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Plan

Roles and Responsibilities

Altwood School Designated Safeguarding Officer (SDSO)	<u>Gary Goodman</u>
Designated Safeguarding Officer (DSO)	Nas Bashir
Designated Safeguarding Leads (DSL)	Matt Love

All staff are responsible for the welfare of children and adults at risk whilst they are visiting FAB Academy. Therefore, it follows that all staff are responsible for reporting incidents of suspected abuse.

The Altwood School Designated Safeguarding Officer (SDSO) is responsible for ensuring all school safeguarding forms, procedures and processes are up to date and that this information is disseminated to all relevant personnel. The SDSO is also responsible for ensuring all managers have the resources to train their staff in safeguarding to the correct level. The SDSO is responsible for liaising with facilities and safeguarding authorities to ensure processes have been followed correctly and any learnings are actioned. Ideally the SDSO will be trained to Level 4 Safeguarding Children and Adults at Risk.

Designated Safeguarding Officer (DSO) is responsible for ensuring all corporate safeguarding forms, procedures and processes are up to date at their FAB Academy and where applicable bespoke. That this information is disseminated to all relevant personnel and being adhered to. The DSO is also responsible for ensuring all managers have the resources to train their staff in safeguarding to the correct level. The DSO is responsible for ensuring all DBS checks are up to date. The DSO is responsible for liaising with safeguarding authorities (dealing with referrals) and the CDSO to ensure processes are followed correctly and any learnings are actioned. Ideally the DSO will be trained to Level 3 Safeguarding Children and Adults at Risk.

Designated Safeguarding Leads (DSL) are responsible for ensuring staff are vigilant and dealing with any cases as they happen. The DSL (where applicable) is also responsible for ensuring any staff they line manage are trained in safeguarding principles. The DSL maybe responsible for liaising with safeguarding authorities (dealing with referrals). All cases must be recorded properly and reported to the DSO and where applicable safeguarding authorities. Ideally the DSL will be trained to Level 2 Safeguarding Children and Adults at Risk.

Each facility / service area will display the name of the Designated Safeguarding Officer (DSO) and Designated Safeguarding Lead (DSL) on a notice board in order to facilitate efficient and effective reporting processes.

Induction, Training and Support

All staff (and volunteers) at FAB Academy will have an induction, this will inform staff / volunteers of duties, roles and responsibilities in relation to the welfare of children and adults at risk in their care.

It is vitally important that all members of staff are made aware of FAB Academy’s commitment to safeguarding. So, all staff will receive formal safeguarding training (the relevant course for their job role), within their probation period. All staff will be told where to access the Safeguarding Code of Conduct / Safeguarding Summary.

We will work closely with Altwood School to ensure that all staff keep up to date with safeguarding procedures and staff will receive refresher training in safeguarding at the start of each school year from the FAB DSL. Altwood School will also hold up to date records of safeguarding training for FAB staff and DBS records in their Single Central Register.

It is important that staff receive the necessary training to be able to make informed decisions about what they perceive to be abuse. Training will include the following elements:

- For all staff - how to recognise abuse
- For all staff - how to deal with a disclosure and referral - emotional and practice advice
- For all staff - reporting procedures (including who are the leads and officers and what their roles are)
- Officers / leads - support mechanisms.



Training	Length of training session	General Awareness	Raising a Concern	Reporting	Liaising with other agencies
SDSO (Level 4)	16 hours	✓	✓	✓	✓
DSO (Level 3)	8 hours	✓	✓	✓	✓
DSL (external training – ideally level 2)	2 hours	✓	✓	✓	✓
Safeguarding Awareness training	Online	✓	✓		



Training records for all staff need to be stored securely and available to be checked. They may need to be inspected by audits, OFSTED, HSE etc. It is recommended that the latest training certificates are in hard copy on personal files and old copies are scanned. Altwood School will also keep records of staff safeguarding training.

Introduction and Safeguarding Terminology

The following procedure has been developed by FAB Academy for internal use only. This policy applies to all FAB Academy staff (paid or voluntary), including coaches and instructors. The procedure forms part of the terms and conditions of service and is to be applied to all FAB Academy facilities, service areas and work activities. FAB will also follow Altwood School Safeguarding policy for those students registered with Altwood School and Claire Court Safeguarding policy for students registered at Claires Court School.

Definitions:

Child – a person under the age of 18 years (even if they are a parent themselves).

Adult at Risk – an adult at risk of abuse or negligence. A person aged 18 years or over, who is, or maybe in need of, community care services by reason of disability, age or illness: and is or maybe, unable to take care of, or unable to protect him or herself against abuse or neglect. Any adult could be potentially be an adult at risk at any time in their lives (e.g. suffering from a mental health disorder / illness).

Parental responsibility - In addition, the Children Act 1989 sets out the concept of "parental responsibility".

"Parental Responsibility" means all the rights, duties, powers, responsibilities and authority which by law a parent of a child has in relation to the child and their property.

Section 3 (1) Children Act 1989

This means the "legal parent", the parent with decision making powers. Although on a day to day basis lots of adults will be responsible for children in a variety of contexts, only those person/s with parental responsibility can give permission for medical/dental treatment and key decisions in respect of children.

