance; we expect everyone who works at the company and with us, to share this commitment. Our staff take all welfare concerns seriously and encourage children and adults to talk about anything that worries them. We will always act in their best interest. We pay close attention to, and work within the legislative safeguarding requirements documented in 'Keeping Children Safe in Education' (2023) and the statutory Prevent duty.

We recognise that safeguarding and child protection is an essential part of the duty of care to all individuals we come into contact with. **Everyone** working for Sport Structures shares an objective to keep children and adults safe by:

- Providing a safe environment for children and adults where they can learn and thrive
- Protecting children and adults from maltreatment
- Establishing and maintaining an environment where children and adults feel confident to talk and are listened to.
- Identifying children and adults who are suffering or are likely to suffer significant harm and taking appropriate action with the aim of making sure they are kept safe.

Safeguarding and promoting the welfare of children is everyone's responsibility. We are committed to ensuring our approach is learner centred. This means we need to consider, at all times, what is in the best interest of the learner (whether this be a child or adult).

Strategic aims

This document will contribute to the protection and safeguarding of children and adults by:

- Adopting a whole company approach to safeguarding.
- Adopting a learner-centred approach as outlined above.
- Clarifying standards of behaviour for staff (including those identified in 'scope' on page 5') and learners.

- Introducing appropriate teaching and learning practices to support learner knowledge and understanding
 - Encouraging learners and parents to participate
 - Alerting relevant staff to the signs and indicators that all may not be well
 - Identifying clear procedures for reporting
 - Developing staff awareness of the causes of abuse
- Developing staff awareness of the risks and vulnerabilities learners may face

- Addressing concerns at the earliest possible stage
- Reducing the potential risks learners face of being exposed to multiple harms including violence, extremism, exploitation, discrimination or victimisation
- Recognising risk and supporting online safety for learners, including in the home

This means that we will:

- Identify and protect all learners especially those identified as vulnerable learners
- Identify individual needs as early as possible; gain the voice and lived experience of vulnerable learners and design plans to address those needs
- Work in partnership with learners, parents/carers and other agencies as appropriate.

Values

British Values are of significant importance to everyone involved in Sport Structures activity. We promote all these values to our learners. British values are defined as:

- Democracy
- The Rule of Law
- Individual Liberty
- Respect and Tolerance

The ethos of Sport Structures is also embedded in our company values:

- Integrity
- Excellent
- Passion
- Togetherness

Scope

This policy, strategy and procedures will apply at all times when Sport Structures is providing services or activities. It applies to:

- The Board at Sport Structures
- Staff
- Learners
- Employers providing an apprenticeship
- Associate workforce (i.e. tutors, assessors, mentors, quality assurers)
- Volunteers
- Contractors
- Anyone who comes into contact with a learner
- Associates who provide a service to the company
- Working groups coordinated by Sport Structures, such as the Governance and Quality Group
- All Sport Structures activities

In this document, we will refer to **children and adults** in learning as **learners**. We recognise that children and adults may face different issues and the reporting mechanisms are not the same. Legislation also differs between children and adults. Additionally, this document will refer to staff as paid employees of Sport Structures. We may also have associate workforce that work for us from time to time. For the purpose of this document, they will be referred to as **staff**.

Statutory Framework

In order to safeguard and promote the welfare of children and adults in learning, we will act in accordance with the following legislation, statutory guidance and regulations:

- Keeping Children Safe in Education – September 2023
- Working Together to Safeguard Children February 2018
- The Children Act 1989 and 2004
- Children and Social Work Act 2017

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- The Care Act 2014
- Safeguarding Vulnerable Adults Act 2006
- The Counter Terrorism and Security Act (Prevent Duty) 2015
- Prevent Duty Guidance for England and Wales
- The Education Act 2001
- Procedures set out by the Birmingham Safeguarding Children Partnership, and Birmingham Safeguarding Adults Board
- Ofsted Education Inspection Framework

This document also encompasses best practice for specific elements of our business, such as

DfES/NIACE "Safer Practice, Safer Learning" (2007) which applies to all providers of post-16 learning and skills.

Other policies and systems that support safeguarding

This document should be used in conjunction with the following company policies/procedures where necessary:

- Safe Recruitment
- Behaviour:
 - Code of Conduct for staff
 - Code of Conduct for learners
- Health and Safety
- Equality and Diversity
- Complaints Policy
- Prevent
- Whistleblowing
- Disciplinary
- External speakers and events
- Privacy
- E-Safety

- I.T Acceptable Use
- Malpractice

Glossary of Terms

- **A child** – the United Nations convention on the Rights of a Child defines a child as any person under the age of 18 years.
- **Vulnerable Adults** – an individual aged 18 years or over and who is being provided with a regulated service. Generally, the more dependent a person is on the help of others for general day to day living, the more vulnerable the person is likely to be. This is especially so where there is also a degree of mental incapacity or mental disorder that affects the person's ability to make informed decisions and exercise choice.
- **Disclosure** - is the process by which a child/adult will let someone know that abuse is taking place. This may not happen all in one go and may be a slow process that takes place over a long period of time.
- **Regulated Activity** – a legal term defining the type of activity that persons barred by the Disclosure & Barring Service (DBS) must not undertake. This primarily covers childcare, health care, personal care, social care and education. Regulated activity undertaken by Sport Structures staff may include teaching, training and instruction of children (although not in the course of employment). See www.gov.uk Safeguarding Vulnerable Groups Act 2006 for full definitions of regulated activity.
- **SEND** –Special Educational Needs and Disabilities. All staff and individuals associated with Sport Structures need to be aware that additional barriers can exist when recognising abuse and neglect in learners with special educational needs (SEN) and disabilities. This can include:

- - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the learner's disability without further exploration.
 - Learners with SEN and disabilities can be disproportionately impacted by issues such as bullying without outwardly showing any signs. Communication barriers and difficulties in overcoming these barriers.
- **Looked After Children** – all staff need to be aware of issues around safeguarding looked after children. The most common reason for young people becoming looked after is as a result of abuse and/or neglect.
- Sometimes, a single traumatic event may constitute **significant harm**, e.g. violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the adults physical and psychological development.
- **Child Protection** – This concerns the procedures to respond effectively to concerns about a child.
MASH – is a Multi-Agency Safeguarding Hub (MASH) which identifies risks to young children and is usually a link between schools, GPs, the police, ambulance service and social care.
- **Safeguarding** - Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. Safeguarding means:
 - protecting children from abuse and maltreatment
 - preventing harm to children's health or development
 - ensuring children grow up with the provision of safe and effective care
 - taking action to enable all children and young people to have the best outcome
- **Safeguarding actions may be needed to protect learners from the following:**
 - Physical abuse
 - Emotional abuse
 - Sexual abuse
 - Neglect

- Bullying including cyberbullying
- Child abduction
- Child missing from education
- Child missing from home or care
- Child criminal exploitation
- Child sexual exploitation (CSE)
- Child on child abuse
- Cybercrime
- Domestic abuse
- Substance misuse
- Fabricated or induced illness.
- So called 'honour' based abuse
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Harmful sexual behaviour
- Gangs and youth violence
- Gender-based violence / violence against women and girls (VAWG)
- Mental health.
- Lesbian, gay, bi or trans (LGBT)
- Radicalisation and Violent Extremism
- Relationship abuse
- Serious violence
- Sexual violence and sexual abuse
- Sexual harassment
- Youth produced sexual imagery
- Trafficking
- County lines

A more comprehensive list can be found in appendix 1.

- **Harm** – is the ill-treatment, or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill-treatment of another.

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- **Concerns that cause harm** - The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child/adult. Harm may be defined in cases where an adult has:
 - o Behaved in a way that has harmed or may have harmed a child/adult.
 - o Possibly committed a criminal offence against, or related to, a child/adult.
 - o Behaved towards in a way that indicates they may pose a risk of harm to children/adults.
 - o Behaved in a way that indicates they may not be suitable to work with children/adults
- **Low level concerns or poor practice** - A low level concern is defined as any concern about an adult's behaviour towards, or concerning, a child or **another adult** that does not meet the harms threshold above or is not serious enough to consider a referral externally at the time of reporting.
- **Extremism** - is defined in the 2011 Prevent strategy as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Included in the definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
- **Non-violent extremism** - is extremism, as defined above, which is not accompanied by violence.
- **Prevent** – Prevent concerns actions to safeguard vulnerable people from becoming terrorists or supporting terrorism and protecting those who are being targeted by terrorist recruiters. Prevent concerns all forms of terrorism and does not focus on any one community.
- **Radicalisation** - refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** - is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Guiding Principles

The policy lists information in the following headings:

- **Prevention and responsibilities:** through the teaching and pastoral support offered to learners and the creation of and maintenance of a whole Company proactive ethos.
- **Procedures** for identifying and reporting cases, or suspected cases of abuse or radicalisation.
- **Supporting vulnerable adults and children** those who may have been abused or witnessed violence towards others
- **Preventing unsuitable people working with children**
- **Reporting**

Prevention and responsibilities

We recognise that high self-esteem, confidence, supportive friends and good lines of communication help to learners. The company will therefore:

- Establish and maintain an environment where learners feel safe in both the real and virtual world and are encouraged to talk and are listened to.
- Ensure learners know that there are adults in the company whom they can approach if they are worried or in difficulty and their concerns will be taken seriously and acted upon as soon as appropriate.
- Include in the curriculum, content and activities which equip learners with the skills they need to stay safe from abuse and radicalisation both in the real and virtual world, contextualised to the environment / roles they are undertaking.
- Through delivery of the curriculum, signpost to relevant resources and organisations that can offer support and improve understanding
- Include in the curriculum material which will help learners develop realistic attitudes to the responsibilities of adult life
- Support staff should they make any disclosures or report any concerns, including Whistleblowing

Further information with regards to the government's Prevent Strategy can be found at <https://www.gov.uk/government/publications/prevent-strategy-2011>

Responsibilities

All staff

All staff will:

- Read and understand this document, along with associated policies which support safeguarding (page 6 and 7)
- Know who the company Designated Safeguarding Lead or Deputy Designated Safeguarding Lead is and be able to approach them if they are unsure or wish to seek advice
- Follow the principles identified in the policy statement on page 4.
- Identify concerns early and be prepared to identify children who may benefit from early help
- Receive appropriate safeguarding and prevent training.
- Be kept regularly updated with safeguarding and prevent updates (at least annually) to provide them with the relevant skills and knowledge to safeguard and protect learners.
- Know what to do if a child or adult tells them they are being abused, exploited or neglected and how to maintain confidentiality.
- Be able to re-assure victims that they are being taken seriously and that they will be supported and kept safe.
- Be aware of the process for making referrals to local authority children's social care and for statutory assessments under the Children Act 1989 and be aware of the role they might need to play in such assessments.
- Be aware of the types of abuse, neglect, exploitation and radicalisation (Appendix 1) understanding that children and adults can be at risk of harm both inside and outside of work and inside and outside of home and online.
- Have the confidence and knowledge to identify children or adults at risk of being drawn to terrorism.

- Be aware that children and adults may not always be ready or able to talk about their experiences of abuse or recognise that they are being abused, exploited, neglected or recognise that their experiences are harmful.
- Be aware that abuse, neglect, safeguarding and prevent issues are rarely standalone events and cannot be covered by one definition. In most cases, multiple issues will overlap.

