



THE STREET SOCCER FOUNDATION Safeguarding Policy

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



Reviewed last: January 2020

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

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 2012 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 (2018), 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 activity 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.

Designated Safeguarding Lead for The Street Soccer Foundation:

MR PAUL STEWART through representation of the **SAVE ASSOCIATION** of Registered Office: Dewley Court, Unit 18 Westway Industrial Estate, Throckley, Newcastle-Upon-Tyne NE15 9AW.

- Email: paul@streetsoccerfoundation.org.uk
- Mobile: 07709-457-000
- Website: www.saveassociation.com

In general: If you have a welfare concern, inform the Designated Safeguarding Lead, Paul Stewart.

- Consider whether the child or young adult is at immediate risk of harm e.g. unsafe to go home
- Access the KSCB Support Level Guidance document and procedures: www.kscb.org.uk
- Refer to other agencies as appropriate e.g. Internal or community services, LADO, Police or Request for Support
- If unsure then consult with the Designated Safeguarding Lead.

Principles

The Street Soccer Foundation takes seriously the responsibility to promote the welfare and safeguard all the children and young adults at risk of harm entrusted to our care.

Our Foundation core safeguarding principles are:

- We are an important part of the wider safeguarding system for children.
- It is our whole Foundation responsibility to safeguard and promote the welfare of children.
- All children (defined as those up to the age of 18) regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- All children have a right to be heard and to have their wishes and feelings taken into account.
- All our staff understand safe professional practice and adhere to our safeguarding policies.

All Street Soccer Foundation staff and volunteers:

- Have a professional duty of care for the welfare and safety of children and young adults at risk of harm with whom they work (Safeguarding is everyone's business)
- Have a responsibility to 'whistle blow' if they become aware of an abusive situation within the work setting
- Must be aware of, and alert to, signs of child abuse and must respond in accordance with the [KSCB procedures](#)
- Be alert to the potential of young abusers and challenge bullying in any form
- Record, report and address all incidents of a racial nature in line with legislative requirements and challenge discriminatory behaviours in any form
- Know how to respond to a child's disclosure of abuse and know what to do with the information
- Are required to follow [KSCB procedures](#) and be familiar with relevant national guidance
- Understand and implement Safer Recruitment practice including relevant and necessary DBS checks: Online safer recruitment training is accessible from the [NSPCC](#)
- Understand and implement KCC Procedures for [Managing Allegations Against Staff](#)

As part of our ethos, The Street Soccer Foundation is committed to:

- Maintaining the welfare of children and young adults at risk of harm as its paramount concern
- Providing an environment in which all children and young adults at risk of harm feel safe, secure, valued and respected; confident to talk openly and sure of being listened to
- Providing suitable support and guidance so that children and young adults at risk of harm have a range of appropriate adults who they feel confident to approach if they are in difficulties
- Using learning to provide opportunities for increasing self-awareness, resilience, self-esteem, assertiveness and decision making so that children and young adults at risk of harm have a range of contacts and strategies to ensure their own protection and understand the importance of protecting others
- Working with children, young people and families to build an understanding of our responsibility to ensure the welfare of all children and young adults at risk of harm including the need for referral to other agencies in some situations
- Ensuring all staff are able to recognise the signs and symptoms of abuse and are aware of these procedures and lines of communication

- Monitoring children and young adults at risk of harm who have been identified as vulnerable or 'in need', including the need for protection; keeping electronic confidential records which are shared appropriately with other professionals
- Developing effective and supportive liaison with other agencies.

TERMINOLOGY & DEFINITIONS

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).

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 or young person 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 A.

What may give cause for concern?

- Bruising on parts of the body which do not usually get bruised accidentally, e.g. around the eyes, behind the ears, back of the legs, stomach, chest, cheek and mouth (especially in a young baby)
- Any bruising or injury to a very young, immobile baby
- Burns or scalds
- Bite marks
- Any injuries or swellings, which do not have a plausible explanation
- Bruising or soreness to the genital area
- Faltering growth, weight loss and slow development
- Unusual lethargy
- Any sudden uncharacteristic change in behaviour, e.g. child or young person becomes either very aggressive or withdrawn
- A child whose play and language indicates a sexual knowledge beyond his/her years
- A child or young person who flinches away from sudden movement
- A child or young person who gives over rehearsed answers to explain how his/her injuries were caused
- An accumulation of a number of minor injuries and/or concerns
- A child or young person who discloses something which may indicate he/she is being abused
- A child or young person who goes missing
- A child or young person who may be at risk of child sexual exploitation (CSE), gangs or radicalisation e.g. they have goods that cannot be account for

This is not an exhaustive list.