Adults have parental responsibility for the child if any of these circumstances apply:

- They are the child's birth mother
- They are the child's birth father and named on the child's birth certificate after 1st December 2003
- They are the child's birth father and are married to the child's birth mother
- They have acquired it through a Parental Responsibility Agreement
- They have acquired it through an (private law) order of the court. (Special Guardianship Order, Parental Responsibility Order, Adoption)
- The local authority has a court order in respect of the child. (see "Looked after children") in this case the parental responsibility will be held by the local authority and not a foster carer/ residential staff member.

Under associated guidance ("Working Together" 2015, "What to do if you are worried a child is being abused" 2015) and working together to Safeguard Children 2018 we also have the following responsibilities:



- To refer any safeguarding concerns to children's social care or the police
- To refer concerns about children and not investigate
- We cannot maintain confidentiality
- To ensure that all children are safeguarded and protected from abuse while on our premises
- To act on concerns, observations, disclosures which might indicate that a child is likely to or has been harmed.

Looked after children

The most common reason for children being looked after is as a result of abuse and /or neglect. There are 2 ways in which a child can be "looked after".

"Voluntary arrangement"

Children can be looked after under s.20 of the Children Act 1989, which is a voluntary arrangement in which parents consent to or may request that their child is looked after by the local authority. In these circumstances the parent/s of the child who have parental responsibility retain this and the local authority does not acquire parental responsibility for the child.

Under an order of the court

For a child looked after under an order of the court, the local authority and the parents will normally share parental responsibility for the child.

This means that when a child who is 'looked after' is registered for activities at FAB Academy, including clubs, playschemes etc., FAB Academy will need to record on the application form who has parental responsibility for the child. This will establish who the child's "legal parent" is and therefore who is the contact person able to give permission/make decisions in respect of the child.

When an adult signs a child up for a holiday / children's activity at FAB Academy they will be asked to include on the form who has parental responsibility for the child.

Stated below are some important terms commonly used with reference to safeguarding matters and may need to be noted when reporting such incidents. Therefore, it is important to understand the meaning of four key terms:

Disclosed abuse - this is when an individual confides in you that he or she is or has been suffering abuse.

Suspected abuse - when you observe symptoms such as unexplained injuries or changes in behaviour that give cause for concern.

Reported abuse - when someone tells you that a child or adult is being abused or that they are abusing a child or adult themselves.

Referral - the facts of the case are reported to the relevant safeguarding authority e.g. police / social services.

It is recognised that abuse can occur within many different environments. Some individuals may actively try to use, seek employment or engage in work (paid or voluntary) specifically in order to inflict harm.



It is important to remember that.... ***"the consequences of reporting suspected abuse and being wrong can be difficult. The consequence of not reporting suspected child abuse could be fatal."*** (Protecting Children: NSPCC).

Law – there are many laws that cover safeguarding, including the Children’s Act 1989 and the Care Act 2014.

Forms

Form	Used For
Safeguarding Incident Form	Child / adult at risk tells you that he or she is being abused, or incident
Referral Form	When you tell a Designated Safeguarding Officer of a potential risk/incident
Record of Contact Form	For a child/adult at risk who is being monitored/investigated
Witness Notes	Completed by team members who witness a disclosure or see an incident
Investigation Form Internal	Completed by Management to investigate an allegation
Investigation Form External	An external company investigate an allegation

Safeguarding Policy Statement

FAB Academy is committed to safeguarding the welfare of children and adults at risk. FAB Academy will endeavour to provide a safe and secure environment in order to protect children and adults from harm. It is acknowledged that the wide range of services / activities provided by FAB Academy be suitably covered under this policy; particularly where contact with children and adults at risk is inevitable. The welfare of children and adults in the care of FAB Academy and of those that work with them, as well as parents and guardians, is of paramount importance.

The purpose of this document is to assist in the development and implementation of a process for which FAB Academy staff are able to fully understand the appropriate reporting procedures and protocols



relating specifically to safeguarding. It is widely accepted that it is the responsibility of every individual to protect children and adults at risk from abuse.

It is recognised that abuse can occur within many different environments. Some individuals may actively try to use, seek employment or engage in work (paid or voluntary) specifically in order to inflict harm. FAB Academy undertakes to ensure that every effort is made to safeguard all those who enter any of its facilities, use its services or attend any of its organised activities.

FAB Academy will seek to continually develop an organisational culture that routinely encourages discussion and awareness with regard to safeguarding issues and does not detract from confronting the issues when they arise. This is achieved by cultivating an accepted 'Code of Conduct' which encompasses qualities of honesty, openness and respect.

Therefore, the aim of this document is to:

- Corporately recognise the need to protect children, young people and adults at risk;
- Confirm FAB Academy's duty of care to its customers and staff; and
- Maintain / raise awareness in order to ensure that appropriate action is taken to appropriately safeguard children, young people and adults at risk, so as to meet its legal and moral responsibilities.

Risk Assessments

FAB Academy risk assess all activities that include adults at risk or under 18s (including staff and volunteers) from a safeguarding perspective. All risk assessments with elements of safeguarding within them must be reviewed on an annual basis / reactive basis in the event of a legislative change or change to best practice guidance or safeguarding incident.

Management should also risk assess the competency and suitability of their designated safeguarding positions. Considerations may include the following:

- Age
- Experience (work / life)
- Personal background
- Wellbeing
- Training.

