

Safeguarding Policy (Children/Vulnerable Adult Protection)

Sport Structures has a professional duty to provide all learners and staff, in particular children and vulnerable adults with appropriate safety and protection. As the welfare of the child/vulnerable adult is paramount, we are committed to providing safe equipment and facilities so that children/vulnerable adults may participate in programmes in a secure environment. Additionally, we promote ethical behaviour, providing children/vulnerable adults with a sense of being valued. On this basis, we aim to ensure safe recruitment practices are always followed, to establish the suitability of personnel to work with children and/or vulnerable adults. We will promote this policy and all the good practice contained in it by clearly sharing it with all learners and stakeholders. It is visible on our website for reference. All new staff are required to read this policy along with all other policies in their induction and regular training is completed to refresh staff.

Definitions

Children – 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.

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.

This policy is governed by Government Legislation and Guidance in respect of protecting children and vulnerable adults including:

- The Counter Terrorism and Security Act (Prevent Duty) 2015
- Working Together to Safeguard Children 2015
- Safeguarding Vulnerable Groups Act 2006
- The Children Act 2004
- The Education Act 2001
- The Police Act 1997
- The Children Act 1989
- Mental Health Act 1983
- Rehabilitation of Offenders Act 1974

Our policy 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.

It is ultimately the responsibility of the Designated Safeguarding Lead (DSL), Simon Kirkland, to ensure that this policy is published and accessible to all personnel, learners and any relevant third parties. The Deputy DSL will also support as required. However, the quality coordinators specific to

each programme are responsible for ensuring this information is fully understood by their qualification team and by the learners who commence programmes in their area.

Through their day-to-day contact with learners and direct work with families, staff at the Company have a crucial role to play in noticing indicators of possible abuse, neglect or radicalisation and referring them to relevant contact with the local council's Children and Social Care provision (referrals will normally be made via the Company's DSL or Deputy DSL).

The Company will follow the relevant local Safeguarding Children Board (LSCB) procedures and guidance from Channel. The policy lists information in the following headings:

- **Prevention** through the teaching and pastoral support offered to learners and the creation of and maintenance of a whole Company proactive ethos The Education Act 2001
- **Procedures** for identifying and reporting cases, or suspected cases of abuse or radicalisation. The definition of the categories of abuse are within this policy
- **Supporting Vulnerable Adults and Children** those who may have been abused or witnessed violence towards others
- **Preventing Unsuitable People Working with Children**
- **Reporting**

Prevention

We recognise that high self-esteem, confidence, supportive friends and good lines of communication with a trusted adult help to protect children.

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 activities and opportunities which equip learners with the skills they need to stay safe from abuse and radicalisation both in the real and virtual world and information about who to turn to for help
- Include in the curriculum material which will help learners develop realistic attitudes to the responsibilities of adult life
- Staff will be supported should they make any disclosures in this regard and are reminded that they can make a disclosure through the company's Whistleblowing Policy
- Further information with regards to the governments Prevent Strategy can be found at <https://www.gov.uk/government/publications/prevent-strategy-2011> and in the company's Prevent Policy

Procedures

We will follow the procedures set out in the Local Safeguarding Children Board procedure and guidance from Channel. We have a DSL:

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

We also have a Deputy DSL should the DSL be unavailable:

Deputy Designated Safeguarding Lead
Katherine Robinson KatherineR@sportstructures.com 07917 388174 Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

Allegations will be taken seriously and dealt with as soon as practicable, in line with this policy.

The DSL or Deputy DSL is also responsible for conducting any investigation and demonstrating the results if the child/vulnerable adult abuse is suspected to be committed by a member of staff. Throughout this procedure, records will be maintained and kept securely and confidentially, separately from the learners' file. 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.