Sport Structures Board

The Sport Structures Board will:

- Ensure that it has an effective Safeguarding Policy in place which is updated annually and that the company contributes to inter-agency working in line with statutory guidance.
- Ensure that the company's Safeguarding arrangements take into account the procedures and practice of the local authority as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children's Partnerships and Adult Safeguarding Boards.
- Ensure that the company complies with the Prevent Duty as set out in the CounterTerrorism and Security Act 2015.
- Ensure that the policies and procedures in place enable appropriate action to be taken in a timely manner to safeguard and promote learners' welfare.
- Ensure that a Designated Safeguarding Lead is appointed to lead on safeguarding, advise/support staff and liaise with the Local Authority and other agencies. They will have status and authority to carry out the role e.g. commit resources to safeguarding and direct staff as appropriate.
- Give scrutiny to regular reports which will provide detail on the numbers and types of safeguarding incidents and concerns which have arisen, along with updates from the DSL, Human Resources and the Senior Apprenticeship Manager
- Ensure that training is updated yearly in accordance with government guidance or training policy
- Hold a safeguarding central record where the DSL and Deputy DSL has access to all safeguarding reports.

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- Hold a staffing central record where the DSL and Deputy DSL has access to DBS, right to work in the UK and references for all staff.
- Ensure staff DBS checks as per the recommended guidance on the update service to remain as accurate as possible
- Ensure at least one member of the Board is nominated with a special interest in safeguarding and child/vulnerable adult protection and that they have undertaken appropriate training
- Ensure every member of staff, paid and unpaid is able to execute their responsibilities, identified on page 11.

The Designated / Deputy Safeguarding Lead

The Designated / Deputy Safeguarding Lead/s will:

- Undertake required training (both trained to the same level) and access continual professional development opportunities regularly (refresher training annually)
- Manage referrals (Local Children's Services, MASH, Channel, Police)
- Act as a point of contact with safeguarding partners (i.e. LADO, Adult Safeguarding Board)
- Provide support, advice and guidance for any staff member, learner and employer with a safeguarding or child protection concern
- Take responsibility for case management
- Keep detailed, accurate, confidential and secure written records of concerns, disclosures and referrals. Ensure all such records are kept confidentially and securely.
- Ensure staff are aware and have access to our Safeguarding and Prevent Policy, which is reviewed annually
- Communicate regularly to staff in regard to safeguarding and prevent updates.
- Ensure as a company, we are meeting legal and statutory requirements

- Ensure that the Safeguarding Policy is available publicly
- Provide an Annual Safeguarding report for the Sport Structures Board, detailing any changes to the policy and procedures; training undertaken by self, staff with specific responsibility and all other staff and number and type of incidents/cases.
- Ensure the quality assurance of the provision of safeguarding information, advice and guidance and procedures
- Obtain access to resources
- Liaise with OFSTED where relevant
- Deal with allegations against staff
- Liaise with the internal safeguarding and prevent group any other relevant staff to inform of any issues/ongoing investigations
- Encourage a culture of listening to children and adults, taking into account their wishes and feelings to best support and protect them.
- Liaise with the Sport Structures Board to inform them of issues – especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an appropriate adult (PACE Code 2019) Both Safeguarding Leads are senior members of staff with leadership responsibilities. Details of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead can be found below.

Designated Safeguarding Lead
<p>Jobeth Hamilton</p> <p>jobeth.bastable@sportstructures.com</p> <p>07917 388166</p> <p>Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP</p>

Deputy Designated Safeguarding Lead

Simon Kirkland

Simon.kirkland@sportstructures.com

07766 768474

Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham
B15 1NP

The Company

Liaison with Other

Agencies The company

will:

- Work to develop effective links with relevant services to promote the safety and welfare of all learners
- Co-operate pro-actively as required, in line with Working Together to Safeguarding Children, with key agencies in their enquiries regarding child protection or Prevent matters.
- Establish and maintain links with regional Prevent Leads and the Police Channel Coordinator

Record Keeping

The Company

will:

- Keep clear, detailed, accurate, written records of any safeguarding concerns (noting the date, event and action taken), even where there is no need to refer the matter to an external agency
- Ensure all records are kept securely in an area only available to the DSL and Deputy DSL and any other Director that may be suitable *Confidentiality and information sharing* The Company will:
- Child/vulnerable adult protection information will be stored and handled in line with the General Data Protection Regulation (GDPR) 2016. GDPR does not

prevent Company staff from sharing information with relevant agencies, where that information may help to protect a child or vulnerable adult.

- Child/vulnerable adult protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children/vulnerable adults and parents do not have an automatic right to see them. If any member of staff receives a request from a learner or parent to see child/vulnerable adult protection requests, they will refer to the DSL or Deputy DSL.
- Ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL or Deputy DSL. Information sharing: Guidance for Practitioners and managers is available from Department of education www.education.gov.uk
- Ensure that the DSL and Deputy DSL only disclose any information about a learner to other members of staff on a "needs to know" basis, including Domestic Violence notifications
- Make all staff aware that they have a professional responsibility to share information with other agencies in order to safeguard children and vulnerable adults, if required.
- Ensure staff are clear with children and vulnerable adults that they cannot promise to keep secrets

Communications with Parents/Carers

The Company will:

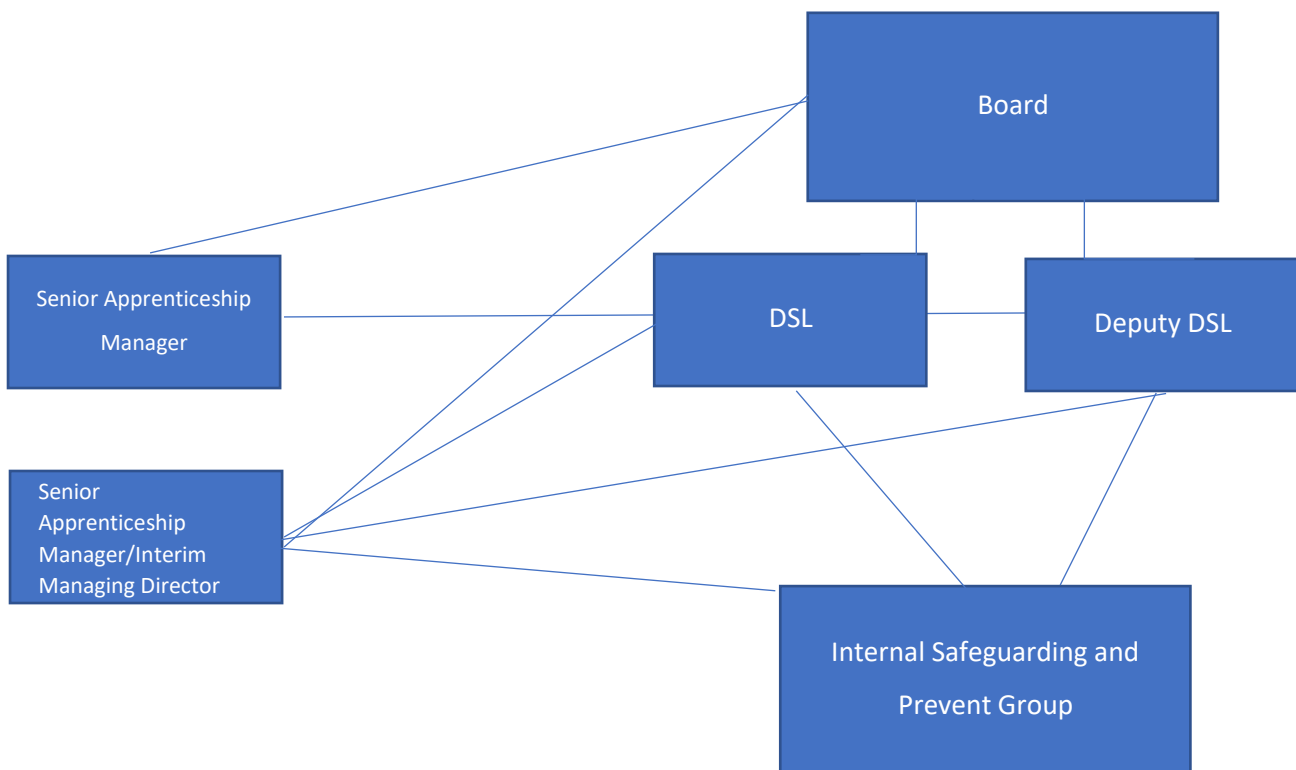
- Ensure that parents/carers are informed of the responsibilities placed on the Company and staff in relation to child/vulnerable adult protection by setting out its duties on the Company website
- Undertake appropriate discussion with parents/carers prior to involvement of another agency unless the circumstances preclude this action. If the Company believes that notifying parents could increase the risk to the child/vulnerable adult or exacerbate the situation, advice will be sought from social care. (Further guidance on this can be found in the Core

Internal Safeguarding and Prevent Group

The internal safeguarding and prevent group will:

- Oversee the company's policies and procedures in relation to Safeguarding and Prevent
- Own the safeguarding and prevent risk register and action plan
- Ensure useful information is shared to best protect children, adults and staff.
- Ensure the company is up to date and relevant with training, information sharing and reporting procedures

The group meets every other month, virtually. An illustration of the roles and responsibilities associated with the Policy can be seen below:



Procedures for dealing with concerns

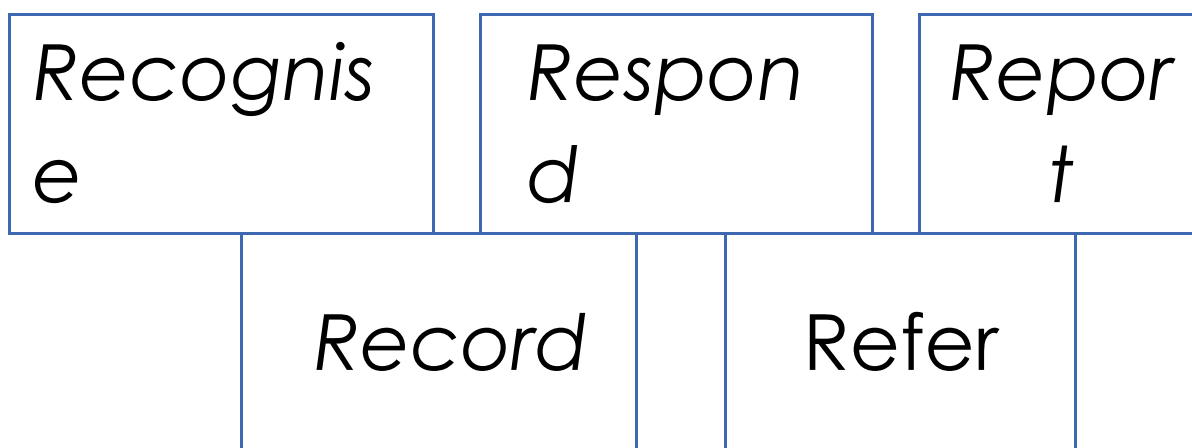
Our procedures have considered the procedures of the Local Safeguarding Children Partnership, the Adult Safeguarding Board procedure and guidance from Channel. Concerns, disclosures and allegations will be taken seriously and dealt with as soon as possible, in line with this document.

The wishes of any victim and the protection of the individual will be important when considering immediate actions.

Dealing with a safeguarding issue

The Designated Safeguarding Lead (DSL) should be the first point of contact. If they are unavailable, please contact the Deputy DSL. The **DSL or Deputy DSL** is responsible for conducting any investigation.

If there are concerns that a vulnerable child or adult may be in danger, appropriate action must be taken to prevent further risk. We have guiding principles to deal with safeguarding issues which are known as the 5Rs:



- **Recognise:** Be aware and have an understanding of the indicators and signs of potential abuse, neglect, exploitation, harm and radicalisation. Relevant training can support you to recognise these.
- **Respond:** If you do have a safeguarding concern, it is essential that you respond appropriately.
Do not ignore the situation.

- **Report:** Safeguarding concerns need to be reported without delay. Confidentiality is important so only share information with those that are part of the safeguarding process. Speak to the DSL or Deputy DSL.
- **Record:** This is the who, where, what, why and when of safeguarding. Take notes that detail everything about your concern. This should be completed as soon as possible. Please use the
- **Refer:** It is the responsibility of the DSL and Deputy DSL to review the concern and make a decision whether the disclosure needs to be passed onto the relevant authorities. However, if somebody is under immediate or severe threat or danger, you should contact the relevant local authority or police.