Do

FAB Academy Commitment to Safeguarding Customers and Staff

Recruitment, Registration and the Disclosure and Barring Service (DBS)

FAB Academy has a recruitment and selection procedure. This ensures compliance with legislation and encompasses best practice to ensure that the organisation is effective in attracting, recruiting and retaining an appropriately skilled and competent workforce.

FAB Academy is committed to ensuring that all children and adults at risk in its care are not exposed to unsuitable personnel. Applying a rigorous selection and recruitment procedure prevents this. Whether



the appointment is for part time, full time, casual or voluntary staff all procedures must be adhered to. See DBS procedure.

It is imperative that DBS checks are completed prior to the commencement of employment (or not left in a position where they could abuse) and prior to expiry date to ensure that all staff are cleared and safe to work with children and adults at risk.

Employment – recruitment:

It is important that all advertisements, job descriptions and pre-employment information, relating to posts that have access to children or adults at risk, depict safeguarding as a high priority for FAB Academy. This will discourage any potential abusers from pursuing an application. Therefore:

Job Descriptions for posts that require a Disclosure will stipulate that the post is exempt from the Rehabilitation of Offenders Act (1974).

Job Advertisements for positions where the member of staff will require a Disclosure will stipulate that the post is exempt from the Rehabilitation of Offenders Act (1974). All adverts will also include the statement on safeguarding as agreed with Altwood School.

Job Application Forms will stipulate that the applicant must refer to the job description to ascertain whether the post is exempt from the Rehabilitation of Offenders Act (1974) and then to complete the relevant Equal Opportunities form accordingly.

Equal Opportunities Form requires the applicant to complete in confidence whether they have any convictions (spent or otherwise) under the Rehabilitation of Offenders Act (1974).

It is important that all applicants, whether permanent, casual or voluntary should complete the Equal Opportunities Form along with their Employment Application form. This gives the applicant the opportunity to offer information in confidence on any past convictions. This information will only be disclosed to the relevant member of the FAB Academy Management Team if it is deemed that it may potentially breach the FAB Academy Safeguarding Policy.

FAB Academy's Designated Safeguarding Officers are responsible for ensuring all relevant staff DBS records are up to date and a copy is given to HR. HR will review, shred and update the DBS register with name of staff member, DBS number recorded and expiry date. All DBS checks must be enhanced and be renewed every three years.

Who is required to have an Enhanced DBS at FAB Academy :

- Designated Safeguarding Officers and Leads
- All Teaching staff for full-time scholarship programme
- All coaching / instructing posts (coaching juniors and / or adults at risk)
- Add all supervising posts (directly supervising children and / or adults at risk)

If a member of staff is in any doubt, about the suitability of the applicant, seek advice from the management team.

If local sports clubs or other organisations are working with children, young people or adults at risk within FAB Academy facilities they must appropriately apply for a DBS form via their own governing body. Evidence of satisfactory authorisation and completion must also be supplied to the facility at which the



activity is taking place and this will be recorded on the relevant booking file by a responsible facility manager. A club checks form should also be completed.

Please also refer to the Disclosure and Barring Service (DBS) procedure.

CCTV, Photographic and Video Images

FAB Academy endeavour to protect, as far as is reasonably practicable, all children using their facilities from being exposed to potential abuse via the inappropriate taking and transmission of photographic images.

Most mobile telephones and digital cameras now have the ability to transmit images onto the Internet via the World Wide Web. To protect our staff and customers using our facilities, the following applies when using images of children for promotional activities. The risks are:

- Images could be used to identify children / adults at risk, especially when they are accompanied by personal information, such as *"this is X who lives at X and is a member of the X gymnastics club, she likes Westlife"*. This information could be used to groom an individual for abuse;
- The content of the photograph could be used or adapted for inappropriate use.

In order to protect FAB Academy, our staff, the press and contractors from being accused of inappropriate use and transmission of photographic and video images while engaged in business on behalf of FAB Academy, the following guidelines are to be followed:

- Reduce or control the risk - consider using models or illustrations where appropriate
- Information - avoid using the first name and surname of an individual in a photograph. If you use the individual's photograph, avoid using their name and vice versa
- Parental consent - specific parental permission is sort by the use of a registration form completed when players join FAB Academy either as a full time student or a Junior Player. Parents are asked to give permission for their child's photograph to be used to advertise activities. Agree to photographic / video images of their child appearing on the FAB Academy website. Before any photo goes on the website or on any other publicity material then consent will be double checked with a parent or guardian
- Content of image - images of individuals are only used in appropriate dress.

Serco (Site managers) have in place CCTV within a number of its facilities/service areas. FAB Academy will work with Serco to ensure that the usage of these cameras is for the prevention of criminal damage and theft, and to ensure all customers are safe from harm. Where facilities have these cameras there will be a set process in place to protect the images collected by these cameras.

CCTV footage can be essential evidence in an adult at risk / child abuse safeguarding investigation. Ensure all footage is downloaded immediately and stored securely.

Please also refer to FAB Academy's General Data Protection Regulations (GDPR) procedures, CCTV procedure, and Photographic procedure.



