



SAFEGUARDING CHILDREN POLICY

2022

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Distribution

This policy will be available for all staff at United Dragons as well as players, parents and members of the public. Staff must all have access to an up-to-date paper copy of the policy.

Contents

1. Introduction.....	3
2. Rules, Regulations & Legislation	3
3. Scope & Governance	3
4. Definitions	3
5. Aims & Key principles.....	4
6. Roles & responsibilities	4
7. Safer Recruitment.....	5
Single Central Record	5
Third Party Organisations and Partnerships	5
8. Disclosure & Barring Service	5
New Appointments	5
Positive Disclosure	6
9. Ratios & Supervision of Children	6
Children at Events	7
10.Coaching Staff	7
11.Gifts and Favouritism.....	7
13.Use of Images	7
Players and Participants	8

14.Travel & Events	8
15.Lost Children	9
16.Risk Assessments	9
Departmental Risk Assessments	9
Activities for Disabled Persons & Adults at Risk	9
17.Guidelines in the event of concern	9
Highlighting Concern	9
Recognising signs of abuse.....	10
Physical Abuse	10
Honour Based Violence	10
Sexual Abuse.....	10
Harmful Sexual Behaviour.....	10
Child Sexual Exploitation	10
Neglect.....	11
Emotional Abuse.....	11
Bullying including Peer on Peer	11
Radicalisation & Extremism.....	11
FGM Mandatory Reporting Duty	12
19.Recording Allegations or Suspicions of Abuse or Poor Practice	13
20.Allegations of abuse against members of United Dragons or partner staff	14
Charity Commission	14
21.Confidentiality	14
22.Continuous Learning and Development	15
23.Safeguarding Contacts	15
24.External Contact	15

1. Introduction

- 1.1. United Dragons are committed to safeguarding and protecting children and young people. They fully accept responsibility for the wellbeing and safety of all children and young people who are under their care.
- 1.2. All children have the right to protection from all forms of abuse and exploitation and it is the duty of all staff and volunteers, paid or unpaid at United Dragons to safeguard children and young people by creating an environment that protects them from harm. This policy also extends to all third-party providers and participants of United Dragons.
- 1.3. The wellbeing of children and young people is paramount for all staff and accordingly, they must make themselves aware of United Dragons' Safeguarding Children Policy. Where appropriate, the policy will be supplemented by in-service training and additional guidance. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.

2. Rules, Regulations & Legislation

- 2.1. This policy is in accordance with the London Safeguarding Children Board procedures and guidelines and is compliant with regulations set out in the 1989 and 2004 Children Act, Working Together to Safeguard Children (2018), Westminster Local Safeguarding Children Board (LSCB), the British American Football Association and UK Coaching guidelines and best practice. In addition the following principles, legislation, rules, regulations and guidance underpin the Safeguarding Policy:

- British American Football Association Safeguarding Policy 2017
- What to do if you're worried a child is being abused: Advice for Practitioners (2015)
- Protection of Freedoms Act (POFA) 2012
- Keeping Children Safe in Education (KCSIE) 2016
- Female Genital Mutilation Act (2013)
- Sexual Offences Act (2003)
- UN Convention on the Rights of the Child (1989)
- The Equality Act (2010)
- Data Protection Act (1998)
- London Child Protection Procedures and Practice Guidance 2017

- 2.2. United Dragons is fully committed to ensuring that the best practice recommended by these bodies is employed throughout our service delivery. United Dragons have a responsibility to maintain regular dialogue with their delivery partners and respective LSCB's. Due to their contact with children, staff and partners are well placed to observe changes in a child's behaviour and outward signs of abuse and/or neglect.

3. Scope & Governance

- 3.1. This policy is for use across United Dragons and has been adopted by management of United Dragons including its Directors. United Dragons is committed to prioritising safeguarding at a strategic level to ensure best practice in safeguarding is promoted and adhered to.
- 3.2. All safeguarding information is stored and retained in line with the United Dragons Privacy Policy. This includes guidance for data storage under the General Data Protection Regulation.
- 3.3. Activities undertaken at the following locations/departments are under the remit of this policy including:
 - United Dragons events on external sites within the UK
 - United Dragons programme delivery by third party providers.
 - Other United Dragons related entities/activities undertaken outside of the UK.

4. Definitions

- 4.1. A 'child' is defined as anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout.¹

¹ Working Together to Safeguard Children, 2015

- 4.2. Safeguarding and promoting the welfare of Children is defined² for the purposes of this policy 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.
- 4.3. An “**Activity**” means any activity or series of activities arranged for children by or in the name of a Club. These are deemed to be regulated and therefore activate the required levels of DBS³ checks.

5. Aims & Key principles

- 5.1. **The aims of the Safeguarding Children Policy are to:**
- safeguard all children who interact with United Dragons and their partners;
 - demonstrate best practice in the area of safeguarding children;
 - ensure that children feel safe in our activities;
 - commit to working in partnership with external organisations including statutory bodies and local schools in order to safeguard and protect children and young people;
 - ensure that any coaches, parents and other adults who come in contact with children are of good character and positive role models;
 - promote high ethical standards.
- 5.2. **The key principles underpinning this policy are that:**
- the child’s welfare is, and must always be, the paramount consideration;
 - all children have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity; and
 - all allegations of abuse or poor practice will be taken seriously and responded to swiftly and appropriately.

6. Roles & responsibilities

- 6.1. United Dragons has a safeguarding structure which ensures the safety and welfare of all children that engage with their services or partner services. For the purpose of this policy the safeguarding structure consists of; the Senior Safeguarding Lead who takes leadership responsibility for United Dragons safeguarding arrangements and the Safeguarding Lead who has overall responsibility for the day to day safeguarding of children at United Dragons.
- 6.2. All job descriptions where the individual will be working with children and young people will reference the individual’s role and responsibility to safeguarding.
- 6.3. Ryan Moore as **Safeguarding Lead**, is responsible for the overall implementation of safeguarding, case management and safer recruitment across United Dragons. The Safeguarding Lead is also the first point of contact should safeguarding concerns arise. They are responsible for ensuring all vetting checks are compliant with Safer Recruitment processes.
- The Safeguarding Lead will undertake regular monitoring and risk assessments of all activities involving children (or will designate this task to an external assessor where appropriate). They are responsible for establishing key safeguarding contacts with every partner who will be delivering on behalf of United Dragons.
- 6.4. **United Dragons Director** – responsible for all aspects of United Dragons and to ensure safeguarding is a key priority at Board Level.
- 6.5. Employees, workers, agency staff, consultants, partners and volunteers are responsible for familiarising themselves with United Dragons policy and procedures, ensuring the safety and welfare of all children and young people as well as promoting best practice and creating a safe

² Working Together to Safeguard Children, 2015

³ Disclosure and Barring Service

and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect.

- 6.6. Anybody with a concern about a child's welfare should contact the Safeguarding Lead for advice in the first instance – details can be found at the end of this policy.

7. Safer Recruitment

- 7.1. As part of United Dragons recruitment and selection process, offers of work for positions which involve working with children are subject to a satisfactory Disclosure & Barring Service (DBS) at the level deemed suitable for the position offered and subject to appropriate references.
- 7.2. United Dragons require two satisfactory written references and a DBS check to be completed before the commencement of employment. Only in exceptional circumstances where it is deemed business critical, can a risk assessment be completed for an individual to allow them to start work before these checks are completed. In these circumstances there will be no contact with children or vulnerable adults.
- 7.3. The Safeguarding Lead will hold a safeguarding induction with all new employees, casuals, volunteers and partner organisations before they begin delivering activities. During this induction key elements of United Dragons Safeguarding Children Policy are discussed in more detail, including any specific safeguarding updates, signs and indicators of abuse and how to report a concern.
- 7.4. All staff working in direct contact with children directly or on behalf of United Dragons are required to attend the UK Coaching Safeguarding Course or equivalent before delivering activities that requires work with children. Individuals must also undertake a refresher course at least once every 3 years. Details of those satisfactorily completing this course are retained by United Dragons.