Additional advice:

- Listen carefully and stay calm.
- You cannot provide any assurance that the information can remain confidential between yourself and the person disclosing.
- Do not interview them, but question normally and without pressure, in order to be sure that you understand what they are telling you
- Do not put words in their mouth. Use open questions only and clarify important points where necessary.
- Reassure the child/vulnerable adult that by telling you, they have done the right thing.
- If the child or vulnerable adult declines to discuss the incident, you must inform the DSL.
- In no circumstances should you investigate the allegation or disclosure yourself. Ensure it is reported immediately or as soon as practically possible to the DSL, or if they are unavailable, the Deputy DSL.

Procedures for staff

Staff concerns about a learner

If staff members have **any concerns** about a learner, this must be referred to the DSL or Deputy DSL as soon as possible. They will assess the severity of the concern.

It is recommended that staff complete the Safeguarding Disclosure Form. Options can include referral to external specialist services or pastoral support and local monitoring. Providing early help is more effective in promoting the welfare of children and adults than reacting later.

Staff **may** be required to support other agencies and professionals in an early help assessment and share information support early identification and assessment. The DSL or Deputy DSL will take the lead on working with external agencies.

If a learner makes a disclosure to a member of staff

If a learner makes a disclosure to a member of staff, the learner should be acknowledged, taken seriously and listened to. As soon as it becomes clear that the learner is talking about a safeguarding issue, you need to gently stop them and inform them that if they continue you have a **legal obligation** to pass this information on to a DSL or Deputy DSL. **You cannot promise confidentiality to the learner.**

Reassure the learner but tell them that a record of information given will be made. It is important not to ask too many questions as **it is clear that you must not under any circumstances investigate any accusations.**

Allow the learner to freely recall significant events, keeping questions to the absolute minimum necessary to ensure a clear and accurate understanding of what has been said. Record the factual details of what has been told to you using the Safeguarding Disclosure Form.

Contact the DSL or Deputy DSL immediately to explain the situation and pass on the written notes. The DSL will outline the action that they have to take so that you can explain this to the learner. It may be appropriate for the DSL to meet the learner. You must not take any further action yourself.

If a member of staff receives information about a learner from another person

If a member of staff receives information about a learner, which suggests a that there is a safeguarding issue or that this is likely, this must be recorded on the

Safeguarding Disclosure Form and reported immediately to the DSL. The DSL will assess the severity of the issue.

If a member of staff suspects a learner has a safeguarding concern

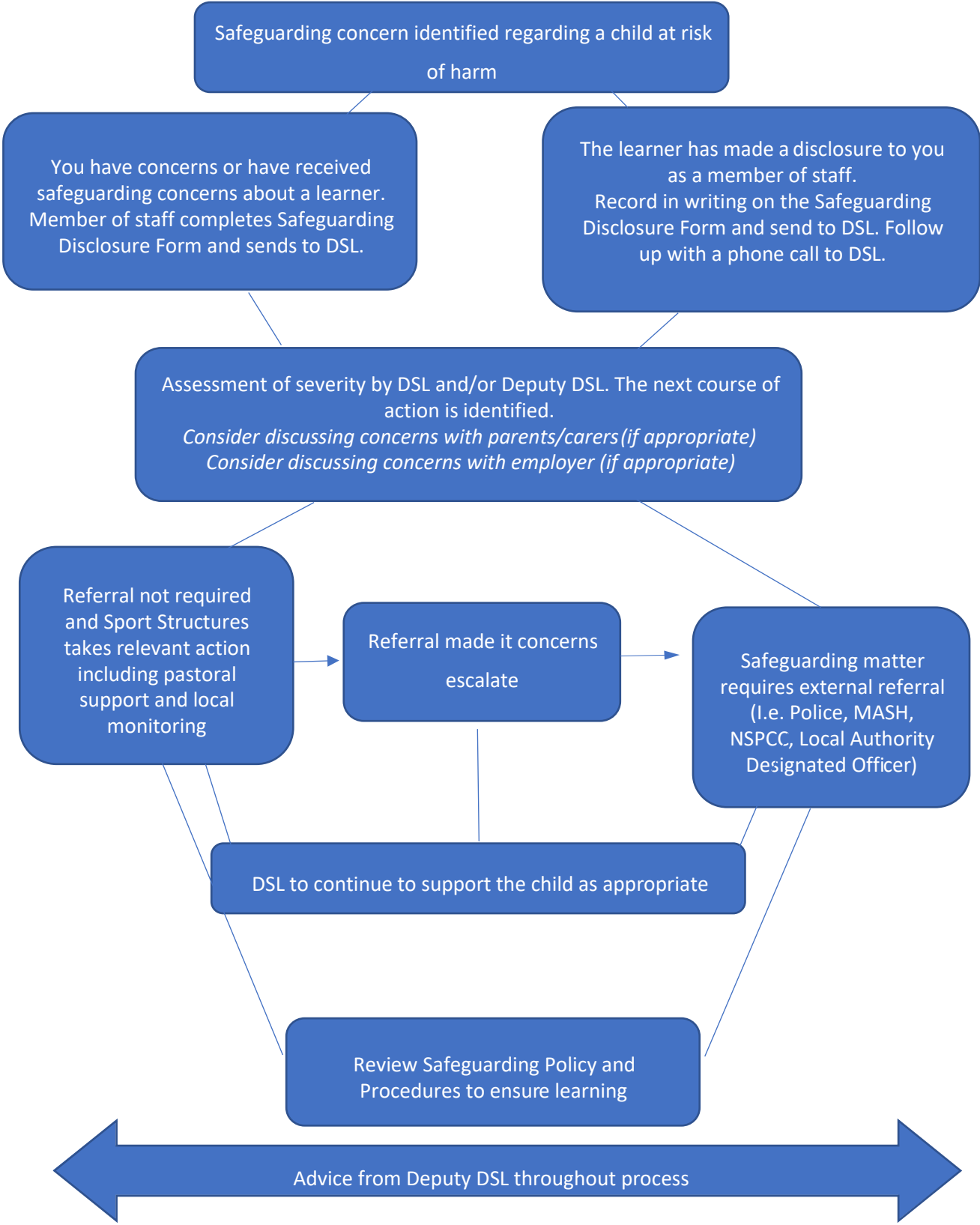
If a member of staff suspects that a learner is at risk from a safeguarding issue, they must discuss these concerns with the DSL or Deputy DSL and not take any independent action. The concerns must be recorded on the Safeguarding Disclosure Form.

All contact with outside agencies over issues of safeguarding must be approved by the DSL/Deputy DSL. They will decide whether to make a referral. In exceptional circumstances, such as in an emergency or a genuine concern that action has not been taken, staff members can speak directly to an external agency.

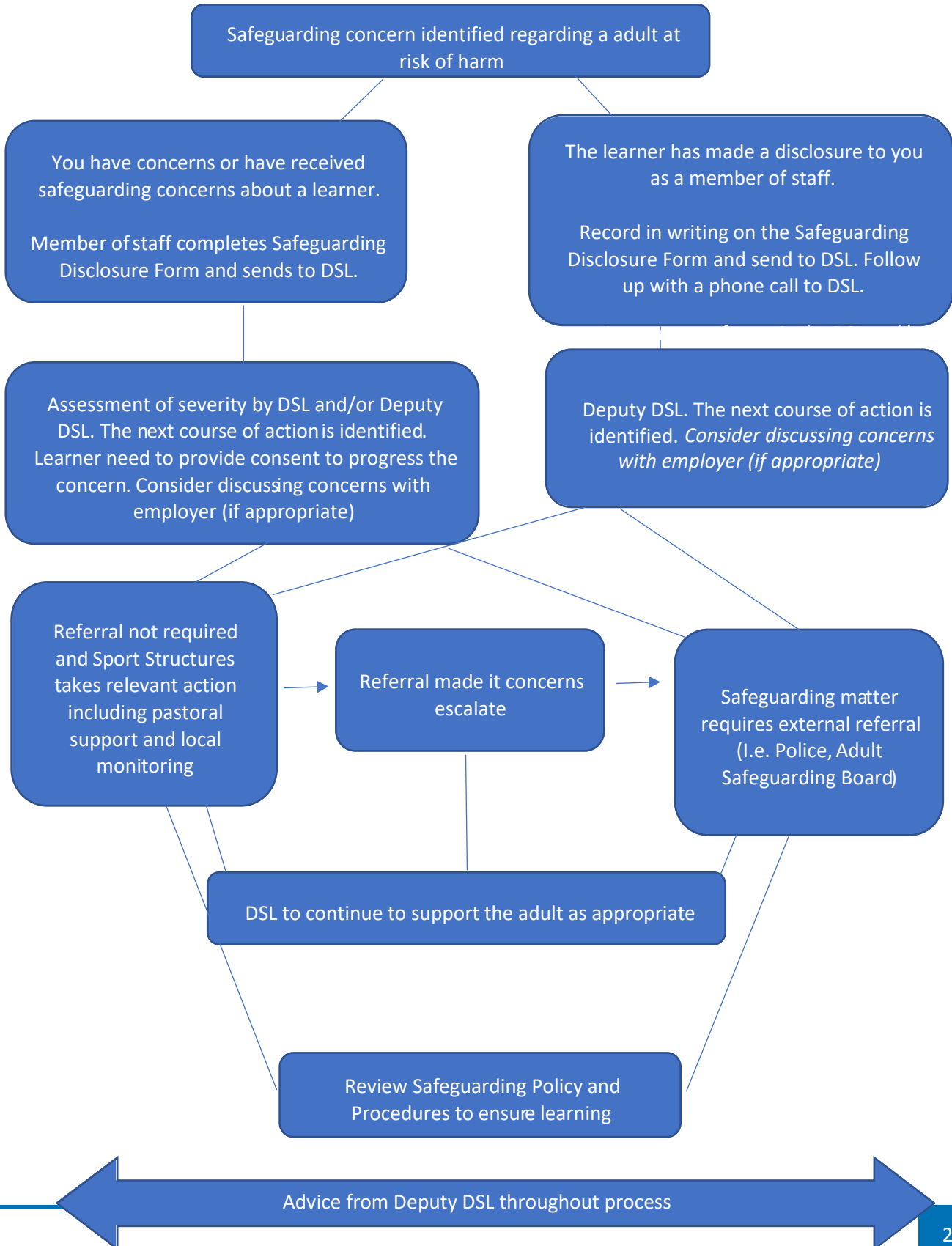
Parents / carers and have the right to be informed in respect of any concerns or any action taken to safeguard and promote their welfare, providing this does not compromise the learner's safety.