The Company will:

- Ensure there is a designated senior person who has lead responsibility for safeguarding for the Company and has undertaken, as a minimum, relevant child/vulnerable adult protection and Prevent training, which is regularly updated. Advice will be sought from the LSCB in regards to this training. Their role will be clearly outlined within the job description and kept under review
- Ensure that this training is updated yearly in accordance with government guidance or best practice and a commitment to accredited training is given to all staff members every 3 years.
- Hold a safeguarding central record where the DSL and Deputy DSL has access to all safeguarding reports.
- 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 are updated yearly on the update service to remain as accurate as possible.
- Recognise the importance of the role of the DSL and Deputy DSL and ensure they have the time, training and support necessary to undertake their duties which for example include, providing advice and support to staff, taking part in inter-agency meetings and contributing to the assessment of children and/or vulnerable adults in need
- Ensure every member of staff, paid and unpaid, and the board knows who the DSL and Deputy DSL are and the procedures for passing on concerns from the point of induction – this is an integral part of their induction
- Ensure that every member of staff, paid and unpaid, and the board knows what the contingency arrangements are for when the DSL is not available. Should the DSL be unavailable, concerns should be reported to Deputy DSL.
- Ensure that the DSL or Deputy DSL takes advice from a child/vulnerable adult protection specialist when managing complex cases from the local Social Care Team
- 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 and every board member knows:

- The name of the DSL and the Deputy DSL and their role
- How to identify the signs of abuse, neglect and radicalisation
- How to pass on and record concerns about a learner

- That they have an individual responsibility to be alert to the signs and indicators of abuse and radicalisation and for referring child/vulnerable adult protection concerns to the DSL or Deputy DSL
- That they have a responsibility to provide a safe environment in which children/vulnerable adults can learn
- Where to find the Core Inter-Agency Procedures on the LSCB website

The company will provide Safeguarding and Prevent training for all staff, and Board members, from the point of their induction which is updated yearly 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 including possible child/vulnerable adult sexual exploitation and female genital mutilation
- The need to record concerns
- How to support and respond to a child/vulnerable adult who tells of abuse
- Ensure 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
- Ensure that every member of staff, board member and volunteer is issued with a copy of Part 1 of the "Keeping Children Safe in Education" statutory guidance document as updated upon induction. A copy of the document is available at <https://www.gov.uk/government/publications/keeping-children-safe-in-education>
- Ensure that parents are informed of the responsibility placed on the Company and staff in relation to safeguarding by setting out these duties on the Company's website
- Ensure that this policy is available publicly either via the Company's website: www.sportstructures.com or by any other appropriate means
- Ensure that learners' attendance is monitored regularly with the aim that no learner is absent without authorisation, and where the reason for a learner's absence is not known ensure that it is followed up immediately. In particular when a child/vulnerable adult does not return from a scheduled break. Any concerns in this regard should be reported immediately to the DSL or Deputy DSL.

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 matters including attendance and providing written reports at child protection conference and core groups
- Establish and maintain links with regional Prevent Leads and the Police Channel Coordinator

Notify the DSL or Deputy DSL immediately if:

- It should have to exclude a pupil who is subject to a Child Protection Plan (whether fixed term or permanently)
- There is an unexplained absence of a learner who is subject to a Child Protection Plan
- There is a change in circumstances to a learner who is subject to a Child Protection Plan

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
- Ensure all relevant child protection records are sent to the receiving school/academy or Company or establishment when a learner moves education establishment in accordance with the education Child Protection Record Keeping Guidance

Confidentiality and information sharing

- 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.

The Company will:

- 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 Managing Director, Principal or Safeguarding Lead will 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
- 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 Inter-agency Procedures of the Local Safeguarding Children Board)

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
- The Company may be the only stable, secure and predictable element in the lives of children/vulnerable adults at risk. Nevertheless, when at the Company 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. Company 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

The company will support the learner through:

- Training /curricular opportunities to encourage self-esteem and self-motivation
- An ethos that actively promotes a positive, supportive and safe environment and values the whole community
- The Company's Code of Conduct will support vulnerable learners in the Company. The Company will ensure that the learner knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred
- Liaison with other agencies which support the learner
- Recognition that children/vulnerable adults living in a home environment where there is domestic abuse, drug or abuse or mental health issues are vulnerable and in need of support and protection; they may also be young carers
- 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, the Company 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

Types of Abuse

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

Domestic Abuse

- Where there is Domestic Abuse in a family, young people will always be affected; the longer violence continues, the greater the risk of significant and enduring harm, which they may carry with them into their adult life and relationships
- Department leads 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

