



Safeguarding Policy



Vision

To ensure all participants have an enjoyable experience and feel fully inclusive in a welcoming environment, where vulnerable groups are safe, valued and respected.

Core principles

- Safeguarding is everyone's responsibility and we recognise our duty to promote and protect the safety and welfare of vulnerable groups.
- Everyone has the right to protection from abuse, mistreatment and exploitation in any form.
- We strive to create an environment where everyone is empowered to protect themselves and others.
- Working together underpins the work undertaken to safeguard vulnerable groups.
- Robust and transparent arrangements for safeguarding are essential.

Evaluation and review

We will regularly assess the implementation and effectiveness of this Policy which will be reviewed annually or whenever there are; changes in legislation, key functions or persons within the organisation, following new or revised government or statutory guidance, or after dealing with any safeguarding concern. The most current version of this Policy will always be available in the Staff Handbook and on the company's shared Google Drive.

The aims of this Policy are to:

- Outline our commitment and expectations.
- Promote and achieve the highest safeguarding standards.
- Ensure that there are effective measures in place to assess the suitability of staff and partners.
- Ensure that there are effective measures in place to create safe and inclusive environments.
- Ensure that staff are clear about what constitutes appropriate behaviour and professional boundaries.
- Ensure that staff recognise poor practice and abuse and their responsibilities to take appropriate action when a safeguarding concern arises.

Safer recruitment and raising awareness

We are committed to safer recruitment procedures which include:

- Ensuring recruiters and interviewers are appropriately trained and supported.
- Fair and thorough application processes.
- Pre-recruitment checks which include identity verification, references and where applicable, criminal record checks.
- Role descriptions which accurately record responsibilities.
- Providing effective supervision, training and support.



- All new members of staff will receive an induction which will include familiarisation with this Policy and individual safeguarding responsibilities.

Disclosure rechecking period

We encourage staff who hold criminal record checks as a result of working with vulnerable groups to subscribe to the Disclosure and Barring Service (DBS) Update Service. We will perform Status Checks every three years. All staff will be informed by any checks that take place. Any relevant investigations or offences committed in the intervening time must be reported to the Head of Safeguarding (Simon Woods) immediately.

Relationships of trust

Those who have responsibility for and authority or influence over, vulnerable groups are in relationships of trust in relation to the vulnerable groups in their care. A relationship of trust can be described as one in which one party has power and influence over the other by virtue of their work or the nature of the activity. It is vital for all those in such positions of responsibility to understand the power they may have over those in their care and the responsibility they must exercise as a consequence.

Partnerships and commissioned services

We will actively promote safeguarding within all partnerships and commissioned services by:

- Ensuring that safeguarding is a primary consideration.
- Actively communicating our safeguarding policies and procedures to partners and service providers.
- Assessing the suitability of partners and service providers and the adequacy of their safeguarding and safer recruitment policies and practice.
- Ensuring that contractual agreements outline respective safeguarding responsibilities.

Propriety and behaviour

This section aims to provide a framework of expected standards and behaviour to which all staff are expected to adhere. This is not an exhaustive list. Staff are expected to ensure that the safety and welfare of vulnerable groups is the primary consideration.

Staff have a responsibility to maintain confidence in their suitability to work with vulnerable groups. Behaviour and actions that would lead any reasonable person to question motivation, intentions and suitability to work with vulnerable groups must be avoided.

Staff are expected to:

- Familiarise themselves with this Policy and any other policies provided by our clients. This includes: *Keeping Children Safe: Part One*.
- Know who the Designated Persons are and how to contact them.



- Ensure the safety of the vulnerable groups in their care.
- Always act in the best interests of vulnerable groups.
- Build balanced relationships with vulnerable groups based on mutual trust.
- Maintain appropriate and professional boundaries at all times.
- Treat all vulnerable groups equally, with respect, dignity and fairness.
- Ensure that the same professional standards are applied regardless of ethnic origin, colour, nationality, race, religion or belief, gender, sexual orientation, age or disability.
- Respect the views, wishes and feelings of vulnerable groups.
- Recognise the developmental needs of children and capacity of vulnerable groups.
- Help maintain an ethos whereby colleagues, partners, vulnerable groups and their parents/ guardians and carers feel able to express any concerns comfortably and safe in the knowledge that effective action will be taken as appropriate.
- Promote an environment where poor practice is challenged and reported.
- Ensure that any concerns or allegations pertaining to the safety and/or welfare of vulnerable groups are recorded and acted upon in accordance with this Policy.
- Encourage and demonstrate consistently high standards of behaviour and understand the types of behaviour that may call into question their suitability to work with vulnerable groups.
- Be aware that behaviour outside of work time may impact upon their suitability to work with vulnerable groups.
- Be aware that breaches of the law and this Policy may result in criminal and/or disciplinary action being taken against them.