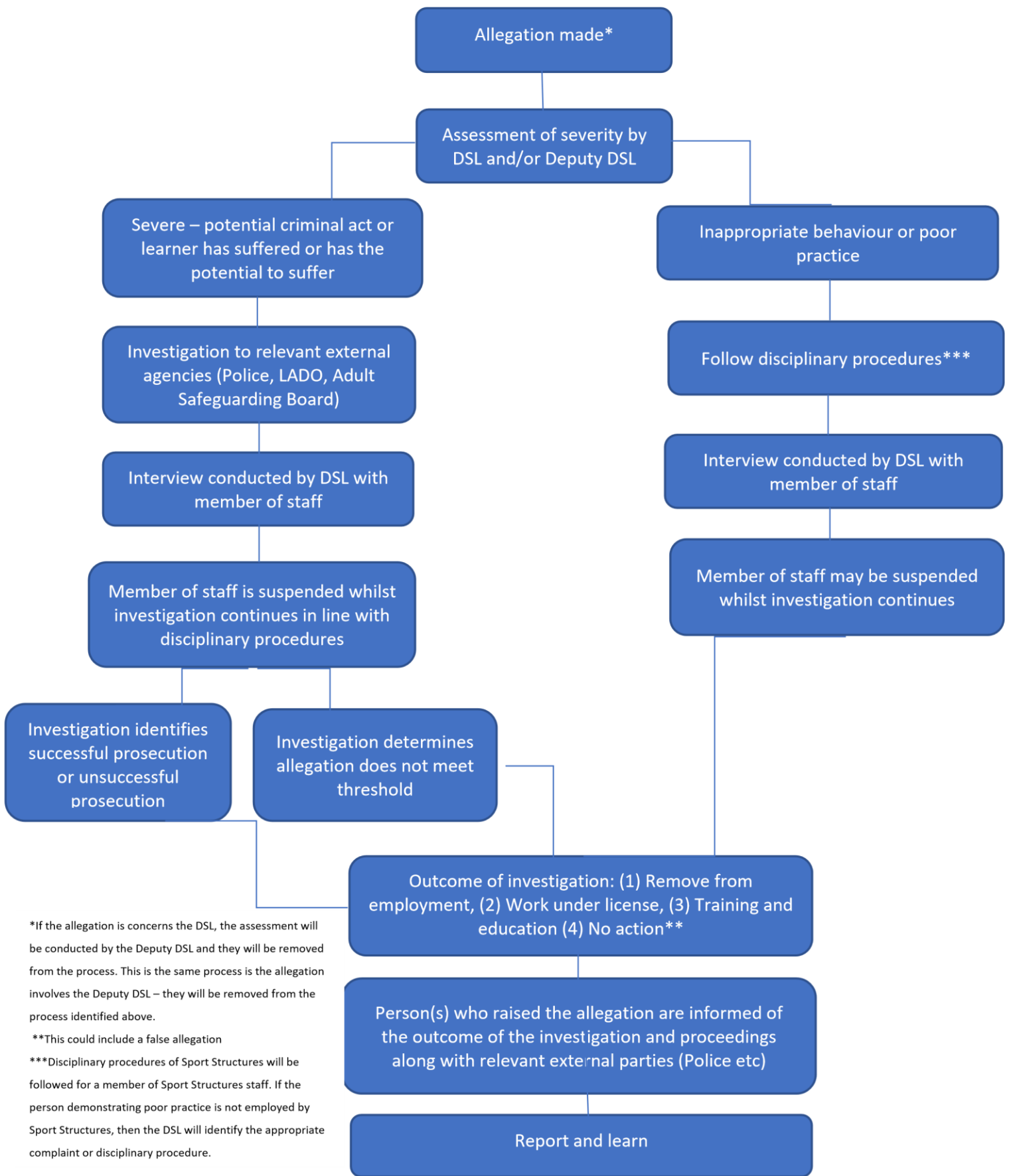
Support will be offered to learners through the process, and this will be led by the DSL.

Safeguarding Procedure for Children (Under the Age of 18 years of age)



Safeguarding Procedure for Adults (over the age of 18 years)





*If the allegation concerns the DSL, the assessment will be conducted by the Deputy DSL and they will be removed from the process. This is the same process if the allegation involves the Deputy DSL – they will be removed from the process identified above.

**This could include a false allegation

***Disciplinary procedures of Sport Structures will be followed for a member of Sport Structures staff. If the person demonstrating poor practice is not employed by Sport Structures, then the DSL will identify the appropriate complaint or disciplinary procedure.

Absent and missing (Apprentices)

It is recognised that if an apprentice is missing or absent from work/learning sessions, this could be a safeguarding warning sign. We have a clear absence and tracking process to monitor absenteeism which staff are aware of.

Concerns about another Staff Member

It is recognised that sometimes there may be concerns about a Sport Structures member of staff.

The Whistleblowing policy identifies situations that constitutes grounds for whistleblowing:

- Criminal offences (e.g. fraud, blackmail, bribery, corruption)
- Endangering someone's health and safety
- Damage to the environment
- A miscarriage of justice
- A failure to comply with legal and regulatory obligation
- A safeguarding concern
- Improper conduct or unethical behaviour including unauthorised disclosure of confidential information.
- Attempting to conceal any of the above

Please refer to the Whistleblowing procedure for further information.

Receiving an allegation from a learner about a member of staff

It is recognised that sometimes allegations may involve a member of Sport Structures staff.

Allegations may emerge in the following ways:

- When a member of staff has behaved in a way that has harmed or may have harmed a child, young person or adult at risk of harm.
- When a member of staff has possibly committed a criminal offence against or related to a child, young person or adult at risk of harm.

- When a member of staff has behaved towards a child, young person or adult at risk of harm in a way that indicated they are unsuitable to work with children, young people or adults at risk of harm.

Sport Structures recognises that an allegation of child abuse or abuse to adults at risk of harm made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

A member of staff who receives an allegation about another member of staff from a learner at risk of harm will follow the guidelines in the Safeguarding Procedure on page 24. This will ensure the learner needs are met. On some occasions the concern may not arise from a direct disclosure. If observations of staff behaviour give rise for concern of inappropriateness, these must be shared directly with the DSL or Deputy DSL.

The DSL or Deputy DSL will contact the Local Authority Designated Officer (LADO) for children under 18 or the Adult Safeguarding Board for adults at risk of harm to discuss referral and action if required. Appropriate internal action will be taken to safeguard the child/vulnerable adult.

Sexual violence, abuse, harassment and behaviour procedure

Where there has been a report of sexual violence, Designated Safeguarding Lead or Deputy Designated Safeguarding Lead will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment will consider:

- The learner, especially their protection and support;
- Whether there may have been other victims,
- The alleged perpetrator(s); and
- All the learners, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and should be kept under review. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. This risk assessment will not replace the Sport Structures risk assessment. At all times, we will actively consider the risks posed to learners and put adequate measures in place to protect them and keep them safe.

Reports will be managed in one of the following ways:

- Internally: we may take the view that the learner(s) concerned are not in need of early help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising their behaviour and bullying policies and by providing internal support. All actions related to the case will be recorded.
- Early help: we may decide that where the learner is a child, they do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life.
- Referral to children's social care
- Reporting to the police.

The needs and wishes of the learner will be paramount (along with protecting the child/adult) in any response. Support will be tailored on a case-by-case basis. Wherever possible, the learner if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the learner's daily experience as normal as possible.

For any scenario or incident relating to sexual abuse, violence, harassment or behaviour, we will review our actions, relevant policies and identify lessons learnt. This could constitute in extra teaching time and/or staff training to minimise the risk of further situations.

Initial Assessment by the DSL

The DSL and or Deputy DLS will make an initial assessment of any allegation/issue or concern. Where the allegation is considered to be either a potential criminal act or indicates that the learner has suffered, is suffering or is likely to suffer significant harm, the matter will be dealt with under the relevant Local Safeguarding Children Board procedures or in the case of adult abuse, the Adult Safeguarding Unit. The police may also be contacted.

The initial assessment will be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child or adult at risk of harm. The matter will be addressed through professional development of mentoring or in some cases more appropriate, the company's Disciplinary Policy and Procedure.
- The allegation can be shown to be false because the facts alleged could not possibly be true, in which case the person concerned will be reassured and supported as appropriate.

Enquiries and Investigations

Child/Adult protection enquiries by Children's Social Care, Adult Services or the Police are not to be confused with internal, disciplinary enquiries by Sport Structures. The company may be able to use the outcome of external agency enquiries as part of its own procedures. Neither the Child Protection Agencies nor the Police have power to direct the company to act in a particular way; however, Sport Structures will always assist the agencies with their enquiries.

If there is an investigation by an external agency, for example, the Police, the DSL will normally be involved in and contribute to the inter-agency strategy discussions. The

DSL is responsible for ensuring that the company gives every assistance with the agency's enquiries. They will ensure that the appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The DSL shall advise the member of staff that they may seek additional advice and support.

Following discussion with the LADO/Adult Safeguarding Board, the Police or other investigating agency, the DSL shall:

- ensure that the parents/carers of the child or vulnerable adult making the allegation have been informed that the allegation has been made and what the likely process will involve.
- inform the member of staff against whom the allegation was made of the fact that the allegation was made. Where investigation is taking place, they will be informed of what the likely process will involve and what support may be available.

Written records of the action taken in connection with the allegation will be kept.

Suspension of staff

Suspension will only occur for a good reason, for example:

- Where there is a cause to suspect a child or adult is at risk of significant harm.
- Where the allegations warrant investigation by the Police or potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- Where necessary for the good and efficient conduct of the investigation.

Suspension will not be automatic; a member of staff may be suspended on full pay whilst an investigation is undertaken (if they are employed through PAYE Sport Structures – not as an associate). If the member of staff is an associate, work with the staff member will stop until the investigation has been carried out. Suspension can only be carried out by the DSL or Deputy DSL.

Prior to making the decision to suspend, the DSL will interview the member of staff. This will occur with the approval of the LADO/Adult Safeguarding Board where possible. In particular, if the Police are engaged in an investigation, the officer in charge of the case will be consulted. The process will follow Sport Structures Disciplinary Procedures.

Where suspension is instigated and or something that could result in dismissal for gross misconduct which harmed a child or placed a child at risk, Sport Structures will refer them to the Disclosure and Barring Service (DBS). Referral to DBS also applies to action taken in relation to adults at risk of harm.

If the staff member is subject to registration by a professional body or regulator, for example, OFSTED, the LADO will advise on whether a referral to that body is appropriate.

If it is decided that a member of staff who has been suspended from work can return, Sport Structures will facilitate their return to work and consider how the member of staff's contact with the child or children who made the allegation can be best managed. The DBS will be notified that the suspension has been lifted.

Disciplinary Investigation

The disciplinary investigation will be conducted in accordance with Sport Structures' existing Disciplinary Policy and Procedure. The member of staff will be informed of:

- The disciplinary allegation against them
- Their entitlement to be represented by a work companion.
- The company's awareness of the personal impact the allegation may have and the support the company is able to offer for example, counselling.

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension will be lifted immediately, and arrangements made for the member of staff to return to work.

The child, children or adult at risk of harm, making the allegation, and/or parent will be informed of the outcome of the investigation and proceedings. This will occur prior to the return to work of the member of staff (if suspended).

Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record will be kept and consideration given to a referral to Local Safeguarding Children's Partnerships / Adult Safeguarding Boards, in order that other agencies may act upon the information.

The company (DSL or Deputy DSL) shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further action will be taken.
- Reassure them of the company's understanding of the personal impact that false allegations may have and the support that Sport Structures will continue to offer.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a child/adult at risk of harm other than the alleged victim, consideration to be given to informing the parents/carers of that child/adult at risk of harm.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.
- Remove allegations from member of staff's personal file

If a staff member has concerns about an employer

If staff members have **any concerns** about an employer, this must be referred to the Senior Apprenticeship Manager/Interim Managing Director if it is not related to

safeguarding i.e. health and safety. If the issue is a safeguarding concern, please refer to the DSL.

Please note, Sport Structures has a responsibility to ensure the health, safety and welfare of all learners undertaking apprenticeships with employers. Sport Structures will ensure that employers are aware of this document and their responsibilities for compliance in relation to Safeguarding and the Prevent duty for any learner who is placed with them and that arrangements are in place to ensure that a learner's wellbeing is safeguarded.

If a staff member has concerns about a learner or other stakeholder which falls outside a safeguarding issue

If a staff member has concerns about a learner or any other stakeholder that fall outside any safeguarding issues (for example, a learner falls below progress expected) they should complete a Concerns Form. Staff will be trained on this procedure separately as and when relevant to their work area and all concerns will be tracked by a senior member of staff and escalated to a safeguarding concern if required. This proactive action ensures safeguarding concerns may be identified early to prevent them becoming a serious issue.

Apprentices with criminal convictions

Sport Structures is committed to the fair treatment of all learners and to the equality of opportunity. A learner who wishes to undertake an apprenticeship will be reviewed against their skills, qualifications and experience, not their background or personal circumstances. Having a criminal conviction will not necessarily prevent someone from undertaking learning with us.