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.

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.

Roles and Responsibilities

Everyone involved in the care of children and young adults at risk of harm has a role to play in their protection. Members of staff and volunteers are in a unique position to observe any changes in a child or young adult's behaviour or appearance. If there is any reason to suspect that a child or young adult in their care is being abused, or is likely to be abused, they have a 'duty of care' to take action on their behalf by following these procedures.

Specifically, all staff members and volunteers are responsible for:

- Providing a safe environment in which children and young adults can learn
- Identifying children and/or young adults who may benefit from early help
- Considering wider environmental factors in a child's life that may be a threat to their safety and/or welfare
- Understanding the early help process and their role in it
- Understanding the safeguarding policies and procedures
- Undertaking regular and appropriate training
- Being aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989
- Knowing what to do if a child tells them that he or she is being abused or neglected
- Knowing how to maintain an appropriate level of confidentiality
- Being aware of the indicators of abuse and neglect so that they can identify cases of children and/or young adults who may be in need of help or protection.

The Designated Person for Safeguarding and Child Protection for the Foundation with overall responsibility for child protection practice is Paul Stewart. All staff must be made fully aware of this and clear information with details of the Safeguarding Lead must be available to all staff and visitors at each centre and hub along with a named Deputy e.g. Delivery Manager. Any deputies must be trained to the same standard as the Designated Person for Safeguarding and Child Protection.

The Designated Person for Safeguarding and Child Protection will take the lead role in ensuring that the Foundation has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and are being followed; and that the policies are reviewed at least annually and when required.

The Foundation Leadership Team will ensure that the Designated Safeguarding Lead is properly supported in their role.

The Designated Person for Safeguarding and Child Protection is responsible for:

- Act as the central contact point for all staff to discuss any safeguarding concerns
- Co-ordinating child protection action
- Liaising with other agencies and professionals, as necessary, in line with WTSC 2018
- Ensuring that locally established referral procedures are followed as necessary, including reporting and referral processes
- Acting as a consultant for other staff to discuss concerns
- Making referrals, as necessary
- Maintain a confidential recording system for safeguarding and child protection concerns
- Representing or ensuring The Street Soccer Foundation is represented at safeguarding meetings, in particular Strategy Discussions and Child Protection Conferences
- Managing and monitoring The Street Soccer Foundation's part in child protection plans
- Ensuring all staff have received appropriate up to date child protection training and have access to appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE (2018)
- Checking that staff and volunteers are "suitable", ensuring DBS checks are carried out as required.

What to do if a child or young person alleges that they have been abused

Children and young adults at risk of harm involved in any allegations will be treated with sensitivity, be comforted and reassured. Staff should be aware that any allegation may result in a criminal investigation and therefore, ensure that they do not affect the evidence. They should let the child or young person tell their story uninterrupted, with as little prompting as possible.

In circumstances where a child or young adult makes an allegation of abuse the member of staff will:

- Make no promises that cannot be kept such as telling them no one will be told about what they are saying
- Listen fully to what the child or young adult has to say
- Make no observable judgements
- Ask open ended questions that encourage the child or young adult to speak in their own words
- Ensure the child or young adult is safe and not left alone
- Ensure an appropriate written record is made and the manager and the Designated Person for Safeguarding and Child Protection are fully informed

Understanding the child or young adult's world

It is important to be familiar with the many factors which can affect how children and young adults learn, how they react, and how they develop.

A child or young adult's developmental needs are affected in different ways by the parenting capacity of parents/carers and by the family and the environmental situation of the child or young person. Further information is available in Working Together to Safeguard Children (2018).

How to share your concerns

Share any initial concerns with the child or young adult's parents/carers, in order that a meaningful discussion can take place to identify the support that can be offered unless you feel that discussing the issue with the parents/carers may put the child or young adult at further risk of significant harm or you think a criminal offence has been committed and discussion would interfere with a potential criminal investigation.

Keep a factual note of any concerns i.e. what you have observed, heard and said with clear actions and expected outcomes. Discuss your concerns with your line manager or the Designated Person for Safeguarding and Child Protection. If there are serious concerns and the Designated Person for Safeguarding and Child Protection or deputy is not available but immediate advice is needed, then contact:

**Front Door Team on 03000 41 11 11
(03000 41 91 91 Out of Hours)**

The process will provide an opportunity to identify if the level for a referral to Children's Social Work Services has been met. If not, a discussion should follow to identify an appropriate way forward. If you are aware that the child or young adult has an allocated social worker, then your concerns should be shared with them directly and a referral to the Front Door Team is not necessary. Keep an electronic record of all actions for future reference ensuring they are dated.