Single Central Record

- 7.5. The Safeguarding Lead will maintain the Single Central Record which includes all staff who are working with children and vulnerable adults.

Third Party Organisations and Partnerships

- 7.6. United Dragons commitment to safeguarding should be outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services.
- 7.7. If other organisations provide services or activities for children for whom United Dragons is responsible, the Safeguarding Lead will check that the organisation has appropriate safeguarding procedures in place, equivalent to those of United Dragons, including safer recruitment procedures.
- 7.8. United Dragons will obtain written confirmation from agencies or third party organisations that agency staff or other individuals who may work at United Dragons with children have been through appropriate safer recruitment procedures and possess the required qualifications.

8. Disclosure & Barring Service

- 8.1. United Dragons ensure that all staff employed directly by United Dragons acquire a Criminal Record Checks. Enhanced DBS checks, plus barred list checks where appropriate, enable United Dragons to undertake more thorough recruitment and selection procedures for positions which involve working with children.
- 8.2. United Dragons does not currently accept the DBS update service.

New Appointments

- 8.3. All staff who are offered a position which involves working with children will be required to complete a Self-Declaration Form and also undertake an Enhanced DBS with barred list check where appropriate.
- 8.4. All offers of work are subject to the outcome of the screening process and where applicable, this is set out in the initial job advertisement and the applicant's offer of work. Until such time as a

satisfactory DBS has been received, the member of staff will not be permitted to work unsupervised with children.

- 8.5. If a new member of staff has been subject to a DBS check by their previous employer United Dragons will still require a further check.
- 8.6. If a member of staff is transferring internally to another role which also requires a DBS. An assessment will be made regarding the level of DBS check (Basic, Enhanced or Enhanced with Barring) and for which workforce (Child or Adult) and a decision will then be made if a new DBS is required.
- 8.7. United Dragons will ensure that all temporary staff and external consultants identified in roles that are working with children, sign a Self-Declaration Form and in any case, will not have unsupervised access to children.

Positive Disclosure

- 8.8. Should a DBS with content be received, a risk assessment will be carried out by the Safeguarding Lead to assess the information contained within the DBS. The member of staff will also be asked to attend an interview prior to a recruitment decision being made. The Rehabilitation of Ex-Offenders Act 1974 and the Protection of Freedoms Act 2012 should be considered in all cases before a final decision is made.
- 8.9. United Dragons is committed to providing equal opportunities to staff and therefore a DBS which has content, will not necessarily result in a bar from work.

9. Ratios & Supervision of Children

- 9.1. Coaches working with young people should not work in isolation. It is important to have the correct level of supervision in order to maintain effective health and safety and so that the coaches can reduce the risk of injury to players and ensure adequate cover remains in case of an emergency. Good practice means at least one other adult in addition to the head coach should be present at every session to supervise. The additional adults do not need to be qualified coaches as long as the ratio of coaches: players are met. Participants aged under 17 should not be included in staffing ratios even if they have coaching qualifications.
- 9.2. The level of supervision should take account of:
 - ability and experience of the players;
 - the age and any disabilities or special requirements of any of the young people;
 - the activity being undertaken;
 - the geography of the facilities being used (i.e. restricted access to indoor or outdoor areas);
 - the 'risk assessment' of the activity and facility.
- 9.3. When working with groups of children under 8 years of age government guidance states clearly that there should be one supervising adult for every 6 children (Care Standards Act 2000). When working with young people aged over 8 years old the ideal coaching ratio is one coach for every 8-12 players. If there is an accident or an incident which may mean a member of staff has to leave, you should ensure that there are enough people remaining to supervise the group.
- 9.4. A person cannot become a qualified Level 1 coach until they are 16 years old, and it is expected that the person leading the session will be at least Level 2 qualified (for which you have to be 18 years old). Young people can become involved in coaching but they should be assisting qualified coaches and not delivering sessions until they are appropriately qualified.
- 9.5. Any activity undertaken by United Dragons or their partners will always give full consideration to the appropriate number of staff members available depending on the age of the children involved; the degree of risk the activity involves; and whether there are any other additional needs of the group. The general rule is that the lower the age of the participants, the greater the need for supervision.
- 9.6. Coaching and staffing arrangements must always meet the needs of all children and ensure their safety.