It is the responsibility of the employer to ensure their recruitment processes reflect the legal requirements when recruiting apprentices. Disclosure rules for criminal records are commonly referred to as filtering which is used to describe the process that identifies which criminal records will be disclosed on a Standard or Enhanced DBS

check. Certain or minor offences may not be disclosed on DBS certificates. These are known as protected offences.

There is a [list of offences](#) that will always be disclosed on a Standard or Enhanced DBS certificate (unless they relate to a youth caution). These are known as 'specified offences' and are usually of a serious violent or sexual nature, or are relevant for safeguarding children and vulnerable adults. It is recommended that employers use the following questions in the recruitment process:

Do you have any unspent conditional cautions or convictions under the Rehabilitation of Offenders Act 1974? (Y/N)?

Do you have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020? (Y/N)?

We requested that the employer brings to our attention any specified offences by emailing the DSL or Deputy DSL using the. This will enable us to work with the employer to determine the level of risk posed to both the learner and to others and to decide a way forward.

Concerns about a partner organisation

In the event of an allegation of child/vulnerable adult abuse being committed by a partner organisation such as an awarding organisation or end point assessment organisation, the DSL or Deputy DSL will report this to the appropriate organisation and support in their procedure to investigate the matter.

Concerns about Safeguarding Practices

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the companies safeguarding practices and that such concerns would be taken seriously by the Sport Structures Board.

If staff members have any concerns about the Sport Structures' safeguarding regime, they should raise this initially with their Line Manager.

If no immediate action is taken, then appropriate Whistle-blowing Procedures are in place for such concerns to be raised with the Board.

Where a staff member feels unable to raise an issue with Sport Structures or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

General guidance can be found at - Advice on whistleblowing.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 - line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC) Weston House 42 Curtain Road London EC2A 3NH.

Low-level concern procedure

As identified at the start of this document, a low-level concern or poor practice is defined as any concern about an adult's behaviour towards, or concerning, a child or **another adult** that does not meet the harms threshold above or is not serious enough to consider a referral externally at the time of reporting. The concern may not pose an immediate risk. The adult in question may have acted in a way that:

- is inconsistent with our Code of Conduct, including inappropriate conduct outside of work and
- is not serious enough to consider a referral to an outside agency.

Low-level concerns **are differentiated** from concerns that cause harm. The harms threshold is the point at which a concern is **no longer low-level and constitutes a threat of harm to a child or adult**. Sport Structures recognises that while low-level concerns are by their nature, less serious than concerns which meets the threshold identified above, often serious safeguarding concerns often begin with low-level concerns.

Examples of low-level concerns may include:

- Being over-friendly with children
- Having favourites
- Engaging with a child one to one in a secluded area

Sharing low level concerns

It is critical that all low-level concerns are shared with the Designated Safeguarding Lead. Having one recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is potentially lost.

- Concerns should be shared as soon as reasonably possible, within 24 hours of becoming aware of the concern where it relates to a specific incident. However, it is never too late to share a concern and a delay should not be seen as a barrier to sharing.

-
- Low level concerns can be made verbally or by completing a low-level concerns form. This can be found in appendix 3.
 - In the event of concerns about the Designated Safeguarding Lead or if the Designated Safeguarding Lead is absent, please inform the Deputy DSL.
 - If the staff member who raises the concern does not wish to be named, then the Designated Safeguarding Lead will respect the staff member's wishes as far as possible.

Self-reporting a low-level concern

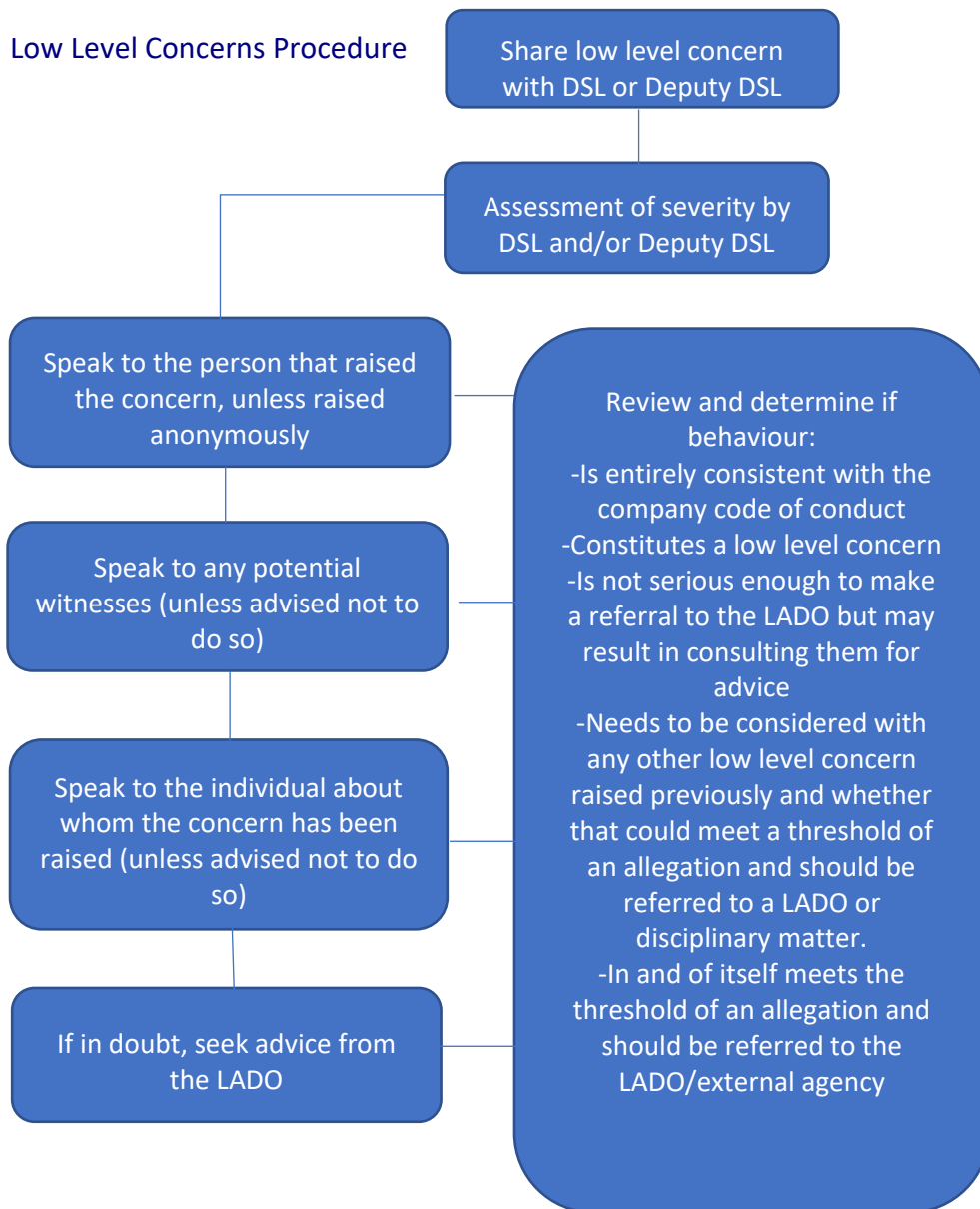
There may be occasions where a staff member may feel they have acted in a way that:

- could be misinterpreted
- could appear compromising to others
- falls below the standards set out in the Code of Conduct

The DSL will maintain a culture of approachability for all staff members and will be understanding and sensitive towards those who self-report. Staff members who self-report will not be treated more favourably during any investigations than staff members who have been reported by somebody else.

Their self-awareness will be taken into consideration.

Low Level Concerns Procedure



Advice from Deputy DSL throughout process

Procedure – Referral to Children's Services

As part of Keeping Children Safe in Education (2023), staff are required to understand how to make a referral to local authority children's social care.

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately.

What is a referral?

A referral in the context of child protection, is when someone contacts Children's Services because they have concerns about the **safety, wellbeing or welfare of a child**.

Who can make a referral?

Anyone can make a referral including a member of staff, parent, family member, DSL or health visitor. For the context of our policy, if a child you come into contact with is in immediate danger, then you must contact children's services or the police.

Which Local Authority do I contact?

Each local authority will have their own children protection procedures and protocols for assessment. The local authority in which the child lives, should be the local authority which is contacted.

What happens when Children's Services receive a referral?

When information is received through a referral, Children's Services usually have 24 hours to decide what type of response is required. It is usually the responsibility of social workers within the Children's Services to investigate, however they may work closely with the Police, health workers and other professional who are connected to the child. The social worker will usually determine whether:

- the child(ren) require immediate protection and thus urgent and immediate action is required;

- the child(ren) is/are in need;
- there are reasonable grounds to suspect that the child(ren) is/are suffering, or is/are likely to suffer, significant harm and whether further enquiries need to be made;
- any services which the child(ren) and/or family require and what they are;
- whether any further specialist assessments are needed to help Children's Services determine what further action to take;
- whether any action needs to be taken; and
- if there is no further action they can take, whether to refer the matter to a more appropriate agency

What happens if Children's Services decide to conduct an assessment following a referral?

Unless the child(ren) in question requires immediate protection, the majority of cases will begin with a social worker conducting a multi-agency assessment under section 17 of the Children Act 1989. The assessment needs to be carried out within **45 days** from the point of referral. The purpose of the assessment is to gather information and to analyse the needs of the child or children and/or their family and the nature and level of any risk of harm to the child(ren).

What possible outcomes are there of an assessment by Children's Services?

The outcomes may include:

- that the child is not 'In Need'. In this case, Children's Services will take no further action other than, where appropriate, to provide information and advice in accordance with the local Common Assessment Framework.
- that the child is 'In Need', but it has been determined that the child is not suffering, or considered likely to suffer, significant harm. In this case, Children's Services will determine the support which will be provided and draw up a 'Child In Need' plan accordingly.
- that the child is 'In Need' and that there are concerns that the child is suffering, or considered likely to suffer, significant harm. In which case, Children's Services will initiate a Strategy Discussion to determine whether a Section 47 investigation is

necessary; and consider whether any immediate protective action is also required.

Early Help

Early help means providing support as soon as a problem emerges, at any point in a child's life, from early years to teenage years. Early help relies upon organisations and agencies to work together to:

- o identify children and families who would benefit from early help.
- o undertake an assessment of the need for early help.
- o provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to improve the outcomes for the child.

Staff should be aware that there may be potential need for early help for a child who:

- o is disabled and has specific additional needs
- o has special educational needs.

- o is a young carer.
- o is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- o is frequently missing/goes missing from care or from home.
- o is at risk of modern slavery, trafficking or exploitation.
- o is at risk of being radicalised or exploited.
- o is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse.
- o is misusing drugs or alcohol themselves.
- o has returned home to their family from care.
- o is a privately fostered child.
- o has a parent/carer in custody.

It is recommended that if staff have any concerns about a child that you feel is in need of early help, please contact the DSL or Deputy DSL.

Supporting Vulnerable Adults and Children

- We recognise that abuse, radicalisation or witnessing violence may have an adverse impact on those children which may last into adulthood without appropriate intervention and support
- We may be the only stable, secure and predictable element in the lives of children/vulnerable adults at risk. Nevertheless, their behaviour may be challenging and defiant or they may become withdrawn
- We recognise that some vulnerable children/vulnerable adults may develop abusive behaviours and that they may need to be referred on for appropriate support and intervention
- We recognise that, statistically, children/vulnerable adults with emotional and behavioural difficulties and disabilities are most vulnerable to abuse. Staff who deal with children/vulnerable adults with complex and multiple disability and/or emotional and behavioural problems should be particularly sensitive to indicators of abuse

We will support the learner through:

- Providing additional support.
- Providing training /curricular opportunities to encourage self-esteem and self-motivation
- Liaison with relevant other agencies which support the learner.
- Monitoring and supporting learner welfare, keeping records and notifying Social Care in accordance with the Local Safeguarding Children Board "Core Inter-Agency Procedures" or the Police Channel Coordinator.
- When a learner who is subject to a child protection plan leaves, information will be transferred to the new learning environment immediately. The relevant contact with social care and any other agencies will also be informed.
- When a child/vulnerable adult is missing from education, we will immediately notify the relevant contact within the Social Care Team/Education Welfare Officer and follow any local procedures' accordingly if a child is subject to a Child Protection Plan or there have been ongoing concerns.

