



Safeguarding of Children and Vulnerable Adults

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Original document Author(s)	Paul Griffiths James Trowman
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Policy Updates:

December 2016 – In consultation with Ben Lovatt (Director at TABU Limited)

Policy needs to be broken down into 3 clear parts;

- i) Safeguarding & Child Protection Policy
- ii) Code of Conduct/Behaviour
- iii) Whistleblowing Policy

2. Development and implementation of a whistleblowing policy should be actioned. National whistleblowing policy can be referred to using The Public Interest Disclosure Act (1998).

3. Initial child protection statement should reference vulnerable adults and that safeguarding young people extends to 25 years in the event of special educational need.

4. Definitions of abuse within the policy should be updated against those found in Working Together to Safeguard Children (2015) and Keeping children safe in education (2016) documents.

5. Policy should also reference specific safeguarding issues highlighted in Keeping children safe in education (2016). Hyperlinks to government guidance can be inserted and these can be found on page 12 and 13 of the document. These should include;

- Bullying including cyberbullying
- Children missing education
- Child missing from home or care
- Child sexual exploitation
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation
- Forced marriage
- Gangs and youth violence
- Gender based violence/violence against women and girls
- Hate crime
- Mental health
- Missing children and adult strategy
- Private fostering
- Preventing radicalisation
- Relationship abuse
- Sexting
- Trafficking

Best practice would be to include a working definition of each as with forms of abuse.

6. Specific examples of abuse within the policy are not relevant and these can be removed. Without context it is very difficult to evidence abuse and it would be more helpful to create a page on risk and vulnerability factors.

7. Creation of a risk and vulnerability factors page for reference. This can be placed in the appendix but might be more useful for staff that specific examples of abuse.

8. Consideration given to some terminology used as it lacks context and would be very difficult to hold staff accountable in the unfortunate case of malpractice or wrongdoing. Examples include;

- Overtraining
- Dangerous

- Physical limits
- Excessive

9. Remove statement on page 5 relating to child abuse that states 'children are usually harmed by adults'. This should be replaced with wording acknowledges that child abuse can happen to any child at any time. Child abuse can be direct, indirect (via the internet), active, passive and can be committed by anyone, including adults and other children (peer on peer abuse and violence).

10. Safeguarding policy currently states that sexual acts with a child under the age of 16 are illegal. This should be amended giving due consideration to the following points;

- i) The legal age of sexual consent is 16 years, however if you are in a position of trust it is illegal to engage in sexual activity with a child under the age of 18
- ii) The working definition of child sexual exploitation extends to children under the age of 18

11. Safeguarding policy should highlight that processes for responding to and reporting a safeguarding or child protection concern are consistent.

12. Inclusion of key contacts and local referral pathways included in the appendix.

13. When referring to 'organisational responsibility' in relation to safeguarding there is a lack of consistent language. This would be stronger if the 'physical, emotional and mental health and wellbeing of children and young people' were consistently used as reference points.

14. Inclusion on protocol on how you share information and good practice internally. Externally this is covered following the inclusion of local referral pathways.

15. Existing document states policy is reviewed every 3 years. This should be amended to every 12 months.

16. Consider creation of a disclaimer for Aspire Sport Ltd to supply external agencies and settings within relation to their responsibilities and safeguarding policy.

17. The role of the designated safeguarding lead should be amended to include reference to the following;

- Referring cases
- Referring cases to the Disclosure and Barring Service as required
- Referring cases where a crime may have been committed to the police as required
- Supporting staff as required
- Understanding and supporting staff in regards to the requirement of the PREVENT duty to protect children from the risk of radicalisation
- Obtaining access to resources and attending any relevant training or refresher courses
- Encouraging a climate of listening to children and taking account of their wishes and feelings, among all staff, in any measures that may be put in place to protect them
- Raising awareness of safeguarding policy and process
- Ensuring annual safeguarding policy review
- Ensuring policy is publicly available upon request
- Maintaining links between Aspire Sports Ltd and LSCB to implement latest policies on safeguarding
- Availability of the designated lead (note that availability should be defined in the interests of exceptional circumstances or outside of reasonable working hours; arrangements should also be implemented in the event of such a case).

18. A section on the responsibilities of **all staff** would support accountability across the workforce in relation to safeguarding. This should reference the following

- Internal and local safeguarding and child protection policy
- Responsibility and guidance in relation to recognising, responding and reporting safeguarding concerns
- Commitment to upholding a climate where children are listened to, believed and their feelings and wishes accounted for in any actions that may be taken

19. The following points should be considered within the recruitment section of the policy;

- Recruitment process should be used for all perspective job roles that come into contact with children, not just those that have a direct 'childcare' role
- A safeguarding statement should be added to the advertisement to tie into the DBS statement
- Good practice to send a copy of the Child Protection policy with the pre-application information as this demonstrates to potential employees your commitment to safeguarding
- Important to stipulate that CV's are not accepted
- Best practice suggests that one of the references must be from the most recent employer regardless of where that was. The second reference could then be used for the child related reference
- For potential employees that are recruited and will be in 'regulated activity' a DBS with Barred list check must be carried out. The current practice whereby if the address is the same as the one on the DBS it will be accepted is unsafe as the DBS is only current up until the day of which it was printed. If potential employees are signed up to the update service, you can then conduct your own check otherwise a new DBS should be carried out
- Overseas applications and checks should be referred to and must cover working or living abroad in one place for more than 6 months. Example1- person leaving university and travels around America for 12 months and spends a month at a time in each place – no check required. Example 2 – person lives in Spain for 7 months and then returns to the UK then goes to France for 6 months, that person would need to get an overseas check that covers both counties
- Applicants from overseas will not be able to obtain a DBS due to having not lived in the UK, they will have had to have lived in the UK for more than 3 months
- Safeguarding training to appropriate level should form part of the induction process
- Volunteers should go through the same process as all paid staff

20. In reference to staff code of conduct/behaviour, this should cover the following;

- Safer working practices
- Standards and expectations of behaviour that compliment current or existing procedure, protocol and guidance relating to specific roles and practices

21. Aspire Sports Ltd mission, vision and values should be reflected within the code of conduct.

22. Code of conduct should reference 'what to do' rather than 'what not to do'.

23. Practice to avoid should remain a separate section but should not stipulate difference between 'practice to avoid' and 'practice never to be sanctioned' in the interests of accountability

Updates in consultation with Walsall College - January 2018

1. Include amendments of policy reviews
2. detail how an individual who feels they are at risk should raise a concern.
3. policy should refer to activity to ensure individuals are educated on "how to stay safe and free from risk of harm/abuse"? (All types of abuse including radicalisation)
4. policy should refer to Working Together to Safeguard Children March 2015
5. refer to safeguarding training within policy
6. Add detail of when impact of the policy will be reviewed
7. Flowchart 2 should reference Local Authority Designated Lead (LADO) and need to notify the DBS service
8. Include local authority contacts

Updates December 2018

1. Updated references to latest legislation; Keeping Children Safe in Education (2018) and Working together to Safeguard Children (2018)
2. Updated definitions in line with latest legislation (see above) for the following terms; abuse and sexual abuse
3. All team members are required to read and confirm they have read and understood part 1 and Annex A of Keeping Children Safe in Education (2018)
4. All applicants will be requested to complete an application, childcare disqualification form and self-declaration form. The purpose of this is to obtain relevant details for the position, including information on past criminal behaviour, records or investigations.
5. Clarification of the roles of volunteers and that if not background checked they cannot be left unsupervised with children and young people
6. Clarification in regard to data sharing and GDPR "The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children"

Updates from January 2021

- Updated information in Child Protection Policy Statement
- All team members are required to read and confirm they have read and understand part 1 and annex A of Keeping Children Safe in Education 2020
- Updated terms of peer on peer abuse with definitions
- Updated information regarding mental health. See OPs.MentalHealthPolicy.VER.01.02.2021 for further information
- Amendments to recruitment procedures in 1.7.
 - i. Section B – Application and Self Declaration Phase
 - ii. Section C – Reference
 - iii. Section H – Induction
 - iv. Section I – Probation
- Amendments to HR.SafeguardingTemplate.VER.1.1
- Amendments to HR.ConcernAboutTeamMemberConduct.VER.1.2
- Creation of Flowchart 1: Disclosure and Barring Service Criminal Record Checks and Barred List Checks
- Amendment to Flowchart 2: Responding to a Concern about a Child/Vulnerable Adult
- Amendment to Flowchart 3: Responding to Concerns about Conduct of Team Members

Updates from April 2021

- Updated safeguarding information for all working areas across the apprenticeship programmes.

Section 1.0 - Safeguarding & Child Protection Policy

Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:

- protecting children from maltreatment;
- preventing impairment of children's 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.

1.1 Child Protection Policy Statement

The Aspire Active Education Group Ltd consists of the following companies:

Aspire Sports Health & Fitness Ltd

Aspire Active Camps Ltd

Aspire Partnerships Ltd

Aspire Training Solutions Ltd

This policy is written to include all the above companies.

Aspire Active Education Group LTD believes that it is always unacceptable for a child, young person or adult to experience abuse of any kind and recognises its responsibility to safeguard and promote the welfare of all children, young people and adults through a commitment to practice which protects them.