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 policy. 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
- 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

Child Sexual Exploitation (CSE)

- 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 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

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

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

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

Sexual Abuse

- Sexual abuse involves a person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child/vulnerable adult to be aware that the activity is sexual and the apparent consent of the child/vulnerable adult is irrelevant

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

Radicalisation and Violent Extremism

Radicalisation – 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

Preventing Unsuitable People from Working with Children or Vulnerable Adults

Summary of the Personnel Recruitment Procedure

Applicants are required to complete an application form along with a CV and covering letter for each position. These are required to be returned to the relevant department and the member of personnel managing the recruitment process. All new staff will be required to complete a Disclosure and Barring Service (DBS) check and have two satisfactory references.

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. If the outcome is positive, arrangements are made for induction and 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. Awareness of child/vulnerable protection practice will continue to be addressed via ongoing training.

All members of personnel who work with children and vulnerable adults are required to adhere to this policy.

- The Company will operate Safer Recruitment practices including ensuring appropriate DBS and two reference checks on prospective employees, volunteers and Board members are undertaken according to the government guidance "Keeping Children Safe in Education" and the Company's Staff Recruitment Policy
- Any allegations of abuse made against a member of staff will be reported immediately to the Principal/Managing Director. In cases where the Principal/Managing Director is the subject

of the allegation, it will be reported to the Chair of the Board. The Company will follow the procedures set out in Part four of Keeping Children Safe in Education

- The Company will consult with the Local Authority Designated Officer (LADO) in the event of the allegation being made against a member of staff and adhere to the relevant procedures set out in Keeping Children Safe in Education. The role of the LADO is set out in HM Government guidance Working Together to Safeguard Children (2018) Chapter 2 Paragraph 4. and is governed by the Authorities duties under section 11 of the Children Act 2004 and MKSCB Inter-Agency Policy and Procedures (Ch 2.8). This guidance outlines procedures for managing allegations against people who work with children who are paid, unpaid, volunteers, casual, agency or anyone self employed
- The DSL and/or the Deputy DSL will liaise with the Local Authority Designated Officer (LADO)
- Ensuring that all allegations are wherever possible, reported to the LADO within one working day. Following consultation with the LADO, the Named Senior Officer will advise on all further action to be taken. Please note that the Principal/Managing Director or Chair of the Board should not seek to interview the child/children or members of staff involved until advice has been sought. Doing so may compromise any police interviews that may be necessary
- The Company will ensure that any disciplinary proceedings against staff relating to child/vulnerable adult protection matters are concluded efficiently and that notification of any concerns is made to the relevant authorities and professional bodies (including statutory referrals where required) and included in references where applicable
- Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory nor is it automatic but in some cases, staff may be suspended where this would be deemed to be the best way to ensure that children/vulnerable adults are protected in these types of cases
- Consideration must be given to the needs of the child/vulnerable adult and recognition that they may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is, however, rare for a child/vulnerable adult to make an entirely false or malicious allegation, although misinterpretations of events do happen
- The Company will ensure that all staff, paid and unpaid, are aware of the need for maintaining appropriate and professional boundaries in their relationships with learners and parent/carers as advised within the Code of Conduct. As part of the Induction process all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children/vulnerable adults, especially those with a disability or who are vulnerable
- All staff to sign to confirm that they have read a copy of the Code of Conduct and Part 1 of the Keeping Children Safe in Education
- The Company will ensure that staff and volunteers are aware that sexual relationships with a learner aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Trust)
- The Company will ensure that communication between learners and adults, be whichever method are transparent and take place within clear and explicit professional boundaries and are open to scrutiny
- Where an allegation of abuse is made against a member of Sport Structures staff, a member of employer's staff or a subcontractor's staff, the person concerned may be suspended while the matter is resolved. This does not imply an assumption of guilt, but an opportunity to clear up allegations with the least possible tension between individuals. Investigations into the allegation will be made swiftly and may include examination of relevant documents and interviews with witnesses and those named in the allegation. Sport Structures will ensure that a person reporting allegations against a colleague will not be treated unfairly as a result.