Preventing Unsuitable People from Working with Children or Vulnerable Adults

As a commitment of our apprentices, we require employers to submit a number of documents to ensure they have the necessary systems and processes in place to best support the learner. There may be occasions where we visit a new employer to meet staff, assess the work environment and check relevant policy and procedures.

Summary of the Personnel Recruitment Procedure

Vacancies are advertised widely in order to ensure a diversity of applicants. Adverts include our commitment to safeguarding and promoting the welfare of individuals, along with any safeguarding responsibilities of the role being advertised.

Applicants are required to complete an application form along with a CV and covering letter for each position advertised. The application form requests a self-declaration of suitability to work along with a statement that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.

These forms are required to be returned to HR Manager who manages the recruitment process, working with the associated Senior Managers.

For applicants that are shortlisted, they will be informed that online searches may be carried out as part of pre-recruitment checks.

The role requirements are clearly defined (job description and person specification) and the job offer will be subject to satisfactory completion of pre-employment checks which include:

- receipt of two satisfactory written references, one of which must be from the present or most recent employer which identifies their suitability to work with children and adults.
- verification of identity and the provision of original documentation as required by the DBS.
- Right to Work in the UK, online survey completion.

- a survey to verify the applicants mental and physical fitness to carry out their responsibilities.
- DBS checks are sought on appointment and updated every 3 years as appropriate.
- a clear check against the DBS Barred Children's List, if applicants are working in regulated activity.
- a variety of selection techniques (for example, cover letter, previous experience and interview).

For applicants working in regulated activity, the interview process will include a question relating to safeguarding.

Personnel are selected on their suitability to meet the job/role-related requirements and responsibilities and their ability to demonstrate that they can work safely with children and/or vulnerable adults. Applicants will receive confirmation in writing relating to the outcome of their application/interview. Where the outcome is positive, an offer letter is sent to the individual outlining the terms and conditions of the role. If previously non-disclosed and criminal/police information is identified by the DBS disclosure, the Human Resources Manager will discuss this with the person seeking the position, before discussing with the Managing Director, to determine whether withdrawing the conditional offer of employment is necessary.

All new members of staff must have either a face to face or online induction.

Arrangements are made for any relevant training, which includes clarification of activity requirements, responsibilities and child/vulnerable adult protection procedures and further identification of training needs.

New members of personnel are then required to confirm their agreement to abide by the Sport Structures policies and procedures, including the safeguarding policy, in writing along with confirmation that they have read Part I and Annex A of Keeping Children Safe in Education 2023. Awareness of child/vulnerable protection practice will continue to be addressed via ongoing training and all staff will be expected to keep themselves up to date with current practice.

All members of staff who work with children and adults are required to adhere to this document. All staff details and required checks will be managed by the Human Resources Manager using a Single Central Record.

Staff training

The company will provide Safeguarding and Prevent training for all staff, from the point of their induction which is updated yearly (in accordance with legal/statutory guidance or best practice) so that they are confident about:

- The Company's legislative responsibilities
- Their personal responsibilities
- The Company's policies and procedures
- The need to be alert to the signs and indicators of possible abuse and radicalisation
- The need to record concerns
- How to support and respond to a child/vulnerable adult who tells of abuse

The company will also ensure:

- Staff undertake accredited training is given to all staff members every 3 years, relevant to their role
- The DSL will receive training updated at least every two years, including training in the interagency procedures.
- Staff have access to relevant resources, relevant to their role
- that all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice in regard to children/vulnerable adults and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies
- That every member of staff, employer and volunteer is issued with a copy of Part 1 of the "Keeping Children Safe in Education" (Sep 2023) statutory guidance document as updated upon induction. A copy of the document is available at <https://www.gov.uk/government/publications/keepingchildren-safe-in-education>

Online Safety

We recognise our responsibility to ensure a safe environment to learn and work, including online. Supporting our Designated Safeguarding Lead, we have a Senior Online Technology Manager who works with our IT provider to make appropriate decisions on required filtering and monitoring to safeguard staff from harmful and inappropriate content online. This is reviewed annually.

At the point of induction with any new staff, we share our e-safety policy which provides guidance on operating safely online. During our induction, we also share suggestions on what content can be deemed as unsafe, such as (list not exhaustive):

- Discrimination
- Extremism
- Gambling
- Malware/hacking
- Drugs / substance abuse
- Pornography
- Self-harm
- Violence
- Piracy and copyright theft

We also advise employers to use appropriate filtering and monitoring systems and regularly review their effectiveness.

Cyber-bullying by learners, via texts, emails, sexting and sharing indecent images will be treated as seriously as any other type of bullying and will be managed through liaising with the employer and through our disciplinary system.

Social networking sites are also sources of inappropriate and harmful behaviour. Any inappropriate behaviour will be dealt with as per the process above.

We will ensure that online safety is included through teaching and learning opportunities as part of an apprentices' curriculum. This may include covering relevant issues such as tutorials.

Photographs and Videos

To protect learners, we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in publications). Consent must be obtained via a Sport Structures consent form, provided by the beginning of a learning programme.
- Ensure learners are appropriately dressed.
- Encourage learners to tell us if they are worried about any photographs that are taken of them.
- Ensure that members of staff delete any associated images of learners once they have been sent to Sport Structures

The Prevent Duty

We are aware of our commitment to protecting staff and learners from the risk of harm and comply with the principles of the Prevent Duty. The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. It aims to:

- tackle the ideological causes of terrorism.
- intervene early to support people susceptible to radicalisation.
- enable people who have already engaged in terrorism to disengage and rehabilitate.

We understand that Prevent is one of the key pillars of CONTEST (The UK's counter-terrorism strategy). The other pillars are:

- **Pursue:** to stop terrorist attacks
- **Protect:** to strengthen our protection against a terrorist attack
- **Prepare:** to mitigate the impact of a terrorist attack

A system of threat level has been created which represents the likelihood of an attack in the near future. The five levels are:

- Critical - an attack is highly likely in the near future.
- Severe - an attack is highly likely.
- Substantial - an attack is likely.
- Moderate - an attack is possible but not likely.
- Low - an attack is unlikely.

In our efforts to comply with the Duty (and the updated Prevent Duty guidance in 2023), we have embedded a number of actions in our safeguarding and prevent risk assessment, which documents risks and actions we need to take. This risk assessment is owned by the Safeguarding Working Group who update it regularly and communicate relevant updates to staff. We feel that this document helps us to:

1. Ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism and reporting concerns.
2. Embed British Values and Prevent content/training within our curriculum
3. Ensure staff have appropriate training and updates on Prevent
4. Provide support for learners who may be at risk by providing appropriate sources of guidance.

We also have a Prevent Champion in the organisation.

Prevent Champion
Joanne Collins
Joanne.Collins@sportstructures.com
07830 119884
Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

The Prevent Champion has undertaken appropriate training to do their role. They are also responsible for:

- Completing the Prevent Self-Assessment tool.
- Training other staff and cascading other Prevent related training.
- Working with the Quality and Training Manager to embed British Values and Prevent in the Curriculum.
- Supporting any referrals, where required.

External Speakers and Events

Sport Structures have a policy and procedure for external speakers and events, and this is followed by all staff so any risks associated with safeguarding or individuals being drawn to terrorism can be mitigated against.

Sport Structures will assess the risks associated with any planned events and consider carefully whether the views likely to be expressed constitute extremist views that may risk drawing people into terrorism. Only where Sport Structures is confident that any such risk can be fully mitigated will the event be allowed to proceed.

The external hire of Sport Structures facilities is subject to the booking being deemed acceptable under their policies and procedures including those relating to risk management, health and safety and safeguarding.

Sport Structures will comply with its legal duties in terms of both ensuring freedom of speech and preventing radicalisation. Any potential concerns by staff should be raised following the normal safeguarding reporting procedure so the DSL can assess the appropriateness of the external speaker or event or assess the suitability of any external facilities identified.

Referral Pathway for Prevent - Channel

It is recognised that on occasions learners may be identified as requiring support for issues connected to radicalisation and extremism. In these cases, the DSL or Deputy DSL will review the case and where it is considered appropriate to seek external support a Prevent referral will be made with a view to assessment of the case for the Channel programme. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages.

It is recognised that learners requiring support may live or reside in differing geographical areas and Prevent referral processes and support may vary from region to region. Therefore, upon identification of a relevant case the DSL or Deputy DSL, or person nominated by them, will liaise with the Department for Education Regional Prevent Coordinator network to ensure quick and effective access to the appropriate local Prevent support.

If in doubt of who the regional contact is, information can be sent to:
Sam Slack

East Midlands Regional Prevent Coordinator HE/FE (G7)

sam.slack@education.gov.uk

07384452156

Reporting

Our Safeguarding Disclosure Form should be used to report any disclosure. This can be requested from Sport Structures at any time and all staff will have access to this. A copy can be found in Appendix 2. The form must be completed immediately following the awareness of a safeguarding concern or disclosure and sent directly to the DSL or the Deputy DSL. The form should be completed as accurately and fully as possible, but if all information is not available this should not stop the form being submitted as quickly as possible.

For low level concerns, please complete a low-level concerns form which can be found in Appendix

3. Please note, that Low level concerns can also be expressed verbally to the DSL or Deputy DSL.

Appendix 1 – Types of Abuse and further information

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by on definition or label. In most cases multiple issues will overlap with one another. The following pages identify types of abuse and further information on safeguarding and prevent issues.

Physical Abuse

Physical abuse causes harm to a child/vulnerable adult. It may involve hitting, shaking, throwing, poisoning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of deliberate failure to prevent injury occurring.

Emotional and Psychological Abuse

Emotional and psychological abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's or vulnerable adult's behaviour and emotional development, resulting in low self-worth. Some level of emotional and psychological abuse is present in all forms of abuse

Sexual Abuse

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

Neglect

Neglect is the persistent or severe failure to meet a child or vulnerable adult's basic physical and/or psychological needs. It will result in serious impairment of the child/vulnerable adult's health or development. This could involve ignoring medical, emotional or physical care needs and the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Bullying, including cyberbullying

Under the Children Act 1989, a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Where this is the case, staff should report their concerns

to the DSL. Even where safeguarding is not considered to be an issue, Sport Structures may need to draw on a range of external services to support the learner who is experiencing bullying, or to tackle any underlying issue which has contributed to a learner engaging in bullying.

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Please note, bullying is child to child. An adult cannot bully a child. This would fall under one of the other abuse categories (neglect, sexual, emotional, physical).

Child abduction

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Child Missing from Education

A young person going missing from education is a potential indicator of abuse or neglect. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. Any concerns should be referred to the DSL.

Child Missing from Home or Care

- Young runaway - a child who has run away from their home or care placement or feels they have been forced or lured to leave.
- Missing child - a child reported as missing to the police by their family or carers. If a member of staff suspects that a child is running away, the normal safeguarding procedures apply, and this must be reported to the DSL.
- Looked after Child: a child who is looked after by a local authority by reason of a care order or being accommodated under section 20 of the Children Act 1989.
- Care Leaver: an eligible, relevant or former relevant child as defined by the Children Act 1989.