We recognise that:

- the welfare of the child or vulnerable adult is paramount
- all children or vulnerable adults regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse
- working in partnership with children, vulnerable adults and their parents, carers and other agencies is essential in promoting young people's welfare.
- We must take into account the interests and well-being of children and vulnerable adults, including respecting their rights, wishes and feelings.

The purpose of the policy is:

- To provide protection for the children, apprentices and vulnerable adults who receive The Aspire Active Education Group, including the children of adult team members or users.
- To provide team members, apprentices and volunteers with guidance on procedures they should adopt in the event that they suspect a child, apprentice or vulnerable adults may be experiencing, or be at risk of, harm.

This policy applies to all team members, including senior managers and Board of Trustees, paid staff, volunteers and sessional workers, agency staff, students, apprentices or anyone working on behalf of The Aspire Active Education Group

We will endeavour to safeguard children, apprentices and vulnerable adults by:

- valuing them, listening to and respecting them
- Supporting their development in ways that will foster security, confidence and resilience.
- Providing a learning environment in which young people, apprentices and vulnerable adults feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- adopting child protection guidelines through procedures and a code of conduct for staff and volunteers
- recruiting staff and volunteers safely ensuring all necessary checks are made
- sharing information about child protection and good practice with children, parents, staff and volunteers

- sharing information about concerns with agencies who need to know, and involving parents and children appropriately
- providing effective management for staff, apprentices and volunteers through supervision, support and training.

The Aspire Active Education Group works with apprentices, individuals, nursery, primary and secondary schools, employers, community settings and the general public. We feel it is of up most importance to liaise with all settings on child protection policies and procedures. We endeavour to do this by:

- identifying and making all team members and apprentices aware of who child protection managers are in all settings in which they are required to work
- sharing information about each settings child protection policies and procedures and good practice with our team and apprentices
- sharing any information about concerns that our team may have with the settings designated Child Protection Person
- providing each setting with our child protection and good practice procedures.

Equally, each setting is expected to liaise with the Designated Safeguarding Lead Officer of the Aspire Active Education Group. This includes:

- sharing information about their setting child protection and good practice procedures
- sharing information about concerns with Aspire Active Education Group team members where appropriate.

Our policy, good practice and training will be regularly reviewed:

- in accordance with changes in legislation and guidance on the protection of children or following any changes within The Aspire Active Education Group
- following any issues or concerns raised about the protection of children within The Aspire Active Education Group
- should there be a change of personal, an incident or concern within the company then a review will take place immediately, prior to the proposed review date.
- in all other circumstances, at least every 12 months.
- During each annual review the impact of this policy will be reviewed.
- All team members and apprentices will receive safeguarding training during their induction period and renewed every two years unless a review has been necessary

This policy has been developed with support from Ben Lovatt (Director, Tabu Limited) and with reference to Working Together to Safeguard Children (2020) and Keeping Children Safe in Education (2020)

Monitoring and Review

Our policy will be reviewed annually or in response to changes in legislation and/or Government guidance or significant internal changes.

1.2 What we are safeguarding children against

Abuse and neglect are forms of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. Children or vulnerable adults may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. An adult or adults, or another child or children may abuse them.

The Children Act, 1989 defines a child as “a person under the age of eighteen”. This policy therefore applies to all young persons under 18. However, the principles of this policy should also be considered for those young people above the age of 18 years who may be defined as a vulnerable adult who may need support by reason of learning or other disability and may be unable to protect him or herself against harm or exploitation. In this situation this safeguarding policy extends to

vulnerable adults aged up to 25 years. Aspire recognises this duty in relation to all young people regardless of age, colour, race, nationality, ethnic origin, religious belief, social class, sex, sexual orientation or disability.

The term “child abuse” is used to describe ways in which children and young people are harmed; child abuse can happen at to any child at any time. Child abuse can be direct, indirect (via the internet), active, passive and can be committed by anyone, including adults and other children (peer on peer abuse and violence).

1.3 Identifying Child Abuse

All team members and apprentices 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.

The following definitions have been updated in line with Keeping Children Safe in Education (2016)

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children

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

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

Sexual abuse:

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

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.

1.4 Abuse by children and young people

Peer abuse

Children are also vulnerable to physical, sexual and emotional bullying and abuse by their peers. Such abuse should always be taken as seriously as abuse perpetrated by an adult. It should be subject to the same safeguarding children procedures as apply in respect of any child who is suffering, or at risk of suffering, significant harm from an adverse source.

Bullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. It can take many forms, but the three main types are:

- physical (e.g. hitting, kicking, theft)
- verbal (e.g. racist or homophobic remarks, threats, name-calling)
- emotional (e.g. isolating an individual from the activities and social acceptance of their peer group).
- Sexual violence; such as rape, assault by penetration and sexual assault
- Sexual harassment; such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse
- Upskirting; which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violence and rituals

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children, to the extent that it affects their health and development or, at the extreme, causes them significant harm (including self-harm).

The company has rigorously enforced anti-bullying strategies in place which can be found later in the document

Racism

Children from British minority ethnic communities (and their parents) may have experienced harassment, racial discrimination, and institutional racism. Although not formally recognized as a form of child abuse, racism can be emotionally harmful to children. Some racist acts also involve acts of physical violence towards individuals or groups. All organisations working with children, including those where British minority ethnic communities are numerically small, should address institutional racism.

Harassment

An essential characteristic of harassment is that it is unwanted by the recipient. It is for individuals to determine what behaviour is acceptable to him or her and what they regard as offensive.

Children may experience harassment or negative discrimination because of their race or ethnic origin, socio-economic status, culture, age, disability, gender, sexuality or religious beliefs. This can have a detrimental effect on a child.

Mental Health

Mental health is defined as the emotional and spiritual resilience which allows us to enjoy life and survive pain, disappointment, and sadness. It is a positive sense of well-being and an underlying belief in our own, the others, dignity and worth.

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Team members, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic, adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If team members have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead.

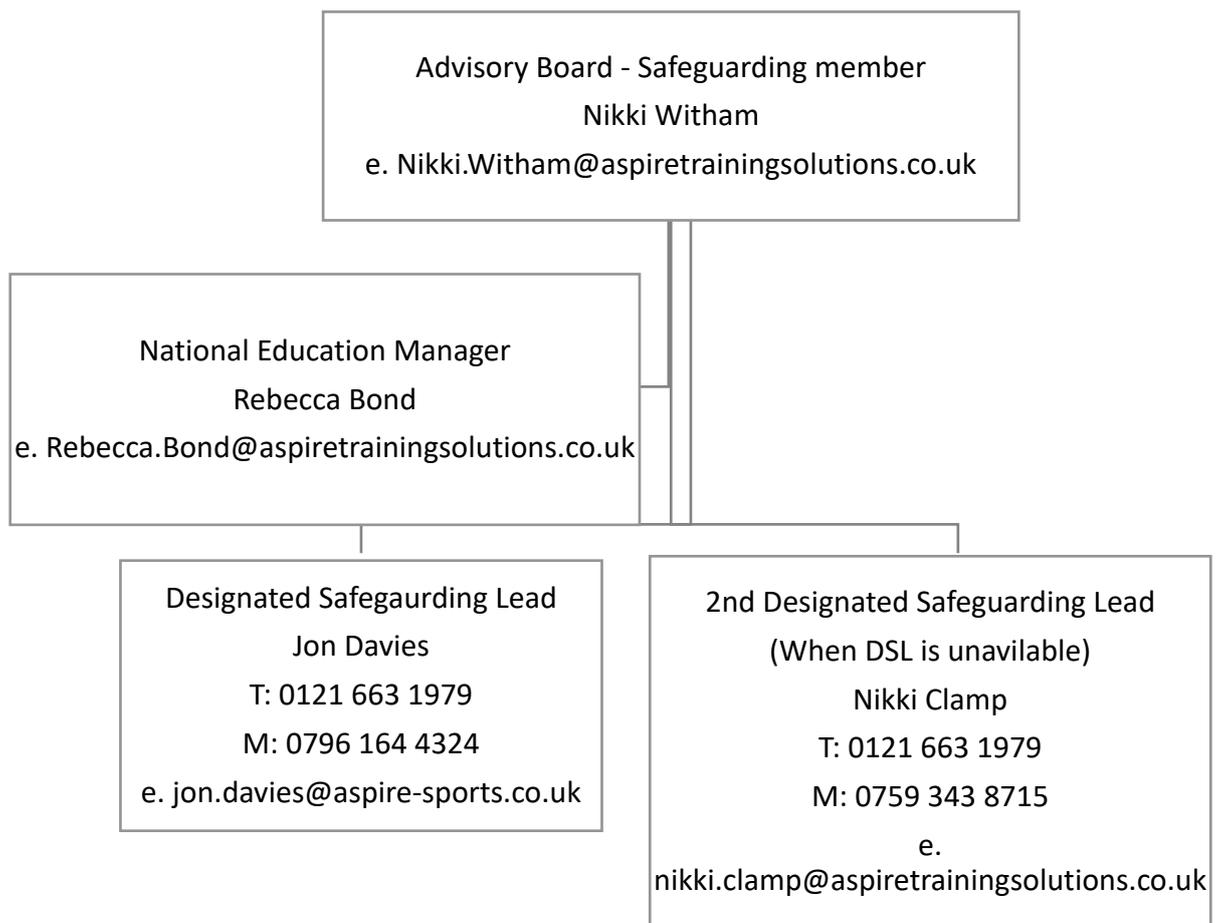
Further information on Mental Health can be found in the groups policy (OPs.MentalHealthPolicy.VER.March'21).