Children at Events

- 9.7. During events there are often groups of children who are visiting United Dragons with parents, guardians or other professionals in organised groups. If United Dragons are providing an event such as a family day, United Dragons are not primarily responsible for these children whilst they are with their parents or guardians. United Dragons will however always have a minimum of 2 responsible adults to every group of 20 children.
- 9.8. For organised groups where other professionals or parents are not in attendance, United Dragons are primarily responsible for the children in attendance for any activity and the ratios described above should be adhered to. United Dragons will take full responsibility for these children whilst in our care and will follow standard protocols such as completing risk assessments, registration and dispersal.
- 9.9. All children who attend an event or activity must be accounted for on a register. Parental consent must be documented prior to any event, which agrees to their participation, photography and how their child will be collected at the end of their experience.
- 9.10. All parents / carers are required to sign the register on collection of their children.

10. Coaching Staff

- 10.1. All United Dragons and partner coaches are responsible for renewing their DBS every 3 years. Where a certificate expires but the individual has applied within the recommended timeframe (3 months), the individual will be taken off regulatory activity and will be provided with alternative non-regulatory duties, at the Safeguarding Lead's discretion.
- 10.2. United Dragons considers coaching staff to be in a position of trust and authority. Therefore it is strictly forbidden for coaches and any other employee to engage in a personal or sexual relationship with any player or participant under the age of 18.

11. Gifts and Favouritism

- 11.1. United Dragons or partner staff should take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.
- 11.2. United Dragons recognise that there are occasions when children or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a "thank you", and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others.
- 11.3. Similarly, it is not permitted for staff to give personal gifts to children. This could be misinterpreted as a gesture either to bribe, or to single out the child. It might also be perceived that a "favour" of some kind is expected in return.
- 11.4. Any reward given to a child must first be agreed with the staff member's line manager as part of a structured reward system in line with the departmental policy and not based on favouritism.

12. Changing Rooms

- 12.1. Where practical, children should be supervised at all times in the changing rooms by two members of staff. Adult staff should not change or shower at the same time using the same facility as players. Staff of the opposite gender should not be present whilst players are showering or changing. If a young person is uncomfortable changing or showering in public, no pressure should be placed on them to do so and they should be encouraged to do this at home. If the club has children with disabilities, involve them and their parents in deciding how they should be assisted and ensure they are able to consent to the assistance that is offered but club members should avoid taking on the responsibility for tasks for which they are not appropriately trained.
- 12.2. All players and staff should be aware that no photographic equipment (including cameras, video cameras, and mobile phones) should be used in the changing room environment.

13. Use of Images

- 13.1. The vast majority of people who take or view photographs or videos of children do so for entirely innocent and legitimate reasons. However, sadly, some people abuse children through taking or distributing images. We must therefore ensure we have effective safeguards in place.
- 13.2. Where children are being photographed the following will apply in order to protect children:
- 13.3. All children featured in United Dragons publications will be appropriately dressed and will have clothing garments covering their torso and from at least the bottom of their neck to their thighs, and feature safety equipment such as shin pads or guards.
- 13.4. Designated United Dragons and/or partner photographers will, where applicable, undertake a DBS and attend an appropriate safeguarding workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the use of images. United Dragons or partner agency staff Identification will be worn at all times.
- 13.5. Recordings of children for the purposes of legitimate coaching aids are only filmed by United Dragons or partner officials and are stored safely and securely in line with United Dragons Privacy Policy and/or the partner's arrangements for GDPR.
- 13.6. Any instances of inappropriate images in sport should be reported to the Safeguarding Lead at United Dragons immediately.
- 13.7. Photography is forbidden in private areas such as changing rooms, toilets, showers, changing rooms whilst a child is in a state of undress.
- 13.8. United Dragons does not condone the use of young player profiles with images and personal information on its own or partner's websites.

Players and Participants

- 13.9. Before taking or publishing images of children (for example on our website or on a newsletter) parental consent is sought in writing prior to the event. Parents/Legal Guardians are responsible for informing United Dragons of any change of circumstances within the season which may affect consent.
- 13.10. Parents/Legal Guardians will be informed of how the image will be used. United Dragons will not allow an image to be used for something other than that for which it was initially agreed.
- 13.11. Children attend events as supporters and spectators. Images of children may appear as part of the crowd on event days and be reproduced in official United Dragons promotional material and appear in the public domain
- 13.12. Only the first name of any child will be used on any publication if consent has been given.
- 13.13. United Dragons and partner staff will encourage children to tell us if they are worried about any photographs that have been taken of them.
- 13.14. Where possible, the image will focus on the activity taking place and not a specific child.
- 13.15. Where appropriate, images represent the broad range of people participating safely in the event.
- 13.16. No images of children featured in United Dragons publications will be accompanied by personal details such as their school or home address.

14. Travel & Events

- 14.1. All off site (outreach) activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where these activities are provided by and managed by United Dragons our own safeguarding and child protection procedures apply.
- 14.2. Children have a right to enjoy taking part in sports events planned and provided by those who put their safety and wellbeing first. United Dragons as event organisers, have a responsibility to

take all reasonable steps to ensure that the activities provide as safe an environment as possible.

- 14.3. When children for whom United Dragons are responsible attend off-site activities, including residential visits and work-related activities, safeguarding Lead will check that effective risk assessments and safeguarding arrangements are in place such as effective supervision, registration and dispersal. These will be monitored and audited on an annual basis and the results of which will be reported back to the Board of Trustees.

15. Lost Children

- 15.1. During delivery of programmes or other events it is the coaches' responsibility to do regular and thorough head counts. At any one time a coach should know how many children are within their responsibility.
- 15.2. A lost child is considered as a very serious incident and therefore a full review will take place within 1 week of the incident occurring. A decision will be made regarding any potential conduct or disciplinary action.
- 15.3. All sites where United Dragons deliver from will have a risk assessment that will include any additional measures taken to ensure a child does not go missing whilst in our care.
- 15.4. In any incident where a child is unaccounted for during or after either a United Dragons or partner session the Safeguarding Lead must be notified. This is reportable to the Charity Commission as a serious incident.

16. Risk Assessments

Departmental Risk Assessments

- 16.1. United Dragons undertakes a risk assessment for each activity they operate on a bi-annual basis, and these are completed in consultation with the event manager and, where necessary, any external support.
- 16.2. All children and young people are encouraged to wear appropriate shoes and protective equipment as appropriate to the sports activity. Coaches at United Dragons and external organisations are required to adapt the sessions should there be participants who are unable to wear the appropriate protective equipment.

Activities for Disabled Persons & Adults at Risk

- 16.3. United Dragons carries out all activities for disabled persons and adults at risk under the guidelines of the Equality Act 2010 and Safeguarding Vulnerable Groups Act 2006.

17. Guidelines in the event of concern

Highlighting Concern

- 17.1. Although United Dragons is committed to doing the utmost to safeguard children from harm there may be occasions when concern is raised over the treatment of a child either directly to United Dragons or through a partner agency.
- 17.2. If you work or intend to work with young people, you are automatically placed in a position of trust that carries authority, status, power and responsibility. If the adults involved are positive role models displaying high moral and ethical standards, the benefit to young people's development can be significant. Unfortunately, it is also possible for adults in sport to do a lot of harm by bullying, harassing, neglecting or abusing children and young people; or by failing to respond to concerns they may have.
- 17.3. Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.
- 17.4. "Child abuse" and "neglect" are generic terms encompassing all ill treatment of Children as well as cases where the standard of care does not adequately support the Child's health or development. Children may be abused or suffer neglect through the infliction of harm, or

through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the Child and may be of the same or opposite sex. There is often a common misconception that only a certain type of person can abuse Children but this is simply not the case – abuse can take place in any setting, by someone of either sex, of any sexual orientation and of any age.

