



SAFEGUARDING POLICY

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Date Reviewed: October 2021
Next Review Due: Sept 2022

SCRUMKIDS SAEGUARDING POLICY

ScrumKids is committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

The Designated Safeguarding Lead (DSL) for Child Protection

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The DSL is also responsible for the implementation of the 'Prevent Duty.'

1 INTRODUCTION

1.1 This policy is has been developed in accordance with the principles established by the following:

- Children Acts 1989 and 2004;
- Education Act 2002, and in line with government publications:
- “Framework for the Assessment of Children in Need and their Families” 2000,
- “What to do if you are worried a Child is Being Abused” 2015.

It also references:

- Disqualification under the Childcare Act 2006 (Feb 2015)
- Prevent Duty Guidance for England and Wales (March 2015)
- The Prevent Duty. Departmental Advice for Organisations and Childminders
- The use of social media for online radicalisation (July 2015)
- “Working Together to Safeguard Children” (February 2019)

The guidance reflects “Keeping Children Safe in Education” September 2020 (“KCSIE”).

1.2 This policy is applicable to the whole ScrumKids community.

1.3 The owners take seriously their responsibility under section 157 and 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within the organisation to identify, assess, and support those children who are suffering harm or who are likely to suffer harm, and those who are in need of additional support from one or more agencies.

1.4 We recognise that all adults, including temporary staff, volunteers and owners, have a full and active part to play in protecting our participants from harm, and that the child’s welfare is our paramount concern.

1.5 All staff believe that our organisation should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

1.6 All members of staff have a duty to safeguard our participants welfare and must therefore familiarise themselves and comply at all times with this policy. This includes a duty both to children in need and to children at risk of harm. All staff should read at least Part 1 and Annex A of KCSIE, whenever a new version is published. All ScrumKids staff should be aware that safeguarding incidents can happen at any time and anywhere and are required to be alert to any possible concerns.

1.7 **The aims of this policy are:**

1.7.1 To support the child’s development in ways that will foster security, confidence and independence. The policy endeavors to keep the child’s best interest at the forefront of all practice.

- 1.7.2 To provide an environment in which children and young people feel safe, secure, valued and respected, and feel confident, and know how to, approach adults if they are in difficulties, believing they will be effectively listened to.
- 1.7.3 To protect children from maltreatment, to prevent impairment of children's mental and physical health or development, to ensure children can grow up in circumstances consistent with the provision of safe and effective care, and to take action where necessary to enable all children to have the best outcomes.
- 1.7.4 To raise the awareness of all coaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- 1.7.5 To provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, ScrumKids, contribute to assessments of need and support packages for those children. The policy and its procedures aim to highlight the value and importance of early intervention wherever possible.
- 1.7.6 To emphasise the need for good levels of communication between all members of staff.
- 1.7.7 To develop a structured procedure within the organisation, this will be followed by all members of the ScrumKids community in cases of suspected abuse.
- 1.7.8 To develop and promote effective working relationships with other agencies, especially the Police and Social Care.
- 1.7.9 To provide good lines of communication with trusted adults, supported friends and an ethos of protection.
- 1.7.10 To recognise and protect our children who may be vulnerable to radicalisation or exposed to extremist views.

2 SAFE STAFF

2.1 We will ensure that:

- 2.1.1 Owners must understand and fulfil their responsibilities. The company CEO is responsible for overseeing safeguarding. The safeguarding lead is to annually review the ScrumKids policies and procedures and the efficiency with which the related duties have been discharged.
- 2.1.2 The CEO will sign off this policy on an annual basis.
- 2.1.3 We have a Designated Safeguarding Lead (DSL) and one deputy (DDSL), both of whom have undertaken Safeguarding Children Training via the *Play It Safe* training programme offered through the RFU.
- 2.1.4 The Owners and all other staff have child protection awareness training, to be arranged by the DSL on a regular basis, to maintain their understanding of safeguarding issues, including the signs and indicators of abuse.
- 2.1.5 All members of staff, volunteers, and owners are provided with child protection awareness training at induction, including training managing a report of child-on-child sexual violence and sexual harassment. They know how to respond to a participant who discloses abuse and who to discuss a concern with. They should not assume that somebody else will take action and share information that might be critical in keeping children safe. This is everyone's responsibility.
- 2.1.6 All parents/carers are made aware of the responsibilities of staff members with regard to child protection procedures through publication of ScrumKids Safeguarding Policy, available via the ScrumKids website.

- 2.1.7 We will seek to ensure that in line with Part 3 of the DfE's guidance 'Keeping Children Safe in Education' (KCSIE 2020), all staff working within our organisation have been checked as to their suitability to work with children by adhering to statutory responsibilities to undertake checks on all staff, including verification of their identity, qualifications, a satisfactory Enhanced DBS check and Barred List check (where appropriate), as well as taking proportionate decisions on whether to ask for any checks beyond the minimum required, and ensuring volunteers are appropriately supervised.
- 2.1.8 We will ensure that all child protection concerns or allegations against adults working within ScrumKids are referred to the LADO (Local Authority Designated Officer) for advice.
- 2.2 Our procedures will be annually reviewed and updated. Any deficiencies or weaknesses in the procedures will be remedied without delay.
- 2.3 The name of the Designated Safeguarding Lead and their deputy will be clearly publicised, with a statement explaining the organisation's role in referring and monitoring cases of suspected abuse.
- 2.4 All new members of staff will be given a copy of our Safeguarding Policy and Annex A of the latest version of Keeping Children Safe in Education. It also has the DSL's and DDSL's names clearly displayed, as part of their induction into the company.

3 RESPONSIBILITIES

3.1 **The DSL is responsible for:**

The DSL's responsibilities are in line with those set out in Annex B of KCSIE (September 2020) and include:

3.1.1 Managing referrals

- (a) Referring a child if there are concerns about possible abuse, to the MASH and acting as a focal point for staff to discuss concerns. Referrals should be made in writing, following a telephone call within 24 hours of a disclosure or suspicion of abuse.
- (b) Liaising with other agencies as may be required. For example,
 - Police (cases where a crime may have been committed or in the case of serious harm)
 - Disclosure and Barring Service (cases where a person is dismissed or has left due to risk/harm to a child)
- (c) Keep the owners informed of any ongoing enquiries
- (d) Act 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.
- (e) Ensuring that either they attend case conferences, core groups, or other multi-agency planning meetings, contributes to assessments, and provides a report, which has been shared with the parents.

3.2 Training

The DSL and DDSLs are fully trained for the demands of this role in child protection and interagency working and should regularly attend courses with child support agencies to ensure that they remain conversant with best practice, and receive appropriate refresher training carried out at least every three years. This training meets the requirements of the DfE's 'Keeping Children Safe in Education' (KCSIE).

The DSL should:

- (a) Ensure each member of staff has access to and understands the organisation's child protection policy and procedures, especially new and part time staff. The DSL is responsible for organising and delivering child protection induction, and for regularly updating all staff on Safeguarding developments, for example, through staff meetings and notices.
- (b) Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- (c) Be able to keep detailed, accurate, secure written records of concerns and referrals.
 - Keeping written records of concerns about a child even if there is no need to make an immediate referral.
 - Ensuring that all such records are kept confidentially and securely.
- (d) Obtain access to resources and attend any relevant or refresher training courses.
- (e) Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff.

3.2.3 Raising Awareness

The DSL should ensure the organisation's policies are known and used appropriately.

- (a) Ensure the ScrumKids' child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governors regarding this.
- (b) Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of ScrumKids in this.

- 3.3 The DDSL is appropriately trained and, in the absence of the DSL, carries out those functions necessary to ensure the on-going safety and protection of participants. In the event of the long term absence of the DSL, the DDSL will assume all of the functions above. The DSL, or DDSL, should always be available to discuss safeguarding concerns.