Confidentiality and Information Sharing

- The Street Soccer Foundation recognises that all matters relating to child protection are confidential. The DSL will only disclose information about a child or young adult at risk of harm to other members of staff on a 'need to know' basis.
- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children and young adults at risk of harm.
- All staff must be aware that they cannot promise a child or young adult at risk of harm to keep secrets which might compromise their safety or wellbeing.
- DfE Guidance on Information Sharing (July 2018) provides further details.

What to do if you need to take emergency action to protect a child or young adult

On very rare occasions, it may be necessary to act quickly e.g. to protect a child or young adult at risk of harm from a parent under the influence of drugs and alcohol or behaving abusively. **In these circumstances the staff member should immediately telephone the Police (999).**

In an unlikely event that a child or young adult at risk of harm presents at a centre or hub with serious injuries, **it would be appropriate to telephone 999 for an ambulance/Police.**

Staff must update the Designated Person for Safeguarding and Child Protection as soon as possible.

What happens if an allegation of abuse is made against a member of staff or volunteer

The procedures which will be undertaken if an allegation is made against a member of staff are detailed in Appendix C. These comply with Ofsted and Children's Social Work Services requirements.

Key measures that can be taken by staff to reduce the risk of any allegations being made against them, another member of staff or volunteer are:

- If a child or young adult sustains an injury whilst in our care, record it on an accident form as soon as possible. When the child or young adult is collected, staff will inform whoever picks them up about the injury and ensure that they also sign the record to confirm they have been informed of the event
- If a child or young adult arrives with an injury sustained elsewhere, ask for an explanation and record this and ask whoever has brought in the child or young adult to sign the record, if appropriate
- Ensure you undertake regular child protection training
- Ensure that all service users understand our role and responsibility in child protection.
- Try to avoid situations where an adult is left alone in a room with a child or young adult. If this does occur, make sure that the door is left open and there are other people around
- Avoid engaging in rough physical play with children and young adults, as this may be misconstrued and could cause accidental injury
- Avoid doing things of a personal nature for young children that they can do for themselves
- Take up references of employees including one from the candidate's last employer and always question any gaps in employment history

Encourage an open-door ethos, to enable staff to talk to senior managers if they have concerns about the conduct of any of their colleagues.

Recording

Staff and volunteers can play a vital role in helping children and young adults at risk of harm by effective monitoring and record keeping. Any incident or behavioural change in a child or young adult that gives cause for concern should be recorded. It is important that records are kept factual and reflect the words used by the child or young adult. All records must be electronic and dated with timings, if appropriate.

Information to be recorded:

- Child or young adult's name and date of birth
- The incident with dates and times
- A verbatim record of what the child or young adult and staff member has said, observed and actions agreed
- If recording bruising or injuries indicate position, colour, size, shape and time on body map
- Action taken

Record the information as accurately as you can, including the timing, setting and those present, as well as what was said verbatim. Do not exaggerate or embellish what you have heard in any way. Records of concern should be regularly reviewed by the Designated Person for Safeguarding and Child Protection who should record and date actions taken.

Support for Staff and Volunteers

The abuse of children and young adults at risk of harm can arouse many difficult feelings for staff and it should be recognised that staff may have differing levels of understanding and awareness. The Street Soccer Foundation will ensure that members of staff are supported through any difficulties they may have, by providing both regular and formal supervision and informal support if required, and training and development opportunities.

All staff are aware that children and young adults at risk of harm may need physical comfort at times. It would be inappropriate to deny children and young adults this if they require it. However, any physical contact should be “child led” and appropriate to the child’s needs e.g. a child seeking comfort after a fall, distressed on separation from a parent. No member of staff should ever seek comfort from a child to meet their own needs. Comfort should be in the form of hugs, holding hands, sitting a young child on the knee. For a variety of reasons, some children and young adults may find being touched uncomfortable or distressing. It is important for staff to be sensitive to physical reactions and to act appropriately.

What support is available?

Any member of staff affected by issues arising from concerns for children or young adult’s welfare or safety can seek support from their Designated Person for Safeguarding and Child Protection and through their supervision process. The Designated Person for Safeguarding and Child Protection can put staff and parents in touch with outside agencies for professional support if they so wish.

Training

The Street Soccer Foundation staff should be trained in basic child protection every two years as recommended by KSCB. [Training courses](#) will be available to staff through KSCB, e-learning and in-house. The Designated Person for Safeguarding and Child Protection and deputy will complete Designated Person training every two years.