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for schools and colleges can be found on the TES, MindEd and the NSPCC websites. School and college staff can access government guidance as required on the issues listed below via GOV.UK and other government websites:

- [bullying including cyberbullying](#)
- [children missing education](#)
- [child missing from home or care](#)
- [child sexual exploitation \(CSE\)](#)
- [domestic violence](#)
- [drugs](#)
- [fabricated or induced illness](#)
- [faith abuse](#)
- [female genital mutilation \(FGM\)](#)
- [forced marriage](#)
- [gangs and youth violence](#)
- [gender-based violence/violence against women and girls \(VAWG\)](#)
- [hate](#)
- [mental health](#)
- [missing children and adults](#)

- [private fostering](#)
- [preventing radicalisation](#)
- [relationship abuse](#)
- [sexting](#)
- [trafficking](#)

1.5 Designated roles and responsibilities



Roles

The role of the designated person includes:

- Delivering safeguarding training to all team members and apprentices
- Referring cases
- Referring cases to the Disclosure and Barring Service as required
- Referring cases where a crime may have been committed to the police as required
- Supporting staff and apprentices as required
- Understanding and supporting staff and apprentices in regard to the requirement of the PREVENT duty to protect children from the risk of radicalisation
- Obtaining access to resources and attending any relevant training or refresher courses

- Encouraging a climate of listening to children and taking account of their wishes and feelings, among all staff, in any measures that may be put in place to protect them
- Raising awareness of safeguarding policy and process
- Ensuring annual safeguarding policy review
- Ensuring policy is publicly available upon request
- Maintaining links between Aspire Sports Ltd and LSCB to implement latest policies on safeguarding
- Availability of the designated lead (note that availability should be defined in the interests of exceptional circumstances or outside of reasonable working hours; arrangements should also be implemented in the event of such a case).

Responsibilities

The designated person is responsible for:

- Acting as a source of advice on child protection matters
- Co-ordinating action within the company
- Liaising with health, children's services and other agencies about suspected or actual cases of child abuse
- Implementing child protection training within the company.

Responsibilities of ALL staff and apprentices

- Attend safeguarding team training
- adhere to internal and local safeguarding and child protection policy
- to recognise, respond to and report safeguarding concerns to the designated person
- commitment to upholding a climate where children are listened to, believed and their feelings and wishes accounted for in any actions that may be taken

1.6 Responding to Concerns

It takes considerable courage for a child or vulnerable adult to disclose abuse. Disclosures need to be handled very carefully and sensitively to avoid causing further distress to the child/vulnerable adult.

All concerns must be responded to in a way that ensures that a child/vulnerable adult receives appropriate help and support and to ensure that appropriate action is taken against those who pose a risk to children/vulnerable adult and to protect not only the child/vulnerable adult involved but also all other children/vulnerable adult.

Robust procedures for responding to concerns will:

- help to avoid those receiving information from engaging in judgments
- reassure those who report concerns that an appropriate course of action will ensue
- support those charged with managing concerns by providing them with a step-by-step process to follow
- safeguard the rights of those against whom complaints or allegations have been made.

Confidentiality

Information provided to organisations should remain confidential unless permission has been given to share the information by the individual concerned or the safety of that person or another person may be at risk.

If there is a reasonable concern that a child may be at risk of significant harm, this will always override a professional or organisational requirement to keep information confidential. It is good practice to inform parents, children and vulnerable adults about the kind of situations which may lead to them having to share information with other agencies.

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children

Procedures for dealing with a concern about a child/Vulnerable Adult

The Aspire Active Education Group are committed to working in partnership with parents/guardians whenever there are concerns about a child. Parents/Guardians have the primary responsibility for the safety and wellbeing of their children.

In most situations, not involving the possibility of the abuse of a child/vulnerable adult, concerns should be discussed with parents. For example, if a child seems withdrawn, he/she may have experienced an upset in the family, such as a parental separation, divorce or bereavement. Common sense is advised in these situations.

Any significant, untoward or unusual incidents that cause concern about the welfare of a child/vulnerable adult should be dealt with immediately (**Refer to flowchart 3 & HR.ConcernAboutTeamMemberConduct.VER.1.2**)

Advice should be sought from Lead Officers if there is any uncertainty about the appropriate course of action where there are concerns about the general welfare of a child.

What to Do if a Child Tells You about Abuse

No member of The Aspire Active Education Group shall investigate allegations of abuse or decide whether or not a child/vulnerable adult has been abused.

Allegations of abuse must always be taken seriously. False allegations are very rare. If a child/vulnerable adult says or indicates they are being abused or information is obtained which gives concern that a child/vulnerable adult is being abused, the information must be responded to on the same day in line with the following procedure.

Respond:

- React calmly so as not to frighten the child/vulnerable adult.
- Listen to the child/vulnerable adult and take what they say seriously. Do not show disbelief.
- Reassure the child/vulnerable adult they are not to blame and were right to tell someone.
- Be aware of interpreting what a child/vulnerable adult says, especially if they have learning or physical disabilities which affect their ability to communicate or English is not their first language.
- Do not assume that the experience was bad or painful
- Avoid projecting your own reactions onto the child/vulnerable adult.
- Avoid asking any questions. If necessary only ask enough questions to gain basic information to establish the *possibility* that abuse may have occurred.
- Only use open ended, non-leading questions e.g. Who? Where? When?
- Do not introduce personal information from either your own experiences or those of others.

Avoid:

- Panicking.
- Showing shock or distaste.
- Probing for more information than is offered.
- Speculating or making assumptions.
- Making negative comments about the person against whom the allegation has been made.
- Approaching the individual against whom the allegation has been made.

- Making promises or agreeing to keep secrets and giving a guarantee of confidentiality.

If the Designated Lead Office is unavailable or an immediate response is required the school Child Protection Officer must be consulted. If none of these people are available then the Local Safeguarding Boards(LASB) must be consulted for advice. They have a statutory responsibility for the protection of children/vulnerable adults and they may already hold other concerning information about the child. Record any advice given.

If you are concerned about the *immediate* safety of the child:

Take whatever action is required to ensure the child's immediate safety.
Pass the information immediately to the police and seek their advice.

Record:

Make a written record of the information as soon as possible using the Concerns About a Child/Vulnerable Adult Form (**template 1.0**), completing as much of the form as possible. The information will help the LASB decide what action to take next.

If completing the form electronically, do not save copies to the hard drive or floppy disk. Print a copy, sign and date and then delete immediately. Pass the record to the Designated Lead Officer and school Child Protection Officer where necessary who will then pass details on to social work services and police.

Sharing Concerns

Where there are concerns that the parent(s) may be responsible for or have knowledge of the abuse, sharing concerns with the parent(s) may place the child at further risk.

In such cases advice must always firstly be sought from the Designated Lead Officer or school Child Protection Officer or LASB as to who informs the parents.

16-18-year-old Apprentices/Trainee's/Volunteers (16-25-year-old vulnerable adults)

Any significant, untoward or unusual incidents that cause concern about the welfare of a 16-18-year-old should be dealt with immediately (**Refer to flowchart 2 & HR.SafeguardingTemplate.VER.1.1**).

All alleged incidents/disclosures should be dealt with following the same procedure as in 1.6 and reported to one of the Aspire Designated Safeguarding Leads rather than Line Managers

1.7 Recruitment

The Aspire Active Education Group Ltd will take all reasonable steps to ensure unsuitable people are prevented from working, or volunteering, with children/vulnerable adults. Further, we have a legal duty to ensure that individuals who have committed a criminal offence against children are not engaged (either paid or unpaid) in positions within The Aspire Active Education Group.

This recruitment and selection procedure has two functions. It:

1. Provides the Aspire Active Education Group with an opportunity to assess the suitability of the individual to work/volunteer with children.
2. Provides the prospective employee or volunteer with an opportunity to assess the organisation and the opportunities available.