4 ScrumKids Will Support Children By:

- 4.1 Providing access to a telephone helpline enabling them to call for support in private if requested or appropriate.
- 4.2 Encouraging self-esteem and self-assertiveness, throughout sessions as well as our relationships, whilst not condoning aggression or bullying.
- 4.3 Promoting a caring, safe and positive environment within the organisation.
- 4.4 Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- 4.5 Notifying Social Care as soon as there is a significant concern.

5 EARLY HELP

Any participant may benefit from early help but all staff should be particularly alert to the potential need for early help for a participant who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory education, health and care plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is misusing drugs or alcohol themselves
- Is at risk of modern slavery, trafficking or exploitation
- Is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse
- Has returned home to their family from care
- Is showing early signs of abuse and/or neglect
- Is at risk of being radicalised or exploited
- Is a privately fostered child.

Early help means providing support as soon as a problem emerges at any point in a participant's life.

In the first instance, staff who consider that a participant may benefit from early help should discuss this with the DSL. The DSL will consider the appropriate action to take. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the participant's situation does not appear to be improving.

6 CONFIDENTIALITY

- 6.1 We recognise that all matters relating to safeguarding are confidential, however, all staff should share information that might be critical in keeping children safe. Fears regarding sharing information under the Data Protection Act 2018 and the GDPR must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of children. In particular, staff should be aware of the following:
- Certain sensitive and personal information may be retained and shared for Safeguarding purposes.
 - 'Safeguarding of children and individuals at risk', as outlined in KCSIE 2020, allows for the sharing of 'special category personal data', and also allows for this to be done without consent, should the gaining of consent place the child at risk, or at further risk.
 - ScrumKids are able to refuse to share data, should they consider that the sharing of such data would place a child at risk. In such instances, the 'serious harm test' should be met.
- 6.2 The DSL will disclose any information about a participant to other members of staff on a need to know basis only.
- 6.3 The guidance, "Information sharing: advice for practitioners providing safeguarding services" (2018), supports staff who have to make decisions about sharing information.
- 6.4 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 6.5 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing.

- 6.6 We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the MASH on this point.

7 SUPPORTING STAFF

- 7.1 We recognise that staff working in the organisation who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 7.2 We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

8 STAFF TRAINING

- 8.1 It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern.
- 8.2 Safeguarding is the responsibility of all members of staff and all staff should know what to do to raise a concern.
- 8.3 New staff (including temporary staff), volunteers and owners will receive training during their induction. Induction training will include:
- 8.3.1 Familiarisation with this policy (Safeguarding Policy)
 - 8.3.2 The identity of the DSL and DDSLs
 - 8.3.3 Updates to Part I and Annex A of the Keeping Children Safe in Education guidelines
- 8.4 Staff training will also include alerting staff to the risks of radicalisation as set out in the Prevent Duty. Training in the Prevent Duty will include knowing how to identify children and young people at risk. This training will be updated on a regular basis.

9 SIGNS AND TYPES OF ABUSE

9.1 Recognising Abuse

To ensure that our participants are protected from harm, we need to understand what types of behaviour constitute abuse and neglect. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside ScrumKids, and/or can occur between children outside these environments. The Safeguarding Team will consider whether children are at risk of abuse or exploitation in situations outside their families: such extra- familial harm can take different forms, including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

There are four categories of abuse:

9.1.1 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.

Some of the following signs may be indicators of physical abuse:

- Children with frequent injuries;
- Children with unexplained or unusual fractures or broken bones; and
- Children with unexplained: bruises or cuts; burns or scalds; bite marks.

9.1.2 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 in so far 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.

Some of the following signs may be indicators of emotional abuse:

- Children who are excessively withdrawn, fearful, or anxious about doing something wrong;
- Parents or carers who withdraw their attention from their child, giving the child the 'cold shoulder';
- Parents or carers blaming their problems on their child; and
- Parents or carers who humiliate their child, for example, by name-calling or making negative comparisons.