Staff must ensure they complete the mandatory e-learning ‘[Prevent](#): Safeguarding people from extremism and terrorism’.

In addition, all staff members should receive safeguarding and child protection updates (for example, by email, e-bulletins, staff meetings) as required but at least annually to provide them with the relevant skills and knowledge to safeguard children effectively.

Safer Recruitment

- The Street Soccer Foundation is committed to ensuring that it develops a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our children and young adults and other staff members. This includes administering all necessary and appropriate DBS checks on all staff members.
- The Leadership Team are responsible for ensuring that the Foundation follows safe recruitment processes outlined within guidance.
- The Leadership Team will ensure that there is at least one person involved with any given conducted interview, who has completed safer recruitment training.
- We advise all staff to disclose any reason that may affect their suitability to work with children and young adults at risk of harm, including convictions, cautions, court orders, reprimands and warnings.

HOW WILL WE IMPLEMENT THE POLICY?

Our Foundation Safeguarding Aims:

A safe and welcoming environment for children and young adults at risk of harm involved in any Foundation activities, free from abuse and fear of abuse in all its forms;

A culture where safeguarding practice is widely understood, openly discussed and where the workforce recognises the role they play in keeping children, young adults, themselves and their colleagues, safe and from harm;

A clear system which promotes and supports: constant vigilance, prevention and early intervention in safeguarding matters, and where necessary, prompt and thorough action in response to any concerns or incidents;

To implement legislation, Government policy and where and as appropriate Premier League and FA regulations, policy and guidance; and

To work closely together with local statutory agencies and other partners to promote and safeguard the welfare of children and young adults at risk of harm.

To realise these aims we will:

1. Work with relevant governing bodies and statutory agencies to ensure we meet all necessary regulations in respect of our safeguarding practice. We will adopt the standards presented in the Governments statutory guidance documents 'Working Together to Safeguard Children' and [The New Care Act 2014](#).

2. Listen to children and young adults at risk of harm, take them seriously, and react swiftly and appropriately to ideas, feelings and concerns and address them in a fair, effective and timely manner;
3. Develop and communicate a series of clear policies, protocols and guidance designed to help deliver good practice across the Foundation;
4. Maintain a visible presence across all areas of the Foundation including Foundation internet platforms;
5. Provide an advisory and support mechanism across all areas of the Foundation where children and young adults at risk of harm are involved in any Foundation-led activity;
6. Develop a consistent and appropriate safeguarding training programme for staff, volunteers, partners and participants; and
7. Maintain confidentiality of all information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with the Data Protection Act.

To illustrate the scope of this work the list below provides a number of examples or situations across the Foundation where we need to consider the welfare of people in our care:

- Participants involved directly in the Street Soccer development programmes;
- Children and young adults at risk of harm taking part in any/all Foundation activities;
- Disabled supporters and other young adults at risk of harm contacting the Foundation, visiting the stadiums of our Delivery Partners on match days, or visiting for other pre-arranged times and/or activities (e.g. stadium tours);
- Homeless people, people with mental health issues, or young offenders taking part in the Street Soccer programme or other community-based programmes the Foundation operates;
- Support to those who may be vulnerable to bullying or cyber-bullying through their relationship with the Foundation; and
- Disabled children and disabled adults taking part in any Foundation organised activity.

Age Sensitivity

The Street Soccer Foundation recognises that the term 'children' covers individuals from birth up to 18 years old and this policy covers this entire age range. As a general principle, we will also be sensitive to the developmental maturity of children in our care and ensure that this is taken into account when decisions are made that affect them.

Additional Vulnerability

'Children' are usually fairly easy to identify. Additional vulnerability is not as easy: disability, ethnicity, sexuality. Adults with additional vulnerability are often even more difficult to identify and plan for. It is a priority of our Foundation to safeguard the welfare of both children and adults with additional vulnerability when in our care.

Language & Communication

As a definitive theme of our Street Soccer programme we recognise football is a multi-cultural, global sport. Professional Football Clubs which the Foundation may partner with, can be global brands. Some people taking part in our activities may not use English as their first language or may have trouble communicating with Foundation staff in the usual ways. As a principle, we will always be patient and try

to communicate in an individual's chosen way and where necessary we will use an interpreter (ie foreign language) or communicator (eg British Sign Language).

Children from Overseas

Occasionally the Foundation will come into contact with children who do not live in this country. This policy applies equally to them. We will also ensure that where this situation does arise that international law and football regulations are applied as well as the needs of the child being put first. Where we have a concern that a child may be being exploited or 'trafficked' the appropriate authorities will be informed.

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.

Information and Communication Technology (ICT)

ICT is used across the Foundation in many and varied ways. Its use will continue to grow and change with new developments in this arena. It is used to communicate with supporters, sponsors, young adults, parents, partners, colleagues, players and the media. The Foundation will:

- develop and maintain clear policies on internet, email and social media usage;
- raise awareness amongst young participants regarding safer internet/social media use in respect of their taking part in Foundation-led activities;
- have a zero-tolerance approach to 'cyber-bullying'; and
- respond quickly and appropriately to inappropriate use of the internet and social media by any members of the workforce.

Training

The Foundation's team will receive training across the safeguarding landscape, such as: good practice, e-safety, disability, neglect, domestic violence, gang culture, substance misuse, exploitation, radicalisation and people trafficking.

In turn the team will offer support and training to other staff who may be faced with those issues and concerns through their day-to-day work with children and/or young adults at risk of harm.

All new staff joining the workforce will complete a detailed induction to the Foundation and this will include suitable safeguarding training relevant to their role. We will also work with programme participants and parents to raise awareness of safeguarding issues that may affect them.

CONSENT

The Foundation recognises the need to approach the individual needs of children and young adults at risk of harm in the appropriate way and according to the law and statutory guidance.

Where a child is at risk of harm, consent to act on concerns is not required, although consent from, and consultation with, those with Parental Responsibility is considered good practice by the Foundation unless this would put the child at greater risk of harm.

'Consent' – Adults at risk of harm

If an adult is at risk of harm and has the capacity to consent, then they should have the opportunity to consent before a decision is made that affects them – e.g. passing on a concern to statutory agencies. Foundation staff will assume that an adult has the capacity to consent unless it is established that they lack this capacity. A seemingly unwise decision should not be mistaken as lacking capacity. We will act where the individual is put in immediate and significant risk of harm.

'Best Interests' – Adults at risk of harm

Any decisions, taken on behalf of someone who is deemed, at the point where a decision must be made, to lack capacity, will be taken in his or her best interests. Where possible we will take into account (known) past or future wishes and religious or moral beliefs.

REPORTING CONCERNS

Alerters

If any member of the Foundation workforce has a concern about a child or young adult at risk of harm, they have a duty to tell a member of the Foundation's team or a member of our Delivery Partner in question. At this point they become an 'Alerter'. The team member will in turn report any 'alerts' to the CEO of the Foundation. If there is immediate risk of harm, a serious injury, or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity.

Whistleblowing

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**.

Record Keeping & Confidentiality

The Foundation will keep a record of all incidents and concerns reported to the team. Any such reports will be taken seriously, treated with respectful uncertainty and carefully recorded, acted upon where appropriate, and confidentially stored. Records will be regularly reviewed to identify patterns of behaviour that may give rise to concern. All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with the Data Protection Act.

Criminal Investigations & Social Care Services

Where serious concerns are raised, and/or a criminal offence may have been committed then it is not the responsibility of Foundation staff to determine if abuse has taken place. This is the responsibility of the police and/or local authority who may involve Foundation staff in any investigation procedures. Where the police decide that they will not take any further action then the local authority may still proceed with an investigation in conjunction with the Foundation.

Where both the police and social care services have decided to take no further action then the Foundation management may undertake an internal investigation in accordance with Foundation disciplinary procedures.

ISA Referrals

If a member of staff is removed (or resigns) from their role because of an allegation or investigation conducted under this policy and the necessary criteria are met, a referral to the Independent Safeguarding Authority will be made in conjunction with the appropriate statutory agencies.

FURTHER POLICIES & GUIDANCE

This Policy underpins all the work undertaken across the Foundation that involves direct (and in some cases indirect) engagement with children and young adults at risk of harm. Where there are significant areas or levels of engagement, this policy is supplemented by further policies, protocols, guidance and training. These documents are available, where appropriate, upon request.

USEFUL CONTACTS

Local Support

All members of staff are made aware of local support available.

In KENT, the **Education Safeguarding Service** is headquartered at:

Sessions House, County Hall, Maidstone, Kent, ME14 1XQ

Telephone: 03000 41 57 88

Website: www.kelsi.org.uk/support-for-children-and-young-people/child-protection-and-safeguarding/safeguarding-contacts

Contact details for the LADO:

- Telephone: 03000 410888
- Email: kentchildrenslado@kent.gov.uk

Children's Social Work Services:

- Integrated 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 Board (KSCB):

- Email: kscb@kent.gov.uk
- Telephone: 03000 421126

National Support

Support for staff

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

Support for Children

- NSPCC: www.nspcc.org.uk
- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- Young Minds: www.youngminds.org.uk
- The Mix: www.themix.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- Kidscape: www.kidscape.org.uk
- The Samaritans: www.samaritans.org
- Mind: www.mind.org.uk
- NAPAC (National Association for People Abused in Childhood): napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk

Domestic Abuse

- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk

Honour based Violence

- Forced Marriage Unit: <https://www.gov.uk/guidance/forced-marriage>

Sexual Abuse and CSE

- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now!: www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- CEOP: www.ceop.police.uk
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk

Online Safety

- Childnet International: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Parents Info: www.parentinfo.org
- Internet Matters: www.internetmatters.org
- Net Aware: www.net-aware.org.uk
- ParentPort: www.parentport.org.uk
- Get safe Online: www.getsafeonline.org

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

Appendix A - Categories of Abuse

Physical Abuse

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

Emotional Abuse

Emotional Abuse is the persistent emotional ill-treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving children 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. It may include interactions beyond the child's developmental capability, overprotection, limitation of exploration or learning, and/or prevention of normal social interaction. It may involve seeing or hearing ill-treatment of another. It may involve serious bullying, causing children to frequently feel frightened or in danger, or exploitation and corruption of children. Some level of emotional abuse is involved in all types of ill-treatment of a child, although it may occur alone.

Sexual Abuse

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

Neglect

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

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers);
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix B - Other Safeguarding Concerns

Our safeguarding framework will consider the wider issues that relate to child well-being and pose significant risk, sometimes in specific regions, and including but not limited to:

- Online Safety
- Homelessness
- Radicalisation and Extremism
- Child Sexual Exploitation (CSE)
- Female Genital Mutilation (FGM)
- Mental Health, Self-harming & Suicidal Behaviour
- Eating disorders

Any concern related to these issues will be taken seriously and reacted to as a safeguarding issue and processed as any other safeguarding matter and will, where required, involve the appropriate statutory agency.

Online Safety

KSCB Online Safety Strategy defines Online Safety (or e-Safety) as the safeguarding of children and young adults in the digital and online world. Therefore, this encompasses not only internet technologies but also mobile phones, gaming consoles plus other devices and technologies. Online safety must be to be considered as part of all professionals' wider safeguarding responsibilities.

It is recognised that the use of technology presents challenges and risks to children and young adults.

The Foundation identifies that the issues can be broadly categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material
- **contact:** being subjected to harmful online interaction with other users
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm.

The Foundation recognises the specific risks that can be posed by mobile phones and cameras and in accordance, all staff and volunteers must read the [KSCB Online Safety Guidance](#) to ensure full understanding. This identifies key principles expected with regards to the safe and responsible use of technology to ensure a safe and secure environment for The Street Soccer Foundation delivery activities including the importance of managers ensuring appropriate filters and appropriate monitoring systems are in place.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible before facing a homelessness crisis.

Radicalisation and Extremism

From 1 July 2015, Prevent is a formal duty for under Section 26 of the Counter-Terrorism and Security Act 2014, to have “*due regard to the need to prevent people from being drawn into terrorism*”. In light of daily reported threats, we must take responsibility in the shared challenge of tackling radicalisation and extremism by supporting Prevent. It is essential that staff or volunteers are able to identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting children from the risk of radicalisation should be seen as part of safeguarding and is similar in nature to protecting children from other harms e.g. drugs, gangs, neglect and sexual exploitation, whether these come from within their family or are the product of outside influences.

All staff and volunteers must complete mandatory online training and familiarise themselves with the Channel (the multi-agency approach to protect people from being drawn into terrorist related activity) referral process.

If staff or volunteers have a concern about potential radicalisation, normal safeguarding procedures, including discussing with the Designated Person for Child Protection, should be followed. Staff can also contact Kent police on 101 to seek advice or e-mail the Kent Channel coordinator directly at channel@kent.pnn.police.uk

Child Sexual Exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something e.g. food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection as a result of engaging in sexual activities. What marks out exploitation is an imbalance of power in the relationship.

CSE involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying, including cyberbullying and grooming.

