

**Policy Ref:  
# GOV-18a**



# Safeguarding and protecting children & young people in physical activity and sport

Date Approved	July 2025
Approved By	Board
Review Date	July 2027



SASP are committed to our Diversity and Inclusion Action Plan (DIAP) which sets out our ambitions for advancing and celebrating diversity and inclusion at every level of our organisation.

This stamp indicates areas in our policies / procedures that focus on Equality, Diversity & Inclusion.

Policy Update Record (Version Control)		
Date	Author	Change(s)
13/05/2025	Laura Carter	<p>Policy updated as follows:</p> <ul style="list-style-type: none"> <li>• Minor wording changes throughout the document</li> <li>• Explanation of the SWO role and limitations (Introduction)</li> <li>• Elimination of unnecessary elements in 3.7 (photography)</li> <li>• Amendments to reflect change to online reporting (4.2/4.3)</li> <li>• Addition of Low-Level Concern (LLC) statement (4.3)</li> </ul>
09/07/2025	FGAR	Policy approved by FGAR sub-committee.

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## **Forward**

Participation in physical activity and sport can make an important and memorable contribution to children's lives and future development.

As well as the positive health benefits of an active lifestyle, physical activity and sport provides children and adults with the opportunity to learn new skills, build confidence, resilience, and self-esteem.

Above all it gives everyone involved the opportunity to fulfil or maximise their own unique potential.

Everyone working with children and young people is first and foremost in a position of trust, influence, and responsibility.

It is important that children and young people aspire to the highest standards and values we can offer and encourage, through enjoyable experiences in positive and safe physical activity and sport environments.

Those of us who by virtue of our position as a volunteer or a professional should be prepared commit to always act in their best interest - and to this end we are more than happy to affirm the commitment of the Board of Directors and to endorse both this Policy and the Implementation Plan which goes with it.

**Jane Knowles**  
**SASP Chief Executive Officer**

**Joanna Whitehead**  
**SASP Board Member**

**Laura Carter**  
**SASP Safeguarding Lead**

### **\*\*IF YOU HAVE AN IMMEDIATE SAFEGUARDING CONCERN\*\***

Please contact:

SASP Safeguarding Lead: Laura Carter - 01823 653990 / lcarter@sasp.co.uk

SASP Deputy Safeguarding Lead: Jane Clark - 01823 653990 / jclark@sasp.co.uk

If a child, young person, or adult at risk is in immediate danger, contact the police on 999. Other useful numbers include:

NSPCC Helpline – 0808 800 5000

Somerset Social Care – 0300 123 2224

NSPCC Childline – 0800 1111

Ann Craft Trust (Adult Safeguarding) – 0115 951 5400

For detailed information on SASP procedures for responding to Disclosures, Allegations and Suspicions please see Appendix D on page 30.

## Introduction

SASP (the Partnership) is committed to providing safe, inclusive, enjoyable activities and sporting opportunities for children and young people.

We have a moral and a legal obligation to ensure the highest possible standard of care for those children and young people who use our service.

We believe that children and young people have the right to be safe, secure, and free from threat and that everyone has the right to be treated with respect and to have their concerns listened to and acted upon.

To this end, the following Policy Document, along with the Implementation Plan, will provide guidance and help raise awareness for all staff working for and with the Partnership, whether paid or unpaid.

This policy will be reviewed every two years or earlier considering changes in regulations, significant incidents, or if requested to do so by relevant partner organisations.

The purpose of the policy is to safeguard children and young people in physical activity and sport and to facilitate the best possible practice from its staff and volunteers.

***Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.***

As part of our safeguarding policy, we will:

- Promote and prioritise the safety and wellbeing of children and young people.
- Ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify, and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people.
- Ensure appropriate action is taken in the event of incidents / concerns of abuse, and support provided to the individual/s who raise or disclose the concern.
- Ensure that confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored.
- Prevent the employment / deployment of unsuitable individuals.
- Ensure robust safeguarding arrangements and procedures are in operation.
- Educate and support those organisations delivering activities with SASP or within their own environments.
- Meet the requirements of the updated 'Working together to safeguard children 2023' statutory guidance. Recognising that SASP may be called upon to join local multi-agency safeguarding arrangements and that if asked SASP has a duty to cooperate.

**National Governing Bodies** have their own Child Protection Guidelines that have been approved by the Child Protection in Sport Unit (CPSU). Their guidelines will complement this SASP Policy but in any area of doubt, the SASP Policy will overrule.

In January 2024 SASP recruited a **Sport Welfare Officer**. Part of a network of officers to support clubs and NGBs in promoting good welfare practices for children, young people, and adults. The purpose of the role is to provide guidance on safeguarding. Any case management queries/concerns will always use the relevant SASP or NGB procedures.

Please note that a child / young person is anyone who is under the age of 18.

## 1. OUR COMMITMENT

We will endeavour to:

- Ensure that our staff and volunteers are carefully selected, trained, and supervised.
- Ensure that clear procedures are in place and understood by all staff and volunteers for implementing this policy.
- Provide clear procedures for parents / carers and children and young people to voice their concerns or lodge complaints about any issue.

### 1.1 Policy Aims

This Policy is mandatory for all staff working for the Partnership and is provided as part of an induction package to all those employed, whether paid or unpaid, who will have direct contact with children and young people.

**The aims are:**

- To create a healthy and safe environment at all activities, sport programmes and sessions.
- To ensure children and young people are listened to and kept safe from harm.
- To support and encourage parents / carers to voice their opinions regarding the welfare of participants.
- To ensure staff and volunteers who administer sessions are well informed, supported and enabled to provide the best possible practice.

### 1.2 Objectives

**The objectives are:**

- To raise the level of awareness of staff and volunteers about abuse and its various forms and what all participants are entitled to be protected from.
- To ensure that all staff are able to recognise signs and symptoms that could indicate child abuse.
- To promote the general welfare, health, and full development of all participants during all sessions.
- To develop effective procedures in recording and responding to accidents and complaints to alleged or suspected incidents of abuse.

### 1.3 Communication

- All staff working within the Partnership will receive training on the Partnership Safeguarding Policy as part of their induction (proportionate to their role).
- All staff working for the Partnership will undergo continuous safeguarding awareness training throughout their employment (proportionate to their role).
- This Policy and attached documents will be easily accessible for parents / carers and participants via the website. Updates will also be communicated via external newsletters and social media.

## 2. RECRUITMENT, EMPLOYMENT AND DEPLOYMENT OF STAFF AND VOLUNTEERS

### 2.1 Recruitment and Selection of Staff / Volunteers

All successful applicants for posts and all current casual staff in regulated activity (either paid or unpaid) involving direct contact with children and young people will be subject to a DBS

check, level of check relevant to role, to ensure that there is no cause for concern. If anything is flagged during a DBS check then SASP will refer to employment law and it's on policies. The SASP Recruitment Policy (HR01) will also be adhered to during the recruitment process.

## 2.2 Induction and Training

Relevant training will follow up the recruitment and selection process.