Recognising signs of abuse

- 17.5. There are many different forms of abuse that fall into the categories identified by the NSPCC as follows, should you have any concern that abuse is occurring you should contact the SM or a Designated Safeguarding Officer immediately.

Physical Abuse

- 17.6. Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts.
- 17.7. It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, and slapped or having objects thrown at them. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell – this is known as fabricated or induced illness (FII).
- 17.8. There is no excuse for physically abusing a child. It causes serious, and often long-lasting, harm – and in severe cases, death.

Honour Based Violence

- 17.9. A child who is at risk of honour based violence is at significant risk of physical harm (including being murdered) and/or neglect, and may also suffer significant emotional harm through the threat of violence or witnessing violence directed towards a sibling or other family member.
- 17.10. Honour based violence cuts across all cultures and communities, and cases encountered in the UK have involved families from Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European communities. This is not an exhaustive list.

Sexual Abuse

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

Harmful Sexual Behaviour

- 17.12. Children and young people who develop harmful sexual behaviour harm themselves and others. Harmful sexual behaviour includes; using sexually explicit words and phrases; inappropriate touching; using sexual violence or threats; full penetrative sex with other children or adults.

Child Sexual Exploitation

- 17.13. Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.
- 17.14. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online.
- 17.15. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.⁴

⁴ www.nspcc.org.uk

Neglect

- 17.16. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Emotional Abuse

- 17.17. Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving 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 the 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, though it may occur alone.

Bullying including Peer on Peer

- 17.18. United Dragons has a zero-tolerance approach to bullying and any reported incidents of bullying by a staff member to a child, child to staff member or child to child will be taken seriously and investigated by the respective organisations Safeguarding Lead.
- 17.19. Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone.
- 17.20. It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.
- 17.21. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

Radicalisation & Extremism

- 17.22. The following definitions are taken from the HM Government Prevent Strategy 2011.

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate on terrorist activity.

Extremism is 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. We also include in our definition of extremism calls for the death of members of the armed forces.

- 17.23. Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This guidance is issued under section 29 of the Act. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty.
- 17.24. A range of private and voluntary agencies and organisations provide services or, in some cases, exercise functions in relation to children. The duty applies to those bodies, which include, for example, children's homes and independent fostering agencies and bodies exercising local authority functions whether under voluntary delegation arrangements or via the use of statutory intervention powers. These bodies should ensure they are part of their

local authorities' safeguarding arrangements and that staff are aware of and know how to contribute to Prevent-related activity in their area where appropriate.⁵

- 17.25. United Dragons recognise that some children and young people are more vulnerable to radicalisation, including those who may be isolated/marginalised in society (through mental health or disability) and may have no other support. Children who attend sports activities are not immune from this risk and therefore United Dragons ensure that all staff who work with children and young people are equipped at identifying potential indicators of abuse in regards to radicalisation and extremism.

FGM Mandatory Reporting Duty

- 17.26. Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence.

- 17.27. Section 74 of the Serious Crime Act 2015 amended the Female Genital Mutilation Act 2003 to introduce the legal duty for regulated health and social care professionals and teachers to make a report to the police if:

- they are informed by a girl under the age of 18 that she has undergone an act of FGM; and/or
- they observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

- 17.28. United Dragons ensure FGM workshops are attended by all staff and partner staff.

18. Reporting a disclosure or suspicion of abuse or poor practice

- 18.1. It can be very hard for children and young people to reveal abuse. Often they fear there may be consequences. Some delay telling someone about abuse for a long time, while others never tell anyone, even if they want to.

- 18.2. Children value being believed and, as the adult they have chosen to tell, it's vital that you act on what you've been told.