Advice regarding CSE can be accessed via the link below. The CSE toolkit helps identify levels of risk if there are concerns around CSE:

<http://www.kscb.org.uk/guidance/sexual-abuse-and-exploitation>

http://www.barnardos.org.uk/what_we_do/our_work/sexual_exploitation.htm

Free online training about many safeguarding issues including CSE and FGM are available from KSCB:

<http://www.kscb.org.uk/e-learning/e-learning-courses>

If staff or volunteers have a concern about potential CSE, normal safeguarding procedures, including discussing with the Designated Person for Child Protection, should be followed.

Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is often carried out on girls aged between 5-8 years. FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Where a member of staff or volunteer is concerned that an act of FGM appears to have been carried/may be carried out on a girl who is aged under 18, there is a statutory duty upon that individual to report it to the police.

What does this mean for you?

If you suspect FGM has been carried out, you have a duty to report it to the police. This became a mandatory duty on 15 October 2015 so to not report would be an offence.

What are the indicators?

There are a range of indicators and risk factors. In general, there are risk factors related to culture, country of origin, previous practice in the family (mother, sisters etc.). There are then risk factors it may be about to happen e.g. arrangements for extended holidays to stay or visit relatives in a high-risk area (e.g. east Africa, Somalia, Eritrea, Sudan but also Egypt and parts of West Africa and the Middle East). Girls as young as 5 years old from families originating in risk areas may talk about a special ceremony or party involving girls of a similar age. Refusal to allow the child to attend PSHE/SEX education lessons might also be relevant. Indicators that FGM has recently taken place can be physical discomfort, urinary problems etc. Indicators that this has happened in the past include recurrent infection or psychological issues. Older girls may not realise that the problems relate to the FGM that they experienced when they were young.

Further information is available via the NSPCC helpline on 0800 0283550.

If staff or volunteers have a concern about potential FGM, or any other cultural traditions, rituals or beliefs such as forced marriage, honour-based violence, spirit possession or witchcraft abuse, then normal safeguarding procedures, including discussing with the Designated Person for Child Protection, should be followed.

Mental Health, Self-harming & Suicidal Behaviour

Any child or young adult, who self-harms or expresses thoughts about this or about suicide, must be taken seriously and appropriate help and intervention should be offered at the earliest point. Any member of staff or volunteer who is made aware that a child or young adult has self-harmed, or is contemplating this or suicide, should talk with the child or young adult without delay.

Self-harm can be described as a wide range of behaviours that someone does to themselves in a deliberate and usually hidden way. In the clear majority of cases self-harm remains a secretive behaviour that can go on for a long time without being discovered. Many children and young adults may struggle to express their feelings and will need a supportive response to assist them to explore their feelings and behaviour and the possible outcomes for them.

The indicators that a child or young adult may be at risk of taking actions to harm themselves or attempt suicide can cover a wide range of life events such as bereavement, bullying at school or a variety of forms of cyber bullying, often via mobile phones, homophobic bullying, mental health problems including eating disorders, family problems such as domestic abuse or any form of child abuse as well as conflict between the child and parents.

The signs of the distress the child may be under can take many forms and can include:

- Cutting behaviours;
- Other forms of self-harm, such as burning, scalding, banging, hair pulling;
- Self-poisoning;

- Not looking after their needs properly emotionally or physically;
- Direct injury such as scratching, cutting, burning, hitting yourself, swallowing or putting things inside;
- Staying in an abusive relationship;
- Taking risks too easily;
- Eating distress (anorexia and bulimia);
- Addiction for example, to alcohol or drugs;
- Low self-esteem and expressions of hopelessness.

A supportive response demonstrating respect and understanding of the child or young adult, along with a non-judgmental stance, are of prime importance. Note also that a child or young adult who has a learning disability will find it more difficult to express their thoughts.

The child or young adult may be in need of services which could take the form of an early help assessment or other related support service. A referral should include information about the background history and family circumstances and the specific concerns about the current circumstances, where available. **Referral to Children's Social Work Services and Early Help and Preventative Services: 03000 41 11 11.**

Eating disorders

Eating disorders can affect anyone. An eating disorder is a serious mental health problem that can have a major impact on a child or young adults' physical health as well as affecting their thoughts and emotions and can impact on their social life as well as school or college.

