



THE STREET SOCCER FOUNDATION

Safeguarding Policy

CREATING SAFE ENVIRONMENTS FOR CHILDREN & YOUNG ADULTS AT RISK OF HARM

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

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Date agreed and ratified:

Date of next full review:

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

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What to do if you have a welfare concern

Why are you concerned?

For example

- Something a child has said – e.g. allegation of harm
- Child's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

Act immediately and record your concerns. If urgent, speak to a DSL first.

Follow the street soccer foundation procedure and contact **Paul Stewart** (Street Soccer Foundation DSL) or **Louise Green** (School Programme DSL)

- Reassure the child, listen fully, making no promises that information will not be shared
- Clarify concerns, using open questions if necessary (**TED**: Tell, Explain, Describe)
- Use child's own words verbatim, record facts **not** opinions, judgements or assumptions
- Sign and date your records

Inform the Designated Safeguarding LEAD: Paul Stewart/Louise Green

Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the Kent Safeguarding Support Level Guidance document and procedures: www.kscmp.org.uk
- Refer to other agencies as appropriate e.g. Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services
- If unsure then consult with Area Education Safeguarding Advisor (03000412284) or Local Authority Social Worker at the Front Door (030000419191)

If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

Young adult/Carer

- Follow Street Soccer Foundation complaints procedures

Record decision making and action taken on the young adult's record: MvConcern secure safeguarding recording portal

Monitor

Be clear about:

- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and request further support if necessary

At all stages, the child's circumstances will be kept under review
The DSL/Staff will request further support if required to ensure the **child's safety is paramount**

1. Child Focused Approach to Safeguarding

SAFEGUARDING POLICY STATEMENT

This policy guidance provides information and outlines expectations for practice to help inform staff and volunteers of their professional responsibilities for safeguarding children and young adults at risk of harm.

The Street Soccer Foundation aims to promote the welfare and safeguard all children and young adults and works to the principles embodied within the Children Act 1989 and 2004, Section 175 and 176 Education Act 2002, the Early Years Foundation Stage Framework (2021) and related guidance including the Framework for the Assessment of Children in Need and their Families (2000), Working Together to Safeguard Children (2018), What to do if you are worried a child is being abused (2015), Children and Social Work Act (2017), DfE guidance Keeping Children Safe in Education (2021), and Ofsted guidance 'Inspecting safeguarding in early years, education and skills settings' (2018).

All staff must familiarise themselves with guidance referenced in Keeping Children Safe in Education (2018) which includes key safeguarding responsibilities for recognising and referring concerns on issues such as Radicalisation and Female Genital Mutilation (FGM), both of which have mandatory reporting requirements.

All our staff members and volunteers have an essential role to play in providing a safe and positive environment for everyone involved: it is a vital aspect of any organisation's operations. The Street Soccer Foundation takes its responsibilities very seriously in this regard, and in particular where children and young adults at risk of harm are present at any Foundation-led activities.

All participants and visitors to Foundation activities have the right to feel safe and to be safe. Wherever they come into contact with the Foundation they will be treated equitably and with dignity and respect. All our members and workforce have a duty to keep children and young adults at risk of harm safe and to help protect them from abuse or harm, bullying and/or neglect, and to ensure appropriate development and access to opportunities.

1.1 Introduction

- The Street Soccer Foundation recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected are an important part of the wider safeguarding system for children and young adults and have an essential role to play in making the Street Soccer community safe and secure.
- The Street Soccer Foundation believe that the best interests of the child and young adult always come first. All children (defined as those up to the age of 18) and young adults (defined for the purposes of this policy as aged 18- 25) have a right to be heard and to have their wishes and feelings taken into account and all children and young adults regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to safety and protection.
- Staff and Volunteers working with children and young adults at The Street Soccer Foundation will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child or young adult, staff will always act in the best interests of the child/young adult, and if any member of our community has a safeguarding concern about any child or young adult, they should act and act immediately.

- The Street Soccer Foundation recognises the importance of providing an ethos and environment within the foundation that will help children and young adults to be safe and to feel safe. In our foundation children and young adults are respected and are encouraged to talk openly. The Street Soccer Foundation takes seriously the responsibility to promote the welfare and safeguard all the children and young adults entrusted to our care. .
- Our core safeguarding principles are:
 - **Prevention**
Positive, supportive, safe culture, activities and learning opportunities for children and young adults, safer recruitment procedures.
 - **Protection**
Following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - **Support**
For all children and young adults, where appropriate specific interventions are required for those who may be at risk of harm.
 - **Working with parents/carers and other agencies**
To ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including temporary or third-party agency staff and volunteers and are consistent with those outlined within KCSIE 2021.