Public Awareness

FAB Academy will ensure that information on safeguarding is readily made available to members of the public, independent local organisations and sports clubs. This will also be issued to parents or guardians when their children are participating in FAB Academy's activities. Links to FAB Academy, Claires Court School and Altwood School safeguarding policies will be available on the FAB Academy Website. Each facility / service area will prominently display safeguarding information and all staff will be made aware of who the **School Designated Safeguarding Officer (DSO)** is for the organisation.

Partnerships

All partner organisations (such as clubs) involved and using FAB Academy facilities and service areas will need to sign terms and conditions to confirm that all their relevant risk assessed staff / volunteers have an enhanced up to date DBS / up to date qualifications and relevant insurance. FAB Academy will take measures to ensure that local recreational providers (i.e. sporting clubs) are aware of their obligations under the FAB Academy Safeguarding Policy. Partners must strictly adhere to this policy and associated practices when working in conjunction with FAB Academy. All organisations must be made aware that FAB Academy may ask for proof of DBS checks or qualifications or insurance.

This means that FAB Academy must be satisfied that:

- a. All persons in the body involved in or supervising children's or adults at risk activities possess a DBS Disclosure
- b. The body has a written Safeguarding Policy
- c. All persons in the body involved in or supervising children's activities have received training in safeguarding.

Liaison with other Professional Bodies

FAB Academy will work within the relevant **safeguarding authority (could be a MASH – Multi Agency Safeguarding Hub, Social Services, Police)** guidelines. Liaison in the first instance will be with Altwood School.

RBWM Safeguarding queries on all aspects:-

Clive Haines clive.haines@achievingforchildren.org.uk

The Safeguarding Team also meets regularly and is in regular contact with the Early Help Hub school link social worker. Any queries regarding the present contact details for this local authority should be made via the Safeguarding Team or the MASH contacts below.

- **Contact details for the LADO (Local Authority Designated Officer)**
- Tel: 01628 683 202
- E-mail: LADO@achievingforchildren.org.uk

- **Multi Agency Services Hub (MASH) and Early help Hub (EHH)**
- Tel: 01628 683150



- E-mail: MASH@achievingforchildren.org.uk
- **Thames Valley Police**
- Tel: 101 (or 999 if there is an immediate risk of harm)
- **RBWM Local Safeguarding Children Board (LSCB)**
- Tel: 01628 683234
- Website: **[The Royal Borough Windsor & Maidenhead Safeguarding Partnership website \(rbwmsafeguardingpartnership.org.uk\)](http://TheRoyalBoroughWindsor&MaidenheadSafeguardingPartnership.org.uk)**
- E-mail: Safeguarding.Partnership@rbwm.gov.uk
- **NSPCC** (what you can do to report abuse dedicated helpline) is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college.
- Tel: 0800 0280285
- E-mail: help@nspcc.org.uk

FAB Academy have additional policies that promote the safeguarding of children and adults at risk regarding:

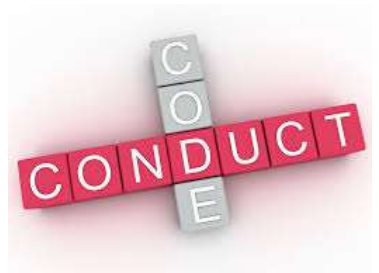
- Health & Safety, buildings, security - Health & Safety Policy;
- Medical needs, first aid - Accident, Incident, Dangerous Occurrences and Near Misses procedure; First Aid Management procedure; Managing Medical Conditions and Medication procedure, Emergency Action Plan which includes 'missing child';
- Drugs and Substance misuse - Alcohol and Drugs Policy
- Altwood School and Claires Court School Safeguarding Policies

Staff Commitment to Safeguarding Customers, Other Staff and Themselves

Safeguarding 'Code of Conduct'

Please also refer to RD-Doc Safeguarding Summary.

This Code of Conduct details how staff and volunteers should behave in relation to children, young people and adults at risk to protect such people and also protect the member of staff / volunteer against any misunderstandings or allegations.



Those working for FAB Academy must recognise that they are in a position of trust and must act in an appropriate manner at all times. As a result, for those in FAB Academy employment, paid or otherwise, must always consider how an action or activity may be different from the way it is intended to the way it is actually perceived. For further detail and information reference FAB Academy's 'Code of Conduct'.

N.b: The layout of rooms in venues allows for constant supervision. No child is left alone with staff or volunteers in a one to one situation without being visible to others.



Respect

- Respect the rights, dignity and worth of every person
- Avoid spending time with children unobserved, move into the view of others or leave the door open, avoid secluded areas (such as woodland)
- Where possible have another person present; where a private conversation is absolutely necessary, inform another member of staff of your whereabouts and how long you expect to be with the individual
- Watch out for each other. Consider if colleagues are being drawn into situations that could be misinterpreted
- Physical contact should be kept to a minimum, and if instructing, only in line with NGB guidelines. If contact is necessary, be aware of your actions and how they may be interpreted. Where necessary, for example when there has been an accident, ensure that you are treating the injury in the presence of others (preferably a parent, carer or another member of staff)
- In a group, when coaching for example, do not have, or appear to have, favourites
- Do not give lifts to children in your car without parental permission
- Do not take or invite children to your home or any facility other than where the activity is
- Do not use physical punishments or any actions that involve restraining a child
- Do not arrange meetings with children outside of working hours. If you come into contact with a child from work in a social setting, be polite but try to move away. If this is not possible try to maintain a professional distance
- Do not buy gifts or equipment for any children in your care
- Do not give children or adults at risk free activities / offers / refreshments – unless it is part of a facility wide promotion or agreed or with management approval
- Do not give a child your personal contact information and do not ask them for theirs unless it is needed for business purposes (i.e. registers)
- Do not add children's contact numbers into personal mobile phones or equipment. Records must not be removed from the FAB Academy. All details are recorded on excel database on secure laptop or secure hard copies are kept in locked cupboard in the FAB office.
- Do not have any personal relationships beyond the professional activity
- Do not contact using social media sites, other than in open groups.