Whilst there are different types of eating disorders – all of which are serious – they are treatable, and a full recovery is possible, so the earlier treatment starts the better. Look out for the following types of signs that there might be a problem and where help is needed:

- Constant thinking or worrying about food, calories, weight gain or their shape. The individual might notice that it is hard to concentrate on other things
- Reducing their food to lose weight and setting themselves strict rules about what they can or cannot eat
- Trying to do other things to lose weight, such as lots of exercise, vomiting, taking laxatives or slimming pills
- The individual might become tired and more emotional (tearful, irritable)

Further information and guidance is available via: <https://www.beateatingdisorders.org.uk/>

And

<https://www.kscb.org.uk/guidance/physical-and-mental-health/self-harm-and-eating-disorders>

The NHS also has lots of information around [what self-harm is and how to spot the signs.](#)

Appendix C - What happens if an allegation of abuse is made against a member of staff or volunteer

The procedures which will be undertaken if an allegation is made against a member of staff are:

- If anyone makes an allegation of abuse against a member of our staff (whether it be in or out of working hours), the Designated Person for Child Protection should be informed immediately and will immediately contact the Local Authority Designated Officer (LADO) on 03000 410888
- They and the line manager, if appropriate, will assess whether the allegation reaches the threshold for referral to Police/Children's Social Work Services and advise accordingly regarding further action to be taken in respect of the child or young person and the member of staff
- The Designated Person for Child Protection or line manager will complete the form below for recording allegations or complaints made against staff
- The managers will not discuss the allegation with the member of staff concerned, unless advised to do so by Children's Social Work Services
- If the allegation is made against an operational manager, this should be made to/or reported to the Designated Person for Child Protection. If against the Designated Person for Child Protection, this should be made to/or reported to the CEO of The Street Soccer Foundation.
- All staff need to be aware that it is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child or young person at risk. When in doubt – consult
- If Children's Social Work Services and/or the police decide to carry out an investigation, advice and consultation will be offered with regard to managing the potential risk and whether the member of staff can continue to work. The Street Soccer Foundation could invoke disciplinary action.
- The Street Soccer Foundation will not carry out an investigation unless Children's Social Work Services and the Police decide it is not appropriate for them to do so. The Street Soccer Foundation understands that Ofsted may wish to undertake further investigations
- Where the allegation is against a member of staff within a crèche registered with Ofsted, Ofsted will be informed. Ofsted should be contacted at the following:

Ofsted
Piccadilly Gate
Store Street
Manchester
M1 2WD
Tel No: 0300 123 1231

Always remember - The welfare of the child is paramount.

Guidance for managers completing checklist for handling and recording allegations or complaints of abuse made against a member of staff/volunteer

1. Record the name and position of member of staff/volunteer against whom the allegation or complaint has been made
2. Verbal complaints should be backed up in writing by the complainant if appropriate. Some may require immediate action that does not allow time for this to happen
3. It is important to identify who made the complaint and whether it was received first hand or is a concern that is passed on from somebody else. If this is the case it is better that you receive the information first hand. If a parent, carer or a member of staff makes a complaint against you it must be passed immediately to your line manager
4. Record the full name, age and date of birth of the child/young adult
5. The address recorded should be the address at which the child or young adult lives with the main carer
6. If there are one or more alleged incidents, be as specific as possible about dates that they are alleged to have happened
7. Check the attendance register or diary of work to see if the child or young adult was present or seen on that day and the shift patterns of the staff member or volunteer involved to see if they were working at that time. This could impact on the judgment about whether the incident had taken place
8. Any other information should be factual. It will be helpful if you can confirm things such as the level of contact that the staff member has with the child or young adult and any other minor concerns that may have been raised previously. **Do not attempt to investigate the complaint yourself.**
9. Remember that if an allegation of abuse is made against a member of our staff you must inform the Designated Person for Child Protection who will contact the Local Authority Designated Officer (LADO) for further advice
10. Ofsted must be informed if an allegation is made against a member of our staff within the crèche, even if Children's Social Work Services decide no further action is required. Ofsted may do their own investigation to ensure that registration requirements are being met
11. Make a note of any actions the Children's Social Work Services or Ofsted advise you to take and the date or times at which you implemented them.
12. If the allegation is against the Designated Person speak to the CEO of The Street Soccer Foundation.

Checklist for handling and recording allegations or complaints of abuse made against a member of staff/volunteer regarding a child/children in their care

Name and position of staff who is the subject of allegations/complaint:

Is the complaint: Written or verbal?

Complaint made by:

Relationship to child:

Name of child:

Age and date of birth of child:

Parent's/carer's name(s) and address:

Date of alleged incident/s:

Did the child attend/seen on this/these date/s:

Nature of complaint (if received in writing see guidance):

Other relevant information (continue on a separate sheet if needed):

Children's Social Work Services (LADO) contacted at (date and time):

Ofsted contacted at (date and time):

Further actions advised by Children's Social Work Services and Ofsted:

Your name:

Your position:

Signature:

Date & time of completing: