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# **SAFEGUARDING CHILDREN AND VULNERABLE PEOPLE POLICY**

**School of Hard Knocks Procedure**

# SAFEGUARDING CHILDREN AND VULNERABLE PEOPLE POLICY

School of Hard Knocks has a duty under section 11 of the Children Act 2004 to ensure that their functions, and services provided on their behalf, are discharged with regard to the need to safeguard and promote the rights and wellbeing of children and adults.

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# 1 GLOSSARY

This glossary defines some of the key terms in the Policy.

## 1.1.1.1 Abuse and neglect

*Form of maltreatment of a child or vulnerable adult.*

## 1.1.1.2 Children

*Anyone that has not reached their 18<sup>th</sup> birthday.*

## 1.1.1.3 Vulnerable Adult

*Any person aged 18 or over who is or appears to be eligible for Local Authority/Mental Health Services' assistance by reason of mental ill health, physical or learning disability, <sup>SEN</sup>illness or age related frailty and may be unable to take care of him/herself or unable to protect him/herself against significant harm or exploitation.*

## 1.1.1.4 Employees

*Those employed by School of Hard Knocks, its sub-contractors, as well as volunteers involved in the delivery of learning activities or in its premises or facilities. Contractors should also meet these guidelines or have their own arrangements, which meet the requirements of this policy.*

## 1.1.1.5 Local authority

*County, city, district and borough councils.*

## 1.1.1.6 Parent

*Generic term to include birth parents, stepparents and carers. The term will specify parental responsibility where necessary.*

## 1.1.1.7 Safeguard and promote the welfare of children

*The process of protecting from abuse or neglect, preventing impairment of their health and development, and ensuring they are growing up in circumstances consistent with the provision of safe and effective care which is undertaken so as to enable children to have optimum life chances and enter adulthood successfully.*

## 1.1.1.8 Adult Social Care

*The Adult Social Care, Local safeguarding children boards (LSCB) helps people who need extra support, or vulnerable people to live as independently as possible. Information regarding LSCB can be found at*

*[http://www.safenetwork.org.uk/training\\_and\\_awareness/pages/lscbs.aspx](http://www.safenetwork.org.uk/training_and_awareness/pages/lscbs.aspx)*

## 2 Scope of policy

### 2.1 Introduction<sup>[SEP]</sup>

2.1.1 School of Hard Knocks is committed to ensuring that all children and vulnerable adults are protected and kept safe from any form of harm. <sup>[SEP]</sup>We have a responsibility to safeguard and promote the well being of children and vulnerable adults

### 2.2 Policy aims

2.2.1 The aims of this policy are to:

- Ensure that School of Hard Knocks' role and responsibility in protecting children and vulnerable adults from abuse is clear to all staff
- Implement and maintain systems of working practice to safeguard children and vulnerable adults during School of Hard Knocks activities
- Ensure that children/adults and their parents have confidence in School of Hard Knocks policies and practices in respect of the safe supervision of children and vulnerable adults
- Ensure that concerns about abuse are reported promptly by our workforce and where necessary to the appropriate authorities
- Offer guidance, training and support to all employees, volunteers and members involved in School of Hard Knocks' activities to assist them in understanding the role they play in our organisation response to safeguarding requirements
- Work in compliance with School of Hard Knocks' other policies, such as Professional Boundaries Policy and Safer Recruitment Policy

### 2.3 Key principles

2.3.1 The guidance given in this policy document is based on the following key principles:

- The welfare of children and vulnerable adults is the primary concern;
- All children and vulnerable adults, whatever their age, culture, disability, gender, language, race, religion or belief and/ or sexual orientation have the right to protection from abuse;
- All incidents of suspected poor practice and/ or allegations of poor practice should be taken seriously and responded to quickly and appropriately; this includes allegations of poor practice against employees, sub-contractors, volunteers, contractors and other participants.

### 2.4 Policy scope

- 2.4.1 The policy covers all of the functions and services of School of Hard Knocks as well as the operations of partners, contractors and voluntary organisations that deliver services on its behalf.
- 2.4.2 The policy covers all children up to the age of 18 years of age who are affected by the services delivered by or on behalf of School of Hard Knocks.
- 2.4.3 Many of the principles set out in this document also relate to vulnerable adults. These are defined as people aged 16 and over who may be vulnerable due to mental or other disability or illness and may not be able to protect themselves against abuse.
- 2.4.4 School of Hard Knocks typically conducts work within schools with children and in community sport settings (such as rugby clubs). SOHK recognises that everyone has a responsibility for child protection and protecting vulnerable adults, including all employees and members of staff, teachers, external rugby coaches, maintenance staff and staff involved with venue management.
- 2.4.5 During the Corona Virus pandemic, much of School of Hard Knocks delivery has moved to a virtual environment and the same principles apply when delivering within this arena
- 2.4.6 As a service provider, School of Hard Knocks is committed to equality and fairness. School of Hard Knocks will endeavour to work with parents and other relevant parties (including schools, carers, and other public services) to plan and organise activities to ensure that all children and vulnerable adults are able to take part at levels appropriate to their needs.
- 2.4.7 This is a company policy. However, different service areas and venues may have specific additional policies and operating procedures that need to be adhered to when working in those areas. When working in schools for example, the schools' Safeguarding Policy will have primacy over our own, although the general requirements will align.

## 2.5 Working with partners

- 2.5.1 School of Hard Knocks regularly works with partners and contractors from a variety of sectors. This policy will be drawn to the attention of, and made available to, all agencies and organisations in partnership working situations.
- 2.5.2 There is an equal responsibility on SOHK to understand external contractor's safeguarding policies and procedures and work to align these with our own. This may include schools, rugby clubs, community sports venues, Job Centres and even council-owned

## 2.6 Contractors

- 2.6.1 Contractors will be expected to follow this policy unless they have their own policy, which has been recognised as an adequate substitute. <sup>[SEP]</sup>The principles of safe recruitment will, therefore, be included in the terms of any contract drawn up between School of Hard Knocks

and contractors or agencies that provide services for, or adults to work with, children and vulnerable adults during the provision of our services.