Any preferential treatment could be conceived as grooming.

It is recognised that a number of FAB Academy staff and volunteers are classified as children (under 18 years old) as far as safeguarding is concerned. It is especially important that young members of staff and volunteers are made aware of this Code as their age and experience may make them more vulnerable (for example a 17 year old Sports Coach volunteer who may be having a relationship with someone in their group).

Therefore, it may be necessary for consideration to be given to exceptions for a number of areas above such as members of staff giving each other lifts in to or home from work; or staff who are friends using social media to keep in contact. However, in these circumstances, care must always be taken by all concerned in relation to possible safeguarding situations or allegations.

Breaches of this Code of Conduct may result in disciplinary proceedings being taken against the member of staff concerned and in extreme cases could result in possible referral to an investigatory body such as the Police.



Whistleblowing

See HR procedure.

Recognising Types of Abuse (children and adults at risk)

Safeguarding looks at the wider practice(s) surrounding the needs of children, young people and adults at risk. Safeguarding can be defined as keeping children and adults safe from harm, such as illness, abuse or injury.

FAB Academy's role in safeguarding relates to:

- Developing child centred policies and procedures;
- Working in partnership with relevant external agencies;
- The School Designated Safeguarding Officer or Designated Safeguarding Officer will inform the relevant external authority of any allegations of serious harm or abuse by any person living, working or looking after children / adults at risk, or any abuse which is alleged to have taken place on the premises, and the action taken in respect of these allegations; and
- All staff being vigilant to and maintaining an up-to-date understanding of safeguarding issues as well as being able to implement the FAB Academy safeguarding policy and procedure appropriately.

It is your responsibility as a FAB Academy member of staff to share your concerns with the appropriate person, following the operational procedures relevant to your facility / service area.

It is important to stress that: ***It is not your responsibility to decide if a child or adult at risk is being abused, but it is your responsibility to act if you have concerns.***

Please refer to RD-Doc Types of Abuse.

Referrals

Referrals are when a member of staff tells/informs a DSO or DSL potential risk, or police of immediate danger to a member of public / staff (informing DSO / DSL immediately).

Why You Should Make a Referral

The greatest fear about reporting suspected abuse cases is that you may be wrong and the resulting consequences bring about pain and suffering for children, their parents and those accused. In such situations it is worth remembering these points:

- Your first responsibility is to the welfare of the child or adult at risk;
- Many parents/guardians will actually recognise this and appreciate that you made the referral out of concern for the child;
- It is not your responsibility to make judgements – only to share your concerns; and
- Any information you provide may be essential in building up a complete picture of an abused individual or a suspected abuser
- You cannot make a referral for an adult at risk to the relevant safeguarding authority unless you have their consent. Except, if the adult at risk is not deemed capable to give that consent.
- You can always make a referral about a child.

Understanding Types of Reports / Concerns / Complaints

- Allegations against a staff member by another staff member
- Allegations against a staff member by a customer
- Allegations against a customer by another customer
- Allegations against a customer made by a staff member.

Staff Dealing with an Initial Concern or Disclosure:

Concerns regarding an adult at risk or child (potentially at risk):

If you are concerned about the welfare of an adult (potentially at risk), apart from a member of staff when internal procedures will be referred to, adopt the following procedure:

- Stay calm, do not panic;
- Where possible ensure that you are not alone with the child or adult at risk
- **Listen** to what is being said, without rushing or probing;
- **Reassure** the individual that he or she was right to talk to you;
- Do not promise confidentiality; explain that you will need to share the information with others who can help;
- **Refer** the information to your line manager / Designated Safeguarding Officer immediately; do not keep information to yourself, and
- **Record** accurate information on your observation and discussions
- **Do not** investigate or probe by asking questions.



The Designated Safeguarding Officer / Lead must consider referring the information to the relevant authorities.



Allegations Against a Staff Member

If an allegation is received about a member(s) of FAB Academy staff or volunteers, it should be immediately reported to the relevant member of the FAB Academy Management Team who fulfils the role of the Designated Safeguarding Officer.

If it is the Designated Safeguarding Officer that is suspected, the allegation must be reported immediately to FAB Academy's School Designated Safeguarding Officer. Safeguarding documentation should be completed - Safeguarding Incident Report Form.

The criteria for an allegation against staff, is where a person who works with a child or adult at risk has:

- Behaved in such a way that has or may have harmed a child / adult at risk; **or**
- Possibly committed a criminal offence against or related to a child / adult at risk; **or**
- Behaved towards a child / children / adult(s) in a way that indicates 'unsuitability' to work with children / adults at risk.

It is important not to further compromise the situation therefore a risk elimination exercise should be carried out. In order to achieve this, it may be necessary for the individual to be suspended pending an investigation on the recommendation from the relevant safeguarding authorities (or possibly NGBs if applicable for coaches / instructors).

The HR department, will carry out this investigation, using the Investigation Form – Internal. If an external company completes the investigation the Investigation Form – External will be used. FAB Academy reserves the right to dismiss an individual on the grounds of alleged gross misconduct at any point in the proceedings. An individual who is subsequently convicted of a crime will, likewise, be dismissed.

Whilst suspended, there will be no loss of earnings during this time. Suspension is a neutral act. If a member of staff is suspended from duty pending the outcome of an investigation it does not mean that the allegation is believed to be true. Suspension should not be automatic or considered as a default action. However, it should be considered in any cases where:



- There is cause to suspect a child/adult at risk is at risk from significant harm; **or**
- The allegation warrants investigation by the police / relevant authorities; **or**
- The allegation is so serious that it might be grounds for dismissal.

All members of staff / volunteers will be denied access to children / adults at risk, pending a referral and investigation by HR and / or relevant authorities. If it is not practical to deny access to children / adults at risk, the individual will be suspended until the investigation is complete.

In the case of a staff member, depending on the outcome of the investigation, the individual will be returned to full duties, reinstated or dismissed; if a return to work is the outcome it is to be recognised that the member of staff may require additional help and support, especially if they will be having contact with the child concerned or the person that made an allegation;

Members of the public will be denied access / banned at all FAB Academy facilities / service areas during the investigative period, pending the outcome; and



- All individuals accused of abuse will be given the opportunity to give their account of the circumstances
- 'Settlement Agreements', whereby the member of staff offers or agrees to resign provided that the disciplinary process is stopped and/or referral is not made to other agencies, is **never** an option in a case of an alleged safeguarding incident.

Employers are also required to notify the DBS / relevant NGBs of relevant information so that individuals who pose a threat to vulnerable groups / individuals can be identified and barred from working in this area. A referral must be made if a person ceases to work for FAB Academy because they have harmed a child or an adult considered to be at risk, or placed them at risk of harm or have resigned prior to the completion of an investigation following a safeguarding allegation being made. Referral forms can be obtained directly from the DBS website. Advice must always be sought from Altwood School and the HR department before making a referral to the DBS.

Reporting

Sharing Concerns with Parent(s) / Guardian(s)

Staff should always consider the possibility that there is a reasonable explanation to account for observations.

Concerns may wish to be shared with parents or guardians, unless this would put the child at further risk, in which case a great deal of sensitivity will be required. If a child is displaying aggressive, withdrawn or over-compliant behaviour, the parent may be able to suggest reasons such as conflict at home or a family bereavement. Likewise, if the child has bruises or injuries, there may be a logical explanation.

At this point it is important to note that there is a differentiation between a child in need and a child in need of protection. In the first instance, it is more appropriate to share concerns with parents or guardians. In the second, in some instances, alerting the parent or guardian of concern may hinder any future investigation.

FAB Staff should not share concerns with parent or guardians without discussing first with the DSL. If you have any concerns about approaching a parent or guardian, seek advice from the DSO / DSL or local authority designated officer or team. Any information relating to such an observation should be recorded on the Safeguarding Incident Report Form.

Support Mechanisms - for members of staff

If an individual is involved with a suspected abuse case and need to discuss their concerns, there are a number of options to pursue.

- Talk to their immediate line manager;
- Contact the Designated Safeguarding Officer;
- Contact the School Designated Safeguarding Officer;
- Contact a member of the Senior Management Team
- FAB Academy can arrange access to staff welfare arrangements.

If requested these will be made available to the member of staff as soon as reasonably possible.





Dealing with a suspected case of child abuse or being accused of such an act, can be a very emotional and disturbing time for all concerned. It is important that staff are aware of support services within the organisation. Confidentiality is the key element to ensure that what is offered is effective and therefore, both internal and independent external assistance is required. Support is also available via Altwood School.

Documentation, Privacy and Confidentiality

FAB Academy will ensure that all safeguarding documentation is suitably controlled, treated with the strictest confidence and dealt with in accordance with current policy, General Data Protection Regulations 2018 and procedure.

It is then the responsibility of FAB Academy's Designated Safeguarding Officer to inform relevant staff if required, of the potential problems, where it is alleged, and of any convictions once confirmed. It should be noted that in the case of an alleged abuse case, the information is highly sensitive and should be dealt with accordingly.

Every effort is made to ensure that the reporting and recording of information relating to suspected child or adult at risk abuse should be conducted in a place where privacy and confidentiality can be assured. Not only is the information sensitive, but the individuals involved may need some initial counselling.

**PRIVATE &
CONFIDENTIAL**

Information should be kept restricted to those who have a need to know in order to suitably protect children, facilitate enquiries or manage a disciplinary process. The police should not provide identifying information to the press or media, unless or until a person is charged, except in exceptional circumstances e.g. an appeal to trace a suspect. In such cases the reasons should be documented and Designated Safeguarding Officer consulted.

Internal Methods of Reporting

How do you report your suspicions within your organisation?