- 18.3. The United Dragons Safeguarding Lead or respective partner agency safeguarding lead should be contacted as early as possible and within 24 hours in any circumstance, however it is recognised that an individual may need to respond to a situation immediately. With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice. These guidelines are the minimum requirements expected of all our partners:

- Listen carefully to the child. Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the child to 'shut down', retract or stop talking
- Let them know they've done the right thing. Reassurance can make a big impact to the child who may have been keeping the abuse secret
- Tell them it's not their fault. Abuse is never the child's fault and they need to know this
- Say you believe them. A child could keep abuse secret in fear they won't be believed. They've told you because they want help and trust you'll be the person to believe them and help them
- Don't talk to the alleged abuser. Confronting the alleged abuser about what the child's told you could make the situation a lot worse for the child
- Explain what you'll do next. If age appropriate, explain to the child you'll need to report the abuse to someone who will be able to help

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

- Don't delay reporting the abuse. The sooner the abuse is reported after the child discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.
- Write down everything said and what was done (handwritten is preferable) and sign and date the notes. An Incident Report Form should be used where possible and, in any case, a referral must be made to the relevant organisation within 24 hours of the incident taking place.
- Seek medical advice if necessary

18.4. In the event that a disclosure is made with a partner agency. They are required to follow the above and once it is safe to do so, they must inform the Safeguarding Lead of United Dragons. This may be reportable as a serious incident to the Charity Commission.

DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.

19. Recording Allegations or Suspicions of Abuse or Poor Practice

- 19.1. All staff should immediately report any observations, allegation or suspicions of abuse or poor practice by another professional to their respective Safeguarding Lead, who will ask for a written factual statement from the person making the report. An Incident Report Form should also be provided.
- 19.2. Any statement made by the child should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, keeping any questions to a minimum and they should be of an open format. No suggestion of who the perpetrator was or how any concern or incident happened should be suggested.
- 19.3. Poor practice represents unsafe working practice and is a cause for concern and staff should feel able to raise concerns about poor or unsafe practice.
- 19.4. Where poor practice is considered to have occurred, in the first instance, staff should discuss with their line manager or their respective Safeguarding Lead. An incident report will then be required to be completed. Where the allegation is in regard to a United Dragons or partner agency member of staff or volunteer the appropriate line manager will be required to complete a full incident report with all appropriate information. An internal investigation will be followed and all relevant information will be assessed and reviewed by the respective Safeguarding Lead and appropriate Line Manager or HR Manager, in order to make a decision about any poor practice that is alleged to have happened.
- 19.5. In all circumstances the United Dragons Safeguarding Lead must be notified and kept up to date with any ongoing investigations that could be subject to Charity Commission reporting.
- 19.6. If a member of staff believes that this route has been ineffective, whistleblowing procedures are in place for such concerns to be raised.
- 19.7. Investigations into possible abuse will require careful management. In these cases the Safeguarding Lead will first seek the advice of Children's Social Care, a Local Authority Designated Officer (LADO) or the Police before setting up an internal inquiry and take their advice on informing the child's parents.
- 19.8. In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, United Dragons must provide a report to the Charity Commission. Any external local authority provision will naturally take the lead on any case.
- 19.9. Providing it is appropriate to do so the United Dragons or partner Safeguarding Lead will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from the external agency. Escalation to inform United Dragons will take place at the Safeguarding Lead's earliest opportunity.
- 19.10. The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 and email help@nspcc.org.uk

20. Allegations of abuse against members of United Dragons or partner staff

- 20.1. If the report involves an allegation about any member staff (whether full time, part time, paid, unpaid, contracted, engaged, partner, agency or voluntary etc.) and United Dragons or the partner believes that the report could demonstrate that the member of staff in question has:
- behaved in a way that has harmed a child, or may have harmed a child;
 - possibly committed a criminal offence against or related to a child; or
 - behaved towards a child or children in a way that indicates he or she is unsuitable to work with children,
- 20.2. Either the United Dragons or respective partner agency Safeguarding Lead shall immediately inform the LADO of the Borough where the alleged incident took place so that he or she can consult with the Police and local authority children's social care colleagues as appropriate. Where the Safeguarding Lead are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.
- 20.3. Advice from legal or HR will also be sought and depending on the nature of the allegation, there may need to be consideration for redeployment or even suspension as a neutral act pending the investigation. This is needed in certain circumstances to protect both the professional from further allegations being made and the children from being subjected to further risk until there is more proof as to what happened.
- 20.4. The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation. This process would only be carried out once the advice of the above mentioned external bodies had been sought and only then in consultation with the Safeguarding Lead.
- 20.5. Providing it does not contradict with any advice received from the LADO, an internal investigation will be carried out in line.