Where an allegation of this kind is made the DSL or Deputy DSL must be notified immediately

Board Child/Vulnerable Adult Protection Responsibilities

- The Board fully recognises its responsibilities with regard to child/vulnerable adult protection and safeguarding and promote the welfare of children/vulnerable adults

It will:

- Nominate a board member for safeguarding and child/vulnerable adult protection who will monitor the Company's compliance with statutory requirements and practice and champion child/vulnerable adult protection issues
- Ensure ongoing reviews of risk and actions in relation to safeguarding are undertaken
- Ensure the effectiveness of this Safeguarding Policy is annually reviewed and any updates provided are implemented immediately

Photographs and Videos

- Photographs of young people or vulnerable adults should not be taken without prior permission, recorded on a Sport Structures consent form. This may be given at the beginning of a learning programme. Photographs and videos should be taken only on cameras belonging to Sport Structures and should be stored only on a computer belonging to Sport Structures. Personal details should not be revealed in the image and consent for publication of photographs and videos must be sought from both the learner and those responsible for them, where appropriate

Prevent Background

Sport Structures has had a longstanding commitment to safeguarding the wellbeing of its learners. The Children's Act 2004 mandated the establishment of local safeguarding children boards. Sport Structures recognised the importance of multi-agency working and established a comprehensive safeguarding procedure. This strategy extends Sport Structures' commitment to safeguarding to include protecting its learners and staff from the risk of harm from radicalisation and being drawn into terrorism.

Since early 2006, the United Kingdom has had a long-term strategy for countering national and international terrorism (known within Government as CONTEST). Its aim is to reduce the risk from national and international terrorism so that people can go about their daily lives freely and with confidence. The strategy is divided into four principal strands:

Pursue - terrorists and their operations at home and abroad

Prepare - for the consequences and improve resilience

Protect - reduce vulnerability of the public and UK interests

Prevent – prevent people from becoming terrorists or supporting terrorism

The Prevent Strategy

The aim of the Prevent strategy, published by the government in 2011, is to reduce the threat to the UK from terrorism by stopping people becoming terrorists or supporting terrorism. In the Counter-Terrorism and Security Act 2015 this has simply been expressed as the need to "prevent people from being drawn into terrorism." This document focuses on the 'Prevent' strand of the strategy.

The 2011 Prevent strategy has three specific strategic objectives:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- work with sectors and institutions where there are risks of radicalisation that we need to address

Terrorist groups often draw on extremist ideology, developed by extremist organisations and individuals. Some people who join terrorist groups have previously been members of extremist organisations and have been radicalised by them. The Government has defined extremism in the 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. We also include in our definition of extremism calls for the death of members of our armed forces.”

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

The Prevent Strategy Principles

Sport Structures is aware of the important role it plays in helping prevent people being drawn into terrorism, which includes not just violent extremism but also non-violent extremism, which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit.

Sport Structures recognises that radicalised learners can act as a focal point for further radicalisation through personal contact with fellow learners and through their social media activity. Where radicalisation happens out of classroom sessions, the learners concerned may well share his/her issues with other learners. The role that staff play in recognising and responding appropriately to any changes in behaviour and outlook of learners cannot be under-estimated and will be central to this strategy, going forward.

In its efforts to comply with the duty, Sport Structures, through this strategy and associated documentation, will demonstrate an awareness and understanding of the risk of radicalisation in its area and what steps can be taken to minimise any risk to its staff, learners and community. For learners every effort will be made to identify any radicalising influences. Learners will be taught British Values of respect and tolerance throughout their apprenticeship programmes to lessen the risk that they become radicalised. Employers and apprentices will be shared information on prevent to allow them to support in this endeavour. Any changes in behaviour or areas of concern raised by an employer, learner or a tutor will be reported immediately and the safeguarding procedures will be followed as detailed in the Safeguarding Policy.

Key Objectives:

This strategy has 5 key objectives:

1. To ensure that learners and staff are aware of their roles and responsibilities in preventing violent extremism.
2. To promote and reinforce shared values and to listen and support the learner voice.