- A Safeguarding Incident Report Form and Safeguarding Record of Contact Form is to be used to record discussions and observations. In addition, if a member of staff finds themselves in a situation that could be misinterpreted at a later date, details of the situation should be discussed and also recorded on a Safeguarding Incident Report Form
- All completed forms must be given to the DSL who will liaise with the DSO, who will in turn liaise with the SDSO .
- At any point your suspicions may be escalated to the relevant authorities by DSL/DSO/SDSO (unless you deem it to be a police emergency, in which case 999 is contacted and the forms completed). It is not necessary to make contact with the police unless there is an immediate risk of an offence being committed or it is a clear case of assault.

The method of reporting suspected abuse is as follows:

- Informal discussions with the line manager;
- All concerns should be discussed with the DSL/DSO/SDSO and recorded on a Safeguarding Incident Report Form



- All completed safeguarding / monitoring forms should be copied promptly to the relevant facility / service area DSL/ DSO for monitoring purposes
- It is vitally important that the recording of information concentrates on facts and not opinion. Inaccurate information can seriously hinder any future investigation
- The Safeguarding Incident Report Form / Record of Contact Form are an extremely important part of 'picture building'. For example: staff may notice bruising one week; soiled clothing two weeks later; a very hungry child in the third week. None of these issues in isolation would result in a cause for concern, but, when taken together they build a very different picture.
- Altwood School will provide advice and guidance on any safeguarding matters. If the FAB DSL is unavailable at any time, concerns can be directly escalated to the SDSO at Altwood School.

All completed forms should be submitted to the School Designated Safeguarding Officer promptly. It is the responsibility of the School Designated Safeguarding Officer to monitor issues relating to the alleged accused. Any identified trends, such as reoccurring names, should be formally shared with the Senior Management Team and documented.

If a FAB Academy staff member, involved in a safeguarding matter, is not satisfied with a decision made by a Designated Safeguarding Officer the staff member is permitted to directly escalate the matter to the FAB Academy School Designated Safeguarding Officer. Likewise, should a Designated Safeguarding Officer be dissatisfied with the decision made by the School Designated Safeguarding Officer they too can escalate the matter to the FAB Academy Managing Director. It is to be noted that the decision taken by the Managing Director on any safeguarding matter will be final.

Escalation / Referral to Relevant Authorities

At a county level, the local authority will have a local authority designated officer or team who is involved in the management and oversight of individual cases, especially those involving allegations made against members of staff or volunteers. The role of the local authority designated officer or team is to offer expert advice and guidance to employers and voluntary organisations. They also liaise with police and other agencies and monitor the progress of cases to ensure they are dealt with as quickly as possible and are consistent with a thorough and fair process.

When an allegation comes to light the DSO / DSL will work with Altwood school to make the decision whether or not to inform the local authority designated officer or team immediately i.e. within 24 hours. This referral will be either a website or phone number or both. If there is any difficulty in communicating this to the local authority designated officer or team, allegations should be reported directly to the police. Consultation with the local authority designated officer or team must not delay any referral where the concern or allegation is clearly very serious.

A formal referral should be made promptly by the DSL / DSO or CDSO to the local authority designated officer or team. This should be done by telephone / website. A copy of the referral must be retained if the referral has been made online. If the referral is made over the phone, this call must be documented on the Safeguarding Incident Form. Including:

- Date of call
- Time of call
- Person who made the call
- Person who took the call



- Correspondence during the call including advice and actions.

The Safeguarding Incident Report Form should be attached to the online Referral Form (if referral was online).

In some cases it may be necessary to inform police, particularly when individuals are in immediate danger. The Safeguarding Incident Report Form must be completed – see Safeguarding Summary.

What is FAB Academy's role in working with the relevant authorities:

- To clarify facts of the allegation (not investigate) before contacting the local authority designated officer or team
- To work with Altwood School to investigate the safeguarding concern
- To work in partnership with the local authority designated officer or team
- To provide necessary information as requested
- To operate a through disciplinary process when / where deemed appropriate
- To keep the local authority designated officer or team updated on the process and outcomes; and
- To ensure a properly managed conclusion to the safeguarding process
- To ensure all documentation and comms are kept confidential.

Should FAB Academy, as a corporate body, disagree with any action(s) / decision(s) taken by the relevant authority in a safeguarding matter then the FAB Academy Designated Safeguarding Officer should refer the matter to the relevant authorities.

The relevant authority will contact the police if deemed necessary. Where emergency medical help is required, arrangements should be made for the child or adult at risk to be taken to hospital. A referral must then be made to the relevant authorities. Don't assume that another service has referred, two referrals of the same case, is better than none.

External Investigation

If the situation is serious or potentially life threatening, the authorities may visit the referral source and the child or adult at risk immediately. However, it is more likely that the investigation team will make other enquiries to help them build up a full picture. This may involve speaking to the individual who made the referral, the child's school, care home, health visitor or doctor, parents or carers.



If someone calls the FAB Academy facility /service area asking for information in connection with a safeguarding investigation and they are not known, ask for their name and telephone number and inform them that the Designated Safeguarding Officer will call them back. This way a check can be made as to who they are and information is not given out inappropriately.