- All staff and volunteers on appointment will, as part of their induction, receive training (proportionate to their role) on the Partnership's Safeguarding Policy, and be required to sign the Conduct Standards (or similar for volunteers e.g., Volunteer Agreement) to confirm they abide by them.
- All staff will be expected to undertake training where relevant, including accredited Child Protection training (at least every 3 years).
- Non-salaried staff and volunteers working for the Partnership will be provided with a basic safeguarding induction, guidance information and a named contact at the Partnership.
- Staff will be made aware that child abuse can and does occur and that colleagues, who are members of staff or volunteers could perpetrate it.
- It is made clear that most abusers are not the monsters most people picture them to be, but ordinary men and women and can be extremely, clever, manipulative, and powerful.
- All staff will be made aware that children can find it very difficult to talk about abuse. They need to be listened to, taken seriously, and have their concerns acted upon.
- Staff are made aware of the procedures they need to follow in response to concerns.
- Staff will be made aware of the changes in the Positions of Trust law which has extended to include sports coaches, **this closes the legal 'loophole' and protects 16- and 17-year-olds from potential abuse.**

## 3. PROMOTING GOOD PRACTICE

### 3.1 Duty of Care

Duty of care means that an organisation needs to take such measures as are *reasonable* in the circumstances to ensure that individuals will be safe to participate in an activity to which they are *invited to* or which is *permitted*. Where there is a formal relationship, for example between a club and a club member, or a coach and an athlete, **there is a duty of care.**

When children and young people are involved in organised activities and are to any extent under the care and / or control of one or more adult(s), the adult(s) have a duty to take reasonable care to ensure their safety and welfare.

This duty occurs in two ways:

A **Legal** Duty of Care

A **Moral** Duty of Care

The **Legal Duty of Care** has a strict definition. The most obvious example of this is in Health and Safety procedures where clear guidance is provided about what reasonable steps should be taken to minimise the hazards related to activities, substances, or situations. In many sports activities, given the health and safety considerations, it is recognised that a sports organisation or individual owes a duty of care to its members. However, it is also understood and recognised that accidents can and do happen, and that it is not possible to predict every eventuality. Liability for the legal duty of care would only arise when an incident

occurs, and it can be demonstrated that *the risk was foreseeable, but no action had been taken to remedy it.*

The **Moral Duty of Care** is a *responsibility* for safety and welfare. Members of staff have a responsibility for those children and young people or adults at risk, and other staff, who are under their control. To determine if a breach of the duty of care has occurred, the ordinary civil law of negligence would be applied. The question is whether the accused in acting, or omitting to act, has failed to reach the standard of *a reasonable person*. In specialist sports activities the qualified instructor has a duty of care for all those taking part irrespective of their age or position. The individual administering the activity, whatever their status, should be appropriately trained and authorised.

In addition to this, those in charge of children have an additional charge and that is to act "*in loco parentis*". This term is best explained as requiring the adult to act as "a reasonable parent".

Within physical activity and sports organisations, the duty of care would start by ensuring the activity is authorised by the sport and the relevant instructors are qualified for the task. It would then go on to ensure that it is managed in a safe manner throughout.

### **3.2 All staff and volunteers must sign and abide by the Conduct Standards**

The Conduct Standards detail the behaviours expected of staff and volunteers. Staff must:

- Treat everyone with respect and dignity.
- Not discriminate.
- Challenge and oppose unacceptable or discriminatory behaviour.
- Maintain satisfactory standards of performance at work.
- Comply with all reasonable management instructions.
- Co-operate fully with your colleagues and with management.
- Ensure the maintenance of acceptable standards of politeness, and do not create an intimidating, hostile, degrading, humiliating or offensive environment.
- Take all necessary steps to safeguard SASP's public image and preserve positive relationships with all persons and organisations connected to SASP.
- Comply with all SASP Policies and Procedures.
- Comply with U.K. law. If SASP become aware of an offence having been committed, SASP may report their concerns to the appropriate authority.
- Ensure that you behave in a way that does not constitute unlawful discrimination, bullying, harassment, or victimisation.
- Managers must not abuse their authority. They must delegate duties to their team members by considering their workload and competencies. Team members must follow team leader instructions and complete their tasks with due care and on time.
- SASP recognises the use of personal mobile phones in the workplace, including to receive verification codes to access SASP IT systems, but they must be used reasonably for personal use, with discretion and without impact on your role or duties.

### **3.3 Physical Contact and Young People in Sport**

Physical contact during physical activity and sport should always be intended to meet the participants' needs, NOT the adults/deliverers. The adult should only use physical contact:

- To treat an injury.
- To prevent an injury or accident from occurring.

- To meet the requirements of the physical activity or sport e.g., develop sports skills or techniques but in strict accordance with guidelines recommended by the relevant National Governing Body.

The adult should always seek to explain the nature and reason for the physical contact and unless the situation is an emergency, the adult should ask for permission. It is good practice for sports club or organisation, to explain, or give written guidance to parents/carers and their children about any physical contact that will be required as part of that activity.

Participants should be encouraged to voice concerns they have if any physical contact makes them feel uncomfortable or threatened.

Contact should not involve touching any part of the body that might cause a child distress or embarrassment, and contact should always take place in an open or public environment and not in secret or out of sight of others. Adults should be aware of the limits within which such contact should properly take place, and of the possibility of contact being misinterpreted.

Some physical activity or sport may require physical contact between young athletes and those teaching them, for reasons of both teaching and the participant's safety. National Governing Bodies have developed guidance to assist coaches in this area. This guidance should be followed by those teaching these sports. Even in sports where there is a need to support or touch a child, over – handling should be avoided. If in any doubt, please consult with the relevant National Governing Body of Sport.

Any form of physical punishment is unlawful, as is any form of physical response to misbehaviour unless it is by way of restraint. It is particularly important that adults understand this both to protect their own position and the overall reputation of the organisation in which they are involved.

There may be times where a participant needs comfort and reassurance which may include physical comforting such as a caring parent or colleague would give. A young person or coach may also want to mark a success or achievement with a hug or other gesture. Adults should use their discretion in such cases to ensure that what is (and what is seen by others present) normal and natural does not become unnecessary and unjustified contact. The physical contact needs to be appropriate to the situation. It should also be considered that what an adult may feel is appropriate may not be shared by a young person.

### **3.4 Supervision of Children**

Planning for the proper supervision of children is one of the most effective ways to minimise opportunities for participants to suffer harm of any kind whilst in your care.

- Organisers should provide clear guidance for parents, teachers, staff, and participants.
- Those in charge must be satisfied that the workers and adults who accompany group parties are fully competent to do so.
- Children must be supervised at all times, the child to adult ratio will be determined by the activity and children must not be left unsupervised at any venue whether it be indoors or out.
- Those in charge should always know where the participants are and what they are doing.
- Any activity using potentially dangerous equipment should have been risk assessed and be subject to constant adult supervision.
- Dangerous behaviour by children should not be allowed.
- When delivering drop-in sessions please refer to the CPSU Drop In Environment briefing.

## **3.5 Code of Conduct for Children and Young People**

Children participating in the Partnership's activities may be requested to sign a Code of Conduct for Participants (see Appendix A for example). If this is not deemed relevant, then Ground Rules can be established with the group either formally or informally. At events, noticeboards can be used to promote this information.

## **3.6 Working with Disabled Participants**

It is recognised that some children and young people may be more vulnerable than others to abuse or harm. They may find it more difficult to recognise and report abuse and to be believed. Staff working with disabled children and young people will have regular updates on safe / best practice through the Disability Manager and Safeguarding Lead, and further training if needed. If a child or young person reaches the age of 18 and considered vulnerable, then the SASP Safeguarding Adults at Risk Policy will be applied.

## **3.7 Guidelines for Photography and Filming**

SASP is keen to promote positive images of children, young people, and adults at risk participating in physical activity and sport and is not banning the use of photographic or video recording equipment. However, there is evidence that some people have used sporting events as an opportunity to take inappropriate photographs and / or film footage. It is not the intention of SASP to prohibit those with a genuine interest in filming or photography but are committed to ensure that all necessary steps are taken to protect children, young people, and adults at risk from the inappropriate use of their images. Appropriate consent is required to be gained before images are taken and used. Please see Appendix B for an example consent form.

### **SASP Guidelines**

- Ask the parent / carer / school permission to use the participant image. This ensures that they are aware of the way the image is to be used (please refer to GDPR Guidelines and be clear about how and for how long images will be securely stored). For Jump Start participants, verbal or written consent to be recorded on the portal.
- Where possible, do not include the name of a child whose image is being used. If naming a child, young person, or adult at risk, only use their first names, as this will reduce the risk of inappropriate and unsolicited attention.
- Avoid the inclusion of other detailed information about individuals.
- Only use images of participants in suitable clothing to reduce risk of inappropriate use.
- Images should positively reflect participants' involvement in the activity and promote the best aspects of the activity.
- Guidelines for use of photographic filming equipment for official use at sporting events:
- Provide a clear brief about what is considered appropriate in terms of content and behaviour.
- Issue the photographer/s with identification which must always be worn.
- Inform children and parents that a photographer will attend an event and ensure they consent to both the taking and publication of films or photographs which feature and clearly identify their child (e.g., close ups, small group, and team photos).
- At many events, organisers and others will reasonably wish to take wide angle, more general photos of the event sites, opening and closing ceremonies, and so on. Separate to the issue of consent for 'identifying' photographs/footage of individual participants (as above) parents and children should at least understand that these types of images will be taken during, or at specific points in the event e.g., information could be included on the parental consent form. It is not reasonable, practical, or proportionate to require parental consents for taking these general types of images, or to preclude it based on the concerns of a small number of parents.

- Do not allow unsupervised access to children or one to one photo sessions.
- Children, parents and others should be informed that if they have concerns, they can report these to the organiser.
- Concerns regarding inappropriate or intrusive photography should be reported to the event organiser or official and recorded.
- Other professional photographers/filming/video operators wishing to record the event should seek accreditation with the event organiser by producing their professional identification for the details to be recorded.
- Students or amateur photographers/film/video operators wishing to record the event should seek accreditation with the event organiser outlining their motive for attending the event and planned use of the material.
- SASP to provide a signed photographic consent procedure at each event to include the photographers
  - Name and address of the person using the camera.
  - The reason or use the images are being or intended to be put to.
  - Signed declaration that the information provided is valid and that the images will only be used for the reasons given.

Guidelines for use of photographic filming equipment by parents / guardians / spectators at sporting events:

- If parents/guardians or other spectators are intending to photograph or video at an event they should also be made aware of SASPs expectations.
- Where appropriate, spectators could be asked to register at an event if they wish to use photographic equipment. It is helpful for the event organisers to provide some indication e.g., a sticker for each registered camera, or badge to be displayed by the spectator to help others recognise those who have registered and respond to those who do not appear to have registered.
- The specific details concerning photographic/video and filming equipment registration should, wherever possible, be published prominently in event programmes, on signage around the site and announced over the public address system, prior to the start of the event.
- Parents/guardians or other spectators should be made aware that photos/footage should only be taken for private use and should not be shared on social media or similar. This should complement any guidelines the school already has in place and promotes to parents.

### **3.8 Guidelines for Transporting Children, Away Trips/Hosting and Dropping Off/Collection Guidelines**

- When an organisation makes the arrangements for travel there must be a risk assessment undertaken by members of staff and volunteers. The risk assessment will need to cover the following areas:
  - Ensuring all vehicles are correctly insured and are roadworthy.
  - Ensuring that the vehicle has breakdown and recovery cover.
  - Ensuring all drivers have a valid and appropriate license.
  - Ensuring all safety measures are available and used (e.g., seatbelts).
  - Ensuring an appropriate child-adult ratio.
  - Ensuring all drivers have adequate breaks.
  - It is also important that wherever possible children and young people are in the back seat of a car. The legal requirements also state that there are seatbelts and booster seats; this is for health and safety reasons.
  - Where a journey is planned, parental / carer consent is necessary if a volunteer or member of staff is to be transporting children (for Jump Start, consent to be obtained at the beginning and is not necessary every time).

- If using a minibus, ensure that all seats are forward facing, and they all have seat belts fitted. Check the driver is experienced in driving a mini-bus and that the driver has undertaken an AccessNI check.
- At least one of the leaders should be trained in first aid procedures and a first aid kit should be available.
- The leader should have access to a mobile phone and contact details for all the children.
- A collection policy needs to be agreed with parents / carers and teachers if relevant which will ensure a clear understanding of collection arrangements between all involved.
- The person transporting a child (if no other option) should tell another member of staff that they are transporting a child, giving details of routes, length of journey and arrival times. For Jump Start, the use of online diaries and Safe Point are to be used to ensure that location of staff is known.
- If possible, two staff members should be present.
- The person transporting the child should call the child's parents or carer to inform them they are transporting their charge, advising them of when they expect to arrive.

## **Away trips and hosting**

- Children should be aware of the travel plans, venue and time for collection, time of return and any costs. Children should also have a clear understanding of what standard of behaviour is expected of them. Children must know what kit they need to bring.
- Parents should be made aware of the above and must have completed a consent form detailing any medical issues that the leader should be aware of. Parents should also have the name and contact details of the leader in the event of an emergency.
- Other coaches / volunteers need to be made aware of what their responsibilities are in advance of the trip. Where possible, all coaches / volunteers have an itinerary.
- A Risk Assessment to be completed for all away trips ensuring that appropriate staffing and facility arrangements are in place for the activity.

## **SASP dropping off and collection guidelines**

- When parents make the travel arrangements to and from an activity without the knowledge of the organising body it is the responsibility of the parents to ensure the arrangements are both safe and appropriate.
- SASP will provide a timetable of programme activities and notify parents/carers of any changes to this timetable in writing where practically possible.
- SASP will require emergency contact numbers for parents/carers.
- SASP adopts and publicises a late collection policy (see below).
- SASP will provide the parents/carers with a contact number which may be used if the parent/carer will be late to collect their child/children.
- SASP will ask parents/carer/nominator to complete a form providing contact details, information about their child/children i.e., medical details etc.

## **Late collection**

If a parent /carer is late the programme/event will:

- Attempt to contact the parent/carer.
- Check records for any information regarding the young person.
- Wait with the young person at the programme venue with, wherever possible, other staff/volunteers or parents.
- Remind parents/carers of the policy relating to late collection.
- If parents/carers remain uncontactable staff will need to report the situation to Children's Social Care or the Police.
- Staff/volunteers should avoid:
- Taking the child home or to any other location
- Asking the child to wait in a vehicle or the programme venue with you alone
- Sending the child home with another person without permission

### **3.9 Sharing of Information**

The Partnership will share information where it reasonably believes that it is necessary to share to protect or safeguard a child/children. It is the responsibility of the Lead Safeguarding Officer to make any decision to share information. Such decisions will be made in accordance with 'Information Sharing – Advice for practitioners providing safeguarding services to children, young people, parents and carers' (HM Government, 2018). In the case of incidents / allegations that are referred out to the Social Services Department, the strategy meeting will determine what information is released to the media.

The principals of information sharing are: necessary, proportionate, relevant, adequate, accurate, timely and secure.

It will be explained to children, young people, adults at risk and families at the outset, openly and honestly, what, and how information will, or could be shared and why. Agreement to this will be sought. The exception to this is where to do so would put that child or young person, or others at increased risk of significant harm, or if it would undermine the prevention, detection or prosecution of a serious crime, including where seeking consent might lead to interference with any potential investigation.

The Partnership will always consider the safety and welfare of a child or young person when making decisions on whether to share information about them. Where there is concern that the person in question may be suffering or is at risk of suffering significant harm, the child's / adult's safety and welfare will be the overriding consideration.

We will, where possible, respect the wishes of children, young people, or families who do not consent to share confidential information. We may still share information, if in our judgement on the facts of the case there is sufficient need to override that lack of consent.

We will seek advice if in doubt, especially where our doubt relates to a concern about possible significant harm to a child or adult at risk or serious harm to others.

We will ensure that the information we share is accurate and up-to-date, necessary for the purpose for which it is being shared and shared only with those people who need to see it and shared securely.

### **3.10 Use of social media and other digital communication**

It is important to note that this is an area that is constantly changing but SASP aim:

- To protect all children and young people involved with SASP and who make use of technology (such as mobile phones and the internet) while in our care
- To provide staff and volunteers with information regarding online safety and inform them how to respond to incidents
- To ensure SASP is operating in line with our values and within the law regarding how we behave online

Our online presence through our website or social media platforms will adhere to the following guidelines:

- All social media accounts will be password-protected, and at least 3 members of staff will have access to each account and password
- Adequate privacy settings are in place either restricting or allowing access to photos, personal information, comments about others, friends and followers

- The accounts will be monitored by a designated person (Communications Lead), who will seek advice from the Safeguarding Lead to advise on safeguarding requirements
- Identifying details such as a child's home address, school name or telephone number shouldn't be posted on social media platforms
- Parents will be asked to give their approval for SASP to communicate with their children through social media, or by any other means of communication
- Parents will be asked to give their permission for photographs or videos of their child to be posted on social media
- All of our accounts and email addresses will be appropriate and fit for purpose

## **What we expect of staff and volunteers**

- Staff should seek the advice of the Designated Safeguarding or Comms Lead if they have any concerns about the use of the internet or social media
- Staff should not 'friend' or 'follow' children or young people from personal accounts on social media
- Staff should make sure any content posted is accurate and appropriate, as young people may 'follow' them on social media
- Staff should not communicate with young people via personal accounts or private messages (with the exception of the Jump Start programme, however, messages should never be deleted)
- Rather than communicating with parents through personal social media accounts, staff should choose a more formal means of communication, such as face-to-face, in an email or in writing, or use an organisational account, profile or website
- Any disclosures of abuse reported through social media should be dealt with in the same way as a face-to-face disclosure, according to our reporting procedures

## **Using mobile phones or other digital technology to communicate**

When using mobile phones (or other devices) to communicate by voice, video or text (including texting, email and instant messaging), we'll take the following precautions to ensure young people's safety:

- Staff to only use work phones for calls, messaging and capturing photos/film that consent has been obtained for
- Staff will avoid having children's or young people's personal mobile numbers and will instead seek contact through a parent or guardian (this is not relevant for the Jump Start Programme)
- We'll seek parental permission on each occasion that we need to contact children or young people directly; the purpose for each contact will be clearly identified and agree upon (for the Jump Start Programme consent always needs to be sought and received from a parent/carer for contact to take place but this does not need to be sought for each individual occasion)
- For Facetime/Video calls a parent or guardian should always be present. Due to the nature of the participants engaged in the Jump Start Programme it has been decided it is not necessary for a parent/carer to be on the call, or in the vicinity of a call, if deemed detrimental to the participant's engagement. A judgement has been made that sometimes the participant's engagement overrides 'best practice' guidance, especially if contact with other professionals has lessened or stopped. If the member of staff feels it is necessary, then another member of staff will be invited to join the call. Calls do not need to be recorded. This decision was made based on the reasoning's above
- Messages, call logs etc. should never be deleted.
- If relevant, the participant will receive a graphic detailing the areas of the Club's Code of Conduct that relate to online/virtual delivery, useful links/apps such as Childline, and how as a young person they can report any concerns to SASP confidentially
- If a young person misinterprets such communication and tries to engage a staff member in conversation, the member of staff will take the following steps:

- End the conversation or stop replying
- Suggest discussing the subject further at the next practice or event
- If concerned about the child or young person, provide contact details for the Safeguarding Lead or appropriate agencies
- Smartphone users should respect the private lives of others and not take or distribute pictures of other people if it could invade their privacy
- Staff and young people must not engage in 'sexting' or send pictures to anyone that are obscene, indecent, or menacing
- At least one other member of staff should be copied into any emails sent to children or young people (with the exception of the Jump Start Programme, however, emails should not be deleted)
- Emails should be signed off in a professional manner, avoiding the use of emoji's or symbols such as 'kisses' ('X's)
- For group Calls (Zoom, Teams, WhatsApp) it is important that settings are utilised to ensure privacy such as passwords and waiting rooms. Please refer to the privacy information of the specific platforms for more information.

## 4. RESPONDING TO DISCLOSURES, SUSPICIONS OR ALLEGATIONS OF ABUSE

### 4.1 What to do in responding to a child – Reporting Concerns (see Appendix D & E)

It is not your role to take individual responsibility for deciding whether child abuse is actually taking place. However, there is a responsibility to protect children by referring to your manager or the Lead Safeguarding Officer. Managers will report all incidents to the Lead Safeguarding Officer.

The Safeguarding Officer will take the appropriate action, this can include (but not exhaustive) referring the matter to the LADO, supporting with an Early Help Assessment or referring to the child exploitation team. Where there is an immediate need to protect the child from danger the police must be advised.

There should always be a commitment to work in partnership with parents or carers where there are concerns about their children. Therefore, in most situations it would be *important to talk to parents or carers to help clarify any initial concerns*. However, there are circumstances in which a child may be placed at greater risk if such concerns were shared (e.g., where a parent or carer may be responsible for the abuse or not able to respond to the situation appropriately). In such situations, or where concerns still exist, any suspicion, allegations or incident of abuse must be reported to your manager / person in charge as soon as possible.

Once the incident / allegation has been reported it is the responsibility of the Safeguarding Officer to inform the relevant authorities without delay. If the person in charge / or Safeguarding Officer is not available, the person discovering or being informed of the abuse should immediately contact the Somerset Safeguarding Children Partnership, if appropriate, who will decide how and when parents / carers will be informed and ultimately become responsible for what steps to take next.

#### IT IS YOUR ROLE TO REPORT NOT TO JUDGE Responding to a Disclosure

Children or adults at risk who are being abused will only tell people they trust and with whom they feel safe. By listening to them, and taking seriously what they are telling you, you will already be helping to protect them.

### **Create a safe environment by:**

- Staying calm and not rushing into action which may be inappropriate.
- Confirming you know how difficult it must have been to confide in you and that they have done the right thing.
- Reassuring them and stressing they are not to blame.
- Listening to what they say. Show you are taking what is being said seriously.
- Where possible remain in view, do not go somewhere on your own.

**Be honest and do not make promises you cannot keep.** Explain you will have to tell other people to stop what is happening.

**Ensure you** are quite clear about what they say so you can pass it on to child protection or adult safeguarding professionals. Use open questions to encourage them to use their own words but do not press for detailed information. NB: The law is very strict, and an abuse case can be dismissed if it appears the victim has been led, or words have suggested.

**Record** exactly what the child or adult has said to you, in a legible and accurate format, as soon as possible after the incident. As far as possible use the child's own words. Stick to the facts and do not give your opinion (incident report form - Appendix C). Where possible record:

- the child or adult's name, address, date of birth
- the nature of the allegations
- a description of any visible bruising or other injuries
- your observations (e.g., a description of their behaviour and physical and emotional state)
- exactly what the child / adult said and what you said.
- the child or adult's account of what has happened and how any injuries occurred
- any action you took because of your concerns (e.g., who you spoke to and resulting action, including any contact with parents, managers or social services). Include names, addresses and telephone numbers
- sign and date what you have recorded
- store the information in accordance with relevant procedures
- complete the online safeguarding form within 24 hours (this can be found on the Intranet and the staff dashboard)
- all records will be kept securely on Smartsheet with access by the Safeguarding Lead, Deputy Safeguarding Lead, HR Lead and CEO.

Do not take sole responsibility – consult someone else (e.g., your manager or safeguarding lead) as soon as possible so you can begin to protect the individual and gain some support for yourself.

In determining your actions, remember that only experienced and specifically qualified and trained professional should deal with cases or suspicions related to abuse.

## **4.2 Dealing with Allegations against Staff/Volunteers**

Please refer to HR11 – Allegations of Abuse Against Staff policy.

## 4.3 Lower-Level Concerns

### Why we need to respond to lower-level concerns

Having clear procedures for responding to lower-level concerns is part of creating a culture of openness and trust. It helps ensure that adults consistently model the organisational values and helps keep children and adults at risk safe. It can also protect adults working in the organisation from potential false allegations or misunderstandings. Please note that the term 'lower-level' does not mean that the concern is insignificant; it simply means the behaviour does not meet the allegation criteria as defined by the Somerset Safeguarding Partnership.

### What is a lower-level concern

A lower-level concern is any concern, no matter how small and even if no more than a 'niggling doubt', that an adult may have acted in a manner inconsistent with the organisational conduct standards (including inappropriate conduct outside of work) or simply – even if not linked to a particular act or omission – a sense of unease as to the adult's behaviour particularly towards or around children and adults at risk.

A lower-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff conduct standards, including inappropriate conduct outside of work
- doesn't meet the threshold of harm or is not considered serious enough for the organisation to refer to the local authority.
- Lower-level concerns are part of a spectrum of behaviour. This includes:
  - inadvertent or thoughtless behaviour
  - behaviour that might be considered inappropriate depending on the circumstances
  - behaviour which is intended to enable abuse.
- Examples of such behaviour could include:
  - being over friendly with children
  - having favourites
  - humiliating children or adults at risk
  - adults taking photographs of children on their mobile phone
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - using inappropriate sexualised, intimidating or offensive language.

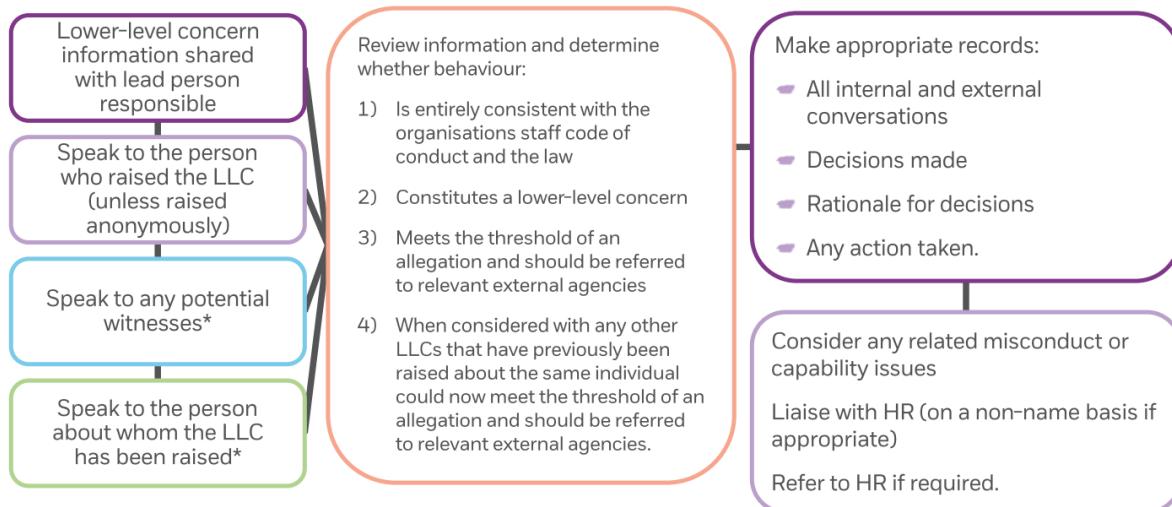
### Reporting a lower-level concern

- Staff are required to report any concerns to the Safeguarding Lead by using the online safeguarding reporting form, a conversation in person or via the phone is also welcome (before the form is completed).
- To encourage reporting, the online form will ask staff whether it is a lower-level concern or safeguarding concern, specific questions will then be asked depending on the answer. Please note that the final determination of whether a concern meets the criteria of an allegation will be made by the Safeguarding Lead and CEO when the matter has been investigated. If there is uncertainty as to whether a lower-level concern meets the harm threshold, the LADO will be consulted for guidance.

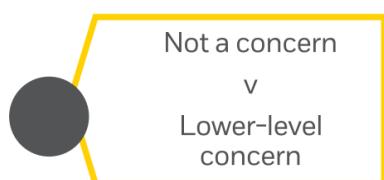
### Recording, reviewing and responding to concerns

- Concerns will be recorded on Smartsheet with secure access only available to the Safeguarding Lead, Deputy Safeguarding Lead, HR Manager and CEO.
- Concerns will be responded to in a sensitive and proportionate way and any investigations will be carried out discretely and on a need-to-know basis.

- Concerns will be handled promptly and effectively whilst protecting staff against any potential false allegations or misunderstandings.
- The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible.
- Depending on the nature of the concern, either the Safeguarding or HR Lead will collect as much evidence as possible by speaking directly to the person who raised the concern, the individual involved and to any witnesses.
- All lower-level concerns, including those determined to be unfounded, will be recorded on Smartsheet. The record will include details of the concern, the context in which the concern arose, and any actions taken and decisions reached (and the rationale for them), and the eventual outcome.
- Records of lower-level concerns are confidential and securely stored in accordance with the Data Protection Act 2018 and the UK General Data Protection regulation until the individual ceases to be employed by the organisation.
- All concerns will be reviewed by the lead every quarter to ensure all concerns are dealt with promptly whilst identifying whether there are any problematic patterns of behaviours.
- Lower-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in employment references provided by the organisation. However, where a lower-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to.



## Decision



## Possible actions

1	No further action
2	Management guidance
3	Training
4	Discussion with individual
5	Disciplinary, grievance or capability procedure

## 4.4 Ways in which abuse may manifest itself

Abuse can happen wherever there are young people, and young people and adults at risk of any age can be abused. The effects of abuse can be so damaging and if untreated, they may follow a person into adulthood. Indications that a child may be being abused include the following:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on part of the body not normally prone to such injuries.
- An injury for which the explanations seems inconsistent.
- The child or adult at risk describes what appears to be an abusive act involving themselves.
- Someone else, a child or adult, expresses concern about the welfare of another.
- Unexplained changes in behaviour over time, e.g., becoming very quiet, withdrawn or displaying sudden outbursts of temper.
- Inappropriate sexual awareness.
- Engages in sexually explicit behaviour in games.
- Is distrustful of adults, particularly those with whom a close relationship will normally be expected.
- Has difficulty in making friends.
- Is prevented from socialising with others of the same / similar age.
- Displays variations in eating patterns including overeating or loss of appetite.
- Loses weight for no apparent reason.
- Becomes increasingly dirty or unkempt.

This list is NOT exhaustive and the presence of one or more of the above is NOT proof that abuse is taking place.

## 4.5 Main forms of child abuse (including bullying)

Abuse in all its forms can affect a child or an adult at risk at any time. For example, an adult who has been abused as a child may find it difficult or impossible to maintain a stable, trusting relationship, become involved with drugs or prostitution, attempt suicide or even abuse a child in the future. There have been a number of studies that suggest children with disabilities are at increased risk of abuse through various factors such as stereotyping prejudice, discrimination, isolation and a powerlessness to protect themselves, or adequately communication that abuse has occurred. Children from ethnic minorities who could also be experiencing racial discrimination may feel doubly powerless.

Where a *child* is found to be exhibiting sexually harmful behaviour to another *child*, it is important to report your concern to your manager immediately.

Where a child's or adult at risk's bullying behaviour is of particularly violent or aggressive nature and the coach is unable to address the behaviour through behaviour management strategies or disciplinary measures within a reasonable time, child protection procedures will be instigated.

### **Physical Abuse**

Where adults or other young people physically hurt or injure children by hitting, shaking, squeezing, burning, and biting or giving children alcohol, inappropriate drugs, or poison.

### **Sexual Abuse**

This occurs when adults abuse children or other young people or use children to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal

intercourse, fondling and showing of pornographic material. Physical contact with children could potentially create situations where sexual abuse may go unnoticed.

### **Emotional Abuse**

This may be caused by a persistent lack of love or affection, where a child or adult at risk may be constantly shouted at, threatened, or taunted. It may also occur when there is constant overprotection (which prevent children from socialising), or there is neglect, physical or sexual abuse.

### **Neglect**

This occurs where adults fail to meet the child's basic needs such as food or warm clothing and fail or refuse to give love, affection and attention. Children might also be constantly left alone or unsupervised. Neglect could include not ensuring children are safe, exposing them to undue cold or to unnecessary risk of injury.

### **Bullying**

Bullying is any repeated words or actions, which are aimed at causing someone to feel frightened, miserable, and helpless. There are many definitions of bullying, but most people consider it to be:

- Deliberately hurtful.
- Repeated over a period of time.
- Difficult for people to defend themselves against.

#### **Bullying can be divided into the following areas:**

**a) Physical** – assault, pushing, shoudering, elbowing, tripping, slapping, kicking, hair pulling, unacceptable touching, including that of a sexual nature, throwing missiles, blocking – preventing passage or movement indoors or outdoors, pinching, stabbing, burning or other physical activity that is used in a way that makes another person feel threatened or intimidated.

**b) Verbal** – racist, sexist, homophobic, any words used in a sexual manner designed to hurt or cause offence, comments about size, appearance, odour, clothing, academic or other abilities, weaknesses, home life, social circumstances, financial circumstances, spreading rumours or any other comments designed to be hurtful or used to intimidate. This also covers all text messages and e-mail usage.

**c) Written** – insults contained in note-passing, threatening letters, graffiti, defacing any property belonging to another individual, any text messages or e-mail usage or any other method designed to intimidate or hurt.

**d) Interference with another individual** – theft, extortion, vandalism, defacing property, ruling games, blackmail or any other activity designed to intimidate or hurt.

**e) Intentional psychological pressure** – social exclusion looks and glares, lying, slander, passing or starting rumours, name calling, reorganising, pressurising friendship groups or any other activity designed to intimidate or hurt an individual.

**f) Incitement of others to become involved in bullying.**

#### **Children's rights in conjunction with bullying**

All participants have the right to:

- Be able to tell someone about any incident of bullying without fear or being regarded as a tell-tale.
- Know that all complaints will be treated seriously and acted upon in accordance with the practices agreed by SASP.
- Feel protected against the bully and their intentions.
- Feel safe and secure.
- Be able to walk around the activities site without fear of anything or any person.
- Expect politeness from others.
- Be respected by others whatever their race, colour, disability, age, creed, or sexual orientation.

- Not to be picked on or ignored by anyone within SASP.

## **Anti-Bullying Policy**

SASP will act promptly whenever an incident of bullying is reported and record all incidents of bullying for a limited period of time through the Safeguarding Officer. Staff within SASP will ensure that they provide good role models for pupils in their everyday engagement. SASP will monitor and review the anti-bullying policy and appropriate changes to the policy will be made where necessary.

Where appropriate, **restorative practice** may be used. This is a way of working with conflict that puts the focus on repairing the harm that has been done. It is an approach to conflict resolution that includes all of the partners involved.

### **Responding to and supporting the victim**

When bullying does occur, **a clear consistent response is essential**. There are many ways in which staff can respond to bullying.

However, the goals of any intervention should always be the same:

- To make the victim safe.
- To stop the bullying and change the bully's behaviour.
- To make clear to every other young person that bullying is unacceptable.
- To learn lessons from the experience that can be applied in future.

If bullying is reported, the member of staff to whom it is reported should immediately investigate to understand the nature of the concern. Where there is evidence to suggest bullying is taking place, they should contact the SASP Safeguarding Lead. Bullying is complex behaviour and if it is not clear who the perpetrator is, it may be more productive to focus on the future than to spend time while each party denies it. In such cases steps could be taken to agree how they will behave in future.

### **Supporting the person who is bullied**

The starting point for any intervention should be to talk to the person who has been bullied, establish what has happened, and agree a way forward:

- Make time to listen calmly, using effective listening techniques.
- Take bullying seriously and avoid telling people to 'just ignore it'.
- Agree an action plan with his or her consent.
- Avoid humiliating the victim by taking actions which make them seem weaker, powerless or a 'grass'.
- Help the victim become more resilient, for example by building up their self-confidence, emphasising their strengths and helping them to develop protective friendships.
- Cyberbullying can be traced and tracked to find proof of the bullying, so it becomes less of a question about one person's word over another.
- Address any prejudice exhibited with the whole group – whether within the group or outside it.

### **Work with the bully**

Work with the bully to help them understand their behaviour, and its effects on others. The overall goal is to ensure the bullying stops and the bully's behaviour changes:

- Make it clear that it is the behaviour that is 'bad', not the perpetrator.
- How does bullying make them feel? Why do they need to do this?
- Help people to find other ways than bullying to feel recognised and to manage their emotions.
- Consider: is there a warning moment before they 'kick off'? What skills can be used before it all becomes 'too much'? Are there patterns to this behaviour – for example on certain days or situations?

- Try to elicit some understanding of the feelings of the victim and challenge any prejudice such as racism. Prejudiced views might be shared among the community in which they live or be driven by anxieties about identity and territory. People may adopt these views in order to be accepted into a group. By engaging with these concerns rather than dismissing them, it may be possible to help all the people as well as the one leading bullying
- How can this person make amends or compensate the victim for the distress caused? Can they offer some ideas?
- Many people who bully others have been victims at some point themselves and may still be one. These cases might be more complex and 'bully victims' as they are known may need professional help and counselling.
- Avoid granting the bully hero status or marginalising them so that you have no influence. Sometimes a person who bullies will be relieved to change their behaviour because they have been uncomfortable with it. They may have been pressured by a group into behaving this way. Others may alter their behaviour because they understand the harm they have caused and wish to change.

### **Vulnerable groups**

Children with a disability, from ethnic minorities, LGBT, elite athletes, or those with learning difficulties are more vulnerable to forms of abuse and are more likely to be targeted. Additional guidance on addressing the additional vulnerability of these groups of children can be found on the CPSU website.

## **4.6 Confidentiality**

When dealing with any case / suspicion / allegation related to abuse, you must be made aware that any breaches in confidentiality can be very damaging to the child or adult involved, family and any child / adult protection investigations which may take place.

It is important that the rights of both the victim and the alleged perpetrator are protected by ensuring that only those who need to know are given the relevant information. This will mean, at the very least, informing:

- Your manager or the Partnership Safeguarding Lead.
- The parents / carer of the child (only if social services ask for this to be done)

Informing the parents / carers of a child about whom you are concerned must be handled in a sensitive way and only **undertaken** in **consultation** with Somerset Safeguarding Children Partnership.

## **4.7 Timescales**

- The incident or concern must be recorded and passed to the Manager / Safeguarding Lead within 24 hours. In an ideal situation an online reporting form should be used but where this is not possible an email update will suffice (particularly on the Jump Start Programme where information is also included on the portal and details of the child already obtained).
- The Lead Safeguarding Officer will determine the appropriate course of action and if appropriate will report the incident to the relevant agency and report outcomes to the Partnership CEO.
- The Safeguarding Lead will retain a copy of all completed incident forms.

## 4.8 Radicalisation

Since the 2011 Prevent Review, the UK government defines extremism as: 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces'.

Radicalisation is defined by the UK Government within this context as "***the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.***"

Dependant on role, staff will undertake relevant Prevent training, causal staff will undertake this training where relevant. If staff become concerned about a child or young person, they work with or know then they can refer to Appendix F or speak to the Safeguarding Lead.

## **APPENDIX A - Code of Conduct for Participants**

- I will treat others with the same respect and fairness that I would like them to show to me.
- I will play within the rules, and respect officials and their decisions.
- I will demonstrate fair play on and off the field.
- I will respect others regardless of gender, disability, age, race, ethnicity, sexual orientation and religious belief.
- I will challenge any behaviour that discriminates against others.
- I will not engage in any irresponsible or illegal behaviour
- I will inform my team manager if I need to leave my team / accommodation at any time
- I will speak out if I am concerned, or if I feel uncomfortable
- I will be organised and on time

**Signed** .....

**Date** .....

## APPENDIX B - Photography and Filming Consent Form

In accordance with our Safeguarding and Protecting Young People and Adults at Risk Policies, SASP will not permit photographs or the recording of participants to be taken without the consent of the parents/carers and the participant. If you become aware that images or recordings are being used inappropriately you should inform the SASP Safeguarding Officer on 01823 653990 immediately. For more information please see the SASP Photography and Filming Policy on the SASP website.

### By signing this consent form, you:

- Consent to SASP taking and using images and recordings, including images of you/your child for publicity reasons. These images may appear on websites, social media, posters and leaflets or in the press to positively promote sport and physical activity. SASP will take all steps to ensure that these images are used solely for the purposes they are intended.
- I understand that images on websites and social media sites can be viewed throughout the world and not just in the United Kingdom and that some overseas countries may not provide the same level of protection to the rights of the individual as EU/UK legislation provides.
- I understand that images and recording will be kept as long as necessary and that some images and recordings may be kept permanently as an archive of SASP activity.

<b>Consent Information</b>	
To be completed by participant (please tick):	
<input type="checkbox"/> I consent to SASP photographing or filming my involvement in sporting activities <input type="checkbox"/> I confirm that I have been made aware of SASPs photography and filming policy	
To be completed by parent/carer, for those under 18 (please tick):	
<input type="checkbox"/> I consent to SASP photographing or filming my child <input type="checkbox"/> I can confirm that I have been made aware of SASPs photography and filming policy <input type="checkbox"/> I can confirm that I have been made aware of how SASP will use these images or recordings	
Signature of participant	
Print name of participant	
Date	
Signature parent / carer	
Print name of parent / carer	
Date	

## Group Consent for Photography

To be completed by Group:

- I consent to SASP photographing or filming my group
- I can confirm that I have been made aware of SASPs photography and filming policy
- I can confirm that I have been made aware of how SASP will use these images or recordings

Group name	
Signature of group contact	
Print name of group contact	
Date	

SASP is committed to processing information in accordance with the General Data Protection Regulation (GDPR). The personal data collected on this form will be held securely and will only be used for administrative purposes. For more information, please see the SASP Privacy Policy on our website.

## APPENDIX C - Incident Report Form

Your name:	Name of organisation:
Your role:	
Contact information (you):	
Address:	
Postcode:	
Telephone numbers:	Email address:
Child's name:	Child's date of birth:
Child's ethnic origin:	Does the child have a disability:
Child's gender:	
<input type="checkbox"/> Male <input type="checkbox"/> Female	
Parent's / carer's name(s):	
Contact information (parents/carers):	
Address:	
Postcode:	
Telephone numbers:	Email address:
Have parent's / carer's been notify of this incident?	
<input type="checkbox"/> Yes <input type="checkbox"/> No	
If YES please provide details of what was said/action agreed:	
Are you reporting your own concerns or responding to concerns raised by someone else:	
<input type="checkbox"/> Responding to my own concerns <input type="checkbox"/> Responding to concerns raised by someone else	
<i>[If responding to concerns raised by someone else] -</i> Name: Position within the sport or relationship to the child: Telephone numbers: Email address:	
Date and times of incident:	
Details of the incident or concerns: <i>[Include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay.]</i>	

Child's account of the incident:

Please provide any witness accounts of the incident:

*Please provide details of any witnesses to the incident -*

Name:

Position within the club or relationship to the child:

Date of birth (if child):

Address:

Postcode:

Telephone number:

Email address:

Please provide details of any person involved in this incident or alleged to have caused the incident / injury -

Name:

Position within the club or relationship to the child:

Date of birth (if child):

Address:

Postcode:

Telephone number:

Email address:

Please provide details of action taken to date:

Has the incident been reported to any external agencies?

Yes

No

If YES please provide further details:

Name of organisation / agency:

Contact person:

Telephone numbers:

Email address:

Agreed action or advice given:

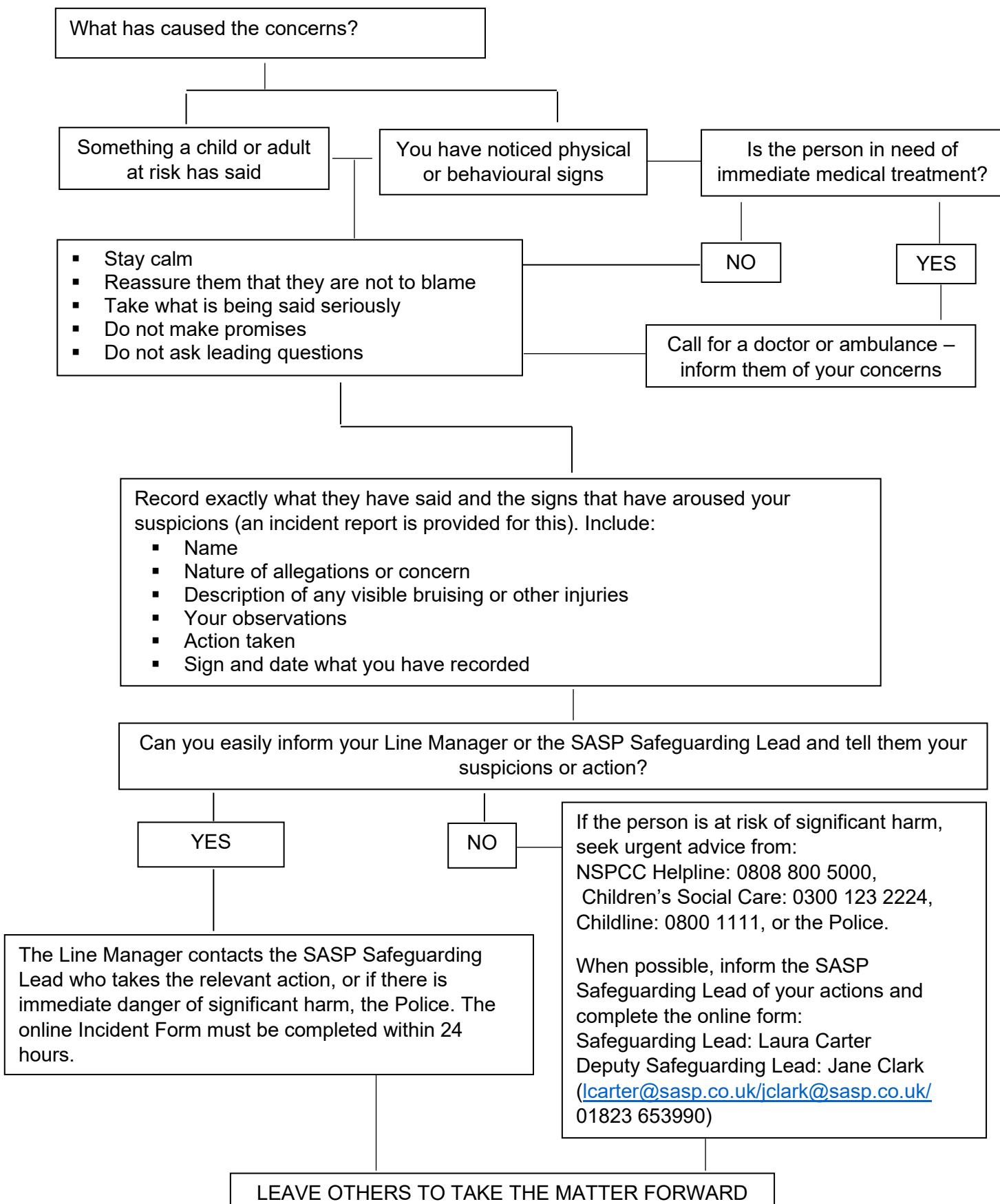
Your Signature:

Print name:

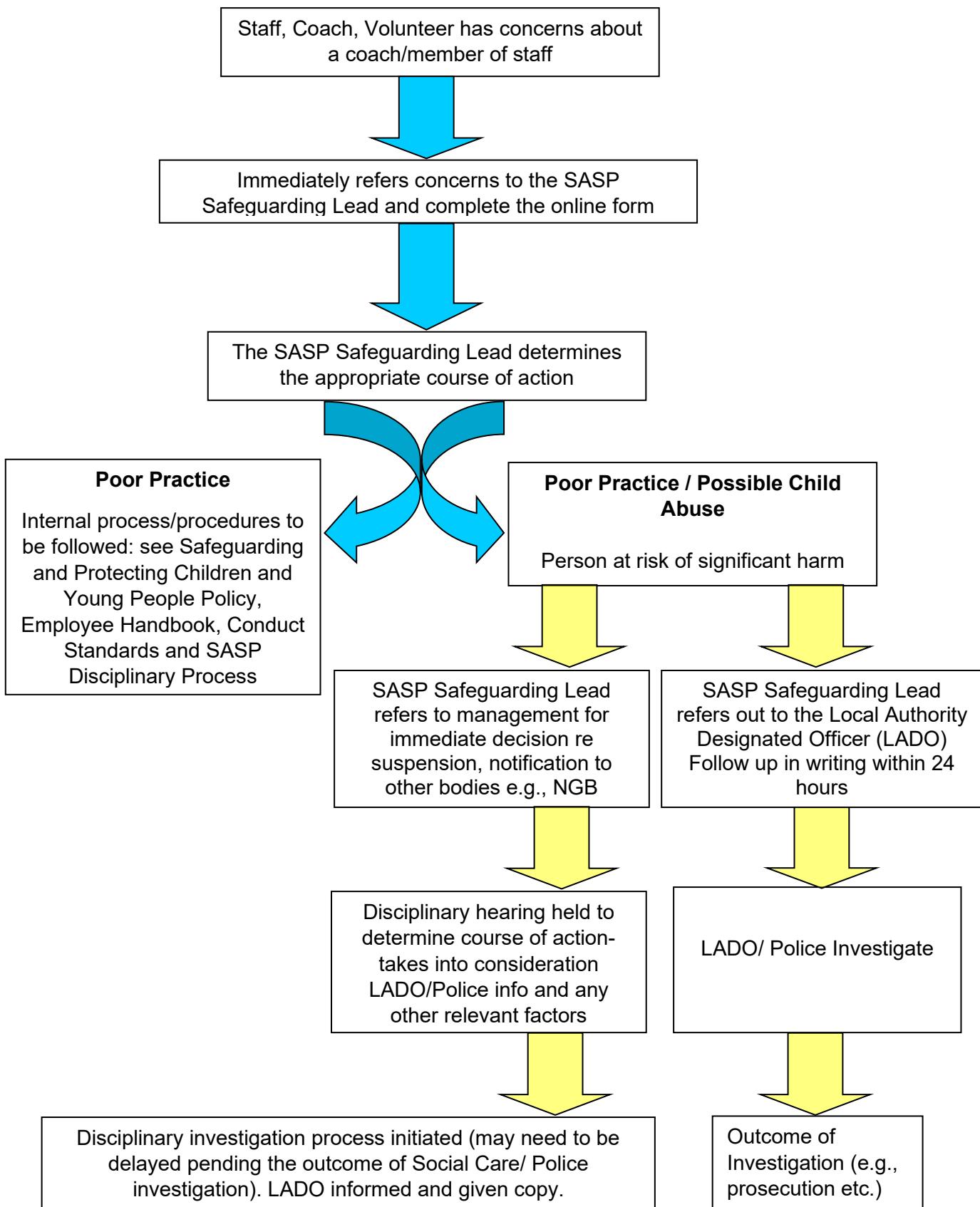
Date:

*Contact your organisation's Designated Safeguarding Lead in line with Somerset Activity Sports Partnership reporting procedures.*

## APPENDIX D - Procedures for responding to disclosure, allegations, and suspicions



## APPENDIX E - Flow Chart for Reporting Child Safeguarding Concerns



## APPENDIX F - Flowchart for SASP Staff reporting a concern of radicalisation with a vulnerable individual

It is important for you as a member of staff to know where to go if you have a concern that someone may be on the route to radicalisation. Below is a flow chart which aims to show the process as to which you can follow:

