

# SAFEGUARDING AND CHILD PROTECTION POLICY

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## 1. Rationale

This policy has been developed in accordance with the principles established by the Children Act 1989 and 2004, The Education Act 2002 and Working Together to Safeguard Children 2018. This policy reflects the statutory requirements within Keeping Children Safe in Education September 2022 and DSCP local policy and procedures. Including local lessons learned to ensure all children young people and families within the Trust are supported.

Safeguarding is defined as:

- protecting children from maltreatment,
- preventing the impairment of children's mental and physical health or development,
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes. (*Keeping Children Safe in Education, (DfE, 2022)*)

This Safeguarding and Child Protection Policy forms part of a range of documents and policies which relate to the safeguarding responsibilities of Activ8 staff and volunteers. All staff should be aware made of these systems, and be familiar with systems within the respective Academies/Schools which they work in, and these should be explained to them as part of staff induction; through Continued Professional Development (CPD) and regular updates. These should include the:

- Safeguarding and Child Protection, which amongst other things includes the policy and procedures to deal with child on child abuse;
- Behaviour Policy which includes measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying;
- Code of Conduct for Staff Policy.

The purpose of a Safeguarding and Child Protection Policy is to inform staff, parents, and volunteers about Activ8's commitment and responsibilities for safeguarding children and its aim to create a culture of vigilance.

Safeguarding is **everyone's** responsibility.

- The welfare of the child is paramount.
- All children regardless of age, gender, ability, culture, race, language, religion or sexual identity have equal rights to protection.
- Everyone who works with children has a professional responsibility to keep them safe (*Working Together 2018*).
- All staff have an equal responsibility to act on suspicion or disclosure that may suggest a child is at risk of harm, any professional with concerns about a child's welfare should make a referral to the Doncaster Children's Trust, and professionals should follow up their concerns if they are not satisfied with the response. (*Working Together 2018*).
- Pupils and staff involved in safeguarding issues receive appropriate support and training.
- Staff adhere to a Code of Conduct and understand what to do if a child discloses any

allegations against Activ8 staff or volunteers.

- To develop and promote effective working relationships with other agencies, including our schools.
- To ensure all staff have been recruited in accordance with safer recruitment principles and a single central record is kept ensuring that all required vetting checks have been carried out before appointments are made. These include satisfactory (enhanced) DBS (incorporating a barred list check), satisfactory references that have been validated, right to work in the UK, full identity information in accordance with guidance. Any gaps in personnel files are noted and reasonable steps are taken to rectify with ongoing supervision.
- All staff understand the categories of abuse, indicators and know how, when, who and how to record and report all safeguarding concerns.

All Activ8 core staff will receive appropriate safeguarding training as part of their CPD, so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow.

Supply staff, contractors and volunteers will be made aware of the safeguarding policies and procedures by the Designated Safeguarding Lead (DSL), including the Safeguarding and Child Protection Policy and Code of Conduct for Staff.

Safeguarding needs to be:

1. **Compliant**
2. **Effective**
3. **Innovative**
4. **Collaborative** – through working with other agencies and sharing best practice.

## 2. Mission Statement

Activ8 will:

- Establish and maintain a positive ethos and culture where children feel safe, secure, happy and are listened and responded to when they have a worry or concern.
- Establish and maintain an ethos and culture where staff and volunteers feel safe, are encouraged to talk and are listened and responded to when they have concerns about the safety and well-being of a child.
- Ensure children know that there are adults on site, whom they can approach if they are worried.
- Ensure that children, who have additional/unmet needs are supported appropriately. This could include referrals to Early Help Services or Child Protection contacts to specialist services if they are a child in need or have been / are at risk of being abused and neglected. These will be coordinated working in liaison with our respective schools DSL & DDSL.

- Promote equality, diversity and inclusion at all times and understand that the welfare of all children is paramount and that they have a right to be protected regardless of background, circumstance or protected characteristic.

## 2. Statutory Framework

In order to safeguard and promote the welfare of children, Activ8 will act in accordance with the following legislation and guidance in order to fulfil its legal responsibilities and duties:

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Education Act 2002 (Section 175/157) Outlines that Local Authorities and Local Governing Bodies have a responsibility to “ensure that their functions relating to the conduct of school are exercised with a view to safeguarding and promoting the welfare of children who are its pupils”.
- Keeping Children Safe in Education (DfE, September 2022)
- Working Together to Safeguard Children (DfE 2023)
- The Education (Pupil Information) (England) Regulations 2005
- Sexual Offences Act (2003)
- Section 26, The Counter Terrorism and Security Act 2015 (PREVENT duty)
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry. Includes taking someone overseas to force them to marry (whether or not the forced marriage takes place).
- Serious Violence Strategy 2018
- Keeping Children Safe in Education Part 5 (2022)
- Information Sharing (2018)

Information sharing is an important aspect of safeguarding children and vulnerable people. Safeguarding Practice Reviews often record that a failure to share information has been a key factor. It is important however that information is shared legally. Working Together to Safeguard Children (2023) says, ‘The Data Protection Act 2018 and General Data Protection Regulations (GDPR) do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.’

Practitioners [may] share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner. It would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.

### 3. Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, and volunteers.

#### Designated Safeguarding Leads (DSL)

During term time, we will liaise with respective DSL/DDSLS at our school sites, during holiday programme periods, we will assume responsibility of DSL and DDSL, however will work in partnership with schools should a disclosure be made and need to be escalated further. The DSL and/or a DDSL will always be available (during school hours).

Main responsibilities include:

- ❖ Managing Early Help referrals and cases
- ❖ Contacting the MASH (Multi Agency Safeguarding Hub) team when advice is needed regarding child protection concerns which possibly meet the threshold for statutory intervention
- ❖ Completing the MASH online form for all cases of suspected abuse or neglect where there is a risk of significant harm to the child/young person
- ❖ Liaising with respective school principals/DSL/DDSLS to inform them of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations
- ❖ Acting as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.
- ❖ When working with others, the DSL is aware of the requirement for children [investigated by the police] to have an Appropriate Adult present.

#### Chief Executive Officer (CEO)

Main responsibilities include:

- ❖ The implementation of this policy
- ❖ Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- ❖ Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- ❖ Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- ❖ Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL/DDSLS on this.

## Safeguarding Training and Support

Activ8 will:

- Ensure that all existing staff and will already have had safeguarding training and have read part 1 of KCSIE.
- Ensure that where new staff are recruited or new volunteers support our delivery, they will be provided with a safeguarding induction. An up to date Safeguarding and Child Protection Policy will support this process as will part 1 of KCSIE.

Any safeguarding training requests can be raised with the DSL.