1.2 Policy Context

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2021 (KCSIE) which requires individual schools and colleges, and those undertaking school based activities to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
 - Keeping Children Safe in Education 2021 (KCSIE)
 - Working Together to Safeguard Children 2018 (WTSC)
 - Framework for the Assessment of Children in Need and their Families 2000
 - Kent and Medway Safeguarding Children Procedures
 - Early Years and Foundation Stage Framework 2021 (EYFS)
 - The Education Act 2002
- The Street Soccer Foundation is currently operating in response to coronavirus (Covid-19), however, our safeguarding principles, remain the same. We will continue to follow government guidance and will amend this policy and our approaches, as necessary.
 - As a result of the Covid-19 pandemic some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

1.3 Definition of Safeguarding

- In line with KCSIE 2021, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - protecting children from maltreatment
 - preventing 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, and
 - taking action to enable all children to have the best outcomes.
- The Street Soccer Foundation acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Children with family members in prison
 - Children Missing Education (CME)
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)
 - Contextual safeguarding (risks outside the family home)
 - County lines and gangs
 - Domestic abuse
 - Drugs and alcohol misuse
 - Fabricated or induced illness
 - Faith abuse
 - Gender based abuse and violence against women and girls
 - Hate
 - Homelessness
 - Human trafficking and modern slavery
 - Mental health
 - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or “Sexting”
 - Online safety
 - Peer on peer abuse
 - Preventing radicalisation and extremism
 - Private fostering
 - Relationship abuse
 - Serious violence
 - Sexual violence and sexual harassment
 - So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage
 - Upskirting

(Also see Part One and Annex B within ‘Keeping Children Safe in Education’ 2021)

1.4 Related Safeguarding Policies

- This policy is one of a series in the Street Soccer Foundations integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - Code of conduct/Behaviour policy
 - Online safety
 - Anti-bullying
 - Data protection and information sharing

- Image use
- Health and safety
- Risk assessments
- First aid and accidents
- Managing allegations against staff
- Staff behaviour policy/code of conduct, including Acceptable Use of Technology Policies (AUP)
- Safer recruitment
- Whistleblowing

1.5 Policy Compliance, Monitoring and Review

- The Street Soccer Foundation will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One of KCSIE 2021 as appropriate.
- Parents/carers of children enrolled in the Street Soccer Foundation Schools Programme activities can obtain a copy of the Street Soccer Foundation Safeguarding Policy and other related policies on request. Additionally, our policies can be viewed via the website:
<https://streetsoccerfoundation.org.uk/safeguarding>
- The policy forms part of the Street Soccer Foundations wider development plan and will be reviewed annually by the Designated Safeguarding Leads and CEO who has overall responsibility for oversight of Designated Safeguarding Leads, safeguarding and child protection systems.
- The Designated Safeguarding Lead will ensure regular reporting on safeguarding activity and systems to the Street Soccer Foundation CEO Keith Mabbutt. The CEO will not receive details of identifying features of families as part of their oversight responsibility.

2. TERMINOLOGY & DEFINITIONS

2.1 The Definition of Safeguarding

Ofsted uses definitions of the term 'safeguarding' from statutory guidance. Safeguarding children is defined in [Working together to safeguard children](#) as:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring that children are growing up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Safeguarding adults at risk of harm is defined in the [Care and support statutory guidance](#) issued under the Care Act 2014 as:

- protecting the rights of adults to live in safety, free from abuse and neglect

- people and organisations working together to prevent and stop both the risks and experience of abuse or neglect
- people and organisations making sure that the adult's wellbeing is promoted including, where appropriate, taking fully into account their views, wishes, feelings and beliefs in deciding on any action
- recognising that adults sometimes have complex interpersonal relationships and may be ambivalent, unclear or unrealistic about their personal circumstances and therefore potential risks to their safety or well-being

“Safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education.” (Inspecting safeguarding in early years, education and skills settings, Ofsted, September 2018).

The procedures contained in this policy apply to all staff (including temporary staff and volunteers) and are consistent with those of Kent Safeguarding Children Board (KSCB).

2.2 What is child abuse?

The Children Act 1989 refers to “Significant Harm” rather than abuse. However, abuse is any behaviour, action or inaction, which significantly harms the physical and/or emotional development of a child. A child may be abused by parents, other relatives or carers, professionals and other children, and this can occur in any family, in any area of society, regardless of social class or geographical location.

Abuse falls into four main categories – physical abuse, emotional abuse, sexual abuse and neglect as shown in Appendix 1.

2.3 Further Definitions

The Foundation - refers to The Street Soccer Foundation, its workforce, and its activities. In certain circumstances it may also refer to third parties with a devolved responsibility for delivering Foundation-supported activity.

Activity - refers to any matches, events, coaching and training development programmes, tours or other related activities where the Foundation has a responsibility for the welfare of individuals taking part.

Workforce - this refers to any person, employed or deployed, by the Foundation to work on a paid or voluntary capacity on a Foundation activity. Such individuals may be full or part-time, permanent or fixed term staff employed directly by the Foundation; they may be deployed by the Foundation on a temporary or casual basis; they may be volunteers deployed by Foundation management; they may be deployed via a third-party delivery partner / contractor.

Child - the term ‘child’ is defined in the Children Act of 1989 as any person under the age of 18

Young Adult- for the purposes of Street Soccer Foundation Safeguarding Policy Young adult will apply to 18 – 25 year old service users of the Street Soccer Academies.

Adult at Risk - is a person aged 18 years or over who is, or may be, in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation. This may also include someone who is homeless, or is in the criminal justice system, and may be receiving support from local statutory agencies. The term is further defined in law in the Safeguarding Vulnerable Groups Act 2006.

Harm - means ill-treatment or the impairment of health or development, including, for example, impairment suffered from seeing or hearing the ill-treatment of another (Children Act 1989). Harm will

often be related to abuse of which there are several recognised forms many relating to both children and vulnerable adults: emotional (including bullying), discriminatory, financial, physical, neglect and sexual.

Parental Responsibility (PR) - Where consent is required in respect of a child taking part in Foundation-related activities, or reporting a concern, we will take all reasonable steps to identify the person(s) with legal PR for that child. Where identifying PR is complex or disputed (not all parents have PR and not all people with PR are parents) we will seek consent from the biological mother or father or adoptive 'parents' unless otherwise instructed.

3. SAFEGUARDING & THE FOUNDATION'S WORKFORCE

Safeguarding is also about ensuring that all staff, volunteers and partners understand the wider role that they play in protecting vulnerable people. This means all members of the workforce involved in training, managing, supervising or caring for children and young adults at risk of harm, in particular:

- | | | |
|--------------------|----------------------------|-------------------------------|
| o Football Coaches | o Drivers & Security | o Players |
| o Football scouts | o Host Families | o Managers |
| o Medical staff | o Hospitality & membership | o Partners, licence holders & |
| o Stewards | o Private tutors | their staff |

The workforce must help to keep those in their care safe from harm but must also be aware of the need to understand how to keep themselves and their colleagues safe from having unfounded or malicious allegations by maintaining professional boundaries and avoiding behaviour that may be misinterpreted by others.

Positions of Trust

As a result of the roles and authority that many members of the Foundation workforce hold, they are in Positions of Trust in relation to those in their care. This means that they are in a position of power and influence over children and young adults at risk of harm who take part in Foundation activity and as such have the potential to abuse that Position of Trust. Staff must not abuse their position for personal advantage or gratification or that of others.

Standards of Behaviour

The Foundation's workforce will adopt the highest standards of behaviour at all times in order that they may maintain the confidence and respect of children, young adults, parents, sponsors, supporters and colleagues. Within the scope of their duties their actions should always be reasonable, appropriate, warranted, proportionate, safe and applied equitably.

4. Governance and Leadership

- The CEO & Designated Safeguarding Leads have a strategic responsibility for all safeguarding arrangements and will comply with their duties under legislation.
- The CEO & Designated Safeguarding Leads have regard to the KCSIE 2021 guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The CEO & Designated Safeguarding Leads have a nominated status for safeguarding. The nominated will have oversight in ensuring that The Street Soccer Foundation has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

- The CEO will ensure that the Designated Safeguarding Leads are supported in their role and are provided with sufficient time so they can provide appropriate support to children, young adults, adults, staff and volunteers regarding any safeguarding and welfare concerns.
- The CEO & Designated Safeguarding Leads will ensure that our child protection and safeguarding policies and procedures are understood, and followed by all staff.

4.1 Designated Safeguarding Lead (DSL)

- The Street Soccer Foundation has appointed **Paul Stewart** as the Designated Safeguarding Lead (DSL) for the Street Soccer Foundation, and **Louise Green** as the Designated Safeguarding Lead (DSL) for our integrated Schools Programme including the Holiday Activities and Food Programme (HAF).
- The DSLs have overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety) at the Street Soccer Foundation. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSLs and this responsibility will not be delegated.
- The Street Soccer Foundation has also appointed Deputy a DSL who will have delegated responsibilities and act in the DSLs absence.
 - **Kay Skelton**, Deputy Designated Safeguarding Lead (DSL)
- It is the role of the DSL to carry out their functions as identified in Annex C of KCISE 2021. This includes but is not limited to:
 - Acting as the central contact point for all staff/volunteers to discuss any safeguarding concerns
 - Maintaining a confidential recording system for safeguarding and child protection concerns
 - Coordinating safeguarding action for individual children/young adults.
 - When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker.
 - Liaising with other agencies and professionals in line with KCSIE 2021 and WTSC 2018
 - Representing the Street Soccer Foundation at Safeguarding meetings, strategy discussions, CIN meetings and Child Protection Conferences.
 - Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - Informing the CEO of any significant safeguarding issues.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

4.2 Members of Staff

- All members of staff have a responsibility to:
 - Provide a safe environment in which children and young adults can thrive.
 - Be aware of the indicators of abuse and neglect so that they can identify cases of children and young adults in their care who may need help or protection.

- Know what to do if a child or young adult tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child/young adult.
- Be able to identify and act upon indicators that children/young adults are, or at risk of developing mental health issues.
- Be prepared to identify children who may benefit from early help.
- Understand the early help process and their role in it.
- Understand The Street Soccer Foundations safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Know how to maintain an appropriate level of confidentiality.
- Reassure children/young adults who report concerns that they are being taken seriously and that they will be supported and kept safe.

4.3 Children and Young Adults

Children and young adults have a right to:

- Feel safe, be listened to, and have their wishes and feelings taken into account.
- Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- Contribute to the development of the Street Soccer Foundations safeguarding policies.
- Receive help from a trusted adult.
- Learn how to keep themselves safe, including online.

4.4 Parents and Carers

Parents/carers have a responsibility to:

- Understand and adhere to the relevant Street Soccer Foundation policies and procedures.
- Talk to their child about safeguarding issues and support The Street Soccer Foundation in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online.
- Seek help and support from The Street Soccer Foundation or other agencies.

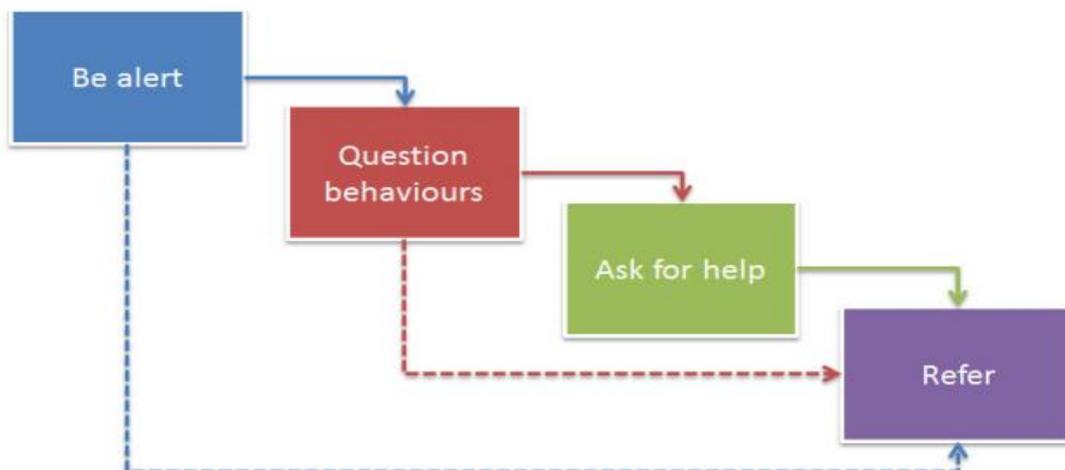
5. Child Protection Procedures

5.1 Recognising Indicators of Abuse and Neglect

- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2021. This is outlined locally within the [Kent Support Levels Guidance](#).
- The Street Soccer Foundation recognise that when assessing whether a child/young adult may be suffering actual or potential harm there are four categories of abuse:
 - Physical abuse
 - Sexual abuse
 - Emotional abuse
 - Neglect
 For further information see Appendix 1.
- The Street Soccer Foundation recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be

worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

- The Street Soccer Foundation recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviors can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children/ young adults may report abuse happening to themselves, their peers or their family members. All reports made by children/young adults to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the Street Soccer Foundations planned activities. Children and young adults can be 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 exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- Technology can be a significant component in many safeguarding and wellbeing issues. Children and young adults are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children and young adults can also abuse their peers online.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child, young adult and their family.
- All members of staff are expected to be aware of and follow this approach if they are concerned about a child or young adult:



- In all cases, if staff are unsure, they will always speak to the DSL (or deputy).
- The Street Soccer Foundation recognises that some children and young adults have additional or complex needs and may require access to intensive or specialist services to support them.

5.2 Responding to Child Protection/Safeguarding Concerns

If staff are made aware of a child protection concern or a safeguarding concern around a young adult, they are expected to:

- listen carefully to the concern and be non-judgmental.
 - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).
 - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
 - be clear about boundaries and how the report will be progressed.
 - record the concern in line with The Street Soccer Foundations record keeping requirements.
 - inform the DSL (or deputy), as soon as practically possible.
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL or Deputy DSL is not available, this should not delay appropriate action being taken. Staff should speak to the Street Soccer Foundation CEO Keith Mabbutt or take advice via consultation with a social worker from the Children's Integrated services/Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
 - The Street Soccer Foundation will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP) or equivalent adult social service where the concern surrounds a young adult over the age of 18.
 - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
 - Specific information and guidance to follow with regards to accessing Early Help and Preventative Services and/or Children's Social Work Services as part of Integrated Children's Services (ICS) in Kent can be found here: www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services
 - Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, a 'request for support' will be made immediately to Integrated Children's Services (via the 'Front Door') and/or the police, in line with KSCMP procedures.
 - The Street Soccer Foundation recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
 - The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
 - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).
 - In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and

ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.

- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Where it is identified a child may benefit from Early Help support (as provided by ICS) , the DSL (or deputy) will liaise with the child's nominated school DSL where possible and a request for support via the Front Door will be made via the nominated school DSL or via the Street Soccer Foundation DSL as appropriate.
 - The DSL will keep all early help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider following [KSCMP escalation procedures](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

5.3 Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded on the Street Soccer Foundations 'My concern' secure safeguarding system and passed without delay to the DSL.
- Records will be completed as soon as possible after the incident/event, using the child's words and the date and time will be recorded by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records and records of concern about a young adult will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records and records of concern around young adult's will be kept confidential and stored securely online using the MyConcern safeguarding software. Child protection/safeguarding records will be kept for individual children/ young adults and will be maintained separately from all other records relating to the child or young adult's involvement with The Street Soccer Foundation. Child protection records and safeguarding records around young adults are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's own School Designated Safeguard Lead, under confidential and separate cover as soon as possible. Child Protection files will be transferred securely to the school DSL and a confirmation of receipt will be obtained.

5.4 Multi-Agency Working

- The Street Soccer Foundation recognises and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements. The DSL will communicate and share information with the child's nominated school DSL and other statutory agencies in line with statutory guidance.
- The Street Soccer Foundation recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote the welfare of children and young adults, protecting them from harm.

5.5 Confidentiality and Information Sharing

- The Street Soccer Foundation recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection and the safeguarding and protection of young adults in our care at the earliest opportunity as per statutory guidance outlined within KCSIE 2021.
- The Street Soccer Foundation is appropriately trained in Data Protection as required by the General Data Protection Regulations (GDPR) to ensure that our foundation is compliant with all matters relating to confidentiality and information sharing requirements.
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children (or adults) safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children (KCSIE 2021).
- The DSL will disclose relevant safeguarding information about a child or young adult with staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy, they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children and young adults; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child or young adult's safety or wellbeing.

5.6 Complaints

- All members of the Street Soccer community should feel able to raise or report any concerns about a child or young adult's safety or potential failures in the Street Soccer Foundations safeguarding regime. The Street Soccer Foundation has a complaints procedure available to parents/ Carers, young adults, members of staff and visitors who wish to report concerns or complaints.
 - Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible.
 - The Street Soccer Foundation views the reporting of concerns by members of the workforce as a vital element of maintaining its Core Values. Individuals are strongly encouraged to report incidents of malpractice where the law, Foundation policy or protocol has been breached by another member, or members, of the workforce. Failure to do so may result in disciplinary or criminal action. In partnership with whistleblowing consultancy, iTrust Assurance Ltd, the Street Soccer Foundation has in place an exclusive Confidential Reporting Line for all its team and those

supported through the Foundation. At any time individuals are welcome to call The Street Soccer Foundation Confidential Reporting Line on: **0203 837 0496**.

- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection/safeguarding failures internally.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.

The Street Soccer Foundation will take all concerns reported to the foundation seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.

- Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

6. Specific Safeguarding Issues

- The Street Soccer Foundation is aware of a range of specific safeguarding issues and situations that can put children and young adults at greater risk of harm. In addition to Part One, DSLs, Street Soccer Foundation leaders, staff and volunteers who work directly with children and young adults will read annex B of KCSIE 2021 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

6.1 Peer on Peer Abuse

- All members of staff at The Street Soccer Foundation recognise that children and young adults are capable of abusing their peers, and that it can happen both inside and outside of the academy/schools programme and can happen online.
- The Street Soccer Foundation recognises that peer on peer abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - abuse in intimate personal relationships between peers
 - physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - sexual violence and sexual harassment
 - consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - 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
 - upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - initiation/hazing type violence and rituals
- The Street Soccer Foundation believes that abuse is abuse and it will never be tolerated or dismissed as "banter", "just having a laugh", "part of growing up" or "boys being boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.
- The Street Soccer Foundation recognises that even if there are no reported cases of peer on peer abuse, such abuse is still likely to be taking place.

- All staff have a role to play in challenging inappropriate behaviours between peers. Staff recognise that some peer on peer abuse issues may be affected by gender, age, ability and culture of those involved, i.e. for gender based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- Concerns about a child or young adults behaviour, including peer on peer abuse taking place offsite will be responded to as part of a partnership approach with the child/young adult and parents/carers . Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying and safeguarding policies.
- In order to minimise the risk of peer-on-peer abuse, The Street Soccer Foundation will ensure robust anti-bullying procedures, clear expectations of appropriate behavior, adequate supervision during Academy and Schools Programme activities, a safe environment to share concerns with staff both verbally and in writing and through the provision of a concern box accessible to children and young adults.
- The Street Soccer Foundation want children and young adults in our care to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of peer on peer abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated Street Soccer Foundation policies, including child protection and anti-bullying. Children and young adults who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Alleged victims, perpetrators and any other child affected by peer on peer abuse will be supported by:
 - Staff taking reports seriously, listening carefully, avoiding victim blaming, providing and referring for appropriate support, liaison with parents/carers, reviewing academy and school programme approaches, following procedures as identified in other policies, behaviour, anti-bullying and child protection procedures, and where necessary and appropriate, informing the police and/or ICS.

6.2 Child on Child Sexual Violence or Harassment

- When responding to concerns relating to child on child sexual violence or harassment, The Street Soccer Foundation will follow the guidance outlined in Part Five of KCSIE 2021 and the DfE [‘Sexual Violence and Sexual Harassment Between Children in Schools and Colleges’](#) guidance.
- The Street Soccer Foundation recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All victims of sexual violence or sexual harassment will be reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment or be made to feel ashamed for making a report.
- When there has been a report of sexual violence or harassment, the DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator (and any other children involved/impacted).

- The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other and any actions that are required to protect them.
- Reports will initially be managed internally by the The Street Soccer Foundation and where necessary will be referred to Integrated Children’s Services and/or the Police.
 - The decision making and required action taken will vary on a case by case basis, but will be informed by the wishes of the victim, the nature of the alleged incident (including whether a crime may have been committed), the ages and developmental stages of the children involved, any power imbalance, if the alleged incident is a one-off or a sustained pattern of abuse, if there are any ongoing risks to the victim, other children, adult students or Street Soccer Foundation staff, and, any other related issues or wider context.
- If at any stage the DSL is unsure how to proceed, advice will be sought from the Education Safeguarding Service.

6.3 Nude and/or Semi-Nude Image Sharing by Children

- The Street Soccer Foundation recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised to:
 - Report any concerns to the DSL immediately.
 - Never view, copy, print, share, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already viewed the imagery by accident, this will be immediately reported to the DSL.
 - Not delete the imagery or ask the child to delete it.
 - Not say or do anything to blame or shame any children involved.
 - Explain to child(ren) involved that they will report the issue to the DSL and reassure them that they will receive appropriate support and help.
 - Not ask the child or children involved in the incident to disclose information regarding the imagery and not share information about the incident with other members of staff, the child(ren) involved or their, or other, parents and/or carers. This is the responsibility of the DSL.
- DSLs will respond to concerns as set out in the non-statutory UKCIS guidance: [Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)’ and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - the DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - parents and carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - All decisions and action taken will be recorded in line with our child protection procedures.
 - a referral will be made to ICS and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.

- the image/videos involve sexual acts and a child under the age of 13, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
- The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
- If DSLs are unsure how to proceed, advice will be sought from the Education Safeguarding Service.

6.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

- The Street Soccer Foundation recognises that CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

6.5 Serious Violence

- All staff are made aware of the indicators which may signal children and young adults are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection/ safeguarding concerns.
 - The initial response to victims is important and staff will take any allegations seriously and work in ways that support children and young adults and keep them safe.

6.6 So-called honour based abuse

- So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing.
- All forms of HBA are abuse (regardless of the motivation) and concerns should be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy).
- All staff will speak to the DSL (or deputy) with regard to any concerns about female genital mutilation (FGM)

6.7 Preventing radicalisation

- The Street Soccer Foundation is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”, also known as the Prevent duty and the specific obligations placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- The Street Soccer Foundation recognises that children and young adults are vulnerable to extremist ideology and radicalisation and staff will be alert to changes in the child/young adult’s behaviour which could indicate that they may be in need of help or protection.
- Staff will report any concerns to the DSL (or a deputy), who is aware of the local procedures to follow.

6.8 Cybercrime

- The Street Soccer Foundation recognises that children or young adults with particular skill and interest in computing and technology may inadvertently or deliberately stray into ‘cyber-enabled’ (crimes that can happen offline but are enabled at scale and at speed online) or ‘cyber dependent’ (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child or young adult may be at risk of becoming involved in cyber-dependent cybercrime, the DSL will be informed, and consideration will be given to accessing local support and/or referring into the Cyber Choices programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with this and other appropriate policies.

7. Supporting Children and Young Adults Potentially at Greater Risk of Harm

- Whilst all children and young adults should be protected, some groups of children and young adults are potentially at greater risk of harm.

7.1 Safeguarding Children/Young Adults with Special Educational Needs or Disabilities (SEND)

- The Street Soccer Foundation acknowledges that children and young adults with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse and neglect.
- The Street Soccer Foundation recognises that children and young adults with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children and young adults with SEND will be appropriately supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour, mood changes or injuries and not to assume that they are related to the child or young adult’s disability. Staff will be mindful that children and young adults with SEND or certain medical

conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.

- Members of staff are encouraged to be aware that children and young adults with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our foundation will always consider implementing extra support for children and young adults with SEND.

7.2 Children / Young Adults Requiring Mental Health Support

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child or young adult has suffered or is at risk of suffering abuse, neglect or exploitation.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.
- Staff must be vigilant in observing behaviour which 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 or young adult that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

7.3 Children who need a Social Worker

- The DSL will hold details of social workers working with children and young adults in the Street Soccer Foundation, so that decisions can be made in the best interests of the child's safety and welfare.
- Where children have a social worker, this will inform the academy/schools programme decisions about their safety and promoting their welfare, for example, responding to absence.

7.4 Looked after children, previously looked after children and care leavers

- The Street Soccer Foundation recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- Where a child/young adult is looked after, the DSL will hold details of the social worker.
- Where the DSL believes a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.

8. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. The Street Soccer Foundation will adopt an approach to online safety which will empower and protect, children / young adults and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- The Street Soccer Foundation will ensure online safety is reflected as required in all relevant policies. Online safety is considered as a running and interrelated theme when devising and implementing our academy, school programme, policies and procedures, when planning staff training, and the role and responsibilities of the DSL
- The Street Soccer Foundation identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - **Content:** being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
 - **Contact:** being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
 - **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- The Street Soccer Foundation recognises that technology, and the risks and harms related to it, evolve and change rapidly. The Street Soccer Foundation will carry out an annual review of our approaches to online safety within the Academy and Schools Programme, supported risk assessments where appropriate to consider and reflect the risks children and young people face.

8.1 Policies and Procedures

- The DSL has overall responsibility for online safety within The Street Soccer Foundation but will liaise with other members of staff, for example IT technicians and other staff as necessary.
- The DSL will respond to online safety concerns reported in line with our child protection and other associated policies. Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- The Street Soccer Foundation uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, the internet, MyConcern Safeguarding online platform and email systems.
 - All Street Soccer Foundation owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- The Street Soccer Foundation recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2021) The Street Soccer Foundation has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.

8.2 Appropriate Filtering and Monitoring

- The Street Soccer Foundation will do all we reasonably can to limit children’s exposure to online risks through foundation provided IT systems and will ensure that appropriate filtering and monitoring systems are in place. If children/young adults or staff discover unsuitable sites or material, they are required to turn off monitor/screen, use a screen cover widget, report the concern immediately to a member of a member of staff who will inform the DSL.
 - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
 - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
 - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the Internet Watch Foundation and the police.
 - When implementing appropriate filtering and monitoring, The Street Soccer Foundation will ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

8.3 Information Security and Access Management

- The Street Soccer Foundation is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard systems, as well as children, young adults and staff. Further information can be found our acceptable use policy.
- The Street Soccer Foundation will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

8.4 Staff Training

- The Street Soccer Foundation will ensure that all staff receive online safety training as part of induction and that ongoing online safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

8.5 Remote Learning

- The Street Soccer Foundation will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with children and young adults will take place using Street Soccer Foundation provided or approved communication channels; for example, street soccer provided email accounts and phone numbers and/or agreed systems.
 - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP)
- Parents/carers will be made aware of what their children are being asked to do online, and will be clear who from the foundation (**if anyone**) their child is going to be interacting with online.

- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

9. Staff Engagement and Expectations

9.1 Awareness, Induction and Training

- All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' 2021 which covers safeguarding information for staff.
 - The Street Soccer Foundation leaders, including the DSL will read KCSIE in its entirety.
 - The Street Soccer Foundation leaders and all members of staff who work directly with children and young adults will read annex B.
 - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. A Copy of this record will be held securely by the DSL.
- The DSL will ensure that all new staff and volunteers working directly with children and young adults (including agency and third-party staff) receive safeguarding and child protection training including information to ensure they are aware of The Street Soccer Foundations internal safeguarding processes, as part of their induction. This will be conducted by one of our Designated Safeguarding Leads.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children and young adults effectively. Designated safeguarding Leads will arrange this as appropriate.
- The DSL will provide an annual report to the CEO detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained

9.2 Safer Working Practice

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in The Street Soccer Foundations behaviour policy/code of conduct.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the Street Soccer Foundations expectations regarding safe and professional practice via the staff behaviour policy/code of conduct and Acceptable Use Policy (AUP).
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant policies including staff behaviour policy, Acceptable Use Policies, and Social Media.

9.3 Supervision and Support

- The induction process will include familiarisation with child protection and safeguarding responsibilities and procedures to be followed if members of staff have any concerns about a child or young adults safety or welfare.
- The Street Soccer Foundation will provide appropriate supervision and support for all members of staff to ensure that:
 - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and young adults.
 - All staff are supported by the DSL in their safeguarding role.
 - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children or young adults welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach similar organisations directly.

10. Safer Recruitment, Allegations and Whistleblowing

10.1 Safer Recruitment and Safeguarding Checks

- The Street Soccer Foundation is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with children, young adults and staff.
 - The Street Soccer Foundation will follow relevant guidance in Keeping Children Safe in Education 2021 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
 - The CEO and leadership team are responsible for ensuring that the Street Soccer Foundation follows safe recruitment processes as outlined within guidance.
 - The CEO and Leadership will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The Street Soccer Foundation are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.
- Where the Street Soccer Foundation organises work experience placements, we will follow the advice and guidance as identified in part Three of KCSIE 2021.

10.2 Allegations/concerns raised in relation to staff, including coaches, other staff, volunteers and contractors

- The Street Soccer Foundation will respond to allegations in line with the local Kent allegations arrangements and Part Four of KCSIE 2021. In depth information can be found within our 'Managing Allegations against Staff' and staff behaviour policy/code of conduct policy.

- Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.2.1) will be recorded and dealt with appropriately in line with national and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the Street Soccer Foundation from potential false allegations or misunderstandings.
- Where DSL's are unsure how to respond, for example if the Street Soccer Foundation is unsure if a concern meet the harm 'thresholds', advice will be sought via the Local Authority Designated Officer (LADO) Enquiry Line and/or the Education Safeguarding Service.

10.3 Concerns that meet the 'harm threshold'

- The Street Soccer Foundation recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children and young adults in our foundation, academy or schools programme. This includes when someone has
 - behaved in a way that has harmed a child or young adult, or may have harmed a child/young adult and/or
 - possibly committed a criminal offence against or related to a child/young adult and/or;
 - behaved towards a child /young adult in a way that indicates he or she may pose a risk of harm and/or
 - behaved or may have behaved in a way that indicates they may not be suitable to work with children or young adults.
- Allegations against staff which meet this threshold will be referred immediately to the DSL who will contact the LADO to agree further action to be taken in respect of the child/young adult and staff member. In the event of allegations of abuse being made against a DSL, staff are advised that allegations should be reported to the CEOL who will contact the LADO. Concerns/allegations about the CEO should be reported directly to the LADO.

10.4 Concerns that do not meet the 'harm threshold'

- The Street Soccer Foundation may also need to take action in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.
- Where low-level concerns are reported to the foundation, the DSL will to share or liaise with the LADO enquiries officer via the LADO Enquiry Line.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the Street Soccer Foundation will implement appropriate action, for example consulting with the LADO enquiry line and following our disciplinary procedures.
- Additional information regarding low-level concerns is contained with our staff behaviour policy/code of conduct – this includes what a low-level concern is and the importance of sharing them.

10.5 Safe Culture

- As part of our approach to safeguarding, Street Soccer Foundation has embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff behaviour policy/code of conduct are constantly lived, monitored and reinforced by all staff (including coaches, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the Street Soccer Foundations safeguarding regime. The leadership team at the Street Soccer Foundation takes all concerns or allegations received seriously.
- All members of staff are made aware of the Street Soccer Foundation Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child or young adult at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The Street Soccer Foundation has a legal duty to refer to the Disclosure and Barring Service (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) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our foundation, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO.

11. Opportunities to teach safeguarding

- We recognise that Street Soccer Foundation provides an opportunity in helping children and young adults understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our academy and schools programme provides an opportunity for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of strategies to ensure their own protection and that of others.
- Our Foundation supports children and young adults to talk to a range of staff. Children and young adults will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

12. Physical Safety

- Staff and visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.
- Any individual who is not known or identifiable on site at our academy or schools programme should be challenged for clarification and reassurance.

- The Street Soccer Foundation will not accept the behaviour of any individual (child/ young adult/parent or other) that threatens academy or school programme security or leads others (children /adults) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the Academy or Schools Programme.

13. Local Support

- All members of staff at The Street Soccer Foundation are made aware of local support available.
 - **Education Safeguarding Service**
Area Safeguarding Advisor
<https://www.theeducationpeople.org/our-expertise/safeguarding/safeguarding-contacts/>
Online Safety in the Education Safeguarding Service
03000 415797
esafetyofficer@theeducationpeople.org (non-urgent issues only)
 - **LADO Service**
Telephone: 03000 410888
Email: kentchildrenslado@kent.gov.uk
 - **Integrated Children's Services**
Front door: 03000 411111
Out of Hours Number: 03000 419191
 - **Kent Police**
101 or 999 if there is an immediate risk of harm
 - **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
kscmp@kent.gov.uk
03000 421126
 - **Adult Safeguarding**
Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email
social.services@kent.gov.uk

Appendix 1: Categories of Abuse

All 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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Sexual abuse: involves forcing or enticing a child or young adult 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.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

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.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot

- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

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.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

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.

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: Support Organisations

NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk

- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadvice.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phonenumber: <https://respectphonenumber.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Peer on Peer abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Online Safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>

- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): <https://www.nicco.org.uk/>