3. To break down differences between different learner communities including supporting inter-faith and inter-cultural dialogue and understanding, and to engage all learners in playing a full and active role in wider engagement in society.
4. To ensure that Sport Structures is free from bullying, harassment and discrimination and that learners feel safe.
5. To provide support for learners who may be at risk by providing appropriate sources of advice and guidance.

Safeguarding and Prevent Risk Assessment

To show our commitment to ensuring all staff and learners remain safe, we have a safeguarding and prevent risk assessment which documents any risks and actions taken to mitigate them. The designated safeguarding lead owns this document and utilises the safeguarding group who support to update this document and communicate it to all staff. This document is updated by the safeguarding group every quarter and more frequently if required. In addition, the safeguarding group maintains effective partnerships, including with the Department for Education Regional Prevent Coordinators, to ensure that the organisation remains well apprised of current risk and best practice.

Sector specific guidance for further education was issued in September 2015, to be read alongside the guidance contained in the revised prevent duty guidance July 2015 as well as Ofsted's Education Inspection Framework for FE skills.

External Speakers and Events

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.

Channel and Referrals

Channel is about safeguarding children and adults from being drawn into committing terrorist related activity. It is a key element of the prevent strategy and uses a multiagency approach to protect people at risk from radicalisation. Channel uses existing collaboration between local authorities, statutory partners, the police and local community.

Access to Police Prevent referral pathways and Channel is achieved by utilising the Department for Education Regional Prevent Coordinator network to effectively and quickly access nationwide support. Further detail is covered in our Safeguarding Policy.

Referral Pathway for Prevent

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.

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

Safeguarding 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 on the secure shared drive.

This form is to be used by a member of staff to report safeguarding concerns about; a learner, themselves or another member of staff.

The form must be completed immediately following the awareness of a safeguarding concern 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.

The information below in appendix 1 is our Safeguarding Disclosure Form and can be used if the individual completing it doesn't have access to the form straight away.

Safeguarding Reporting Procedure

If a child or vulnerable adults tells a member of staff about possible abuse or radicalisation (or if a third party discloses information that suggests this has or may occur):

- Inform the child or vulnerable adult (or third party) that you must pass the information on to the DSL and the DSL may need to refer the allegation or incident onto a third party if required. However, this will be the limit of disclosure.
- You cannot provide any assurance that the information can remain confidential between yourself and the person disclosing.
- If the child or vulnerable adult declines to discuss the incident you must inform the DSL.
- Listen carefully and stay calm.
- 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.
- Use the Sport Structures Safeguarding Disclosure Form to make detailed notes of the disclosure and only note the exact words and descriptors used.
- In no circumstances should you investigate the allegation or disclosure yourself, but report it immediately or as soon as practically possible to the DSL, or if they are unavailable, the Deputy DSL.
- The DSL or Deputy DSL will investigate the matter and keep all information in a secure location. Support the DSL or Deputy DSL in anything else they require.

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
Simon Kirkland Simon.kirkland@sportstructures.com 07766 768474 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
Katherine Robinson KatherineR@sportstructures.com 07917 388174 Sport Structures, Suite 8, The Cloisters, 12 George Road, Edgbaston, Birmingham B15 1NP

Part 1 – Information

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. <input type="checkbox"/> I am responding to concerns raised by someone else (<i>record details below</i>)			
Name of person raising concern if not staff member:		Contact number(s)	
Designated Safeguarding Lead (DSL):		Date disclosure reported to DSL	

Part 2 – Incident/Disclosure Details

Details			
Date of incident/ disclosure:		Time:	
Other persons present at time of incident/disclosure:	Y/N	Location of incident/disclosure:	
Reason for concern (please tick)			
Disclosure by learner <i>Concern or risk of harm</i>		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 <i>Circle relevant concern(s)</i>	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>		
Name of other person(s) present:		Contact number(s)	
Attitude to concern			
Learner attitude towards our concern:			
Attitude of parent/carer/other support networks as reported by learner:			
Learner informed of duty of care to report concern:	Y/N		
Any additional comments:			
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:			

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 (complete for all safeguarding concerns)		
Internal referral (complete 4a)	Y/N	
External referral (complete 4b)	Y/N	
No immediate referral (complete 4c)	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