Designated Safeguarding staff will have attended mandatory Level 3 training. The DSL AND DDSL will undertake Prevent Awareness Training to enable them to provide advice and support to other members of staff on protecting children from the risk of radicalisation.

### 4. When to be Concerned

Knowing what to look for is vital for the early identification of abuse and neglect. All staff should be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may need help or protection.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online. or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

### The Four Categories of Child Abuse

#### EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment

of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

<b>Indicators in a child/ young person</b>
Self-harm
Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away
Abnormal or indiscriminate attachment
Drug/solvent abuse
Low self-esteem
Compulsive stealing
Extremes of passivity or aggression
Makes a disclosure
Social isolation – withdrawn, a ‘loner’
Frozen watchfulness particularly pre school
Developmental delay
Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)
Desperate attention-seeking behaviour

### **PHYSICAL ABUSE**

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

<b>Indicators in a child/ young person</b>
Bruises – shape, grouping, site, repeat or multiple
Withdrawal from physical contact
Bite-marks – site and size
Burns and Scalds – shape, definition, size, depth, scars
Aggression towards others, emotional and behaviour problems
Improbable, conflicting explanations for injuries or unexplained injuries
Frequently absent from school
Untreated injuries
Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely
Fractures
Repeated or multiple injuries
Fabricated or induced illness



## **SEXUAL ABUSE**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

<b>Indicators in a child/ young person</b>
Self-harm - eating disorders, self-mutilation and suicide attempts
Poor self-image, self-harm, self-hatred
Running away from home
Inappropriate sexualised conduct
Reluctant to undress for PE
Withdrawal, isolation or excessive worrying
Pregnancy
Sexual knowledge or behaviour inappropriate to age/stage of development or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn
Poor attention / concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area
Sudden changes in schoolwork habits, become truant
Sexually exploited or indiscriminate choice of sexual partners

## **NEGLECT**

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

<b>Indicators in a child/ young person</b>
Failure to thrive - underweight, small stature
Low self-esteem
Dirty and unkempt condition Inadequate social skills and poor socialisation
Inadequately clothed
Frequent lateness or non-attendance at school
Dry sparse hair
Abnormal voracious appetite at school or nursery
Untreated medical problems
Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold
Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury
Disturbed peer relationships

### **Specific Safeguarding Issues**

All staff should be aware where possible that when a child has a social worker, it is an indicator that the child is more at risk than most pupils to other safeguarding issues.

Children with special educational needs or disabilities (SEND) or certain health conditions can also face additional safeguarding challenges.

### **FGM (FEMALE GENITAL MUTILATION)**

Section 5B of the Female Genital Mutilation Act 2003 places a statutory duty upon Activ8 staff, along with social workers and healthcare professionals, to report to the police where they discover FGM appears to have been carried out on a girl under 18.

It will be rare for Activ8 staff to see visual evidence, and they should not be examining pupils, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Under the mandatory reporting requirements, Activ8 staff must personally report to the police cases where they discover that an act of FGM appears to have been carried out (either through disclosure by the victim or visual evidence) on a girl under 18. Those failing to report such cases will face disciplinary sanctions. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with the designated safeguarding lead and involve children’s social care as appropriate (KCSIE, September 2023).

<b>Indicators in a child/ young person</b>
A special occasion or ceremony is going to take place where a girl 'becomes a woman' or is 'prepared for marriage'
A relative or someone known as a 'cutter' is visiting from abroad
A female relative, like a mother, sister or aunt has undergone FGM
A family arranges a long holiday overseas or visits a family abroad during the summer holidays (professionals may become aware of this if parents are preparing vaccinations or planning absence from school)
A girl has an unexpected or long absence from school
A girl struggles to keep up in school
A girl runs away – or plans to run away – from home
Difficulty or discomfort walking, standing or sitting
Complaints of pain between legs
Spending longer than normal in the bathroom or toilet (due to difficulties urinating)
Appearing quiet, anxious, or depressed
In school, a girl may have long periods away from classes (e.g. trying to get out of physical education or sporting activities)
Mentioning that someone did something to them that they are not allowed to talk about
Reluctant to go to the doctors or have routine medical examinations
Asking for help, but possibly avoiding being explicit about the problem because they're scared or embarrassed
Acting differently after an absence from school or college (e.g. acting withdrawn or bleeding, discharge, urinary infections, clutching their body)

### **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. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such.

<b>Indicators in a child/ young person</b>
Lengthy or repeated absence from school, decline in academic performance
Depression, anxiety, self-harm, substance misuse, suicidal thoughts
Poor attendance at school
Restrictions on friends, disapproval of adopting 'western' clothing and make-up

### **Child Sexual Exploitation (CSE)**

The definition of child sexual exploitation is as follows: Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into

sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (DfE, *Child Sexual Exploitation*, 2017)

<b>Indicators in a child/ young person</b>
Unhealthy or inappropriate sexual behaviour
Persistently going missing for periods of time or returning home late regularly
Frequently staying out late or overnight with no explanation as to where they have been
Being secretive about who they are talking to and where they are going
Using more than one phone
Spending more time online or on their devices
Excessive receipt of texts or phone calls, letters, or emails
Having an older girlfriend or boyfriend, or having relationships with controlling older individuals or groups
Unexplained absences from school, college, training, or work
Suddenly acquiring expensive gifts such as mobile phones, jewellery – even drugs – and not being able to explain how they came by them
Having mood swings and changes in temperament
Having hotel cards or keys to unknown places
Noticeable changes in behaviour – becoming secretive, defensive or aggressive when asked about their personal life.
Wearing inappropriate clothing that is too adult or revealing for their age
Significant changes in emotional well-being
Sudden changes in lifestyle
Increasingly disruptive or violent behaviour
Getting into trouble with the police
Bruises, marks on the body, bleeding in their genital or anal area, sexually-transmitted diseases, pregnancy, drug and alcohol abuse or self-harm.

### **Child Criminal Exploitation (CCE)**

CCE takes a variety of forms but ultimately it is the grooming and exploitation of children into criminal activity. Across each form that CCE takes, the current reality is that children who are coerced into criminal activity are often treated as criminals by statutory agencies rather than as victims of exploitation.

Recently, CCE has become strongly associated with one specific model known as ‘County Lines’, but it can also include children being forced to work in cannabis factories, being coerced into moving drugs (often forced to insert drugs in their vagina or anus in a practice known as ‘plugging’) or money across the country, forced to commit financial fraud, forced to shoplift or pickpocket.

## **County Lines**

County lines is the organised criminal distribution of drugs from the big cities into smaller towns and rural areas using children and vulnerable people.

The influence of county lines is nationwide. Young boys, often 9 or 10 years old, are identified and groomed by street gangs. Others who want to be part of the gang and its allure of ready cash, clothes, cars, and respect will ask to join. Entry is often by violent initiation.

Girlfriends are pulled into the gang, and are often subject to a high level of sexual violence. Others close to the gang members, their families, friends, and neighbours are drawn into the gang's sphere of influence too.

The gang will take over the home of a vulnerable person, often after following them home. This is known as "cuckooing". Once in the property, drugs and weapons can be stored there along with a possible venue for dealing drugs and the sexual exploitation of girls and young women.

The vulnerable people whose homes have been taken over in this way are kept compliant by intimidation, violence, and threats that now they are involved, they could be jailed too. The impact on local communities cannot be underestimated. Debt bondage further threatens the vulnerable person and keeps them from reporting the intruders.

Children most at risk are those with chaotic backgrounds, maybe some previous offending, poor school attenders, and often children who are looked after.

In Doncaster a low-level intelligence form (not a referral form) is in place. The DSL should complete this form and pass to the police should low level concerns emerge that may indicate CCE.

<b>Indicators of CCE/ County Lines in a child/ young person</b>
Persistently going missing from school or home and/or being found out-of-area
Unexplained acquisition of money, clothes, jewellery, or mobile phones
Excessive receipt of texts or phone calls
Spending more time online or on their devices
Using more than one phone
Suddenly acquiring expensive gifts such as mobile phones, jewellery – even drugs – and not being able to explain how they came by them
Having hotel cards or keys to unknown places
Being secretive about who they are talking to and where they are going
Relationships with controlling older individuals or groups
Leaving home/care without explanation
Unexplained absences from school, college, training, or work
Returning home unusually late or staying out all night
Coming home looking dishevelled
Suspicion of physical assault or unexplained injuries
Carrying weapons
Starting or increasing drug use, or being found to have large amounts of drugs on them
Starting or increasing alcohol use
Loss of interest in school and significant decline in performance
Using sexual, gang, drug-related or violent language you wouldn't expect them to know
Meeting with unfamiliar people or associating with a gang
Becoming isolated from peers or social networks
Self-harm
Significant changes in emotional well-being
Sudden changes in lifestyle
Increasingly disruptive or violent behaviour
Getting into trouble with the police

## **Child on Child Abuse and Sexual Violence & Sexual Harassment**

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 children (sometimes known as 'teenage relationship abuse')
- 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

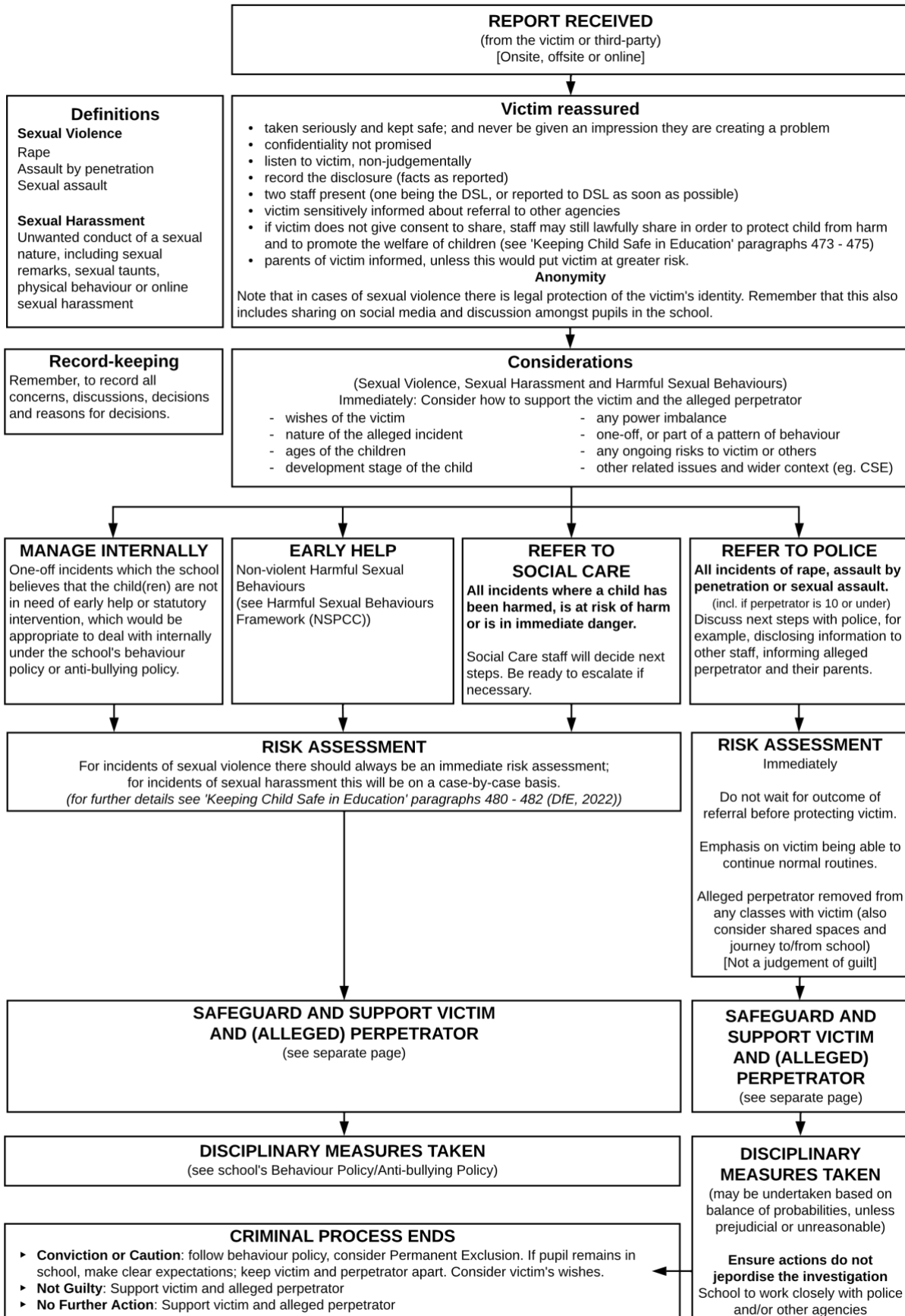
causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- up skirting, 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, and
- 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).

When there has been a report of sexual violence, the DSL (or a deputy) 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 for a report of sexual violence will consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged perpetrator(s)
- all the other children, (and, if appropriate, adult students and staff) at the Academy/School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms, and
- the time and location of the incident, and any action required to make the location safer.

**\*PART FIVE: CHILD-ON-CHILD SEXUAL VIOLENCE AND SEXUAL HARASSMENT**





Risk assessments should be recorded and should be kept under review. At all times, the Activ8 staff should be actively considering the risks posed to all their pupils attending sessions and put adequate measures in place to protect them and keep them safe.

The DSL (or a deputy) will ensure they are engaging with local authority children's social care and specialist services as required. 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.

Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'. Activ8 staff are aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the Academy/School. The DSL (or deputy) will liaise with respective school leads, who are likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response. Important considerations will include:

- the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the Trust's duty and responsibilities to protect other children
- the nature of the alleged incident(s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident and well-known social standing? Does the victim have a disability or learning difficulty?
- if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- are there ongoing risks to the victim, other children, adult students or Academy/School staff?
- other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Activ8 takes the sharing of nude and semi-nude images and/or videos very seriously and refers to the UK Council for Internet Safety (UKCIS) Guidance: Sharing nudes and semi-nudes (December 2020) to establish appropriate action.

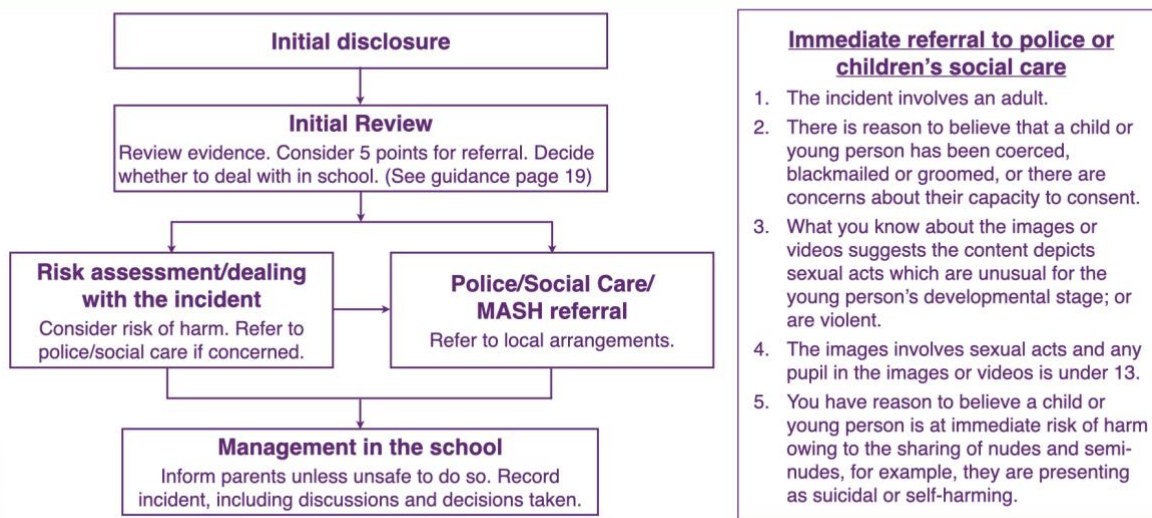
Sharing nudes and semi-nudes is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

In Academies/Schools, staff who learn of incidents where nude or semi-nude images have been shared will immediately report them to the Designated Safeguarding Lead (DSL). The UKCIS has a one-page overview which outlines to staff what they should and shouldn't do prior to informing the DSL:

- Never view, copy, print, share, store or save the imagery, or ask a child to share or download – this is illegal.

- If the member of staff has already viewed the imagery by accident (e.g. if a young person has showed it to them before they could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that the staff member needs to report it and reassure them that they will receive support and help from the DSL (or equivalent)

## What safeguarding staff should do



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Source: Sharing nudes and semi-nudes: Responding to incidents (UKCIS, 2020)

All staff are aware that abuse is abuse and child on child abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. Furthermore, they recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys’ perpetrators), but that all child on child abuse is unacceptable and is taken seriously.

To allow or condone child on child abuse will lead directly to child protection procedures. All incidents will be recorded, investigated by the DSL/DDSL and reported to the MASH team where deemed that thresholds are met.

Indicators in a child/ young person
Physical injuries
Stop attending school
Poor mental health
Show physical manifestations like headaches and stomach pains
Drink alcohol, smoke, or start using street drugs
May begin to abuse others

## Domestic Abuse

Domestic abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

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 and are therefore victims of domestic abuse themselves.

Indicators in a child/ young person
Bullying or aggression towards others
Bed-wetting
Nightmares, trouble sleeping or insomnia
Constant or frequent sickness (e.g. headaches, colds)
Anti-social behaviour (e.g. vandalism)
Problems in school
Drug or alcohol use
Attention seeking
Tantrums
Withdrawal
Anxiety, depression, or suicidal thoughts

## Mental Health

Activ8 can have an important role to play in supporting the mental health and wellbeing of pupils attending their provision.

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

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

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the procedures in this Policy and speaking to the DSL/DDSL. Activ8 staff will liaise with relevant school staff where needed to ensure the most appropriate course of action is taken to best support the child.

Indicators in a child/ young person
Persistent sadness
Withdrawing from or avoiding social interactions
Self-harming
Talking about death or suicide
Outbursts or extreme irritability

Out-of-control behaviour that can be harmful
Drastic changes in mood, behaviour or personality
Changes in eating habits
Loss of weight
Difficulty sleeping
Frequent headaches or stomach aches
Difficulty concentrating
Changes in academic performance
Avoiding or missing school

## **Prevent: Safeguarding Children and Young People from Radicalisation**

Children can be vulnerable to extreme ideologies and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from radicalisation is part of the Trust’s safeguarding approach.

There are signs and vulnerability factors that may indicate a child is susceptible to radicalisation or is in the process of being radicalised. If there are concerns about an individual who is believed or suspected of being engaged in extremist activity or suspected to having been radicalised, staff should speak in confidence to the South Yorkshire Police Prevent team. The information is valuable to them and will be treated in the strictest confidence.

Children and young people at risk of radicalisation may:

- Have low self-esteem
- Be confused about their faith, sense of belonging, or identity
- Be victims of bullying or discrimination
- Feel isolated or lonely
- Be experiencing stress or depression
- Be going through a transitional period in their life
- Be angry at other people or the government
- Feel angry about how they are treated or seen by society

It is possible to protect vulnerable people from extremist thinking and intervene to safeguard those at risk of radicalisation. Staff must be alert to changes in children’s behaviour, which could indicate that they may need Prevent support.

<b>Indicators in a child/ young person</b>
Withdrawal from family and friends, or changing circle of friends
Hostility towards others
Talking as if from a script
Being unwilling to discuss their views
Increased levels of anger
Being secretive, particularly around what they are doing on the internet
Using extremist terms to exclude people or incite violence
Expressing the values of extremist or terrorist organisations (including political or religious based grievances)
Supporting violence and terrorism towards other cultures, nationalities, or religions
Writing or creating artwork that promotes extremist values

Talking about being a 'martyr'
Possession of extremist literature or other material, or trying to access extremist websites
Possession of any material about weapons, explosives, or military training

## **Channel Panel**

Channel is part of the Prevent strategy. The process is a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism.

Once a referral is made through any of the contact methods in Appendix 1, the Prevent team will assess it. If the individual is considered to be vulnerable to radicalisation, the case will then be referred to the South Yorkshire Channel Panel.

At this meeting partners work together to support individuals vulnerable to radicalisation and provide tailored safeguarding measures to support their needs. This support can come from the Local Authority, Educational Establishments, Healthcare providers, Probation, Police and members of the community. The earlier the Channel intervention is started, the more likely it is to be effective.

Effective early help relies on all staff to be vigilant and aware of the nature of the risk for children and young people and what support may be available. Our Trust will ensure that all staff undertake Prevent awareness training.

## **MANAGING ATTENDANCE**

Activ8 staff will contact non-attendance families at our holiday provision to determine reasons for non-attendance.

Activ8 will hold at least two contacts for each child, that are checked on a regular basis.

All pupils who attend an Activ8 community session, must do so via our online class4kids booking portal. This allows us to collect contact, medical and photo consent information prior to attendance.

Activ8 staff monitor pupils' attendance through their daily register.

- Activ8 staff will contact non-attenders to determine the reason for non-attendance, as we are aware there could be a number of reasons for not attending a session, particularly if it is a free booking.
- If any member of staff is concerned about a reason for absence, they will inform the DSL.

Children who are absent, abscond or go missing during the delivery day are vulnerable. Activ8 staff will follow the procedures for dealing with children who are absent/go missing, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.

Where child sexual exploitation or child criminal exploitation, or the risk of it is suspected, frontline practitioners should complete a cause for concern form and pass onto the DSL.

## **Hidden Harm**

The witnessing of harm to others is dealt with as if the child or young person has been a victim of harm, and is classed as such e.g. witnessing domestic abuse. For some of these vulnerable children, attendance at school provides a respite from difficult home circumstances. For others, the consequences of family substance misuse include poor attendance, and failure to develop the necessary social and behavioural skills. This can be particularly difficult for children if they are also taking on a carer role for parents or siblings. Children can "act out", through challenging behaviour, or "act in", through withdrawal or self-harming behaviours, the distress that they are experiencing due to difficulties at home.

The DSL will refer any concerns to the MASH team and work with partner agencies so children in these circumstances can be responded to appropriately.

Families where parents/carers drink problematically, use illicit drugs or misuse prescribed medication can still provide a safe, secure and supportive family environment for children. However, for some families, drug and/or alcohol misuse can become the central focus of the adults' lives, feelings and social behaviour, and has the potential to impact on a child at every age from conception to adulthood. It is therefore essential that the implications for each child in the family are carefully assessed.

## **LGBT**

Activ8 staff are aware they can play a role in supporting LGBT children and young people by creating an inclusive environment where all learners feel welcome and valued.

- The fact that a child or young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT
- Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.
- LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and the Trust will access the range of support available to help counter homophobic, biphobic and transphobic bullying and abuse should the occasion arise.
- The DSLs will consider the whole Academy/School approach and seek additional advice if required.

The Trust will continue to work in partnership with all to ensure all children and young people feel supported and safe.

## **Extra-familial Harms**

All staff, especially the DSL (and deputies) will consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

## 5. Dealing with a Concern/Disclosure

### The Safeguarding System (the 5 R's):

1. **Recognise**
  - Identify the risk to all the children
  - Identify the risk to a child or young person
  - Identify children or young people at risk
  - Identify children on Child Protection (CP) Plans
2. **Respond**
  - Systems in place
3. **Refer**
  - See flowchart documents
4. **Record**
  - Internally and directly with either DSL or DDSL
5. **Reflect**
  - Consistency of approach
  - Impact

### Disclosures

All staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened this could be due to their vulnerability, disability and/ or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.

If a child discloses that he or she has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child, but not make promises which might not be possible to keep
- Never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child.
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell
- Listen, only asking questions when necessary to clarify what is being said.
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told.
- Support dealing with a disclosure from a child, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the DSL.

### **Any concerns about a child will be promptly shared in writing with the DSL using a concern form**

- All records will provide a factual and evidence-based account and there will be accurate recording of any actions.
- Concern forms will be signed, dated and handed directly to the DSL or Deputy DSL in their absence.
- Any verbal conversations will be promptly recorded
- At no time should an individual teacher/member of staff or school be asked to or consider taking photographic evidence of any injuries or marks to a child's person, this type of behaviour could lead to the staff member being taken into managing allegations procedures.
- In the case of serious injury or allegation the DSL will contact The Doncaster Children's Trust Duty Team without delay.
- In the case of poorly explained serious injuries or where behaviour concerns arouse suspicion, the DSL will seek support and guidance
- Staff will record any continued minor concern and will take responsibility for alerting the DSL should the number of concerns rise or, in their professional judgement, become significant.
- Safeguarding, child protection and welfare concerns will all be recorded and kept internally.

### **Third Party Disclosures**

It is **everyone's** responsibility to report concerns related to children and make referrals to Children Services and the Police if suspected that a child has been abused or is at risk of abuse. Therefore, when safeguarding concerns are shared with the DSL in a school by a parent or member of the public, it is important to note that there is equal responsibility by the complainant to report the matter also directly rather than assume the responsibility is that of the school.



## Early Help

The Early Help Enquiry through MASH (Multi Agency Safeguarding Hub) has been established to improve communication, information sharing and to support more effective delivery of services where there is a need. All enquiries are triaged by a Social Worker, where threshold for Early Help is clear, contacts will be screened within the Early Help Hub, where threshold is unclear the MASH process will be used.

MASH is a multi-disciplinary team with two main functions:

- Providing information, advice and guidance to professionals who have queries about children who may need a coordinated early help response.
- Screening all early help enquiry forms to ensure an appropriate level of response for the child and family.

If Activ8 staff believes that Early Help is needed, the situation will be discussed with the respective school DSL/DDSL to liaise with parent/carers to gain their signed consent to make the Early Help Enquiry through MASH. Once consent is gained, the online form is completed within the Doncaster Council website: <https://www.doncaster.gov.uk/Eforms/SimpleEform/Boot/2370100> and a copy of the consent form attached. MASH will screen the enquiry to establish the threshold of need and who would be the most appropriate Lead Practitioner.

MASH will assess the case and inform the Academy/School of the action required. This could be:

- If an Early Help Assessment (EHA) has already been completed or there is an existing Team around the Child/Family (TAC/F), school will be asked to share information and join the TAC/F
- Single agency response for a specific piece of work – Lead Practitioner identified
- EHA required – lead practitioner identified
- No further action
- Escalation to Children's Social Care if they already know this case or the information gathered during screening indicates escalation is required.