Charity Commission

- 20.6. In addition to statutory reporting to either the LADO or Police, United Dragons are also responsible for reporting serious incidents to the Charity Commission.
- 20.7. The Charity Commission details what to report on their website and although not exhaustive, includes the following criteria:
- A beneficiary within the charity's care (includes partner's) has/alleges to have suffered serious harm;
 - Allegation that a staff member has physically assaulted a beneficiary
 - A volunteer, following an incident of abuse or neglect of a beneficiary, has resigned during an investigation of the incident
 - United Dragons failed to carry out DBS checks which would have identified that a member of staff or trustee was disqualified in law (under safeguarding legislation) from working with children or adults
 - A beneficiary of United Dragons has died or been seriously harmed; a significant contributory factor is a policy or procedural failure by the charity, and/or the way it has worked with other agencies
 - United Dragons discovers that an employee or volunteer, in contact with children or vulnerable adults, is on the sex offenders list
 - A member of United Dragons staff or volunteer has been arrested for terrorism related offences
 - A visiting speaker has used a United Dragons event to promote extremist messages, via live speech or social media
- 20.8. The Charity Commission are clear that if you are in doubt about what to report, report it.

21. Confidentiality

- 21.1. There is always tension and caution around issues of confidentiality. The advice for all staff at United Dragons is that no guarantee of confidentiality can be given to a child (although this does not necessarily mean that the parents / carers have to be told).

- 21.2. A child should never be pressured to give information or show physical marks unless they do so willingly. If they chose to show markings, two members of staff should be present and any marks raising concern should be recorded.
- 21.3. There are actions which staff have to and are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring any issue to a Safeguarding Lead.

22. Continuous Learning and Development

- 22.1. United Dragons understands that risk can only be mitigated not eradicated. Therefore it is critical that United Dragons work within a culture of continuous learning in order to ensure a high quality of service provided to all. Where an incident or accident occurs or a complaint is received, United Dragons are committed to investigating, reviewing and evaluating the circumstance and/or event in order to understand what has happened and most importantly what controls can be implemented in order to mitigate the risk of the incident, accident or complaint occurring again.
- 22.2. United Dragons values the continuous development of all staff, volunteers and participants in line with the Safeguarding Strategy in order to increase the capability of their workforce; and to add value to existing service, systems and frameworks in order to ensure safe and effective services for children and young people.
- 22.3. It is the responsibility of the Safeguarding Lead to ensure the workforce keep up to date with emerging safeguarding and inclusion issues by way of attending workshops, conferences and learning and engaging with current affairs, serious case reviews and other relevant issues.
- 22.4. All staff and volunteers who are working with children and young people are requested to attend annual Safeguarding Briefings and workshops on relevant and up to date subjects in order to keep the participants of all sports programmes safe.

23. Safeguarding Contacts

Ryan Moore
Safeguarding Lead
ryan@uniteddragonsfc.com

24. External Contact

Dependent on where the child or young person resides will depend on which Local Authority should be contacted. Please contact Ryan Moore, Safeguarding Lead in all circumstances who will confirm which Local Authority is dealing with the matter.

THE FA: 0808 800 5000
NSPCC HELPLINE: 0800 056 0566
NSPCC SMS: 88858

25. External Resources

- **British American Football Association Safeguarding Children Guidelines:**
<https://www.britishamericanfootball.org/governance/corporate-documents#.XPFVMyhKqdU>
- **London Child Protection Procedures (2018)**
http://www.londoncp.co.uk/chapters/A_contents.html
- **Working Together to Safeguard Children 2018:**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf
- **Standards for safeguarding and protecting children in sport (2005)**

26. Date and review

- 26.1. This policy is applicable to 2022 and is under constant review. A revised policy will be drafted annually with the next scheduled review due in June 2023 for use in the following season. The policy may also be subject to review following incident learning outcomes, a major incident, organisational or legislative change.