Internal Investigation

Timescales - the following timings should be kept to wherever possible, depending on the nature of the investigation:



- If formal disciplinary action is not needed, other appropriate action should be taken within three working days
- If disciplinary action is required, and can be progressed without further investigation, this should take place within 15 days
- If FAB Academy decides that further investigation is needed in order to make a decision about formal disciplinary action, the Designated Safeguarding Officer for children should discuss with the local authority
- The possibility of this investigation being done by an independent person to ensure that the process is objective. Whether or not the investigation is handled internally or independently, the report should be presented to the designated safeguarding officer within 10 working days
- Having received the report of the disciplinary investigation, the Designated Safeguarding Officer should decide within two working days whether a disciplinary hearing is needed
- If a hearing is needed, it should be held within 15 working days
- The Designated Safeguarding Officer should continue to liaise with the relevant authority during the course of any investigation or disciplinary proceedings, and should continue to use the relevant authority as a source of advice and support.

External and Internal Investigation Collaboration

When the investigation team have made their assessment of the child / adult at risk's situation they will decide what action is necessary. There may be an assessment / case conference, to which a FAB Academy representative may be asked to attend. The case conference is a forum for exchange of information and discussion about the alleged or suspected abuse.

The outcome of the conference will decide if the child / adult at risk should be placed on the child / adult at risk protection register, what support is needed for child and family, and what further assessment or review is needed.

Generally, there is no formal feedback beyond the initial recommendations made at the referral stage. However, if this happens then feedback should be documented on the relevant Safeguarding Incident Form.

Persons on the Sex Offenders Register (SOR)

Any person on the Sex Offenders Register, on release from prison, will be subject to various conditions and permissions (where they can go, where they cannot go, where they can go as long as they are supervised etc.). Part of their conditions should also be that they inform the location they are visiting that they are on the SOR.

If staff are aware that someone is on the SOR and they are seen in the grounds or in the facility, come into your facility, or are seen within, the DSL should immediately notify the police. The police will know the conditions/permissions of the individual and whether or not they are in breach, and will also tell you what action to take. They may say that the customer is able to carry on using the facility.

The DSL should complete a Safeguarding Incident form if any concerns are raised.

Destruction of Records

- Registration and other associated records, including Safeguarding Incident and Referral Forms, should be kept no longer than 6 years



- Exception to the 6 year period will occur when records:
 - a. Need to be retained if information is relevant to ongoing legal action
 - b. Are required by law to be kept longer.
- In England, where allegations have been made against a member of staff, documents and information should be retained, including for people who leave the organisation, at least until person reaches normal retirement age, or for 10 years if that is longer. The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where a future DBS disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction. It will also prevent unnecessary re-investigation if, as sometimes happens, allegations resurface after a period of time
- When records are being kept for more than the 6 year period, files need to be clearly marked and the reasons for the extension period clearly identified
- Information should be kept in a secure facility and access to information should be strictly limited. All documentation should be marked 'strictly confidential'
- Electronically stored information must be password protected, to which only limited staff have access
- Data protection must be a prime consideration.

Records must be incinerated or shredded in the presence of Nas Bashir.

DBS certificates should be destroyed after 6 months; however it is permissible to keep a record of the date the check was completed and the reference number of the disclosure certificate.

Further information on the retention and storage of Child Protection records (England and Wales) can be obtained from:

<https://thecpsu.org.uk/resource-library/2013/guidance-on-child-protection-records-retention-and-storage/>

Associated Forms:

- Safeguarding – Incident Form
- DBS – Disclosure Record Sheet
- Safeguarding – Record of Contact for Child or Adult
- Safeguarding – Investigation Report and Summary – Internal
- Safeguarding – Investigation Report and Summary – External
- Accident, Incident, DO and Near Misses - Witness Notes (Safeguarding)
- Behaviour Management Exclusion - Exclusion Letter
- Photographic – Photography Consent Form
- Bookings (Block & One Off) - Club Check Form (Questionnaire to be completed by clubs, hirers, cultural and sporting bodies using FAB Academy premises for children's activities)
- Safeguarding - Important Contact details (Staff communication point) (organisation specific)
- Letter to clubs, hirers, cultural and sporting bodies using FAB Academy premises for children's activities (organisation specific)



Associated RD-Docs:

- RD-Doc Safeguarding Summary
- RD-Doc Safeguarding - Types of Abuse (Children and Adults at Risk)
- RD-Doc Safeguarding - Modern Slavery and Trafficking
- RD-Doc Safeguarding - DBS Suitable Identification Guide

Associated Guidance and Legislation:

- National Coaching Foundation Code of Ethics for Sports Coaches
- Guidance to members of staff on completing a Disclosure and Barring Service (DBS) Application Form
- Protection of Freedoms Act (September 2012)
- Working together to safeguard children (July 2018)
- Children's Act (1989) (2004) (2014)
- Care Act (2014)
- "Safeguarding Children" A Joint Chief Inspectors Report (2002)
- Rehabilitation of Offender's Act (1974)
- NSPCC, Child Protection in Sport Unit (CPSU)
- PAS520:2015 Safeguarding 0 to 4 year old children within the teaching of swimming, including any associated professional photography – Code of Practice
- National Guidance for Child Protection in Scotland 2014
- CPSU – Child Protection Records, Retention and Storage (England and Wales)
- The Modern Slavery Act 2015
- General Data Protection Regulations 2018

Updates of procedure:

Issue No.	Description of Revision	Date	Review Due Date	Action By
1	None - First Issue	29/06/2023	29/06/2024	Train designated staff and incorporate the procedure into QMS.