Staff should never:

- Use their position of power and influence to intimidate, threaten, coerce, exploit or undermine vulnerable groups.
- Use their status and standing to form or promote inappropriate relationships. Professional boundaries must be maintained at all times.
- Use their position to gain access to information relating to vulnerable groups for their own or others' advantage. Such information should only be used or shared to protect vulnerable groups and to meet their needs.
- Carry out their duties whilst under the influence of alcohol, solvents or drugs.
- Engage in any sexual, betting, gambling or related activities or have discussions about such activities in the presence of vulnerable groups.
- Access, make or distribute illegal or indecent content or images of vulnerable groups.

Recognising abuse, poor practice and other safeguarding

Everyone has a role to play in reporting abuse or any incident or behaviour that causes concern or puts vulnerable groups at risk of harm. Staff are not expected to be experts



in recognising abuse, however, they should be vigilant and ensure that they always respond swiftly and appropriately to safeguarding allegations, concerns and incidents in line with this Policy and any given staff training.



This section describes forms of abuse, inappropriate behaviour and other safeguarding concerns that must be recorded and reported to the Head of Safeguarding who will take such steps as are considered necessary to ensure the safety and welfare of vulnerable groups.

- [?] **Physical abuse:** Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/ or that may harm them or application of inappropriate restraint measures.
- [?] **Emotional abuse:** Any act or other treatment which may cause emotional damage and undermine a person's sense of well-being, including persistent criticism, denigration or putting unrealistic expectations on vulnerable groups, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.
- [?] **Sexual abuse:** Any act which results in the exploitation of vulnerable groups, whether with their consent or not, for the purpose of sexual or erotic gratification. This may be by an adult or by a young person who is intellectually, emotionally, physically or sexually more mature than the victim. This includes non-contact activities, such as indecent exposure, involving vulnerable groups in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of staff to abuse their relationship of trust for sexual gratification.
- [?] **Child sexual exploitation:** A form of child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or 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 can also take place through the use of technology.
- [?] **Neglect:** Ongoing failure to meet the basic needs of vulnerable groups. Neglect may involve; failing to provide adequate food, shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or the failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an activity setting, it may involve failing to ensure that vulnerable groups are safe and adequately supervised or exposing vulnerable groups to unnecessary risks.



- ❑ **Grooming:** The process of developing a relationship and trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person.
- ❑ **Radicalisation:** The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of vulnerable groups for the purposes of involvement in extremist activity is a serious safeguarding issue.
- ❑ **Female genital mutilation (FGM):** Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.
- ❑ **Bullying:** Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.
- ❑ **Cyberbullying:** The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among children. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.
- ❑ **Bullying as a result of any form of discrimination:** Bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. Discriminatory behaviour is unacceptable and will be reported.
- ❑ **Poor practice:** This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of vulnerable groups are not afforded the necessary priority compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing vulnerable groups in potentially compromising and uncomfortable situations, failing to ensure the safety of vulnerable groups, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals.
- ❑ **Hazing:** Any rituals, initiation activities, action or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of vulnerable groups.
- ❑ **Peer-on-peer abuse:** Children and young people can be taken advantage of or harmed by adults and by other children. Peer-on-peer abuse is any form of



physical, sexual, emotional and financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).



- [?] Infatuations:** Vulnerable groups may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware, that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against staff. They should therefore ensure that their own behaviour is above reproach. A member of staff who becomes aware that a child is at risk that may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with the Head of Safeguarding.