Child Criminal Exploitation

This can occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons or begin to carry weapons (such as a knife) for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the indicators for boys and girls may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse and can be a one-off occurrence or might happen over time. All children and young people can experience child sexual exploitation. This includes 16- and 17-year-olds, who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

- Child Sexual Exploitation involves exploitative, contexts and relationships where young people receive something (for example food, drugs, alcohol, gifts or in some cases simply affection) as a result of engaging in sexual activities
- Sexual exploration can take many different forms, from the seemingly "consensual" relationships to serious organised crime involving gangs and groups
- Exploitation is marked out by an imbalance of power in the relationship and involves varying degrees of coercion, intimidation and sexual bullying including cyberbullying and grooming

-
- It is important to recognise that some people who are being sexually exploited do not show any external signs of this abuse and may not recognise it as abuse
 - Young people who go missing can be at increased risk of sexual exploitation and so procedures should be put in place to ensure an appropriate response should any young person go missing, particularly on repeat occasions
 - The Company will refer to the Keeping Children Safe in Education Document (2023) and seek advice from the Social Care Team and/or the LSCB if there is a concern that a young person may be at risk

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

Child on Child Abuse

All staff should be aware that children can abuse other children. It is important that staff recognise the indicators and signs of peer-on-peer abuse and know how to identify it and respond to any reports. Child on child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos¹⁰
(also known as sexting or youth produced sexual imagery);
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Staff have a responsibility to challenge inappropriate behaviours between peers. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

If a member of staff has any concerns or believe a child is at risk, they must speak to the DSL or Deputy DSL who will investigate accordingly.

Cyber Crime

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). Children and adults with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child or adult in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme.

Domestic Abuse

The Domestic Abuse Act came into force in 2021. The Act introduces the first ever 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. Types of domestic abuse include

- o intimate partner violence
- o abuse by family members
- o teenage relationship abuse
- o child to parent abuse

Staff should be aware that 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. Experiencing domestic abuse 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.

The DSL and Deputy DSL should be notified of Domestic Abuse incidents where the police have been called and that involve young people under their jurisdiction, and they will take appropriate action to ensure children/vulnerable adults are kept safe.

Substance Misuse and Child/Vulnerable Adult Protection

The discovery that a child/vulnerable adult is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient in itself to initiate child/vulnerable protection proceedings but the Company will consider such actions in the following situations, where there is evidence or reasonable cause:

- To believe the child/vulnerable adult's substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse
- To believe the pupils substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults
- Where the misuse is suspected of being linked to parent/carer substance misuse

Children/Vulnerable Adults of Substance Misusing Parents/Carers

- Misuse of drugs and /or alcohol is strongly associated with Significant Harm to children/vulnerable adults, especially when combined with other features such as domestic violence
- When the Company receives information about drug and alcohol abuse by a child/vulnerable adults' parents/carers they will follow appropriate procedures

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children/vulnerable adult
- Children/vulnerable adults exposed to unsuitable caregivers or visitors e.g. customers or dealers
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviours
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Disturbed moods as a result of withdrawal symptoms or dependency
- Unsafe storage of drugs and/or alcohol or injecting equipment
- Drugs and/or alcohol having an adverse impact on the growth and development of an unborn child

Fabricated or Induced Illness

There are three main ways of the parent / carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- Fabrication of signs and symptoms which may include fabrication of past medical history.
- Fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may include falsification of letters and documents.
- Induction of illness by a variety of means.

So-called 'honour' based abuse

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL or Deputy DSL.

Faith Abuse

Faith abuse is child abuse linked to faith or belief. This includes: belief in concepts of witchcraft and spirit possession, demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list.

Female Genital Mutilation (FGM)

Female Genital Mutation includes procedures that intentionally alter or injure the female genital organs for non-medical reasons. It is a surprisingly common form of abuse in the UK.

FGM is carried out on children between the ages of 0-15, depending on the community in which they live. It is extremely harmful and has a short- and long-term effects on physical and psychological health. FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries, including the UK

The Company takes these concerns seriously and staff will be made aware of the possible signs and indicators that may alert them to the possibility of FGM. Any indication that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures outlined in this document. Particular regard should be given to a child, who has returned from an extended holiday, and this should always be followed up and any concerns reported to the DSL or Deputy DSL. Where the Company believes there is a specific risk due to the community it

serves further guidance can be found under Part 1 of the Keeping Children Safe in Education Document (2023).

The DSL or Deputy DSL will make appropriate and timely referrals to Social Care if FGM is suspected.

In these cases, parents will not be informed before seeking advice. The case will still be referred to

Social Care if it is against the learner's wishes.

Forced Marriage

A forced marriage is a marriage without the consent of both parties and where pressure or threats are a factor. This is very different to an arranged marriage, which both parties will have to agree to. It is a criminal offence to force someone to marry. Signs of concern could include poor punctuality or absences from Company, low motivation, self-harm, depression, isolation, attempted suicide, eating disorders, other family members forced to marry, family disputes, domestic violence, substance misuse or the learner being reported missing from home.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). HSB can occur online and/or face to face and can also occur simultaneously between the two.

When considering HSB, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential, specialist support and advice on HSB is available from the specialist sexual violence sector.

Examples can be found below:

- StopItNow - [Preventing harmful sexual behaviour in children - Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.
- The NSPCC provides free and independent advice about HSB: [NSPCC Learning: Protecting children from harmful sexual behaviour](#) and NSPCC - Harmful sexual behaviour framework
- The Lucy Faithfull Foundation has developed a [HSB toolkit](#), which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse

Gangs and Youth Violence

Gang Activity - Groups of children and young people often gather together in public places to socialise, and peer association is an essential feature of most children's transition to adulthood. Groups of children and young people can be disorderly and/or antisocial without engaging in criminal activity. Young people on the periphery of becoming involved with street gangs and those young people already involved in some way can be described as 'A relatively durable, predominantly street-based group of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity'.

Youth Violence - Youth violence, serious or otherwise, may be a function of gang activity. However, it could equally represent the behaviour of a child acting individually in response to his or her particular history and circumstances. 'Serious youth violence' is defined as 'any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19', i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way, but also includes assault with injury offences. Most children and young people do not become violent overnight. Their behaviour represents many years of (increasingly) anti-social and aggressive acts.

Gender-based Violence / Violence against Women

and Girls This can include:

- Physical, sexual and psychological violence occurring in the family, within the general community or in institutions, including domestic abuse, rape, incest and child sexual abuse.
- Sexual harassment and intimidation at work and in the public sphere; commercial sexual exploitation, including prostitution, pornography and trafficking.
- Dowry related violence.
- Female genital mutilation.
- Forced and child marriages.
- 'Honor' crimes.
- Commercial sexual exploitation including activities such as pornography, prostitution, stripping, lap dancing, pole dancing and table dancing.
- Sexual harassment and stalking

Mental Health

Mental health includes our emotional, psychological, and social well-being. It affects how we think, feel, and act. Issues may include:

- Relationship problems.
- Family break-up/divorce.
- Depression.
- Study problems.
- Anger Management.
- Self-harming behaviours.
- Feeling dissatisfied with life or self.
- Domestic Violence/Abuse (past/present).
- Stress/Anxiety.
- Bereavement.
- Low self-confidence / self-esteem.

- Issues with drugs or alcohol.
- Suicidal thoughts.

Lesbian, gay, bi or trans (LGBT)

The fact that a child or adult may be LGBT is not in itself an inherent risk factor for harm. However, children or adults who are LGBT can be targeted by others. In some cases, a child or adult who is perceived by others to be LGBT (whether they are or not) can be just as vulnerable as children and adults who identify as LGBT. Staff should be mindful of the barriers these individuals might face and provide support and a safe space for them to share their concerns, if required.

Radicalisation and Violent Extremism

Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism. A radicaliser is an individual who encourages others to develop or adopt beliefs and views supportive of terrorism and forms of extremism leading to terrorism. It is recognised that radicalisation pathways can be very different for everyone and that the objective is to identify those people who are most at risk of radicalisation so that they can be offered support as may be most appropriate in their individual case. Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology
- The individual becomes increasingly intolerant of more moderate views
- The individual may change appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups
- The individual expresses a desire/intent to take part in or support extremist activity
- Ensure all records are kept securely; separate from the main learner file, and in a locked location

Relationship abuse

- Emotional abuse - can include constant insults and name calling, isolation from friends and family, controlling what someone wears / where they go, checking up on someone all the time (checking emails, texts, social networking sites etc) and making someone feel responsible for the abuse.
- Physical abuse - can include hitting, punching, pushing, biting, kicking, using weapons etc.
- Sexual abuse - can include unwanted kissing or touching, forcing someone to have sex, being made to watch pornography against their will and pressure not to use contraception.
- Financial abuse - can include the taking and controlling of money, forcing someone to buy things for someone, forcing someone to work or not to work.

Serious Violence

Children might become at risk from or can become involved with serious violent crime. Indicators may include:

- Increased absence
- A change in friendships or relationships with older individuals or groups
- A significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

There are a range of risk factors which increase the likelihood of involvement in serious violence such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Further advice can be found in the [Preventing Youth Violence and Gang Involvement](#) and [Criminal Exploitation of Children and Vulnerable Adults: County Lines](#)

Sexual violence and sexual abuse

Sexual violence and sexual abuse can happen anywhere, and all staff working with children through our training provision are advised to maintain an attitude of 'it could happen here'. Staff should be aware of, and respond appropriately to all reports and concerns, including those outside of our training provision, and or online. Any risks or concerns must be reported immediately to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead.

When referring to sexual violence, we do so in the context of child-on-child sexual violence. For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003, as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage

in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice:

- A child under the age of 13 can never consent to any sexual activity.
- The age of consent is 16/17.
- Sexual intercourse without consent is rape.

Sexual Harassment

When referring to sexual harassment, this is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of a training environment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- o Consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and Sharing nude photographs of U18s is a criminal offence;
- o Sharing of unwanted explicit content;
- o Upskirting (a criminal offence);
- o Sexualised online bullying;
- o Unwanted sexual comments and messages, including, on social media;
- o Sexual exploitation; coercion and threats;

Staff have a responsibility to challenge inappropriate behaviours and prevent an environment that could lead to sexual violence.

Youth Produced Sexual Imagery (Sexting)

Making, possessing and distributing an imagery of someone under 18 which is indecent is illegal. This includes imagery created by under 18s themselves.

The type of incidents covered by this guidance are:

- A person under the age of 18 creates and shares sexual images of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and this should be reported to the DSL who will report to the police.

Trafficking

Trafficking is defined as the recruitment, transportation, transfer, harbouring or receipt of children by means of threat, force or coercion for the purpose of sexual or commercial sexual exploitation or domestic servitude' (NSPCC).

The Palermo Protocol establishes children as a special case for whom there are only two components - movement and exploitation. Any child transported for exploitative reasons is considered to be a trafficking victim - whether or not he/she has been deceived, because it is not considered possible for children to give informed consent.

A child may be trafficked without crossing any national borders, e.g. only within the UK.

A child may be trafficked between a number of countries prior to being trafficked into/within the UK. The child may have entered the UK illegally or legally (i.e. with immigration documents). The intention to exploit the child underpins the entire process.

The Modern Slavery Act 2015 consolidates current offences of trafficking and slavery and details the different forms of exploitation that a victim of trafficking may be forced into. The exploitation can take place in a number of ways including:

- Sexual Exploitation
- Labour Exploitation
- Criminal Exploitation
- Domestic Servitude
- Organ Harvesting

Distinction between human trafficking and smuggling:

Human trafficking does not include people smuggling, which requires the consent of the person being moved.

A smuggled person is, however, a potential victim who may be vulnerable to being trafficked at any point in their journey, and the distinction can be blurred.

Perpetrators may smuggle people with the intention of exploiting them, or with the intention of facilitating exploitation. Alternatively, the smuggled can become vulnerable to traffickers upon arrival at their destination and subsequently be exploited and/or harmed

County Lines

The 2018 Home Office Serious Crime Strategy states the NPCC definition of a County Line is a term used to describe gangs and organised criminal networks involved in

exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement. In some cases, the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as *cuckooing*.

People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.

Children often don't see themselves as victims or realise they have been groomed to get involved in criminality.

The following signs may indicate that a child is being exploited by a county lines gang:

- frequently going missing from school, home or care
- travelling to locations, or being found in areas they have no obvious connections with, including seaside or market towns
- unwillingness to explain their whereabouts
- acquiring money, clothes, accessories or mobile phones which they seem unable to account for
- receiving excessive texts or phone calls at all hours of the day
- having multiple mobile phone handsets or sim cards
- withdrawing or having sudden changes in personality, behaviour or the language they use
- having relationships with controlling or older individuals and groups
- unexplained injuries
- carrying weapons

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- significant decline in results or performance
 - being isolated from peers or social networks
 - associating with or being interested in gang culture
 - self-harming or having significant changes in mental health

(Ministry of Justice, 2019)

Appendix 2: Safeguarding Disclosure and Prevent Disclosure Form

Safeguarding Disclosure Form

To be completed in full by **ALL** relevant staff members. Complete as fully as possible and send it immediately to our designated safeguarding lead (DSL):

Designated Safeguarding Lead
Jobeth Hamilton Jobeth.Bastable@sportstructures.com 07917 388166 Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

In the event that the DSL is unavailable, please pass the information onto our Deputy DSL:

Deputy Designated Safeguarding Lead
Simon Kirkland Simon.kirkland@sportstructures.com 07766 768474 Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

Part 1: Staff Member Information			
Staff member raising concern:		Job role:	
Staff member contact number:		Staff member email:	
Learner Information			
Learner Name:		Learner ID:	
Learner contact number:		Gender:	
Learner DOB:		Age:	
Learner Postcode:			
Please tick one:			
<input type="checkbox"/> I am reporting my own concerns.			

I am responding to concerns raised by someone else (record details below)

Part 2: Incident/Disclosure Details

Date of incident/ disclosure:		Time:	
Other persons present at time of incident/disclosure:		Location of incident/disclosure:	
	Y/N		

Reason for concern (please tick)

Disclosure by learner Concern or risk of harm		Summary of disclosure: <i>Details of the incident or concerns (include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay)</i>
Disclosure relates to learner or another learner		
Disclosure is current		
Disclosure is historic		

Type of Concern Circle relevant concern(s)	Mental / Physical / Emotional / Other
-----------------------------------------------	---------------------------------------

Details of incident/disclosure	<p><i>Provide full details of the incident or disclosure here – try to be as factual as possible, and use the words and phrases of the person making the disclosure if possible. Under no circumstances note opinion, or personal interpretation of what an individual “meant”. You may include observations such as body language, emotional state, injuries etc.</i></p> <p><i>Also include any immediate action taken such as first aid or referrals to any external agencies such as the Police, social services, NSPCC etc. with all corresponding advice and contact details of those agencies if contacted.</i></p>
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Part 3 – Designated Safeguarding Lead (DSL) Decision and Action (to be completed by the DSL)

Designated Safeguarding Lead (DSL) name:		Date disclosure received:	
Action taken by DSL:			
Rationale for decision making/actions taken:			
Follow up action by DSL:			
Feedback given to person reporting the concerns:			

Has information been sought or shared with an external agency?	Y/N
Name of agency:	
Named person:	

Contact details:	
Time/date of contact:	
Summary of information/advice received:	

Decision <i>(complete for all safeguarding concerns)</i>		
Internal referral <i>(complete 4a)</i>	Y/ N	
External referral <i>(complete 4b)</i>	Y/ N	
No immediate referral <i>(complete 4c)</i>	Y/ N	
Decision clearly communicated to learner	Y/ N	
Declaration		
Signature:		Date:

Part 4 – Referral and Follow Up	
Part 4a – Internal referral <i>(complete if applicable)</i>	
Referral to:	
Person making referral:	
Date referral made:	
Notes:	

Part 4b – External referral action plan <i>(complete if applicable)</i>	
Referral to:	
Person making referral:	

Date of referral:	
Information to be shared with agency:	
Response requested from agency:	
Person responsible for following up:	
Follow up on (date):	

Part 4c – Support and follow up communication with client/external agencies <i>(complete for all safeguarding concerns)</i>		
Contact date & time	Support and or follow up communication	Date action to be delivered by

Prevent Disclosure Form

This form is to be completed if you have a safeguarding concern which specifically relates to Prevent (where you are concerned that an individual is at risk from radicalisation). If you feel the individual is in immediate danger, please call the Police.

The Designated Safeguarding Lead and Deputy invite you to have a conversation with them in advance of the form being completed (if possible). Please complete as much of the form as you can and submit it to the contacts below.

Designated Safeguarding Lead
Jobeth Hamilton jobeth.bastable@sportstructures.com 07917 388166 Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

In the event that the DSL is unavailable, please pass the information on to our Deputy DSL:

Deputy Designated Safeguarding Lead
Simon Kirkland Simon.kirkland@sportstructures.com 07766 768474 Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

Prevent Champion
Joanne Collins Joanne.Collins@sportstructures.com 07830 119884 Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

Part 1: Person raising the concern			
Name of the person raising the concern:		Job role:	
Contact number:		Email address:	
Individual details			
Is the individual a child or an adult? <i>(Please note, a child</i>	Child	<input type="checkbox"/>	Adult <input type="checkbox"/>

is someone who has yet to reach their 18 th birthday?)			
Name of child/adult:		Learner ID (if applicable):	
Contact number of child/adults:		Gender:	
Date of Birth (if known):		Age:	
Postcode of child/adult:		Nationality/citizenship:	
Any other family details (Anything you may feel relevant)			
Please tick one:			
<input type="checkbox"/> I am reporting my own concerns. <input type="checkbox"/> I am responding to concerns raised by someone else (please record details below)			
Do you wish to remain anonymous?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Designated Safeguarding Lead (DSL):		Date disclosure reported to DSL	

Part 2: Incident/Disclosure Details			
What instance or circumstance has led you to share this concern?			
Other persons present at the time of instance/circumstance:	Yes <input type="checkbox"/> No <input type="checkbox"/> Please specify:	Date of instance/circumstance:	
Relationship:			
Describe your relationship to the individual believed to be at risk			
Reason for concern (please tick)			

Please describe, in as much detail as possible, the specific concern(s) relevant to Prevent			
What concerning behaviours have you noticed?	Absence <input type="checkbox"/> Expressions of extremist views <input type="checkbox"/> Abuse <input type="checkbox"/> Alcohol <input type="checkbox"/> Becoming socially isolated <input type="checkbox"/> Confrontational <input type="checkbox"/> Desire to travel to conflict <input type="checkbox"/> Drug use <input type="checkbox"/> Fixated on a topic <input type="checkbox"/> Seeking to recruit ideology <input type="checkbox"/> 'Them and Us' language <input type="checkbox"/> Legitimising use of violence <input type="checkbox"/> Honour-based violence <input type="checkbox"/> Other <input type="checkbox"/> If stated other, please describe:		
Please describe further the behaviours that have come to your attention			
Is there anything in the individual's life that you think might be affecting their wellbeing or that might be making them vulnerable?	Yes <input type="checkbox"/> No <input type="checkbox"/> If yes, please specify:		
Does the individual know you are sharing the concern?	Yes <input type="checkbox"/> No <input type="checkbox"/>		
Is the individual's employer / manager aware of the concern?	Yes <input type="checkbox"/> No <input type="checkbox"/> Not applicable <input type="checkbox"/>		
Please provide any other information which you feel might be relevant:			
Declaration:			
Signature:		Date:	

Part 3 – Designated Safeguarding Lead (DSL) Decision and Action (to be completed by the DSL)

Designated Safeguarding Lead (DSL) name:		Date disclosure received:	
Action taken by DSL:			
Rationale for decision making/actions taken:			
Follow up action by DSL:			
Feedback given to person reporting the concerns:			
Recorded on case management log?	<input type="checkbox"/> Yes <input type="checkbox"/> No		

Has information been sought or shared with an external agency?	Y/N
Name of agency:	
Named person:	
Contact details:	
Time/date of contact:	

Summary of information/advice received:	
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Decision *(complete for all safeguarding concerns)*

Internal referral <i>(complete 4a)</i>	Y/N	
External referral <i>(complete 4b)</i>	Y/N	
No immediate referral <i>(complete 4c)</i>	Y/N	
Decision clearly communicated to learner	Y/N	

Declaration

Signature:		Date:	
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Part 4 – Referral and Follow Up

Part 4a – Internal referral *(complete if applicable)*

Referral to:	
Person making referral:	
Date referral made:	
Notes:	

Part 4b – External referral action plan *(complete if applicable)*

Referral to:	
Person making the referral:	
Date of referral:	
Information to be shared with agency:	
Response requested from agency:	
Person responsible for following up:	
Follow up on (date):	

Part 4c – Support and follow-up communication with client/external agencies <i>(complete for all prevent concerns)</i>		
Contact date & time	Support and or follow-up communication	Date action to be delivered by

Appendix 3: Low Level Concerns Form

Please use this form to share any concerns, no matter how small. Please forward this onto the DSL or Deputy DSL.

Concern reported by:	
Name of adult:	

Details of concern: (Brief context in which the low-level concern arose, any witness etc)			
Has this been discussed verbally with the DSL / Deputy DSL?	<input type="checkbox"/> Yes No <input type="checkbox"/>		
Signed		Date	
For office use only			
Concern received by			

Date	
Actions taken	
Signed	
Date	

Appendix 4: Disclosure of Criminal Convictions Form

Strictly confidential

This form must be completed in full by the employer who has identified that an apprentice has a specified offence through disclosure on a standard or enhanced DBS certificate.

Section 1: Employer Details

Full name:	
Organisation representing:	
Phone number:	
Email:	

Section 2: Apprentice details

Full name:	
Address:	
Phone number:	
Email:	
Please provide details of the apprenticeship you would like to undertake:	

Section 3: Details of specified offence

Details of specified offence:	
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Section 4: Declaration

Employer signature:	
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Date:

Appendix 5: Useful Contact Details

Designated Safeguarding Lead

Jobeth Hamilton

jobeth.bastable@sportstructures.com

07917 388166

Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

Deputy Designated Safeguarding Lead

Simon Kirkland

Simon.kirkland@sportstructures.com

07766 768474

Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

Keeping Children Safe in Education:

<https://www.gov.uk/government/publications/keepingchildren-safe-in-education--2>

Birmingham Local Children's Partnership: <https://www.lscpbirmingham.org.uk/>

Birmingham Adult Safeguarding Board: <https://www.bsab.org/>

NPSCC: <https://www.nspcc.org.uk/>

Prevent Duty:

https://www.birmingham.gov.uk/downloads/download/773/the_prevent_duty

Keeping Children Safe Online: www.ceop.gov.uk

Bullying & child abuse: www.anti-bullyingalliance.org.uk

Marie Collins Foundation: <https://www.mariecollinsfoundation.org.uk/>

Ann Craft Trust: <https://www.anncrafttrust.org/>

Child Line: <https://www.childline.org.uk/>

Staff can access government guidance as required via a number of GOV.UK website addresses. We have identified some examples below:

www.gov.uk/government/publications/children-missing-education

www.gov.uk/government/publications/children-who-run-away-or-go-missing-from-home-or-care www.gov.uk/government/publications/missing-children-and-adults-strategy www.gov.uk/domestic-violence-and-abuse

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

www.gov.uk/government/publications/female-genital-mutilation-guidelines

www.gov.uk/forced-marriage

www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence www.gov.uk/government/policies/violence-against-women-and-girls www.gov.uk/government/publications/prevent-duty-guidance

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-beentrafficked-practice-guidance>