9.1.3 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, and it is also recognised that children can sexually abuse other children.

Sexual Exploitation ('CSE')

Is a form of sexual abuse where children are sexually exploited for money, power or status. It involves an individual or a group using a power imbalance to coerce, manipulate or deceive a child into sexual activity. Age may be the most obvious factor, but this power imbalance can also be due to other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. CSE can be a one-off occurrence, or it can be a series of incidents over time, and can range from opportunistic to complex organised abuse. CSE can involve violent, humiliating and degrading sexual assaults, and victims can be exploited even when the activity appears consensual. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child Sexual Exploitation doesn't always involve physical contact and can happen online.

Some of the following signs may be indicators of sexual abuse:

- Children who display knowledge or interest in sexual acts inappropriate to their age;
- Children who use sexual language or have sexual knowledge that you wouldn't expect them to have;
- Children who ask others to behave sexually or play sexual games; and
- Children with physical sexual health problems, including soreness in the genital and anal areas, sexually transmitted infections or underage pregnancy.

Some of the following signs may be indicators of sexual exploitation:

- Children who appear with unexplained gifts or new possessions;
- Children who associate with other young people involved in exploitation;
- Children who have older boyfriends or girlfriends;
- Children who suffer from sexually transmitted infections or become pregnant;
- Children who suffer from changes in emotional well-being;
- Children who misuse drugs and alcohol;
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss organisation or education or don't take part in education

9.1.4 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.

Some of the following signs may be indicators of neglect:

- Children who are living in a home that is indisputably dirty or unsafe;
- Children who are left hungry or dirty;
- Children who are left without adequate clothing, e.g. not having a winter coat;
- Children who are living in dangerous conditions, i.e. around drugs, alcohol or violence;
- Children who are often angry, aggressive or self-harm;
- Children who fail to receive basic health care; and
- Parents who fail to seek medical treatment when their children are ill or are injured.

9.2 It is recognised that abuse can take place wholly online, or that online techniques may be used to facilitate offline abuse.

9.3 Other forms of abuse can include domestic abuse (whether a participant is abused themselves or witnesses such abuse), involvement in, or coercion into gangs, so called honour-based abuse and forced marriage.

9.4 Safeguarding issues can also be linked to, for example, children and the court system, children with family members in prison, child criminal exploitation: county lines, and homelessness. Further information in relation to these issues is provided (below).

9.5 **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The Organisation may refer some parents and carers to this service where appropriate.

9.6 **Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

9.7 **Child criminal exploitation (county lines)**

Child Criminal Exploitation is a form of abuse where children are exploited for money, power or status. It involves an individual or a group using a power imbalance to coerce, manipulate or deceive a child into criminal activity. Age may be the most obvious factor, but this power imbalance can also be due to other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. CCE can be a one-off occurrence, or it can be a series of incidents over time, and can range from opportunistic to complex organised abuse. Victims of CCE can be exploited even when the activity appears consensual. Consent cannot be given, even where a child may believe they are voluntarily engaging in activity with the person who is exploiting them. CCE doesn't always involve physical contact and can happen online.

CCE is also sometimes referred to as 'County Lines', this being is a geographically widespread form of harm that is a typical feature of criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

9.8 Homelessness

Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The organisation should be aware of potential indicators of homelessness including: household debt, rent arrears, domestic abuse and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware, or suspect that a participant may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

9.9 Signs and Symptoms of Abuse

The warning signs and symptoms of child abuse and neglect can vary from child to child. Children develop and mature at different rates so what appears to be worrying for a younger child might be normal behaviour for an older child. By understanding the warning signs, we can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign doesn't automatically mean a child is being abused.

Signs and symptoms are listed under 9.1.