2.6.2 When a contractor is working for SOHK alongside a public sector body (such as a school), they will also be expected to follow the policy of the public sector body, especially if this policy includes additional requirements.

2.6.3 School of Hard Knocks will monitor compliance with the contract that will also include a requirement that the provider will not sub-contract to any personnel who have not been part of a safe recruitment process.

## 2.7 Roles and responsibilities

2.7.1 There are a number of roles, responsibilities and duties of different people within School of Hard Knocks that work directly with and/or whose work affects children and vulnerable adults. Everyone who comes into contact with children and their families has a role to play in safeguarding children and vulnerable adults. Staff from the external organisations (such as schools or the Job Centre) are particularly important as they are in a position to identify concerns early and provide help for children and vulnerable adults, to prevent concerns from escalating. School of Hard Knocks and their staff form part of the wider safeguarding system for children and vulnerable adults. This system is described in statutory guidance [Working together to safeguard children 2015](#). School of Hard Knocks will work with social care, the police, health services and other services to promote the welfare of children and vulnerable adults to protect them from harm.

2.7.2 **Voluntary, private and community sector providers** working in partnership with School of Hard Knocks involving children and vulnerable adults will be made aware of the School of Hard Knocks' Safeguarding Policy. Organisations that are grant aided will be encouraged to develop an appropriate policy as a condition of financial support.

2.7.3 **The Chief Executive Officer** will be responsible for approving the Safeguarding Policy and for ensuring that it is reviewed regularly. **One Board Member** will also have oversight of this and represent the board in terms of safeguarding.

2.7.4 **Programmes Directors and Managers** will ensure that the policy is implemented by ensuring that their staff understand their responsibilities, appropriate training is provided and incidents and concerns are monitored and reviewed by the **Safeguarding Lead**.

2.7.5 SOHK recognises the statutory guidance [Keeping Children Safe in Education 2020](#) issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Education (Non-Maintained Special Schools) (England) Regulations 2011.

2.7.6 All employees have a statutory obligation to safeguard confidentiality of personal information. The relevant legislation includes the Data Protection Act 1998, the Human Rights Act 1998 and the Freedom of Information Act 2000. Access to personal information should be on strict need-to-know basis when you are sharing information with School of Hard Knocks and with

other agencies. Children and vulnerable adults of all ages have equal rights to confidentiality. If a child or vulnerable adult is making a disclosure you must always explain that some of this information will need to be shared with appropriate people and/or agencies.

### 3 Dealing with Safeguarding Incidents

- 3.1 **Definition of Abuse:** Abuse is a form of maltreatment of a child or vulnerable adult. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented, or cannot consent. Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.
- 3.1.1 Physical Abuse - may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a person. <sup>[L]</sup><sub>[SEP]</sub>
- 3.1.2 Emotional Abuse - is the persistent emotional maltreatment of a person such as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying to the person 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 a person. These may include interactions that are beyond the person's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the person participating in normal social interaction. It may involve serious bullying (including cyberbullying) causing individuals frequently to feel frightened or in danger, or the exploitation or corruption of children or vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment, though it may occur alone. <sup>[L]</sup><sub>[SEP]</sub>
- 3.1.3 Sexual Abuse - involves forcing or enticing a child or vulnerable adult to take part in sexual activities, including prostitution, whether or not the person is aware of what is happening. The activities may involve physical contact, including by penetration (e.g. rape, buggery or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may include non-contact activities, such as involving children or vulnerable adults in looking at, or in the production of, sexual activities encouraging children or vulnerable adults to behave in sexually inappropriate ways, or grooming an individual in preparation for abuse (including via the internet). Sexual abuse may be perpetrated by other SOHK participants.
- 3.1.4 Child Sexual Exploitation

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children, young people and vulnerable adults are often unwittingly drawn into sexual exploitation through the offer of friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

- 3.1.5 Neglect - is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of the individual's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food and clothing, shelter including exclusion from home or abandonment, failing to protect a child or vulnerable adult from physical and emotional harm or danger, failure to ensure adequate supervision including the use of inadequate care-givers, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a person's basic emotional needs.
- 3.1.6 Financial and Material Abuse - misappropriation of an individual's funds, benefits, savings etc. or any other action that is against the person's best interests, for example:
- Theft of money, possessions, property or other material goods
  - Misuse of money
  - Fraud or extortion of material assets
  - Persuading a vulnerable adult to enter into a financial agreement, which is to their detriment.
- 3.1.7 Female Genital Mutilation - FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.
- 3.1.8 Preventing Radicalisation and Extremism - The 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. Some children and vulnerable adults are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form. School of Hard Knocks will remain alert to the risk of radicalisation into white supremacy extremism. School of Hard Knocks staff will receive training to help to identify signs of extremism.
- 3.1.9 Grooming – is when someone builds a relationship and trustful bond with a child/vulnerable person in order to exploit, abuse or manipulate them. Grooming can be a precursor to sexual

abuse or to involvement within a gang, for example. Grooming can be very subtle, and a person will be often completely unaware that they are being groomed.

- 3.1.10 Eating Disorders – are complex patterns of behaviours and emotions associated with unhealthy and potentially damaging feeding patterns. These include bulimia, anorexia, binge eating disorder (BED) and other specified feeding or eating disorder (OFSED), which is the most common. Signs and symptoms of eating disorders may vary from individual so can be hard to spot. SOHK often discusses general principles of healthy nutrition through our work, including specific workshops on this in schools. SOHK staff often regularly discuss body image with schools groups. These activities present an opportunity to highlight if an individual has a problem in this area.
- 3.1.11 Forced Marriage - A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-social Behaviour, Crime and Policing Act 2014

## 4 RESPONDING TO AND REPORTING ABUSE

- 4.1 **Recognition of Abuse and Bullying (Error! No bookmark name given.)** Any or all other types of abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.
- 4.1.1 It is not always easy to recognise when abuse has taken place or a situation that has taken place may develop to become abusive. School of Hard Knocks employees are not expected to be experts at recognising such situations, but employees do have a responsibility to act if they have concerns about the behaviour of an adult or child, towards a child or vulnerable adult. All employees have a duty to discuss any concerns they may have about the welfare of a child or vulnerable adult with their line manager or another appropriate senior member of staff as soon as possible.
- 4.2 **Responding to Suspicions and Allegations of Abuse and Poor Practice**
- 4.2.1 If a child or vulnerable adult indicates that they are being abused, or information is obtained which gives concern that a person is being abused, this should never be ignored, taken seriously and always be acted upon.
- 4.2.2 There are a number of barriers that exist which prevent a child or vulnerable adult from telling others about abuse, some of the main barriers are that they may:
- be scared because they may have been threatened
  - think they will be taken away from home
  - believe that they are to blame, or they may feel guilty
  - think it happens to others

- feel embarrassed
- not want their abuser to get in trouble<sup>[11]</sup><sub>SEP</sub>
- have communication or learning difficulties
- not have not yet have the vocabulary to describe what has happened
- be afraid that they won't be believed
- think they have already told e.g.by dropping hints
- have told someone before and weren't believed, so what's the point in trying again.

#### 4.2.3 Action to be taken if a disclosure or allegation of abuse is made:

- In a medical or criminal emergency, always call 999
- React calmly so that you do not frighten the person and reassure the person that they were right to tell you
- Do not make promises of confidentiality, let the person know that you will have to tell another adult
- Try to reduce any questions you may choose to ask, to an absolute minimum and concentrate on listening to the person
- Questions should never be leading, they should only consist of Who...? Where...? When...? What...?
- Make a full written record of what has been said, heard and/ or seen as soon as possible using an Incident Report form.

#### 4.2.4 This report form should then be discussed with your line manager or other senior member of staff. Actions to be avoided:

- Panic
- Allow shock and/ or distaste to show
- Probe to find out more information than offered
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Make promises to agree to keep it a secret
- Doing nothing, expecting someone else to deal with it
- Discussing the issue with anyone other than the appropriate line manager or senior member of staff.

#### 4.2.5 It is not the responsibility of any employee of School of Hard Knocks to decide whether or not abuse is taking place. There is however a responsibility to act on any concerns and to protect children and vulnerable adults in order that appropriate agencies (the school for children, or police/probation usually for adults) can make enquiries and take necessary action to protect the child or vulnerable adult.

### 4.3 Reporting Procedure: See Appendix F

### 4.4 Employees

4.4.1 Employees responding to a suspicion of abuse or poor practice should complete an incident report by email in liaison with their line manager. The incident should then be reported to the Safeguarding Lead (Currently Nathan Persaud). The appointed Safeguarding Lead will then decide what appropriate action needs to be taken. Serious/urgent incidents will be referred to LSCB's Children's Social Care or LSCB's Adult Social Services and the Police. School of Hard Knocks will co-operate fully with any investigation carried out by those agencies in line with their procedures.

4.4.2 Employees should also follow the guidelines of the venue or institution they are working in. For example, some schools will have an incident form to complete and others may require an email. This should be understood before work commences in a school. SOHK should always aim to speak to the appropriate school staff member face to face first if they are on site.

#### 4.5 **Good practice guidelines for employees (Appendix C)**

4.5.1 We take any allegation seriously and investigate immediately and thoroughly, giving careful and due consideration to the thresholds for statutory referral. However, we also recognise that it is not impossible for our employees to become victims of false accusations. Employees are encouraged to protect themselves from false accusations by adopting good practice at all times. Examples of how to create a positive environment when working with children and vulnerable adults are set out in **Appendix C**.

#### 4.6 **Allegations against School of Hard Knocks employees**

4.6.1 Any concerns about the welfare of a child or vulnerable adult arising from alleged abuse or harassment by an employee of School of Hard Knocks must be reported immediately. It can often be difficult to report a fellow employee, but School of Hard Knocks assures all employees that it will fully support and protect anyone who, without malicious intent reports their concerns about a colleague's practice or the possibility that a child or young person may be being abused or harassed.

#### 4.7 **Types of investigation**

4.7.1 If there is an allegation about an employee, there may be three types of investigation.

- Criminal
- Child Protection
- Disciplinary

#### 4.8 **Action to be taken if there are concerns about a School of Hard Knocks employee**

4.8.1 If the concern or allegation is clearly regarding poor practice, then the line manager and appropriate senior manager should deal with it as a misconduct issue and follow School of Hard Knocks' Disciplinary Procedure. Where it is suspected that abuse has taken place the following should happen:

- Any suspicions that an employee has abused a child or vulnerable adult should be reported to the Safeguarding Lead
- If this is a serious incident or if someone is at risk of harm then the incident should be reported to statutory organisations as mentioned in 4.4.1.
- The Safeguarding Lead will then seek advice from the Independent Safeguarding Advisor
- The Disciplinary Procedure will then be followed
- Any serious incident will be reported to the Charity Commission by SOHK's appointed trustee leading safeguarding

## 5 Confidentiality

5.1.1 School of Hard Knocks will make every effort to maintain confidentiality. Information should be handled on a need to know basis. This includes the following:

- Members of the team leading the internal investigation<sup>[SEP]</sup>
- The parents/ guardian / carer of the person who is alleged to have been abused
- The person making the allegation
- External/statutory stakeholders like the police
- The alleged perpetrator<sup>[SEP]</sup>

5.1.2 Sharing confidential information without consent is normally justified:

- Where there is evidence that a child or vulnerable adult is suffering or is at risk of suffering significant harm.
- Sharing information as part of preventative services
- Obtaining consent should be the first consideration. Where this is not possible the key factor on deciding whether to share confidential information without consent is proportionality i.e. whether the proposed sharing is a proportionate response to the need to protect the public interest in question. The senior officer should record any decision and the reasons for it relating to whether or not to share information.
- If the decision is to share, a record of what information was shared and with whom must be made. You should also record any consultations and views sought which were undertaken as part of the process.

5.1.3 Any information should be stored in a secure place with limited access and in-line with data protection laws.

5.1.4 Gathering Information - Common Assessment Framework (CAF) - If you regularly work with children and young people you will need to be trained in completing a Common Assessment Framework (CAF). This is a standardised assessment that's designed to get a complete picture of a child's additional needs at an early stage. The assessment is a simple process that encourages close working with the family and can be completed by any practitioner who is

involved with the child. It provides a holistic assessment of the child's needs in the context of the individual, the family and the community. The CAF encourages information sharing between practitioners in cooperation with the child and their family. Contact the Safeguarding Lead for more information.

- 5.1.5 Any electronic information will be password protected and only made available to relevant individuals.
- 5.1.6 Every effort will be made to prevent unauthorised access, and sensitive information should not routinely be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. [If it is necessary to store child protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage.] Child protection information will be stored separately from the routine files and the file will be 'tagged' to indicate that separate information is held.

## **6 HANDLING OF DIFFICULT SITUATIONS (APPENDIX D).**

- 6.1.1 There may be situations when individuals pose an immediate risk to others, property or themselves.
- 6.1.2 Where dialogue and diversion tactics fail there are two types of simple control methods that can be used. <sup>[1]</sup><sub>[SEP]</sub>
  - Simple physical presence as control. This involves no contact e.g. standing in front of an exit. <sup>[1]</sup><sub>[SEP]</sub>
  - Holding or touching to persuade a child, young person or vulnerable adult to comply with verbal requests e.g. holding a person's hand or using the shoulders to steer a person away from a situation.
- 6.1.3 If a situation is approaching the point where these methods will not or don't work or if the person is threatening or using violence then the police should be contacted immediately.
- 6.1.4 Set procedures must be applied if these control methods are used (please see APPENDIX D).

## **7 RECRUITMENT AND EMPLOYMENT**

- 7.1.1 School of Hard Knocks will take all reasonable steps to prevent unsuitable people from working with children and vulnerable adults. In particular, it will:
  - Ensure all staff with responsibility for recruitment and selection are trained to at least Safeguarding Children and Vulnerable Adults Level 1
  - Each recruiting manager will evaluate the need for Disclosure and Barring Service (DBS) for all vacancies/ new posts
  - As appropriate, ensure experience of working with children, young people and vulnerable adults (and also cover any apparent gaps in employment history at interview).

- Confirm the identity of the prospective appointee. This will normally be done at interview stage. This information can then be crosschecked with the information required for the DBS check in England and Wales and Disclosure Scotland in Scotland.
- Provide full induction on the job role and the provision of this and related policies.
- Complete regular monitoring during a new employees probationary period.
- School of Hard Knocks will ensure that all employees who come into contact with children and vulnerable adults will be DBS checked on a 3-yearly basis.

## 7.2 Recruitment of Ex-offenders

- 7.2.1 As an organisation using the Disclosure and Barring (DBS) checking service assessing applicants' suitability for positions of trust, School of Hard Knocks complies fully with the DBS Code of Practice and undertakes to treat all applicants for positions fairly. It undertakes not to discriminate unfairly against any subject of a DBS check on the basis of a conviction or other information revealed.
- 7.2.2 School of Hard Knocks is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability or offending background.
- 7.2.3 Having a criminal record will not necessarily bar someone from working with us. This will depend on the nature of the position and the circumstances and background of your offences. This will include offence type, conviction information, pattern of offending and potential of to risk to participants or others. An individual risk assessment will be completed taking this information into account.

## 8 LEARNING AND DEVELOPMENT

- 8.1.1 School of Hard Knocks has a responsibility to ensure all new employees undertake an induction programme. As part of this induction programme, School of Hard Knocks will ensure employees are made aware of and understand their responsibilities in respect of the Safeguarding Children and Vulnerable People Policy.
- 8.1.2 As part of the service induction, line managers will go through this policy with all new employees who may have work with or have access to children and vulnerable adults and give them a copy.
- 8.1.3 All staff will be trained to a relevant, accredited Level 1 Safeguarding qualification as a minimum standard. Staff will then be trained at Level 2 and on specific issues, which may be more pertinent to the work they are doing or the geography of where they are doing it. All SOHK staff also receive training on working in a trauma-informed

## 9 HEALTH AND SAFETY

- 9.1.1 Under health and safety law, School of Hard Knocks has the same legal responsibilities for the health, safety and welfare of young people and/ or vulnerable adults, as its employees.
- 9.1.2 Protecting the health and safety of young people and vulnerable adults must be done in such a way that it complies with School of Hard Knocks' legal responsibilities but at the same time does not restrict the young person or vulnerable adult's rights to autonomy, privacy or dignity.
- 9.1.3 Risk Assessments will be carried out for all activities involving young people and vulnerable adults before they begin. The risk assessment will determine the level of supervision the young people or vulnerable adult requires. The responsibility for the completion of these risk assessments belongs to the **Programme Directors**. These are all kept electronically with Sharepoint, within the related programme folder – e.g. Wales Schools.
- 9.1.4 All young people and vulnerable adults will be inducted before they start in employment, work experience or undertake School of Hard Knocks activities in order to provide them with information and instruction to enable them to carry out their tasks safely, or participate in activities safely. An accident or incident involving a child or vulnerable adult should be reported to managers using the health and safety accident report form.

## 10 GUIDELINES FOR PHOTOGRAPHY AND FILMING AT SCHOOL OF HARD KNOCKS'S MANAGED FACILITIES AND EVENTS

### 10.1 Obtaining permission

10.1.1 As part of the registration process for all participants on School of Hard Knocks' programmes, permission for use of imagery of participants is requested and obtained.

10.1.2 The following guidelines apply to photographers:

- The photographer should be sensitive to other users/ participants and as far as reasonably possible restrict the images taken to those of the subject(s)
- If at any time another user in the area where the photographs are being taken complains about the activity then the photography or filming must stop immediately

## 11 FURTHER INFORMATION

11.1.1 Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information for Training Providers and colleges can be found on the [Foundation Online Learning](#) website and [NSPCC](#)

website. You can also access broad government guidance on the issues listed below via the GOV.UK website.

11.1.2 Children and Young People (Scotland) Act 2014 . Every area has a Children’s Trust which is responsible for the wider planning and delivery of services. The contact details of relevant bodies that may need to be contacted, when reporting concerns or allegations externally, should be held locally and kept up to date.

11.1.3

**Local Contacts for onward referrals (non-emergency):**

*If you are delivering in a new area/area outside the below, please check your local contacts in the area before delivery begins.*

<b>Child Protection in Fife</b>	03451 551503	sw.contactctr@fife.gov.uk	Out of hours	03451 550099
<b>Fife Adult Protection</b>	03451 550099			
<b>Cardiff and Vale of Glamorgan Child Protection</b>	01446 725 202	(Intake and Family Support Team, Glamorgan)	Out of hours	02920 788570
<b>Cardiff Children’s Services</b>	029 2053 6490			
<b>Vale of Glamorgan Adult Services</b>	01446 700111			
<b>Cardiff Multi-Agency Safeguarding Hub (MASH)</b>	02922 330888			
<b>Edinburgh City Social Care Direct (for adults and children)</b>	0131 200 2324	socialcaredirect@edinburgh.gov.uk	Out of Hours	0800 731 6969
<b>Lambeth Safeguarding Adults Board</b>	Report via online form	<a href="https://www.lambethsab.org.uk/">https://www.lambethsab.org.uk/</a>		
<b>Lambeth Safeguarding Children Board</b>	020 7926 5555	<a href="https://www.lambethsab.org.uk/children">https://www.lambethsab.org.uk/children</a>  (24 hours)		
<b>Hertfordshire Safeguarding Children Partnership</b>	0300 123 4043	(24 hours)		

## 11.2 National Agencies

NSPCC Helpline	0808 800 5000 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Childline	0800 1111
Churches Child Protection Advisory Service	0845 120 4550
Disability Rights Commission Helpline (DRC)	08457 622 633 / 08457 622 644
Domestic Violence Helpline	0808 2000 247
The Forced Marriage Unit	020 7008 0151 Emergency Duty Officer (out of hours): 020 7008 1500 <a href="http://www.fco.gov.uk/forcedmarriage">www.fco.gov.uk/forcedmarriage</a>
Muslim Youth Helpline	0808 808 2008
Rape Crisis	0808 802 9999 <a href="http://www.rapecrisis.org">www.rapecrisis.org</a>
Refuge – Domestic Abuse	0808 200 247

<b>Mental Health</b>	
MIND	0845 766 0165 <a href="http://www.mind.org.uk">www.mind.org.uk</a>
Relate	<a href="http://www.relate.org.uk">www.relate.org.uk</a>
Parentline Plus (confidential and anonymous helpline for parents on any parenting issue)	020 7284 5500 0808 800 2222
SANE	0845 767 8000 (12 noon – 2am) <a href="http://www.sane.org.uk">www.sane.org.uk</a>
Samaritans	08457 90 90 90
Bereavement Advice and Support	<a href="http://www.survivingsuicide.com">www.survivingsuicide.com</a> <a href="http://www.crusebereavementcare.org">www.crusebereavementcare.org</a>

<b>Sexually Transmitted Infections</b>	
National Aids/HIV helpline	0800 567 123
Terrence Higgins Trust	0845 1221 200 <a href="http://www.tht.org.uk">www.tht.org.uk</a>

<b>Sexuality</b>	
Bisexual helpline	0181 569 7500
Stonewall	<a href="http://www.stonewall.org.uk">www.stonewall.org.uk</a>

<b>Conception, Pregnancy and Sexual Health</b>	
Brook Advisory Centres	0800 0185 023 <a href="http://www.brook.org.uk">www.brook.org.uk</a>

<b>Drugs and Alcohol</b>	
Al-Anon and Alateen	0171 0 0888
Alcohol and drugs support	<a href="http://www.adfam.org.uk">www.adfam.org.uk</a>

<b>Eating Disorders</b>	
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Eating Disorders Association	01603 619 090
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<b>Bullying</b>	
Kidscape	08451 205 204 <a href="http://www.kidscape.org.uk">www.kidscape.org.uk</a>

**Accident and incident Form** *(A Summary of this information should be included in the online injury log, HQ>Documents>Accident & Injury Reporting)*

<b>Name of person completing this form</b>			<b>Location</b>		<b>Date of report</b>	
<b>Accident/Incident details</b>						
<b>Name of participant/s</b>	<b>Date and time of accident</b>	<b>Witness</b>	<b>location</b>	<b>Nature of accident/incident</b> <b>What happened, or in the case of a near miss, what could have happened</b>		<b>Action Taken</b>

INJURY-NATURE OF INJURY		TICK THE RELEVANT BOX					
	Contusion/crush		Burn		Dislocation		Amputation
	Laceration/open wound		Superficial Injury		Foreign Body		Internal Injury
	Concussion		Sprain/Strain		Fracture		Dermatitis
LOCATION OF INJURY							
	Head/face		Hand/fingers		Hip		Eye
	Shoulder/arms		Foot		Internal organs		Trunk (other than back)
	Other (state)		toes		leg		
RESULTS OF ACCIDENT							
Lost time injury		Y/N	No of _____ days	Treatment received:		First <input type="checkbox"/>	<input type="checkbox"/> Doctor <input type="checkbox"/> Hospital
DAMAGE TO EQUIPMENT/BUILDINGS/VEHICLES ETC.							
What was damaged?				Extent of damage?			
Corrective Actions							

Immediate action/s

What controls can be put in place to prevent this from happening again?

**HAS A SAFEGUARDING INCIDENT TAKEN PLACE?** If yes please complete the following table with details of all incidents.

<b>Name of participant</b>	<b>Date and time of incident</b>	<b>Location</b>	<b>Witnesses</b>	<b>Describe briefly what was disclosed</b> <b>Say what you see, do not include opinion (include additional sheets if required)</b>

Continuation.....

**REPORTING AND ACTION**

Investigating Manager

Date reported to Safeguarding Manager

Name of safeguarding manager  
form submitted to:

Please refer to the Safeguarding Policy

Action taken

This section is to be completed by the Safeguarding Manager

Date report received \_\_\_\_\_ Recommended Action to be taken

Date Report sent/given to safeguarding lead \_\_\_\_\_ nathan@schoolofhardknocks.org.uk

**Any additional comments on Health and Safety**

## **APPENDIX A: SHARING INFORMATION**

### **Key Points for sharing information:**

Staff should explain to the child, vulnerable adult and parent at the outset, openly and honestly, what information will, or could be shared. They should explain how, and why, it needs to be shared, and seek their agreement. The exception is where to do so would put the person or others at risk of significant harm, or undermine prevention, detection or prosecution of a serious crime including where seeking consent might lead to interference with a potential investigation. Staff must always consider the safety and welfare of a child or vulnerable adult when making decisions on whether to share information about them. Where there is concern that the person may be suffering or is at risk of significant harm, the individual's safety and welfare must be the overriding consideration.

Staff should, wherever possible, respect the wishes of children, vulnerable adults or their parents who do not consent to share confidential information. Staff may still share information, if in their judgement on the facts of the case; there is sufficient need to override that lack of consent.

Staff should seek advice from the appropriate professional bodies where they are in doubt, especially where their doubt relates to a concern about possible significant harm to a child, vulnerable adult or to others.

Staff should ensure that the information they share is accurate and up-to-date, necessary for the purpose for which they are sharing it, shared only with those people who need to see it and shared securely.

Staff should always record the reasons for their decision-whether it is to share information or not.

### **Obtaining Consent**

The individual's consent should always be sought. However, a lack of consent should never compromise the safety or welfare of a child or vulnerable adult. However, consideration should be given to why consent is being withheld in line with their human rights. Written consent to share information should be sought wherever possible.

### **Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

1. The situation is an emergency and the Designated Safeguarding Lead, line manager and Chief Executive are all unavailable
2. They are convinced that a direct report is the only way to ensure the individual's safety
3. For any other reason they make a judgement that direct referral is in the best interests of the child or vulnerable adult.

## **APPENDIX B: RECOGNITION OF ABUSE AND BULLYING**

### **Indicators of abuse**

Indications that a person may be experiencing abuse could include the following:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated in a part of the body not normally prone to such injuries.
- Bruises that reflect hand marks or fingertips could indicate pinching or slapping.
- Cigarette burns and scalds would also be a concern.
- An injury for which the explanation seems inconsistent<sup>[1]</sup><sub>[SEP]</sub>
- The child, young person or vulnerable adult describes what appears to be an abusive act involving him or her<sup>[1]</sup><sub>[SEP]</sub>
- Someone else (a child, young person or adult) expresses concern about the welfare of another person<sup>[1]</sup><sub>[SEP]</sub>
- Unexplained changes in behaviour e.g. becoming very quiet, withdrawn or having severe temper outbursts<sup>[1]</sup><sub>[SEP]</sub>
- Inappropriate sexual awareness<sup>[1]</sup><sub>[SEP]</sub>
- Engaging in sexually explicit behaviour<sup>[1]</sup><sub>[SEP]</sub>
- Discomfort when walking or sitting down<sup>[1]</sup><sub>[SEP]</sub>
- Distrust of adults, particularly those with whom a close relationship would normally be expected<sup>[1]</sup><sub>[SEP]</sub>
- Has difficulty making friends<sup>[1]</sup><sub>[SEP]</sub>Is prevented from socialising with other people
- Displays variations in eating patterns including overeating and loss of appetite
- Loses weight for no apparent reason<sup>[1]</sup><sub>[SEP]</sub>
- Becomes increasingly dirty and unkempt.

This list is not exhaustive and the presence of one or more of the indicators is not proof that abuse is actually taking place or has taken place.

### **Abuse and Children and Vulnerable Adults with a Disability**

Children and vulnerable adults with a disability are at increased risk of abuse and those with multiple disabilities are at even more significant risk both of abuse and neglect. Parents of children with a disability may experience multiple stresses. This group of children and vulnerable adults may be particularly vulnerable to abuse for a number of reasons including:

- Having fewer social contacts than other children
- Receiving intimate personal care from a larger number of carers
- Having an impaired capacity to challenge abuse
- Having communication difficulties resulting in difficulties in telling people what is happening
- Being reluctant to complain for fear of losing services
- Being particularly vulnerable to bullying or intimidation
- Being more vulnerable to abuse by peers than other children.

### **Bullying**

In some cases of abuse it may not always be an adult abusing a child or vulnerable adult. In the case of bullying the abuser may be another child or vulnerable adult. Bullying is deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for the victim to defend themselves.

Anyone can be a target for bullying, sometimes victims are singled out for being overweight, physically small, having a disability, being shy and/or sensitive or belonging to a different race, faith or culture. Bullying can and does occur anywhere there is inadequate supervision. Bullying may be:

- Physical including hitting, kicking and theft
- Verbal including name calling, teasing, racist or homophobic taunts, threats and graffiti
- Emotional indulging tormenting, ridiculing, humiliating and ignoring
- Sexual including unwanted physical contact or abusive comments
- Cyber bullying e.g. email, text messaging etc.

Bullying can cause a considerable amount of stress to children and vulnerable adults, it can affect their health and development and in extreme cases it can cause them significant harm including self-harm.

Indicators that a child or vulnerable person is being bullied could include:

- Behavioural changes such as reduced concentration, becoming withdrawn, clingy, depressed, tearful, having mood swings, having a reluctance to go to training, events or sports clubs
- A drop in performance at training, events, rehearsals etc
- Physical signs such as stomach aches, headaches, scratching and bruising and damaged clothes
- A shortage of money or frequent loss of possessions.

The following action to help the victim and prevent bullying should be taken:

- All signs of bullying should be taken seriously
- All children and vulnerable adults should be encouraged to share their concerns
- The victim should be helped to speak out and tell the person in charge or someone in authority
- All allegations should be investigated and action taken to ensure the victim is safe.
- The victim and bully/ bullies should be spoken to separately
- Employees should reassure the victim that they can be trusted and will help them, but do not promise not to tell anyone else
- Records should be kept of what is said.

The following action should be taken towards the bully/ bullies:

- The situation should be explained to the bully/ bullies

- An effort should be made to get the bully/ bullies to understand the consequences of their behaviour<sup>[SEP]</sup>
- An apology to the victim should be sought
- Any items belonging to the victim should be returned
- Encouragement to the bully/ bullies to change their behaviour should be offered
- Meetings should be held with parents or carers to report on progress
- All appropriate employees should be informed of action taken
- A written record of action taken should be kept.

## Appendix C: Good Practice Guidelines for Employees

Examples of how we to create a positive environment when working with children and vulnerable adults:

- Work in an open environment, avoid private or unobserved situations
- Treat all children and vulnerable adults with equal dignity and respect
- Put the welfare, success and achievement of each child first, before the winning or achieving of goals
- Make activities enjoyable and promote fair play
- Maintain a safe and appropriate distance with children and vulnerable adults
- If physical contact is necessary for demonstrating skills etc, explain and discuss these actions with the person first<sup>[LSEP]</sup>
- Recognise that caution is required especially when dealing with sensitive moments e.g. when dealing with bullying, bereavement or abuse
- Keep up to date with technical skills, qualifications and insurance requirements
- Be an excellent role model, this includes not drinking alcohol or smoking in the company of children and vulnerable adults in any work related environment
- Give constructive feedback rather than negative criticism
- Recognise the development needs of children and vulnerable adults and avoid excessive training or competition.

### Things to avoid:

You should NEVER allow or take part in any of the following:

- Engage in sexually provocative games
- Engage in or allow any form of inappropriate touching
- Allow children and vulnerable adults to use inappropriate language unchallenged
- Make sexually suggestive comments to a child or adult, even in fun
- Reduce a child, young person or vulnerable adult to tears, as a form of control
- Allow allegations made by a person to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature for a child, young person or vulnerable adult that they can do for themselves including things like applying sun cream
- Transport or take children, young people or vulnerable adults to their home unsupervised
- Administer medication unless specifically trained and approved by the person's parents to do so
- Take a child or vulnerable adult to the toilet unsupervised.

The list is not exhaustive. Some specific posts and activities may need more detailed guidance. If employees have any concerns about the appropriateness of any practice or action, they should contact their line manager where possible or a senior manager.

## **APPENDIX D: HANDLING DIFFICULT SITUATIONS**

### **Handling Difficult Situations – Control**

Two types of simple control methods can be used in order to prevent injury to the child or vulnerable adult, other children and vulnerable adults or significant damage to a property. Simple physical presence as a control involves no contact e.g. standing in front of an exit. Holding or touching to persuade a child or vulnerable adult to comply with verbal requests e.g. holding a person's hand or using the shoulders to steer a person away from a situation. Wherever possible, steps should be taken in advance to avoid the need for these control methods through dialogue and diversion. If a situation is approaching the point where these methods will not or do not work or if the person is threatening or using violence then the Police should be contacted immediately. If other children or vulnerable people are present in the area, they should, if possible be moved away from the situation.

Procedures to be followed if these control methods are used:

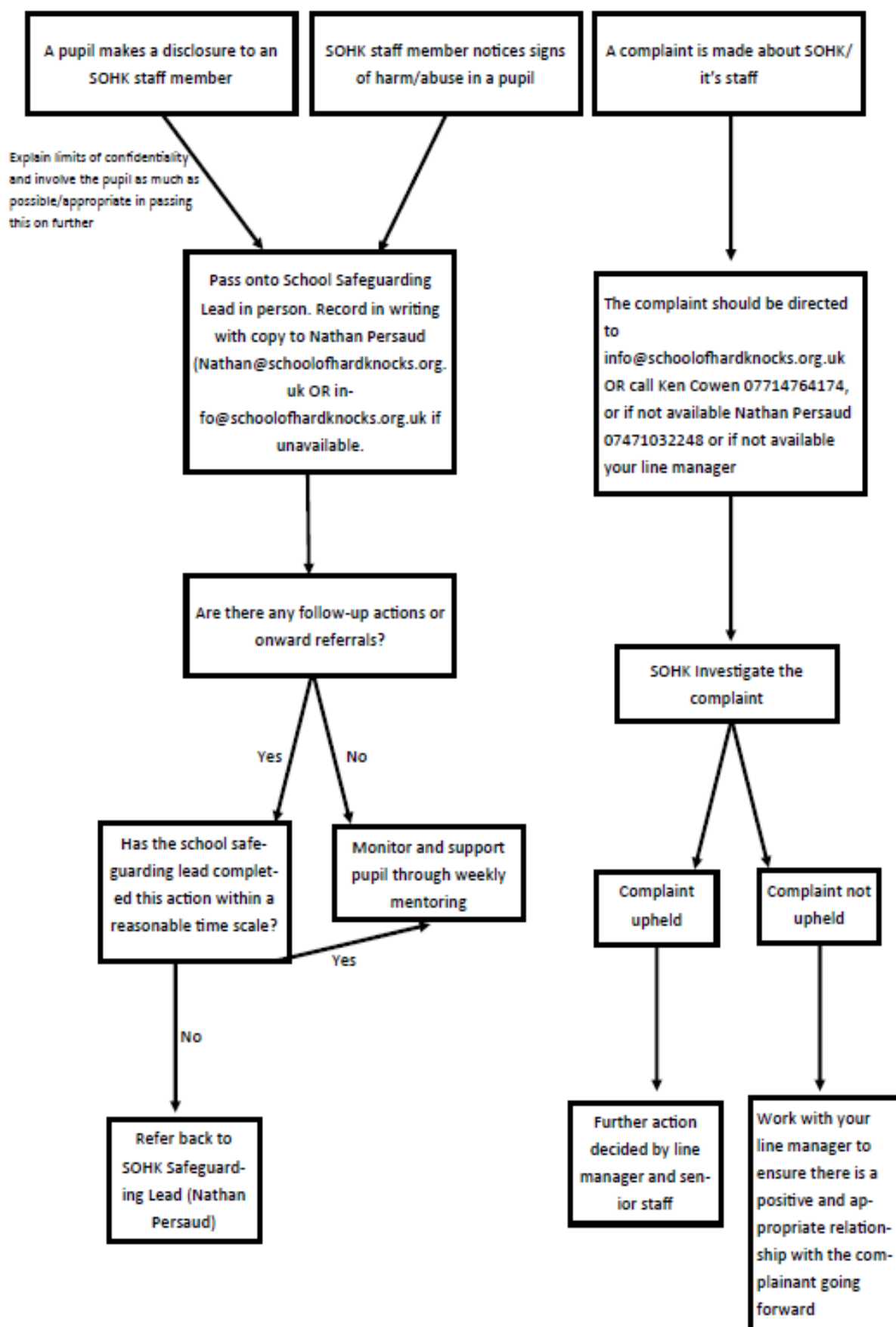
- Notify your line manager immediately after the incident has occurred.
- Complete an accident report form and send this to your line manager and the Health and Safety Officer.

Line managers should then:

- Ensure the report is comprehensive
- Ensure that the parents of the child or vulnerable adult are informed of the incident and provided with a copy of the report
- Arrange a meeting to discuss the incident with the employee within 24 hours of the incident if possible
- Write up the meeting with the employee and obtain the employees signature to the accuracy of the discussion notes
- Keep all records of the incident in a secure locked cabinet
- Ensure further training to reduce the risk of this type of incident recurring is provided to the employee if appropriate. Training could include preventative measures and strategies.

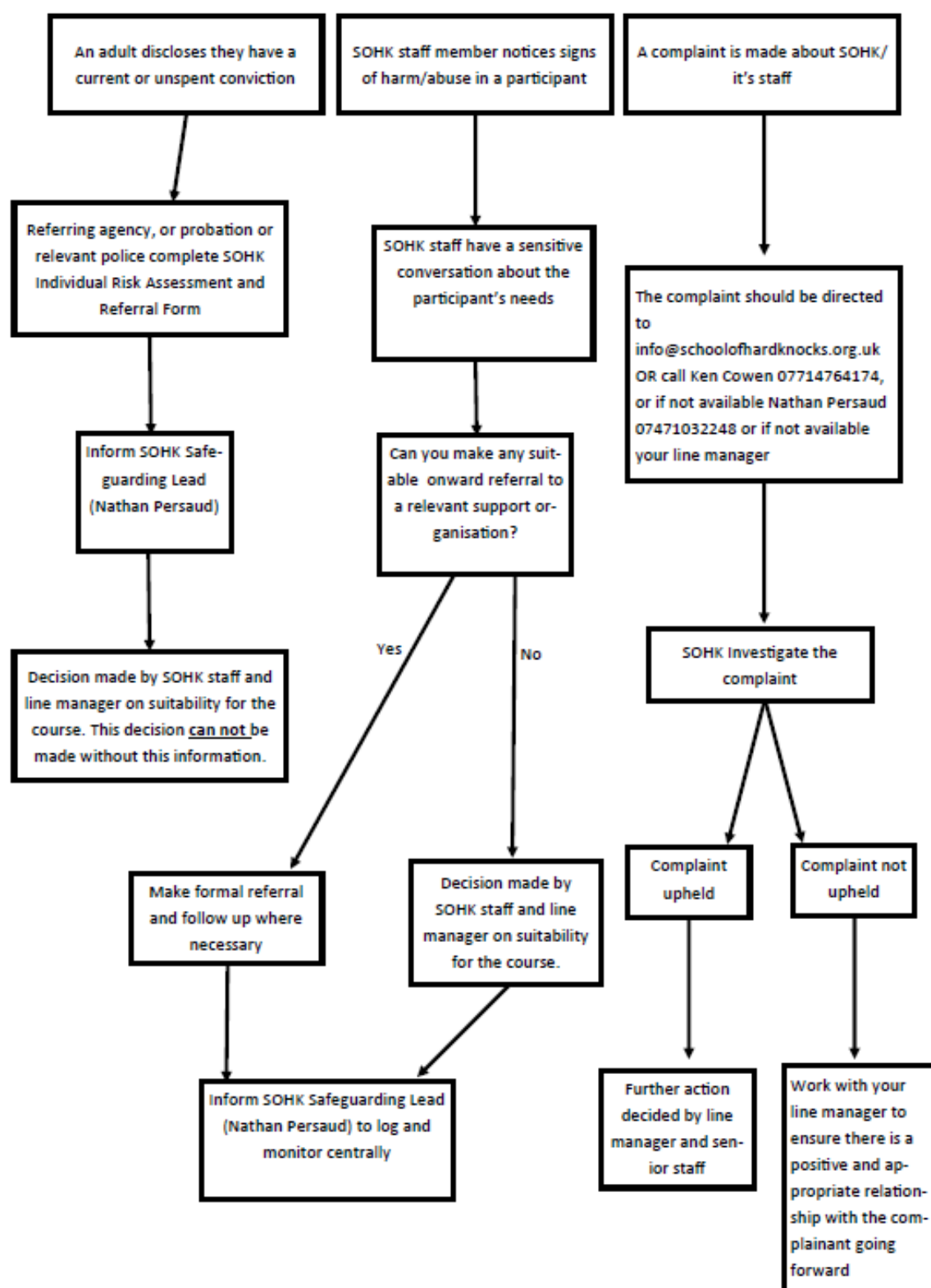
## **APPENDIX F: REPORTING**

SOHK for Schools Safeguarding Procedure Overview



if a pupil is ever at risk of **immediate harm** and you are either off school site (with no school staff), or cannot reach the school safeguarding lead; you should always pass information on by calling 111 or in an emergency 999.

SOHK Adults Safeguarding Procedure Overview



If a participant is ever at risk of immediate harm you should always pass information on by calling 111 or in an emergency 999.