The following procedures will be completed for all positions within the organisation.

a. Advertising

All forms of advertising used to recruit and select staff/volunteers for all positions will include the following:

- The aims of The Aspire Active Education Group and, where appropriate, details of the particular programme involved.
- The responsibilities of the role.
- The level of experience or qualifications required (e.g. experience of working with children is an advantage).
- Details of the Aspire Active Education Group open and positive stance on safeguarding
- A statement that the position applied for entails working with children and requires Disclosure and Barring Service (DBS) checks which will be requested before the appointment is confirmed and after the applicant has been offered the position.
- A safeguarding statement will also be added to all job adverts to make all applicants aware of the Aspire Active Education Group approach to safeguarding

b. Application and Self-Declaration Form

All applicants will be requested to complete an application, childcare disqualification form and self-declaration form. Self-declaration forms will not be checked until it comes to shortlisting. These should be returned by any application via post or email titled: PRIVATE AND CONFIDENTIAL; SELF-DECLARATION FORM. The purpose of this is to obtain relevant details for the position, including information on past criminal behaviour, records or investigations.

c. References

A minimum of two references will always be requested and thoroughly checked using the company reference form. One of these references must be from the most recent employer. References from relatives will not be accepted. Reference checks will be completed prior to interview phase

d. Interview

Interviews will be carried out for all positions. The process will consist of an interview with a panel and where possible an observation of a work-based task.

e. Offer of Position

Once a decision has been made to appoint, an offer letter will be sent to the applicant including the details of the position, any special requirements and the obligations e.g. agreement to the policies and procedures of the Aspire Active Education Group, the probationary period and responsibilities of the role. The offer must be formally accepted and employment agreement signed and dated by the applicant. A volunteer agreement will be completed for voluntary positions.

f. Disclosure and Barring Service (DBS) checks

The Aspire Active Education Group are registered with the Disclosure and Barring Service (DBS). Prior to appointment all individuals are required to complete and submit a Disclosure and Barring Service (DBS).

The applicant's appointment will only be confirmed when a satisfactory DBS check has been returned to the Aspire Active Education Group and satisfactory references have been received and checked.

g. Overseas Applicants

Applicants from overseas will not be able to obtain a DBS due to having not lived in the UK, (they will have had to have lived in the UK for more than 3 months).

Applicants from overseas will also be requested to provide a police check from their relevant country where possible. Such checks must cover working or living abroad in one place for more than 6 months. Example1- person leaving university and travels around America for 12 months and spends a month at a time in each place – no check required. Example 2 – person lives in Spain for 7 months and

then returns to the UK then goes to France for 6 months, that person would need to get an overseas check that covers both counties

h. Induction

All new team members and learners will receive a full company induction with the first two weeks of their employment in line with the company induction procedure. This includes training on Safeguarding of Children and Vulnerable Adults Policy, Safeguarding, how to stay safe and PREVENT

All team members are required during induction to read Part 1 and Annex A from Keeping Children Safe in Education (2020) and records kept to evidence this

i. Probation

Newly appointed team members and volunteers will complete an agreed period of probation on commencement of their role which will be a minimum of six months.

j. Monitoring and Performance Appraisal

All team members and volunteers will be monitored and their performance appraised. This will provide an opportunity to evaluate progress, set new goals and identify training needs.

k. Retention of team members and volunteers

The Aspire Active Education Group recognises the contribution of all team members and volunteers to achieving the aims of the company and our People Strategy is in place to support the retention and development of our team and volunteers.

l. Volunteers

A risk assessment will be undertaken regarding the role of volunteers when working with children and young people. Under no circumstances should a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

Section 2: Policy to Support the Prevention of Extremism and Radicalisation (PREVENT)

Any team member, apprentice or learner associated with the Aspire Active Education Group who have any concerns regarding the issues identified within this guidance policy should report those concerns immediately and no later than the end of the working day to the Designated Safeguarding Leads or the Lead Person for Child Protection within the setting.

- Designated Senior Person for Safeguarding – Jon Davies, Rebecca Bond, Andrew Stanton, Nikki Clamp or Matthew Whittington
- Setting Lead Person for Child Protection – Information available in red folders

1. Introduction

The current threat from Terrorism and Extremism in the United Kingdom is severe and can involve the exploitation of vulnerable people, including children and young people. This policy is designed to provide a clear framework to structure and inform our response to safeguarding concerns for those young people who may be vulnerable to the messages of extremism. In addition, it provides details of the local inter agency process and expectations in identifying appropriate interventions based on the threshold of need and intervention model and the Channel process (see below).

Terrorism is defined as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes with or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing political, religious or ideological cause (Section 1 of the Terrorism Act 2000).

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. (Revised Prevent Duty Guidance for England and Wales, issued on 12th March 2015 and revised on 16th July 2015, definition)

Extremism is defined by the UK Government as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Extremism also includes calls for death of members of the armed forces. (Revised Prevent Duty Guidance for England and Wales (originally issued on 12th March 2015 and revised on 16th July 2015, paragraph 7)

2. Equality, Diversity and Community Cohesion

The Aspire Active Education Group aims to guide our team and our learners to understand others, to promote common values and to value diversity, to promote awareness of human rights and of the responsibility to uphold and defend them, and to develop the skills of participation and responsible action. We take extremely seriously our key role in preparing all our young people for life in modern Britain. We aim to encourage working towards a society in with a common vision and sense of belonging by all. Communities; a society in which the diversity of people's backgrounds and circumstances is appreciated and valued; a society in which similar life opportunities are available to all; and a society in which strong and positive relationships exist and continue to be developed in the workplace, in schools and in the wider community.

3. National Guidance and Strategies

PREVENT is a key part of the Government's strategy to stop people becoming involved with or supporting terrorism. Early intervention is at the heart of PREVENT in diverting people away from being drawn into terrorist activity. PREVENT happens before any criminal activity takes place. It is about recognising, supporting and protecting people who might be susceptible to radicalisation. The PREVENT strategy objectives are:

Ideology: respond to the ideological challenge of terrorism and the threat we face from those who promote it.

Individuals: prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support

Institutions: work with sectors and institutions where there are risks of radicalisation which we need to address.

All Aspire Active Education Group team members and apprentices should have an awareness of the PREVENT agenda and the various forms of radicalisation takes in being able to recognise signs and indicators or concern and respond appropriately. All delivery team members are required to complete the Education and Training Foundation 'Prevent for Practitioners' and all Managers 'Prevent for Leaders and Managers' online training (<https://www.foundationonline.org.uk/course/index.php?categoryid=14>) on an annual basis.

4. Vulnerability/Risk Indicators

The following lists are not exhaustive and all or none may be present in individual cases of concern. Nor does it mean that vulnerable young people experiencing these factors are automatically at risk of exploitation for the purposes of extremism. The accepted view is that a complex relationship between the various aspects of an individual's identity determines their vulnerability to extremism.

There is no such thing as a 'typical extremist' and those involved in extremism come from a range of backgrounds and experiences. The following indicators may help to identify factors that suggest a young person, or their family may be vulnerable or involved with extremism:

Vulnerability

- **Identity crisis:** Distance from cultural/religious heritage and uncomfortable with their place in the society around them.

- **Personal crisis:** Family tensions; sense of isolation; adolescence; low self-esteem; disassociating from existing friendship group and becoming involved with a new and different group of friends; searching for answers to questions about identity, faith and belonging.
- **Personal circumstances:** Migration; local community tensions; events affecting country or region of origin; alienation from UK values; having a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy.
- **Unmet aspirations:** Perceptions of injustice; feeling of failure; rejection of civic life.
- **Criminality:** Experiences of imprisonment; poor resettlement/reintegration, previous involvement with criminal groups.

Access to extremist influences

- Reason to believe that the young person associates with those known to be involved in extremism
- Possession or distribution of extremist literature/other media material likely to incite racial/religious hatred or acts of violence
- Use of closed network groups via electronic media for the purpose of extremist activity

Experiences, behaviours and influences

- Experience of peer, social, family or faith group rejection
- International events in areas of conflict and civil unrest had a personal impact on the young person resulting in a noticeable change in behaviour
- Verbal or written support of terrorist attacks
- First-hand experience of racial or religious hate crime
- Extended periods of travel to international locations known to be associated with extremism
- Evidence of fraudulent identity/use of documents to support this
- Experience of disadvantage, discrimination or social exclusion
- History of criminal activity
- Pending a decision on their immigration/national status

More critical risk factors include:

- Being in contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites, especially those with a social networking element
- Possessing extremist literature
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Significant changes to appearance/behaviour

5. Referral and Intervention Process

Any identified concerns as the result of observed behaviour or reports of conversations to suggest that the young person supports terrorism and/or extremism, must be reported to the named designated safeguarding professional immediately and no later than the end of the working day.

Safeguarding Lead Officers:

The company SLOs are:

- Jon Davies – Operations Manager
- Rebecca Bond – National Education Manager
- Andrew Stanton – Programmes Manager
- Matthew Whittington – Senior Educator

Where a young person is thought to be in need/or at risk of significant harm, and/or where investigations need to be carried out (even though parental consent may be withheld), a referral to Local Safeguarding Boards should be made in line with the company Safeguarding Children and Vulnerable Adults Policy. However, it should be recognised that concerns of this nature, in relation to violent extremism, are most likely to require a police investigation (as part of the Channel process). As

part of the referral process, the designated professional will also raise an electronic referral to prevent@west-midlands.police.uk

Channel referral process

Some concerns which are identified may have a security dimension to them. For this reason, it is important that liaison with the police forms an early part of all investigations. West Midlands Police will carry out an initial assessment and, if appropriate, set up a multiagency meeting to agree actions for supporting the individual. If it is deemed that there are no concerns around radicalisation, appropriate and targeted support will be considered for the young person.