9.10 Contextual Safeguarding

All staff, but especially the DSL and deputy, should consider the context in which safeguarding incidents and behaviour occur and how they can be associated with factors outside of ScrumKids. The organisation will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The organisation will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

9.11 Peer-on-Peer Abuse

Peer-on-peer abuse is abuse carried out by one (or more) child on another, and can take many forms, including physical, sexual and emotional abuse, as well as more specific actions such as hazing, predatory sexting, and upskirting. The treatment of allegations of peer-on-peer abuse is dealt with in Section 16 of this policy.

9.12 Serious Violence

All staff should be aware of the indicators that children might be at risk from, or involved with serious violent crime. These might include increased absence from organisation, a change in friendships, relationships with older individuals or groups, a significant decline in performance, signs of assault or unexplained injuries, or unexplained gifts or new possessions. Any concerns should be passed on in line with this policy.

9.13 Mental Health

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. While only appropriately trained professionals should attempt a diagnosis of mental health problems, staff who have concerns about the mental state of a participants should pass these concerns on in line with the protocols set out in this document. Staff should also be aware that children who have suffered abuse, neglect, or other traumatic childhood experiences, may experience a long-lasting impact on their mental health. A link to official Government guidance to support participants in this way can be found in Section 22 of this Policy.

10 CHILD PROTECTION PROCEDURES

10.1 Procedures for staff about reporting a concern

ScrumKids treats the safeguarding of the participants in its care as the highest priority and recognises the important role it has to play in the recognition and referral of children who may be at risk. All our staff are made aware of their duty to safeguard and promote the welfare of children in the organisation's care. They should not assume that somebody else will take action and share information that might be critical in keeping children safe. This is everyone's responsibility. Staff members are alerted to the particular potential vulnerabilities of looked after children.

All staff should be alert to signs and symptoms of possible abuse. Every member of staff is required to report instances of actual or suspected child abuse or neglect to the DSL. This includes alleged abuse by one or more participants against another participant (see below section on Arrangement for Dealing with Peer-on Peer Allegations).

If a member of staff observes something that gives cause for them to consider whether a participant is being abused they should:

- 10.1.1 Record the incident in detail including the names of the participant concerned as well as any participants involved. They should also record accurately the date, time and place of the incident.
- 10.1.2 Immediately pass the information on to the DSL or the DDSL in the absence of the DSL.
- 10.1.3 Reference will be made within 24 hours to an external agency if there is risk of significant harm, or if the incident involves a Child at Risk.

10.2 Procedures for staff about dealing with a disclosure

Occasionally a participant may make a disclosure to a member of staff. When a participant makes a disclosure the following needs to be borne in mind:

- 10.2.1 The member of staff may not promise confidentiality. If the matter places the participant or another participant in potential harm, then the information must be passed on to the DSL. This must be made clear to the participant.
- 10.2.2 The member of staff should record the disclosure as accurately as possible using the participant's language and words. The member of staff should not attach their own meaning to the disclosure or attempt to interpret implications of the disclosure.
- 10.2.3 The member of staff should not prompt or ask leading questions. The member of staff should not allow their own emotions to compromise their ability to listen and offer support.
- 10.2.4 The member of staff should explain to the participant what they will do next and encourage them to speak directly to the DSL (offer to accompany the participant to see the DSL). Give the participant a time frame regarding what will happen next.
- 10.2.5 The member of staff should not discuss the matter with anyone else. Report directly and immediately to the DSL to enable them to notify appropriate agencies within 24 hours.
- 10.2.6 If staff members are unsure they should always speak to the DSL.
- 10.2.7 The member of staff should not investigate the matter.
- 10.2.8 In exceptional circumstances such as in an emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care and/or the police. Parental consent is not needed for referrals. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up as appropriate.

10.3 Concluding notes

Referrals will be made to MASH once a case has crossed the threshold for referrals. MASH provide a 'Threshold Tool' which is used to assess whether or not a case should be referred.

Before proceeding any further, the DSL always has the option of having an informal discussion with the LADO without naming the individual concerned. These discussions can be helpful in determining when borderline cases need to be pursued further.

In borderline cases the LADO can advise whether the Organisation may pursue its own investigation or whether the investigation is to be conducted by the LADO.

Where there is reasonable cause to suspect that a child is suffering, or likely to suffer significant harm, a referral to Children's Social Care will be made immediately. For children in need of additional support from one or more agencies, the organisation will contact other relevant external agencies.

In the case of serious harm, or if a crime has been committed, the police will be informed from the outset.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. **Anybody can make a referral.**

11 ALLEGATIONS OR DISCLOSURES OF ABUSE

- 11.2 All ScrumKids staff should take care not to place themselves in a vulnerable position with a child. Sessions, where appropriate, should take place under the supervision of parents.
- 11.3 *The IRSC nationally agreed document "Guidance for Safe Working Practice for the Protection of Children and Staff in Education Settings" is available at www.saferrecruitmentconsortium.org*
- 11.4 We understand that a participant may make an allegation against a member of staff, a participant, parent or other person connected to the Organisation. Allegations of abuse against coaches and other staff relating to their behaviour towards a participant or participants in a way that indicates that he or she may pose a risk of harm to participants will be dealt with according to the statutory guidance set out in part four of KCSIE 2020.
- 11.5 If such an allegation is made, or information is received which suggests that a person may be unsuitable to work with children, the member of staff receiving the allegation or aware of the information, will immediately inform the DSL.
- 11.6 The DSL on all such occasions will discuss the content of the allegations or suspicions of abuse or cases where there is reasonable cause to suspect a child is suffering with the Duty LADO within the working day. In the case of the allegation being made out of hours, the DSL will contact the MASH's Emergency Duty Team. If a crime has been committed, the police will be informed.
- 11.7 If the allegation made to a member of staff concerns the DSL, the person receiving the allegation will immediately inform the relevant authority without informing the DSL.
- 11.8 The organisation will follow Part 4 of Keeping Children Safe in Education 2020 procedures for managing allegations against staff. Under no circumstances will we send a child home, pending such an investigation, unless this advice is given exceptionally, as a result of an Allegations/Senior Strategy Meeting:

The term Allegations or Senior Strategy Meeting covers any urgent formal strategy discussion which may take place by telephone between the police, social care, and education managers, requiring action prior to the first meeting

- 11.9 If the allegation concerns a member of staff, a volunteer or another participant he/she would normally be informed as soon as possible after the result of any initial investigation authorised or conducted by the LADO is known. Advice will always be sought from the LADO first, however. The organisation will normally appoint a member of staff to keep the person informed of the likely course of action and the progress of the case.
- 11.10 Suspension of the member of staff against whom an allegation has been made, needs careful consideration, and the Owner will seek the advice of the LADO in making this decision.
- 11.11 In the event of an allegation against the Owner, the decision to suspend will be made by the relevant authority.
- 11.12 The reasons and justification for suspension will be recorded and the staff member informed of them.
- 11.13 During the course of the investigation, the organisation in consultation with the LADO will decide what information should be given to parents, staff and other participants and how press enquiries are to be dealt with. In reaching their decision due consideration will be given to the provisions in the Education Act 2011 and in Keeping Children Safe in Education relating to reporting restrictions identifying coaches who are the subject of allegations from participants.
- 11.14 In the case of participant-on-participant abuse which the organisation has reported to the LADO and which the LADO or statutory child protection authority decides to investigate further, the matter will be dealt with after discussion with the LADO.
- 11.15 The outcome of investigation of an allegation will record whether it is substantiated (sufficient evidence either to prove or disprove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive) and unfounded (no evidence or proper basis which supports it). If it is established that the allegation is malicious, no details of the allegation will be retained on the individual's personnel records. In all other circumstances a written record will be made of the decision and retained.

12 EXTERNAL REPORTING

- 12.2 We follow Disclosure and Barring Service (DBS) guidance and procedures regarding referrals and barring decisions and the Safeguarding Vulnerable Groups Act 2006 and the Safeguarding Vulnerable Groups Act (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009. ScrumKids have a duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) at the organisation, or would have been removed had they not left.
- 12.3 ScrumKids will make such a referral as soon as possible after the resignation or dismissal of any individual whose services are no longer used because he or she is considered unsuitable to work with children. This includes dismissal, nonrenewal of a fixed term contract, no longer using covering coaches engaged directly or supplied by an agency, terminating the placement of a trainee or volunteer, no longer using staff employed by a contractor and resignation and voluntary withdrawal from any of the above.

13 PARENTS

- 13.1 In general, we believe that parents should be informed about any safeguarding concerns regarding their children. It is important that we are honest and open in our dealings with parents. However, concerns of this nature must be referred to the DSL who will decide on the appropriate response. In a very few cases, it may not be right to inform them of our concerns immediately as that action could prejudice any investigation, or place the child at further risk. In such cases, advice will be sought from the LADO or Social Services.
- 13.1 In line with KCSIE (2020), parental consent is not required for referral to statutory agencies.

14 WHISTLE-BLOWING

- 14.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 14.2 All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues. If it becomes necessary to consult outside the organisation, they should speak in the first instance, to the LADO.
- 14.3 The Organisation will aim to provide immunity from retribution and no disciplinary action will be taken against staff for ‘whistleblowing’ in the public interest.

15 PHYSICAL INTERVENTION

- 15.1 Staff must only ever use physical intervention 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.
- 15.2 Such events should be recorded and signed by a witness.
- 15.3 Staff who are likely to need to use physical intervention will be appropriately trained.
- 15.4 We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.
- 15.5 We recognise that touch is appropriate in the context of working with children and all staff have been given “Safe Practice” guidance to ensure they are clear about their professional boundary.

16 ARRANGEMENTS FOR DEALING WITH PEER-ON-PEER ALLEGATIONS

- 16.1 Peer-on-peer abuse is abuse by one or more participants against another participant. It can manifest itself in many ways and can include bullying (including cyber bullying), physical abuse, initiation/hazing violence and rituals, sexting, sexual assault, upskirting, gender-based issues and harmful sexual behaviours including sexual violence and sexual harassment. ScrumKids believes that all bullying and peer-on-peer abuse is unacceptable and must be treated as a safeguarding issue and reported immediately to the DSL who will take the necessary steps to ensure the safety of the participants involved.

Abusive comments and interactions should never be passed off or dismissed as “banter” or “part of growing up”. Nor will harmful sexual behaviours be dismissed as the same or “just having a laugh” or “boys being boys”.

- 16.2 The Organisation recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the participant is likely to feel that the member of staff is in a position of trust.
- 16.3 The Organisation recognises that children with special educational needs and disabilities can be more prone to peer on peer group isolation than other children. The organisation’s safeguarding records will make notes of participants’ Special Educational Needs, if applicable, to allow the organisation to monitor concerns relating to such participants and consider additional pastoral support for those participants.
- 16.4 A participant against whom an allegation of abuse has been made may be suspended from the organisation during the investigation. If it is necessary for a participant to be interviewed by the Police in relation to allegations of abuse, the organisation will ensure that parents are informed as soon as possible and that the participants involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the organisation.
- 16.5 Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. If the DSL decides to make a referral to children’s social care and/or a report to the police against a victim’s wishes, the reasons should be explained to the participant and appropriate specialist support offered.
- 16.6 In the event of disclosures about participant-on-participant abuse, all children involved (both victim and perpetrator) will be treated as being at risk and safeguarding procedures in accordance with this policy will be followed. Victims will be supported by a member of staff and advice will be sought from appropriate agencies as to the best form of support to offer both victim and perpetrator.
- 16.7 When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:
- the victim;
 - the alleged perpetrator; and
 - the other children (and, if appropriate, staff)

17 RACIST INCIDENTS

ScrumKids acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures.

18 PREVENT

18.1 Radicalisation and Extremism

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous.

Staff acknowledge the need for a culture of vigilance to be present in the organisation to support safeguarding. This includes awareness and sensitivity to attitudinal changes of participants which may indicate they are at risk of radicalisation.

Staff will consider the level of risk to identify the most appropriate referral, which could include reference to Channel or Children's Social Care. Contact details for support and advice on the Prevent Duty can be found below.

- 18.1.1 **Radicalisation** is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.
- 18.1.2 **Extremism** is defined as the holding of extreme political or religious views.
- 18.1.3 ScrumKids has a **zero tolerance** approach to extremist behaviour for all organisation community members. We rely on our strong values to steer our work and ensure the pastoral care of our participants protects them from exposure to negative influences.
- 18.1.4 ScrumKids is fully committed to safeguarding and promoting the welfare of all its children. As an organisation we recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. All staff are expected to uphold and promote the fundamental principles of British values, including **democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs.**

18.2 Female Genital Mutilation (FGM)

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so organisation staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female participant about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years imprisonment or a fine, or both.

If staff have concerns that FGM has taken place, as well as reporting this to the police, they should also activate local safeguarding procedures using existing and national and local protocols. Unless the staff member has a good reason not to, they should still consider and discuss any case of FGM with the DSL and involve children's social care as appropriate.

18.3 **What to do if you have a concern**

The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

19 **USE OF MOBILE PHONES, PHOTOGRAPHY AND DVDS**

Staff are not permitted to use their mobile phones or any device with cameras whilst delivering sessions. Unless given direct permission via a parent/guardian present at the session or through written parent/guardian permission.

Many organisation activities involve recording images. These may be undertaken as part of promotion or to publicly celebrate achievement. All members of staff and parents need to be aware of the potential for these aspects to be misused for pornographic or "grooming purposes". Careful consideration should be given as to how these activities are organised and undertaken. Staff should remain sensitive to any children who appear uncomfortable and should recognise the potential for misinterpretation.

Using images of children for publicity purposes will require the age-appropriate consent of the individual concerned and their legal guardians. Images should not be displayed on websites, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to ScrumKids have access.

It is recommended that when using a photograph the following guidance should have been followed:

- If the photograph is used, avoid naming the participant
- If the participant is named avoid using their photograph
- ScrumKids should establish whether their image will be retained for further use
- Images should be securely stored and used only by those authorised to do so

Parents

Parents are permitted to take photographs of their own children at ScrumKids sessions. The photos taken at these events (of other children and/or staff) are for parents' personal use only. They must not be published on any internet website. This includes Facebook, Twitter, Instagram, YouTube and all other social media sites.

20 IMPORTANT CONTACT DETAILS AND LINKS

In the first instance concerns should be raised with the Organisation's DSL. Only in exceptional circumstances, such as an emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children's social care.

In case of needing to raise a concern outside of normal office hours the Emergency Duty Team can be contacted on 0845 6000 388.

For non-emergencies the Police can be contacted on 101. In emergencies the Police can be contacted on 999.

OFSTED Safeguarding Children:

08456 404046 (Monday to Friday from 8am to 6pm)

Whistleblowing@ofsted.gov.uk

The organisation's points of contact for children who are in need of help are as follows:

MASH/Early Help – Tel No: 0345 155 1071; email: mashsecure@devon.gov.uk

Extremism:

Department for Education dedicated helpline for staff and governors: 020 7340 7264 and

counter-extremism@education.gsi.gov.uk

Other useful contacts

Disclosure and Barring Service

PO Box 181, Darlington, DL1 9FA

Tel: 01325 953795

Independent Organisations Inspectorate

0207 6000100

concerns@isi.net

NPCC 'When to Call Police' document

[When to Call Police](#)

Mental Health and Behaviour in Organisations

[Official Government Guidance](#)

Devon LADO

childsc.localauthoritydesignatedofficersecure-mailbox@devon.gov.uk

Warwickshire LADO

lado@warwickshire.gov.uk

Lincolnshire LADO

LSCP_LADO@lincolnshire.gov.uk