**FLOW CHART FOR RAISING SAFEGUARDING CONCERNS ABOUT A CHILD**

Concern put in writing on a Safeguarding concern form



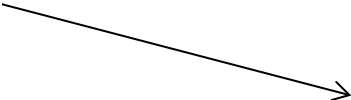
Alert DSL of concern promptly



Designated Safeguarding Lead reviews concern and plans next steps



Decision made to discuss the concern informally with respective school DSL/DDSL and/or the parents/carers



Decision made to escalate further

Decision made to monitor the concern.



**Monitor**

Relevant adult asked to monitor child and feedback to the Designated Safeguarding Lead within an agreed timescale.



**Discuss**

Once discussed, Designated Safeguarding Lead may decide to discuss further with parents, monitor or refer to MASH.

**Refer**

Designated Safeguarding Lead may review decision and decide to refer to Early Help Through Mash or directly to DSCP referral team

**Monitor**

**Refer**



Contact EH/MASH through One Front Door portal  
Or  
Referral team directly  
Or  
Call the Police (depending on nature of concern)

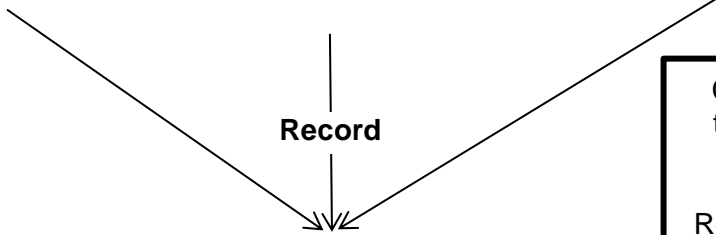
**Record**

Designated Safeguarding Lead scans concern form onto internal system

SPCC Whistleblowing Helpline 0800 028 0285

Education Support Helpline 08000 562 561

Education Support Helpline 08000 562 561



## 6. Record Keeping

- Any concerns about a child will be recorded promptly internally via concerns form.
- The DSL & DDSL will be given universal access to concerns.
- Activ8 staff will be given access to input concerns only, ensuring an alert is sent to the DSL for their attention.
- A chronology will be kept internally. Staff, will record any minor concerns to the the DSL
- Safeguarding, child protection and welfare concerns will be recorded
- Files will be available for internal and external scrutiny, for example by a regulatory agency or because of a safeguarding practice review or audit.
- The DSL will share **all** safeguarding information with respective school DSL/DDSL without delay.
- Safeguarding records will be sent to the receiving school separately from other pupil files.
- All hard copy safeguarding files being transferred, will contain a receipt which the receiving school should sign and return immediately to Activ8 DSL
- All staff are encouraged to understand why it is important that recording is comprehensive and accurate and what the messages are from safeguarding practice reviews in terms of recording and sharing information.

## 7. Confidentiality

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers within the Trust.

- All staff have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies.
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

**Information sharing should be necessary, proportionate, relevant, adequate, accurate, timely and secure.**

Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff will speak to the DSL or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

## 9. Areas of Particular Risk

### Physical Intervention

- Staff will only ever use physical intervention (reasonable force) as a last resort, when a child is endangering him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Where needed, individual plans will be created in order to minimise the likelihood of challenging behaviour, and when it does occur, that there is less use of physical restraint and other restrictive methods.
- Staff who are likely to need to use physical intervention will be appropriately trained in the Team Teach technique or equivalent training.
- Physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
- The school understands how to report any injuries to staff to the health and safety team.
- Touch is appropriate in the context of working with children, and all staff are clear about their professional boundaries and a clear Code of Conduct is in place for all staff.
- All staff are aware of the role of LADO and what constitutes a referral to LADO following any allegation of using force or restraint.

**This must only be used in the event a child is in immediate danger if physical action is not taken.**

### Changing Facilities

Some signs of abuse may become apparent while children and young people are getting changed. Staff and volunteers are trained to recognise the signs of abuse and know what procedures to follow if they have any concerns about a child and young person.

Changing areas could be places where young people are more vulnerable to child-on-child abuse such as bullying or harmful sexual behaviour. Academy/School staff endeavour to keep children safe while allowing them privacy.

- Mixed gender changing areas are less appropriate as children get older. Staff are sensitive to those who physically mature at a much earlier or later age than their peers. Children usually begin puberty at any point between the ages of 8 and 14 (NHS, 2021).
- Staff will treat everyone fairly and with respect for their privacy and dignity.
- Staff will make adequate and sensitive arrangements for changing which considers the needs of all children. This should include those with disabilities, those who are transgender, non-binary or questioning their gender identity and those from different religions, beliefs and cultural backgrounds.
- Adults must always change or shower privately; never in the same space as children.

Appropriate supervision is based on the age and developmental needs of the children and young people getting changed.

It is not always necessary for adults to remain in the changing room in order to maintain good behaviour; being in close proximity and children being aware of this is usually enough.

The children know that adults are in earshot of what is happening in the room and will enter if necessary - in response to a disturbance or bullying, for example.

Staff will also consider the following principles of best practice.

- It may be possible to leave the door of designated changing rooms slightly open so that nobody can see inside but staff outside can hear if there is a disturbance.
- If an adult needs to enter the room they will alert children in advance and give children the opportunity to cover up if they want to.
- Where possible, the adults who are supervising children getting changed will be of the same gender as them.
- Adults will never stand in the changing room watching children and young people, or go in and out repeatedly without good reason.
- Staff will establish a clear code of behaviour and make sure children understand expectations about their behaviour while they are unsupervised.
- Children and young people know who to talk to if they have concerns about the behaviour of a member of staff or other young people. If concerns are raised these will be taken seriously, and the Trust will take appropriate action.

## Online Safety

Issues can be categorised into four specific areas of risk:

- **Content:** being exposed to illegal, inappropriate, or harmful content.
- **Contact:** being subject to harmful online interaction with other users.
- **Conduct:** online behaviour that increases the likelihood of, or causes harm.
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.

If there are any immediate safeguarding concerns raised regarding significant harm, the DSL will follow safeguarding procedure as appropriate and contact MASH team, police, and/or South Yorkshire Prevent team following procedures.

## 10. Complaints and Allegations Against Adults Who Work with Children

These procedures must be followed in any case in which it is alleged that a member of staff, visiting professional or volunteer has: -

- behaved in a way that has harmed a child or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in such a way that indicates he or she would pose a risk of harm if they worked regularly or closely with a child
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (incident does not necessarily involve a child, for example, domestic abuse).

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

- **Physical** - includes, for example, intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.
- **Emotional** - includes, for example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes which discriminate on the grounds of race, gender, disability or sexuality.
- **Sexual** - includes, for example, sexualised behaviour towards pupils, sexual harassment, sexual assault and rape.
- **Neglect** - may include failing to act to protect a child or children, failing to seek medical attention or failure to carry out appropriate/proper risk assessment etc.

A safeguarding complaint that meets the above criteria must be reported to the DSL immediately. If the complaint involves the DSL the allegation must be passed to the DDSL without delay. For all concerns the DSL should carry out an urgent initial consideration/fact find in order to establish whether there is substance to the allegation. The DSL **should not** carry out the investigation itself or interview pupils without LADO advice. As part of this initial consideration, the DSL should consult with Quest HR Advisor who will then guide for appropriate action to contact the LA.

Staff should not be automatically suspended.

A multi-agency strategy meeting may be arranged to look at the complaint in its widest context. The DSL must attend this meeting, which will be arranged by the LADO. All issues must be recorded and the outcome reached must be noted to ensure closure.

In many cases it may be appropriate to provide further training and support to staff/volunteers and ensure that they are clear about the expectations for their conduct.

In more serious cases, allegations may be investigated under the formal disciplinary procedures and, where allegations are upheld, formal warnings issued as well as specific training and support. In cases where children may be at further risk and/or evidence/witnesses may be compromised and/or the allegations are so serious that they may, if upheld, constitute gross misconduct, suspension of the member of staff/volunteer may be appropriate and should be considered in line with Activ8's Disciplinary Policy.

Any staff/volunteers who are dismissed by the Activ8 for gross misconduct or cumulative misconduct relating to safeguarding of children will be referred to the DBS for consideration of barring. Activ8 will keep written records of all of the above.

Allegations will be dealt with expeditiously and in a fair manner;

- Activ8 will ensure that staff always adhere to a code of conduct and professional standards, including after school activities. Staff are aware of social media/on-line conduct.

- Activ8 will ensure any disciplinary proceedings against staff related to Child Protection matters are concluded in full in accordance with Government guidance - Working Together to Safeguard Children 2018 and Keeping Children Safe in Education 2022.
- Activ8 will ensure that all staff and other adults on site are aware of the need for maintaining appropriate and professional boundaries in their relationship with pupils and parents following the Academy/School's Code of Conduct. Adequate risk assessments are in place for extended school, volunteer and holiday activities.
- Staff are confident to report any misconduct.
- All staff are aware of their Duty of Care and know how to respond to medical/first aid needs.
- Allegations found to be unfounded or malicious should be removed from personnel records
- Pupils making malicious allegations should face appropriate sanctions
- Activ8 should also ensure that they liaise with the LADO about any allegations about supply teachers. Academies/Schools should not simply cease using the person without ensuring that they have established all the facts.

### **Low Level Concerns**

A low-level concern is one that does not meet the threshold for harm and thus for a referral to the LADO. Low level concerns should never be ignored as they represent actions that may damage Activ8s culture of openness, honesty, trust, and transparency. Such behaviour is not confined to working hours and may include behaviour which would lead any reasonable person to question their suitability to work with children or to act as an appropriate role model. It might include:

- making, or encourage others to make sexual remarks to, or about, a pupil.
- use of inappropriate language to or in the presence of pupils, discussing their personal or sexual relationships with or in the presence of pupils.
- making (or encourage others to make) unprofessional personal comments which scapegoat, demean, discriminate or humiliate, or might be interpreted as such.

Such concerns should always be shared with the DSL unless the concerns relate to the DSL in which case, shared with the DDSL. DSL's should keep confidential records and review these regularly to establish whether patterns of behaviour are emerging. Good practice would involve a confidential discussion between the DSL and the individual and the issuing of words of professional advice. Records of such discussion should be kept confidentially by the DSL. The DSL should review summaries of concern and decide whether the thresholds for LADO referral are met. Similarly, breaches of the Code of Conduct Policy for staff should be recorded and the policy reviewed annually in light of any such breaches.

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the Academy/School or education setting's safeguarding arrangements.
- Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies, should be in place for such concerns to be raised with the Academy/School's senior leadership team and the MAT Executive Leadership Team.
- Concerns about the DSL should be raised with the DDSL

## 11. Safer Recruitment

- Activ8 pays full regard and commitment to following the safer recruitment, selection and pre-employment vetting procedures as outlined in part three of KCSIE (2023).
- The single central record shows the relevant vetting checks required including: a barred list check, DBS check at the correct level, identity, qualifications, prohibition order and right to work in the UK.
- As part of the shortlisting process, Activ8 will consider carrying out an online search as part of its due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which Activ8 might want to explore with the applicant at interview.
- Activ8 will ensure that where relevant, employed individuals are not disqualified under the Childcare Disqualification Regulations 2018.
- Activ8 will ensure that appropriate DBS risk assessments will be undertaken as required.

## 12. Disclosure and Barring Service Checks

The Disclosure and Barring Service (DBS) vets people who work with children and vulnerable adults. There are three levels of checks depending on the nature of the work that a person undertakes:

- Standard
  - a check of the Police National Computer (PNC) records of convictions, cautions, reprimands and warnings;
- Enhanced
  - a check of the PNC records as above
  - plus, other information that is considered relevant by the police
- Enhanced with barred list information
  - only legal for people working in regulated activity with children
  - adds DBS' Children's Barred List checks

It is essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the Trust follows the relevant safer recruitment processes.

Volunteers are checked and risk assessed. A volunteer, who has not been checked, will not be left unsupervised or allowed to work in regulated activity.

### Renewals of DBS Checks

Staff DBS' will be renewed every three years, or where otherwise required.



### 13. Whistleblowing

If staff have concerns about safeguarding practices within Activ8:

- All staff and volunteers are able to raise concerns about poor or unsafe practice and potential failures in the Activ8's safeguarding regime and know that such concerns will be taken seriously by the DSL/DDSL.
- Appropriate whistleblowing procedures are in place for such concerns to be raised.
- Where a staff member feels unable to raise an issue with their employer, or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:
  - They should speak in the first instance, to the Doncaster Council, Children and Young People Safeguarding Team or LADO following the Whistleblowing Policy.

## Appendix 1

### Activ8 Coaching & Activ8 Camps key contacts

DSL	Owen Wedgwood 07792 694894 <a href="mailto:owen@activ8coaching.co.uk">owen@activ8coaching.co.uk</a>
Safeguarding team member	Callum Taylor 07415 671337 <a href="mailto:callum@activ8coaching.co.uk">callum@activ8coaching.co.uk</a>

### External agency key contacts

<b>Doncaster Early Help</b>	<a href="https://dscp.org.uk/report-concern">https://dscp.org.uk/report-concern</a>  01302 736250 <a href="mailto:EarlyHCo@doncaster.gov.uk">EarlyHCo@doncaster.gov.uk</a> 01302 737033 (Urgent cases)
<b>Doncaster LADO</b>  LADO Administrator Milovan Orlandich Helen Myers	<a href="tel:01302737332">01302 737332</a> <a href="mailto:LADO@doncaster.gov.uk">LADO@doncaster.gov.uk</a>
<b>Doncaster Childrens Services: Referral and Response Team</b>  For urgent safeguarding concerns.  If you are worried about a child that might be at immediate risk of harm or if the situation is an emergency, you can wait to contact the LADO and contact either Children's Services and/or the Police straight away.  The LADO can then be contacted after the child is safe, as long as they are contacted within 24 hours.	Office hours: <a href="tel:01302737777">01302 737777</a>  Out of hours: <a href="tel:01302796000">01302 796000</a>  Police: Phone <a href="tel:101">101</a> or in an emergency <a href="tel:999">999</a>
<b>Doncaster Child Sexual Exploitation Team</b>	<a href="mailto:CSE.admin@doncaster.gcsx.gov.uk">CSE.admin@doncaster.gcsx.gov.uk</a>
<b>Prevent</b>  SY Police Prevent Team  UK Anti-Terrorist Hotline  Report Extremist material online Report Online	0114 2523217 or 101 or 999 (emergency only) <a href="mailto:Prevent_Inbox@southyorks.pnn.police.uk">Prevent_Inbox@southyorks.pnn.police.uk</a>  0800 789 321  <a href="http://www.gov.uk/report-terrorism">www.gov.uk/report-terrorism</a> <a href="http://www.gov.uk/act">www.gov.uk/act</a>

## Appendix 2

### Glossary of key terms and definitions

(Definitions taken from Keeping Children Safe in Education (KCSIE): Statutory guidance for schools and colleges. (Department for Education, September 2021)

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

#### **Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

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

**Sexual Abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

**Specific Safeguarding Issues:** 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, Kanga Sports Ltd staff should report their concerns to a member of the Safeguarding Team. Even where safeguarding is not considered to be an issue, Kanga Sports Ltd 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. Stopping violence and ensuring immediate physical safety is obviously the Kanga Sports Ltd Training's first priority but staff need to be aware that emotional bullying can be more damaging than physical. Many experts say that bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

**Missing from Education:** A young person going missing from education is a potential indicator of abuse or neglect. Activ8 staff should follow Activ8 Coaching/Camps procedures dealing with learners that go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. 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 a member of the Safeguarding Team.

**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.

**Sexual Exploitation and Grooming:** Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation. Children and young people can be groomed online or in the real world, by a stranger or by someone they know – for example, a family member, friend or professional. Groomers may be male or female. They could be any age.

**Child Sexual Exploitation (CSE):** is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

**Signs and Symptoms:** go missing from home, care or education, be involved in abusive relationships, intimidated and fearful of certain people or situations, hang out with groups of older people, or antisocial groups, or with other vulnerable peers, associate with other young people involved in sexual exploitation, get involved in gangs, gang fights, gang membership, have older boyfriends or girlfriends, spend time at places of concern, such as hotels or known brothels, not know where they are, because they have been moved around the country, be involved in petty crime such as shoplifting, have unexplained physical injuries, have a changed physical appearance, for example lost weight.

**Domestic Violence:** The definition of domestic violence and abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: • Psychological • Physical • Sexual • Financial • Emotional

**Drugs:** This includes alcohol, tobacco, illegal drugs, medicines, new psychoactive substances ('legal highs') and volatile substances.

**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

**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 and there will be other examples where children have been harmed when adults think that their actions have brought bad fortune, such as telephoning a wrong number which is believed by some to allow malevolent spirits to enter the home.

**Honour Based Violence (HBV):** So-called 'honour based violence' encompasses 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. All forms of so-called HBV are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts, staff should speak to one of the Safeguarding Team.

**Female Genital Mutilation (FGM):** Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Although the age of learners at Activ8 is such that they are not necessarily in the high risk category for FGM, a learner may disclose that she is at risk of FGM, has suffered FGM or that a sister or family member is at risk.

**When a potential case of FGM has been disclosed to a member of staff, it is that staff members responsibility to contact the police and then refer to DSL**

Activ8 staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. The new mandatory reporting duty for FGM, introduced via the Serious Crime Act 2015, came into effect on 31 October 2015. This duty requires Activ8 Coaching & Camps to report known cases of FGM in under 18 year olds to the police. Signs and Symptoms: a long holiday abroad or going 'home' to visit family, relative or cutter visiting from abroad, a special occasion or ceremony to 'become a woman' or get ready for marriage, a female relative being cut – a sister, cousin, or an older female relative such as a mother or aunt.

**Forced Marriage:** Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family).

**Financial abuse:** (taking wages or not giving money) can also be a factor.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

**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 anti-social 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.

**Mental Health:** Mental health problems can include depression, anxiety, eating disorders, self-harm, suicidal tendencies and the potential risk of harming others.

**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 relevant legislation is contained in the Protection of Children Act 2004 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). Specifically, it is an offence to possess, distribute, show and make

images of children. The Sexual Offences Act 2003 defines a child, for the purposes of indecent images, as anyone under the age of 18. The latest guidance from the UK Council for Child Internet Safety (UKCCIS) introduces the phrase 'youth produced sexual imagery' instead of 'sexting'. (August 2016). This guidance refers to sexual imagery and not indecent imagery as indecent is subjective and has no specific definition in law.

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 police.

### **HANDLING INCIDENTS**

- All incidents involving youth produced sexual imagery should be reported to the Safeguarding Team.
- An initial review meeting will be held and subsequent interviews with the young people involved, if appropriate.
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm.
- At any point in this process if there is a concern that a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

An immediate referral to the police and/or children's social care will be made at this initial stage if:

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent, for example due to a learning difficulty.
- What is known about the imagery suggests the content depicts sexual acts which are unusual for the young person's development age or are violent.
- The imagery involves sexual acts and any child in the imagery is under 13.
- There is reason to believe that a young person is at risk of harm owing to the sharing of imagery, for example, the young person is presenting as suicidal or self-harming.

If none of the above apply Activ8 may decide to respond to the incident without involving the police or children's social care. Although the sharing of sexual imagery is illegal, the National Police Chief's Council (NPCC) is clear that 'youth produced sexual imagery should be primarily treated as safeguarding issue' and the law was also created to protect children and young people and not to criminalise them. The decision to respond to the incident without involving the police or children's social care will be made when the Designated safeguarding Lead is confident that there is enough information to assess the risks to the young people involved and that the risks can be managed within the Kanga Sports Ltd Training's learner coaching policy.

**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.

**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.

**Financial or Material Abuse:** This can include theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions or the misuse, misappropriation of property, possessions or benefits