Section 3: Code of Conduct

3.1 Team code of conduct for the protection of children and vulnerable adults

A Code of Conduct has many important functions. It:

- sets out expectations of behaviour that compliment current procedure, protocol and guidance relating to specific roles and practices
- defines standards of practice expected from those to whom it applies
- forms the basis for challenging and improving practice
- helps to safeguard staff by encouraging them to adhere to agreed standards of practice
- sets out safer working practices for those working with children and vulnerable adults which they and the organisation should expect from those who work/volunteer with children

Underpinning Principles

- The welfare of children and vulnerable adults is paramount.
- It is the responsibility of **EVERYBODY** to safeguard and promote the welfare of children and vulnerable adults. This responsibility extends to a duty of care for those employed, commissioned or contracted to work with children and vulnerable adults.
- Adults who work with children and vulnerable adults are responsible for their own actions and behaviour and should avoid any conduct which would lead others to question their motivation and intentions.

- Adults should work and be seen to work, in an open and transparent way that is in the best interests of all children and vulnerable adults.
- The same professional standards should always be applied regardless of age, disability, gender, language, racial origin, religion or belief, sex or sexual orientation
- Adults should continually monitor and review their practice and ensure they follow the guidance contained in this document.

The Aspire Active Education Group supports and requires **all** team members to observe the following standards of practice, including verbal and non-verbal actions when involved in activities with children and vulnerable adults.

All concerns about breach of this Code of Conduct will be taken seriously and responded to in line with the Aspire Active Education Group Complaints Policy, Disciplinary Procedure and/or Procedure for Responding to Concerns about Child Abuse.

Expectations

Statement	Issues	Actions
To maintain and portray an excellent quality and safe service.	<ul style="list-style-type: none"> • ASPIRE expects its staff to conform to certain professional standards to ensure all sessions are carried out in an enjoyable, controlled and safe environment. • To maintain and portray a high quality service, Aspire staff are expected to adhere to the code of conduct and expectations sheet. 	<ul style="list-style-type: none"> • Wear uniform supplied by the Aspire Active Education Group • To arrive at least 15 minutes prior to the start of the session. • Adhere to the policies of Aspire Active Education Group • Adhere to any policies submitted by the setting you are working in. • Communicate effectively and show integrity with management, employers and customers. • Adapt and adhere to fit in with the settings ethos and help the customer in any way possible. • Have an understanding of the aims and objectives of the programme you are delivering.

Responsibilities: Professional standards –

Statement	Issues	Actions
To maximise benefits and minimise the risks to participants, the educators must attain a high level of competence. Ensure safe and correct practice.	<ul style="list-style-type: none"> • Provide a safe environment that maximises benefits and minimises risks to participants. • Promote the execution of safe and correct practice. • Be professional and accept responsibility for their actions. 	<ul style="list-style-type: none"> • Follow the guidelines, policies and procedures set out by The Aspire Active Education Group • Only allow participation if there is no risk to the participants • Plan all sessions so they adhere to guidelines set out by the governing body/awarding organisation, that they are progressive and meet the needs of the participants.

	<ul style="list-style-type: none"> • Make a commitment to providing a quality service. • Contribute to the development of Aspire by exchanging knowledge and ideas. 	<ul style="list-style-type: none"> • Maintain up-to-date knowledge and understanding of other issues that might impact on both you and your participants, • Engage in self-analysis and reflection to identify their professional needs. • Seek professional development • Manage their lifestyle and commitments to avoid burnout that might impair their performance.
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Responsibilities: Personal standards

Statement	Issues	Actions
To demonstrate proper personal behaviour and conduct always	<ul style="list-style-type: none"> • Must be fair, honest and considerate to participants and associates. • Should commit to project an image of health, cleanliness and functional efficiency. • Must be positive role models for participants always. 	<ul style="list-style-type: none"> • Maintain a level of interest when performing all duties • Maintain the same level of commitment when a pupil/child/learner is not taking part in the lesson • Display high standards in use of language, manner, punctuality, preparation and presentation. • Discriminatory, offensive and violent behaviour are unacceptable • Must not smoke; consume alcohol or recreational drugs during a session. The use of alcohol or recreational drugs before a session is prohibited. • Must should not chew gum while coaching • Ensure mobile phones are turned off during the session and not used on any occasion where children are present

Relationships

Statement	Issues	Actions
Aspire staff must develop relationships with participants and associates based on openness, honesty, mutual trust and respect.	<ul style="list-style-type: none"> • Must not engage in behaviour that constitutes any form of abuse (physical, sexual, emotional, neglect, bullying) • Must not engage in behaviour that could be misinterpreted or open to 	<ul style="list-style-type: none"> • Be aware of the physical needs of pupils, especially those still growing, and ensure that training loads are appropriate • Ensure that children/young people are unable to link or view personal social media sites. • Ensure physical contact is appropriate and necessary and

	<p>allegations of abuse (Social media, physical contact)</p> <ul style="list-style-type: none"> • Should promote the welfare and best interests of their participants. • Should empower participants to be responsible for their own decisions. • Should communicate and cooperate with employees and schools in the best interests of the participants. 	<p>is carried out within recommended guidelines with the child/young person's full consent and approval.</p> <ul style="list-style-type: none"> • Be responsible and treat children and company employees with dignity, respect, sensitivity and fairness • Encourage children and young people to take responsibility for their own actions • Allow participants to discuss and participate in the decision-making process • Adhere to child protection policy and guidelines. • Avoid doing things of a personal nature for children/young people that they can do for themselves. • Avoid spending excessive amounts of time alone with children/young people away from others.
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Rights

Statement	Issues	Actions
Aspire Staff must respect and champion the rights of every individual to participate.	<ul style="list-style-type: none"> • Create an environment where every individual has the opportunity to participate • Recognise the rights of all participants to be treated as individuals • Create and maintain an environment free of fear and harassment 	<ul style="list-style-type: none"> • Treat all individuals with respect • Avoid discrimination • Challenge any form of discrimination • Refrain from criticising others publicly or engage in demeaning descriptions of others • Communicate with and provide feedback that reflects respect and care. • Avoid having 'favourites' – this could lead to resentment and jealousy by other children/young people and could be misinterpreted by others.

3.2 First Aid and the treatment of injuries

All team members/volunteers must ensure:

- They are aware of who the Designated First Aid person is at the setting/ venue they are working at.
- There is an accessible and well-resourced first aid kit at the venue.
- They are aware of any pre-existing medical conditions, medicines being taken by participants or existing injuries and treatment required.

- Only the Designated First Aid Person at the venue with a current, recognised First Aid qualification should treat injuries. In more serious cases staff/ volunteers should use common sense to administer first aid, where they are qualified to do so.
- An Accident/ Incident form is completed if a child or vulnerable adult sustains an injury along with the details of any treatment given.
- An incident form is completed if a child or vulnerable adult has a 'near miss' incident.
- The Designated First Aid Person is informed of any injury and action taken as soon as possible.
- The person in charge of a venue, is informed immediately of any injury. Where appropriate the Designated Safeguarding Lead is also informed.
- The circumstances in which any accidents occur are reviewed to avoid future repetitions.

3.3 Emergency / Fire Procedures

All venues and settings:

All team members must be aware of the emergency/ fire procedures at the venue/ setting they are working at. It is the responsibility of the member of staff to have access to all relevant documents.

3.4 Risk Assessments

Every team member has a duty of care to ensure that risks to children, vulnerable adults, their parents, and fellow team members are minimised. If a team member identifies a risk, it is their responsibility to inform the person in charge of a venue or setting.

3.5 Mobile phones and technology

- Mobile phones are not permitted in the presence of children or vulnerable adults.
- Mobile phones can be used in an emergency in the privacy of an office where there are no children or vulnerable adults present, with the permission of a manager.
- It is reasonable to request parents do not use their mobile phones whilst inside the premises,
- Visitors to the setting are not to use their mobile phones whilst on the premises, in the presence of children and vulnerable adults
- Whilst working in different areas team members are requested to take their own mobile phones for an emergency use, no one should ever use their phone to make or receive social calls, they must not use their own phone to take photographs of children.

3.6 Photography and video

The Aspire Active Education Group are keen to promote positive images of children/vulnerable participating in physical activity and education and is not preventing the use of photographic or videoing equipment.

There may be reasons why individuals may not wish their child's photograph to be taken by someone they do not know personally, for example estranged parents looking to gain access to a child.

The guiding principles are:

- Parent consent must be granted. (For Aspire Active Camps this can be obtained from information required on the Active camps booking forms and/or asking parents to complete the 'photography consent form')
- A consent form from each parent will be required when using images at an Educational setting. The setting will also need to be notified in writing of the intentions to use digital equipment, and where the images are to be published.
- If no consent has been given the person using the digital equipment will need to be aware of the individual, to avoid taking images of that particular child/vulnerable adult
- The children/vulnerable adults need to be informed a person will be taking photographs

- The children/ vulnerable adults should be informed that if they have any concerns, they can report these to any Aspire team member.
- Concerns regarding inappropriate, or intrusive photography should be reported to the Designated person and recorded in the same manner as any other child protection concern.

3.7 Using photography and video's as a coaching aid.

To improve the quality of learning in an Educational setting, The Aspire Active Education Group promotes the use of photography and/ or video's as a teaching aid.

Where possible permission should be granted and the equipment used should belong to the educational setting in which they are to be used. Any material taken in connection with this will need to be stored safely at the setting. When this material is no longer required all evidence should be deleted immediately.

If no consent has been given for a child/vulnerable adult to be included in the photo or video they are still to participate in the lesson but not in used for images.

3.8 Social media

No person within the organisation should ever use a social networking site (whether on or off your organisations premises) to refer in any way to the organisation, the team, parents, visitors or children/vulnerable adults.

Team members are reminded of their professional boundaries and should avoid having children, vulnerable adults, learners and parents as friends on social networking sites.

3.9 E-Safety

Aspire recognises the benefits and opportunities which new technologies offer to teaching and learning. We provide internet access to all learners and staff and encourage the use of technologies in order to enhance skills, promote achievement and enable lifelong learning. However, the accessibility and global nature of the internet and different technologies available mean that we are also aware of potential risks and challenges associated with such use. Our approach is to implement appropriate safeguards within the company while supporting staff and learners to identify and manage risks independently and with confidence. We believe this can be achieved through a combination of security measures, training, guidance and implementation of our policies.

We reinforce these e-safety rules:

S encourages young people to be **safe** by not giving out their personal details online

M draws attention to the risks associated with **meeting** someone you only know online

A highlight the risks of **accepting** emails, pictures and text messages from unknown sources

R is a reminder that not all information found online is necessarily **reliable**

T encourages learners to **tell** someone if something happens or they meet someone online that makes them feel uncomfortable

3.10 Anti Bullying

Bullying may be seen as particularly hurtful behaviour usually repeated over a period of time, where it is difficult for those bullied to defend themselves. Bullying can take many forms including:

- Physical e.g. hitting, kicking, theft
- Verbal (including teasing) e.g. racist remarks, spreading rumours, threats or name calling
- Emotional e.g. isolating a child from the activities or social acceptance of the peer group

- Harassment e.g. using abusive or insulting behaviour in a manner intended to cause alarm or distress.
- Children may be bullied by adults, their peers and in some cases by their families.

Action to Help the Victim(s) and Prevent Bullying:

- Take all signs of bullying very seriously
- Create an open environment and encourage all children to speak and share their concerns
- Help the victim(s) to speak out and tell the person in charge or someone in authority
- Take all allegations seriously and act to ensure the victim(s) is safe
- Speak with the victim and the bully(ies) separately.
- Reassure the victim(s) that you can be trusted and will help them, although you cannot promise to tell no one else.
- Keep records of what is said i.e. what happened, by whom and when.
- Report any concerns to the Designated Safeguarding Lead of the setting where the bullying is occurring.

Action towards the Bully(ies):

- Talk with the bully(ies), explain the situation and try to get the bully(ies) to understand the consequences of their behaviour.
- Seek an apology from the bully to the victim(s).
- Inform the bully's parents/guardians (if at Active Camp).
- If appropriate, insist on the return of 'borrowed' items and that the bully(ies) compensates the victim.
- Impose sanctions as necessary.
- Encourage and support the bully(ies) to change behaviour
- Keep a written record of action taken.

3.11 Guidelines for the retention and storage of records

The Data Protection Act 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children

Aspire Active Education Group will promote good practice in the storage of all records, including:

- Information about concerns, allegations, and referrals being kept in separate files.
- Compiling and labelling files carefully.
- Files containing sensitive and confidential data being locked away and access to the keys being strictly controlled.
- Keeping a key log so that it is possible to see who has accessed the cabinet, when, and the titles of the files they have used.
- Access to records being limited to Company Directors and people in named roles who either need to know about the information in those records and/or who manage the records/files.
- If files are to be stored long term, then making arrangements need to be made for the keys to be passed from outgoing staff to their successors.

Type of Record	Retention
Child welfare concerns that Aspire refers on to children's social care or the police. For example, this would include concerns about physical, sexual, emotional or neglect of a child or	The referral will be acknowledged in writing by children's social care and Aspire keeps this on file.

<p>vulnerable adult, disclosures from a child or vulnerable adult about being abused or information from a third party which might suggest a child is being abused; concerns about a parent or another adult that uses your organisation, or a young person who has been abused by another young person.</p>	<p>Records and incident forms will be kept for 6 years after the last contact with the service user unless any of the exemptions apply (listed above) or if Aspire is required to comply with any other statutory requirements.</p>
<p>Child welfare concerns that Aspire decide, after consultation, do not necessitate a referral to children's social care or the police. In such circumstances, the organisation should make a record of the concern and the outcome. For example, where a child or vulnerable adult has been bullied, overly pushy parents or a very distressed child/vulnerable adult where the distress is unrelated to child abuse.</p>	<p>The incident forms and records will be destroyed a year after the child/adult concerned ceases to use the service unless the child or adult are continuing to use Aspire services.</p>
<p>Concerns about employees (paid and voluntary) who work with children and vulnerable adults, for example, allegations, convictions, disciplinary action, and inappropriate behaviour towards children and vulnerable adults. For example, where an employee has breached the code of conduct, a record of the behaviour, the action taken and outcome should be recorded.</p>	<p>Personnel files, incident forms and training records (including disciplinary records and working time records) - retained for 6 years after employment ceases. However, the records will be retained for a longer period if any of the following apply:</p> <ul style="list-style-type: none"> • There were concerns about the behaviour of the adult who was working with children/vulnerable adults where s/he behaved in a way that has harmed, or may have harmed, a child/Vulnerable adult; • The adult possibly committed a criminal offence against, or related to, a child/vulnerable adult; • The adult behaved towards a child/vulnerable adult in a way that indicates s/he is unsuitable to work with children/vulnerable adults <p>In such circumstances records will be retained at least until the adult reaches normal retirement age, or for 10 years if that is longer.</p>
<p>Criminal Records Bureau disclosure certificates and self-declaration forms are obtained as part of the screening process.</p>	<p>The disclosure certificate and self-declaration form will be destroyed after 6 months. However, Aspire will keep a record of the date of the check, the reference number, the decision about screening and the outcome.</p>

Destruction of records

Records will be shredded in the presence of a member of the organisation. This action will be taken at the same time as the electronic record is eliminated. If not shredded immediately, all confidential records will be held in a secured plastic bag, labelled as confidential and locked in a secure cabinet.

Section 4: Whistle Blowing Policy

We encourage an open culture in all our dealings with employees, managers and all the people with whom we come into contact. Effective and honest communication is essential if malpractice is to be effectively dealt with. The procedure below provides guidelines to all our employees, casual, temporary agency staff, freelancers, trainees, apprentices, home workers and contractors, who feel they need to raise certain issues, in confidence.

The Public Interest Disclosure Act 1998 (commonly known as the 'Whistle Blowing Act') protects workers who raise legitimate concerns about specified matters from being dismissed by the Company or being subjected to detrimental treatment or victimised by either the Company or colleagues as a result, provided certain criteria are met. Certain kinds of disclosures qualify for protection and these are set out below. These are disclosures of information which a worker reasonably believes are made in the public interest and tend to show one or more of the following relevant failures is either happening now, took place in the past, or is likely to happen in the future.

- A criminal offence has been committed including offences such as theft, fraud or acts of bribery;
- A person has failed, is failing, or is likely to fail to comply with a legal obligation which they are subject to;
- A miscarriage of justice;
- A danger to health and safety of any individual;
- Damage to the environment;
- Deliberate covering up of information tending to show any of the above five matters.

The procedure is not a substitute for the Disciplinary and Grievance policy and is not a channel for employees to raise matters in relation to their terms and conditions of employment. The procedure allows individuals to have their concerns treated in confidence.

Your protection:

If you raise a genuine concern, you will not be at risk of damaging your position as a result. Provided you are acting in the public interest, it does not matter whether or not your concern proves to be well founded. You must however make your complaint to the right person and in the right way as detailed in this policy. The Company does not of course extend this assurance to someone who acts from an improper motive and raises a matter they know to be untrue.

Your confidence

The Company will not tolerate the victimisation of anyone raising a genuine concern and anyone responsible for such conduct will be subject to disciplinary action. You may decide that you want to raise a concern in confidence. Therefore, if you ask for your identity to be protected, it will not be disclosed without your consent. If a situation arises where it is not possible to deal with the concern without revealing your identity (for instance because your evidence is needed in court or a disciplinary hearing), there will be a discussion as to whether and how we can proceed. This policy does not cover the situation where information about malpractice is received anonymously; however, discretion will be used in the investigation of such information.

How to raise your concern

Stage 1: Internal Line Management/Tutor

If you have a concern about malpractice, we hope you will feel able to raise it first with your line manager or a more senior manager. This should be done in writing. It will help if you state the facts of the matter clearly. You can outline how you would like it to be investigated. If you have a direct or personal interest in the matter, you should also tell us at this stage.

Stage 2: Alternative Contacts

If you feel unable to raise the matter with someone in your line management or your Tutor, for whatever reason, please speak to a Designated Safeguarding Lead.

Once you have reported your concern, the Company will look into it to assess initially what action should be taken. If your concern falls more appropriately within other policies, we will tell you. A manager will be asked to carry out the investigation.

The disclosure will be treated seriously and promptly investigated and as part of the process the worker will be interviewed and asked to provide a written statement.

Once the Company has finalised the investigation any necessary action will be taken.

While the purpose of this policy is to enable us to investigate possible malpractice and take appropriate steps to deal with it, we will give you as much feedback as we properly can. If requested, we will confirm our response to you in writing. Please note, however, that we may not be able to tell you the precise action we take where this would infringe a duty of confidentiality owed by us to someone else.

If you are dissatisfied

If you are unhappy with the Company's response, the worker may then go to the proper authority. However, we do ask that matters are reported to the Company in the first instance. While we cannot guarantee that we will respond to all matters in the way that you might wish, the matter will be handled fairly and properly. By using this policy, you will help us to achieve this.

Malicious Claims

We encourage you to use the procedure if you are concerned about any wrong doing at work. However, if the procedure has not been invoked in good faith (e.g. for malicious reasons or in pursuit of a personal grudge), then it will make you liable to immediate termination of engagement or such lesser disciplinary sanction as may be appropriate in the circumstances.

Section 5 – Key Contacts, Documents & Flowcharts

Local Authority	Key Contacts
Birmingham	West Midlands Police: 0845 113 5000 MASH: 0121 303 1888 Birmingham Safeguarding Children's Board: 0121 464 2612 LADO: 0121 675 1669
Worcester	Worcestershire Police: 0300 333 3000 Family Front Door: 01905 822666 (8:30am - 5pm) Emergency Duty Team: 01905 768020 (5pm – 8:30am) MASH: 0121 303 1888 Birmingham Safeguarding Children's Board: 0121 464 2612 LADO: 01905 843311 (Jon Hancock)
Dudley	Dudley Safeguarding 0300 555 2345 Children: 0300 555 0050 Adult: 0300 555 0055
Warwickshire	For all police enquiries please contact the Police Control Room on 101 or 01926 451111. Warwickshire Safeguarding Children Board 01926 410 410
Walsall	West Midlands Police: 0845 113 5000 Walsall Multi Agency Safeguarding Hub 0300 555 2866 option 2 0845 111 2922 (Out of Hours) LADO: 01922 646640
Wolverhampton	West Midlands Police: 0845 113 5000 Wolverhampton Safeguarding <i>Concern about an adult:</i> Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm 01902 551199 For emergencies, out of above hours 01902 552999 <i>Concern about a child</i> Monday to Thursday 8:30am to 5pm, Friday 8:30am to 4:30pm on 01902 555392 Outside of the above hours for emergencies on 01902 552999
Coventry	West Midlands Police: 0845 113 5000 Coventry Safeguarding Children Partnership 024 7697 5477 LADO: 024 7697 5483
Derby	Derbyshire Police: 0345 123 3333 Derby Safeguarding Children Partnership: 01332 642351 LADO: 01332 642376 Derby City Council First Contact Team: 01332 641172
Nottingham	Nottinghamshire Police: 0115 967 0999 Safeguarding Children Partnership 0300 1310 300 LADO: 0115 876 4762
Leicester	West Midlands Police: 0845 113 5000 Nottingham Safeguarding Children Partnership: 0116 454 6520 LADO based in Safeguarding Unit: 0116 454 2440 LADO: 0116 305 4141
Liverpool	Merseyside Police on 0151 709 6010 Liverpool Safeguarding Children Partnership 0151 233 0493 / 0510

	LADO: 0151 233 3700
Manchester	Greater Manchester Police: 0161 872 5050 Manchester Multi Agency Safeguarding Hub 0161 234 5001 LADO: 0161 234 1214
Stockport	Greater Manchester Police: 0161 872 5050 Walsall Multi Agency Manchester Multi Agency Safeguarding Hub 0161 234 5001 LADO: 0161 234 1214
Wiltshire	Wiltshire Police: 0845 113 5000 Wiltshire Multi-Agency Safeguarding Hub (MASH) 0300 456 0108 (08:45am-5pm Mon-Thurs) and (8:45am-4pm) Friday Emergency Duty Service 0300 456 0100 (5pm - 8.45am) LADO 0300 456 0108
London	London Metropolitan Police: 020 7230 1212 London Safeguarding Board Telephone Children's Services 020 7332 3621 (9.00am- 5.00pm, Mon – Fri) Out of hours: 020 8356 2710 LADO 01708 431653
Essex	Essex Police: 01245491491 Essex Children's Safeguarding Board:0333 013 8936 LADO: 03330 139 797



CONCERNS ABOUT A CHILD/VULNERABLE ADULT INCIDENT FORM

This form must be completed as soon as possible after receiving information that causes concern about the welfare or protection of a child/vulnerable adult. The form must be passed to Aspire Active Education Group Designated Safeguarding Leads as soon as possible after completion.

Name of child _____

Age and date of birth _____ Ethnicity _____

Religion _____ First language _____

Disability _____ Any special factors _____

Parent's/carer's name(s) _____

Home address (and phone no. if available). _____

Are you reporting your own concerns or passing on those of somebody else? Give details. _____

Brief description of what has prompted the concerns: include dates, times etc. of any specific incidents. _____

Any physical signs? Behavioural signs? Indirect signs? _____

Have you spoken to the child? If so, what was said? _____

Have you spoken to the parent(s)? If so, what was said?

Has anybody been alleged to be the abuser? If so, give details.

Have you consulted a statutory agency? Give details (including reasons if the incident has not been reported).

Your name and position.

To whom reported and date of reporting.

Signature

Today's date

The protection of the child is the most important consideration when reporting suspected abuse. Therefore, this report is strictly confidential and will be held securely by the company in accordance with the Data Protection Act 1998 and the company Policy and Procedures for Retention and Storage.



**CONCERNS ABOUT THE CONDUCT OF A MEMBER OF
STAFF, APPRENTICE OR VOLUNTEER INCIDENT FORM**

This form must be completed as soon as possible after receiving information that causes concern about the welfare or protection of a child/vulnerable adult. The form must be passed to Aspire Active Education Group Designated Safeguarding Leads as soon as possible after completion.

Name of person whom there is a concern:	
Position:	
Address:	
Telephone contact:	

Are you reporting your own concerns or passing on those of somebody else? Give details:

Details of concerns: (Include dates, times, etc of any specific incidents)

Details of action taken:

Details of statutory agencies contacted: (Record date, time, name of person contacted and advice received)

Have the school/ child's parents been informed? Yes/No If Yes, record details:

Child's views on situation (if expressed):

To whom reported and date of reporting:

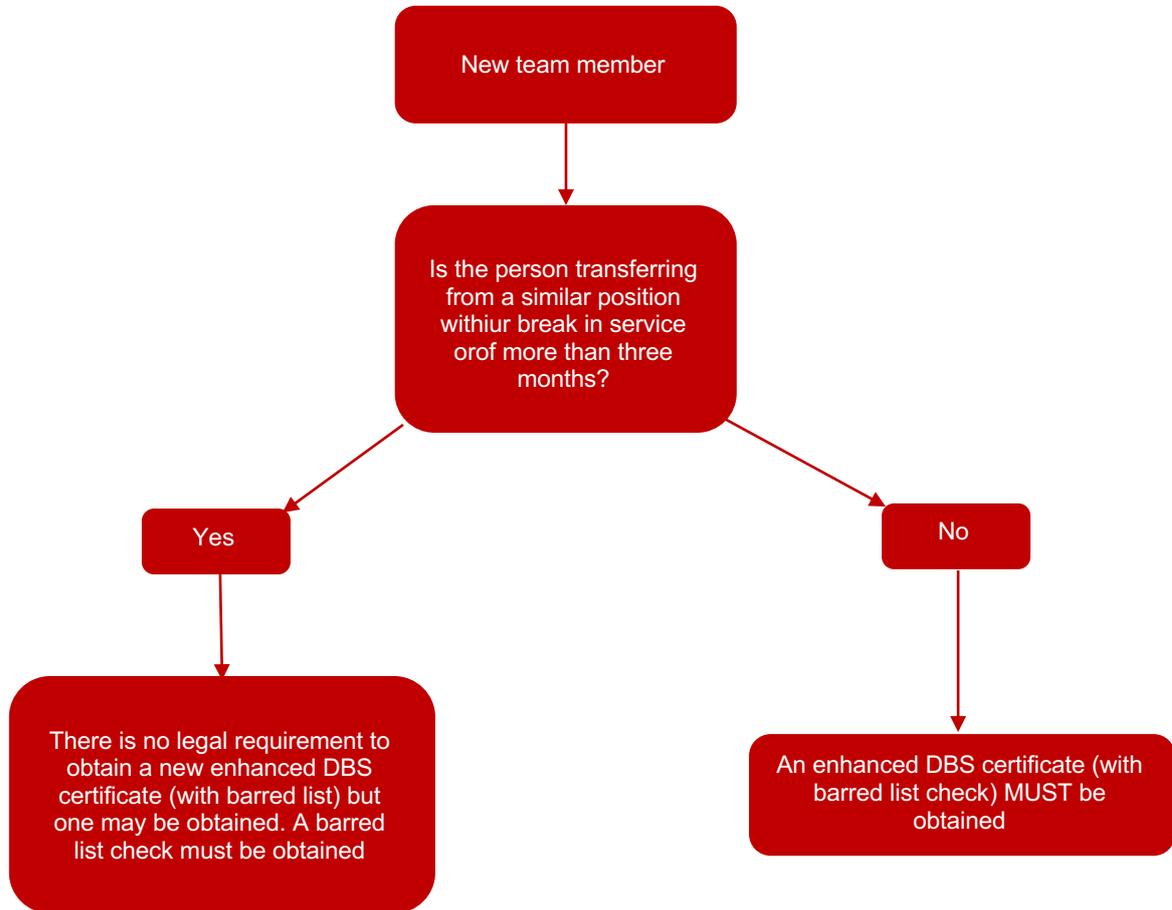
Signed:	Date:
Print Name:	Position:

The protection of the child is the most important consideration when reporting suspected abuse. Therefore, this report is strictly confidential and will be held securely by the company in accordance with the Data Protection Act 1998 and the company Policy and Procedures for Retention and Storage.

FLOWCHART 1

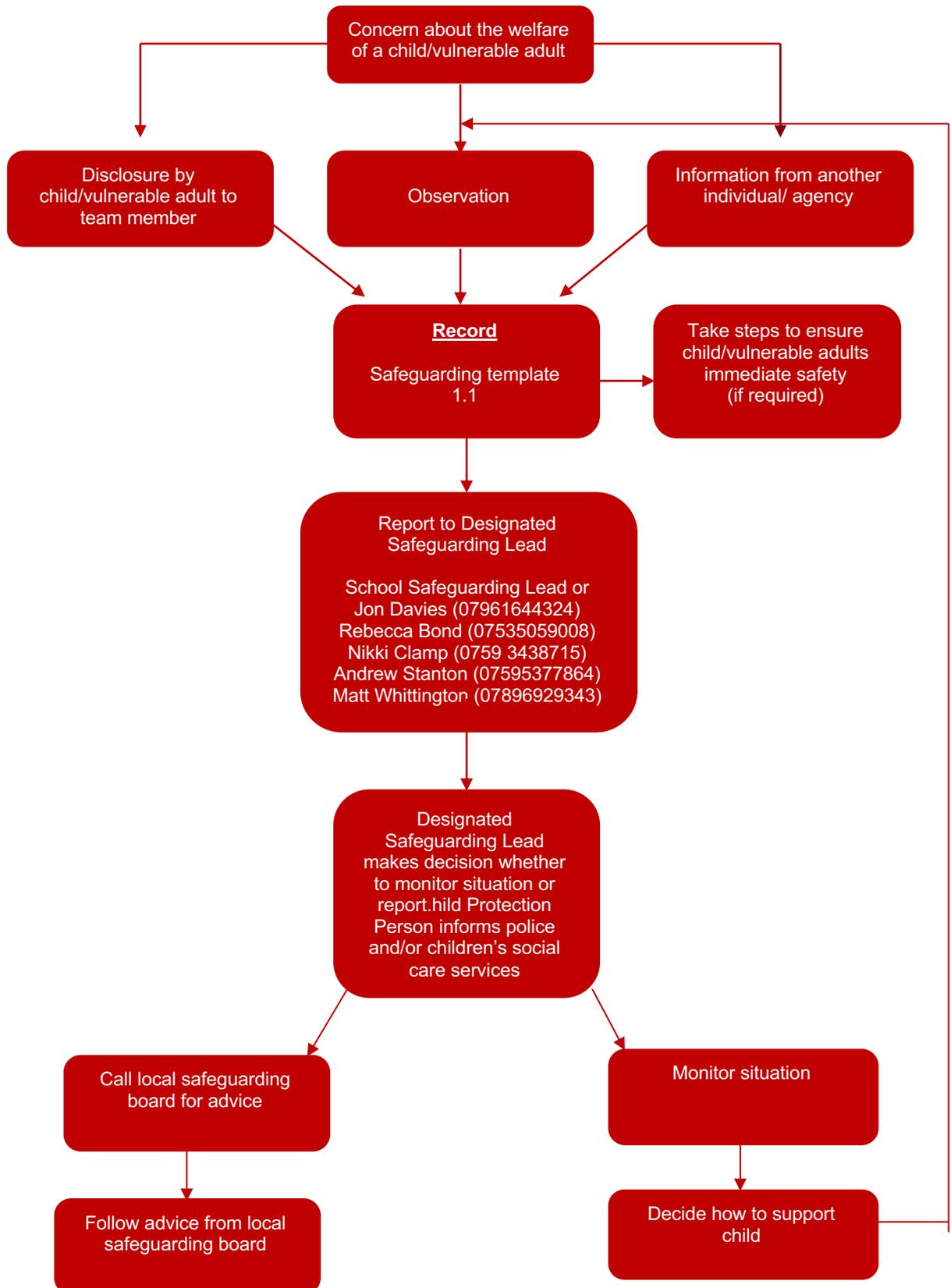
FLOWCHART OF DISCLOSURE AND BARRING SERVICE CRIMINAL RECORD CHECKS AND BARRED LIST CHECKS

New team Members



FLOWCHART 2

RESPONDING TO CONCERNS ABOUT THE WELFARE OF A CHILD/VULNERABLE ADULT

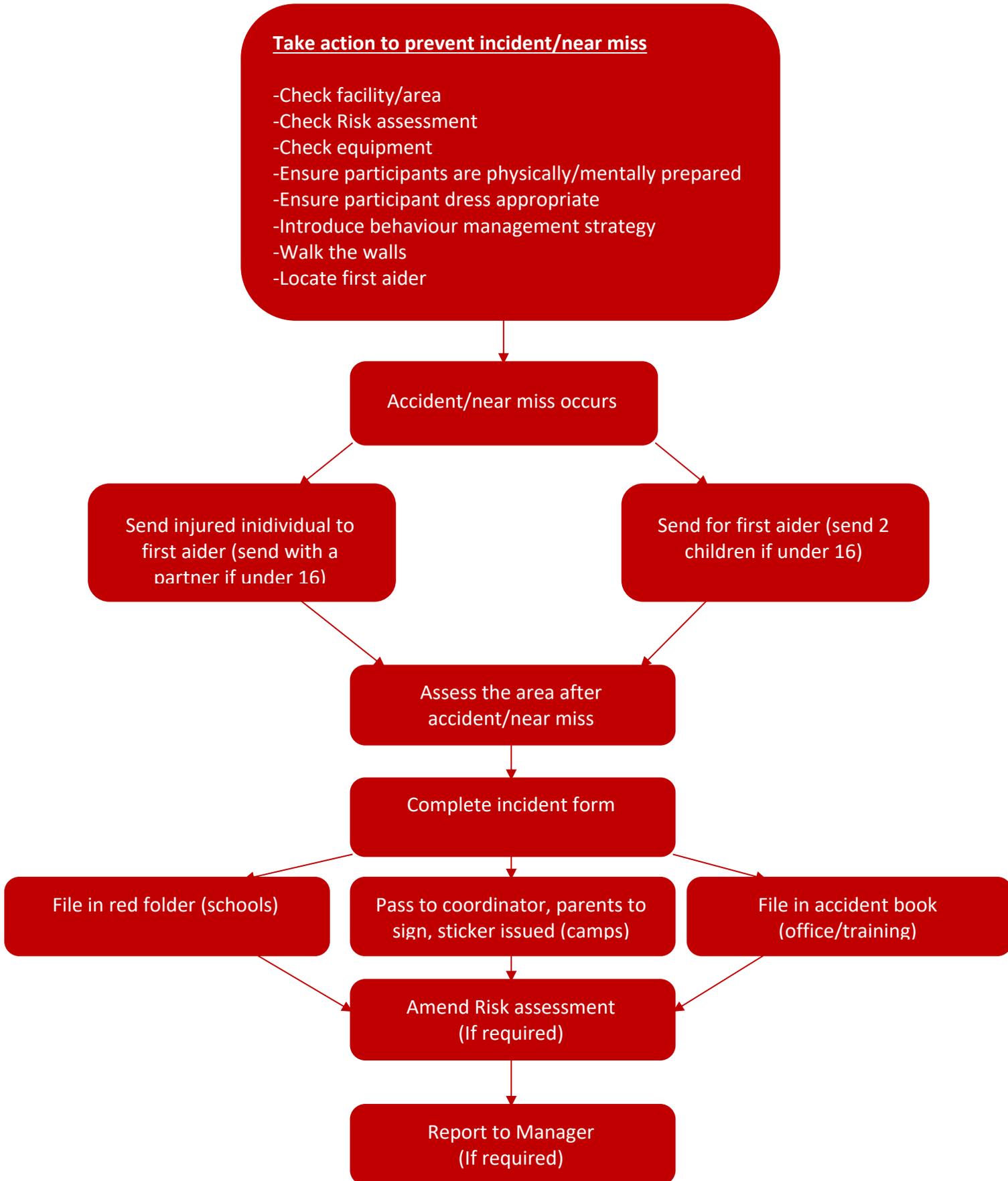


FLOWCHART 3

RESPONDING TO CONCERNS ABOUT THE CONDUCT OF A TEAM MEMBER



FLOWCHART 4
INCIDENT / NEAR MISS



**FLOWCHART 5
CHILD/VULNERABLE ADULT LEAVING THE PREMISES**