Dealing with a disclosure

When a child at risk discloses that he or she has been abused or is at risk of abuse, staff must ensure that the child or adult at risk's immediate needs are met and prioritise their safety and protection from further abuse above all else. It is important to remember that, while it is a member of staff's responsibility to be a supportive listener and to refer the information, it is not their role to counsel the child or adult at risk or to investigate their claims. Staff are, however, expected to act in the best interests of vulnerable groups at all times.

Vulnerable groups must be listened to and taken seriously. Once it has been established that a child or adult at risk has been harmed, or is at risk of being harmed, staff should not pursue the conversation any further. This is important to ensure that questions cannot be raised later about the accuracy and legitimacy of the disclosure.

This means that staff should:

- Ensure that the child's immediate needs are met and that the priority is their safety and protection from further risk of harm.
 - Allow the person disclosing to lead the discussion, to talk freely and at their own pace.
 - Listen and remember that their role is supportive rather than investigative.
 - Limit any questioning to the minimum necessary to seek clarification only.
 - Put their own feelings aside and avoid expressing their views on the matter.
 - Provide reassurance that the person disclosing is being taken seriously and that they are doing the right thing by disclosing.
 - Be mindful that if physical abuse has taken place, they may observe visible bruises and marks, however they should not ask them to remove or adjust their clothing to observe them.
 - Explain to the person disclosing what action they will be taking and that they will support them through the process.
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- Always act in the best interests of vulnerable groups and seek advice from the Head of Safeguarding if in any doubt about sharing information.



Recording and reporting disclosures and other safeguarding concerns

All safeguarding concerns and disclosures must always be taken seriously and every effort should be made to ensure that confidentiality is maintained for all concerned when dealing with a disclosure or a safeguarding concern. It is important to ensure that information is handled and disseminated on a 'need to know basis' only. Those who need to know are those who have a role to play in protecting the child at risk and others who may be at risk, for example:

- Designated Persons (those with specific operational responsibility for safeguarding).
- Statutory authorities (Police and Local Authorities).
- The DBS who help employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups.
- LADO - Local Authority Designated Officer
- MASH – Multi Agency Safeguarding Hub

Any member of staff may make a referral themselves directly to statutory authorities, particularly if they are concerned about a child's at risk's immediate safety, if they are having difficulty contacting the Designated Persons or if they are concerned that a disclosure or information about a safeguarding concern has not been acted upon appropriately. The Head of Safeguarding must be notified immediately after contacting a statutory authority or emergency services.

It is vital that clear and concise notes are made at the time of the concern or soon after a disclosure is made to support the completion of a more detailed record later. A written record should include the following information wherever possible:

- The date and time of incident or disclosure, parties involved i.e. victim(s), the person(s) whose conduct there are concerns about, any witnesses, person(s) reporting the concern, person(s) to whom the concern was reported.
- Factual information. Staff might convey their intuitive thoughts but these should be recognised as such and should not form part of the record.
- In the case of bruises or observed injuries, a body map (a drawing of a body outline, upon which the location of bruises/injuries can be indicated) can be completed.
- The date and time of referring the information and to whom the information was referred.

Such records must be signed and dated by the individual recording the information. If more information is recalled at a later date, this should be added as an addendum. The original record must not be changed.

Staff should be aware that such records may be used as evidence for investigations and inquiries, court proceedings, disciplinary procedures and/or quality assurance purposes.



Superstar Sports will fully support anyone who in good faith reports his/her concerns about the safety and welfare of vulnerable groups.



Managing safeguarding concerns

Superstar Sports takes all safeguarding allegations, concerns and incidents seriously. We are committed to working in partnership with all of our schools.

There are many factors which can determine the outcome when dealing with a safeguarding concern, thus the action taken is determined on a case by case basis.

Referrals to the DBS should be made once investigations and disciplinary processes are complete (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.

Support for staff

Dealing with a disclosure or a safeguarding concern may have an impact on the well-being of the staff involved. It is important that anyone affected seeks help if they feel that they need support.

Data protection

We will maintain confidentiality of all; (i) data collected (in writing or electronically) relating to vulnerable groups, (ii) information and documentation relating to safeguarding allegations, concerns and incidents and (iii) information and documentation relating to recruitment and selection procedures in accordance with relevant data protection legislation.