

Charlton Athletic Community Trust

Safeguarding / Child Protection Policy and Procedures



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Date agreed by Trustees:	03/09/2025
Name of Designated Trustee for Safeguarding / Child Protection:	Ian Parkes
Name of Senior Safeguarding Manager:	Jason Morgan
Name of CACT Designated Safeguarding Lead for Child Protection:	Barry Simmons
Date shared with staff:	03/09/2025
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Policy Statement

Charlton Athletic Community Trust (CACT) recognise our moral and statutory responsibility to safeguard and promote the welfare of all children and young people and young people.

We endeavour to provide a safe and welcoming environment where children and young people, young people and adults feel respected and valued. CACT recognises that it has a Duty of Care to all children and young people and adults.

We maintain an attitude of '**it could happen here**' where safeguarding is concerned and promote a culture of openness where children and young people and adults are able to talk and are listened to.

This policy will provide staff, directors, and trustees with the framework they need to keep children and young people safe and secure. It will be used to inform parents and carers of how CACT will safeguard their children and young people whilst they are in our care. This Policy relates to all services and activities delivered by CACT were children and young people and adults.

The policy provides information regarding different types of abuse, links to statutory and non-statutory documentation and outlines our procedures which ensure our children and young people, receive effective support, protection, and justice.

CACT will ensure that it listens to the individual and organisational needs concerning safeguarding and what makes young people feel safe. CACT has established a youth forum where safeguarding will be regularly discussed in terms of young people expectations and needs.

Introduction

Safeguarding is Everyone's Responsibility

The procedures contained in this policy apply to all CACT staff, volunteers, directors, and Trustees and are consistent with those of our statutory partners including the Royal Borough of Greenwich Safeguarding Partnership (GSCP), London Borough of Bexley, Kent County Council, the English Football League (EFL), The Premier League (PL) The Football Association and other locally agreed procedures.

CACT takes seriously its responsibility to protect and safeguard the children and young people in its care and has updated this policy to meet the requirements within updated statutory guidance. These documents outline the responsibilities of CACT in carrying out its duties to safeguard and promote the welfare of children and young people by ensuring that "mechanisms are in place to assist staff to understand and discharge their role and responsibilities".

CACT will support children and young people in their understanding of staying safe when using new technology (in accordance with the DfE guidance published in June 2019 'Teaching online safety in clubs'). Children and young people will be supported in their understanding of personal safety through the programmes that CACT offer.

Equality Statement

CACT is committed to promoting equality and inclusion across all areas of our work including employment and service provision. At CACT we are guided by our values and committed to tackling discrimination and promoting equality. We seek to develop an environment where all groups and individuals are treated fairly and in a consistent way. CACT recognise that there are additional vulnerabilities to young people that identify as LGBTQ+, those who are playing or working in an adult dominated environment and

young people who are in the care environment (possibly as young carers) or Looked after Children (LAC) We work within both the spirit and practice of the Equality Act 2010 by promoting a culture of trust and respect. We will support our employees and volunteers to implement the principles of equality and inclusion in the delivery of our services and activities. CACT will also work with partners in the community, voluntary, public, and private sectors to achieve this. CACT's Equality Policy is available at: www.cact.org/policies

Definition of a Child

A child is anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.

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1 Aims and Principles

CACT recognises its responsibilities for safeguarding children and young people including those in need of protection.

1.1 Aims:

- To provide staff, directors, and trustees with the framework to promote and safeguard the wellbeing of children and young people and in doing so ensure they meet their statutory responsibilities.
- To ensure consistent good practice across CACT.
- To demonstrate our commitment to protecting children and young people.

1.2 Principles and Values:

- Children and young people have a right to feel secure and cannot learn effectively unless they do.
- All children and young people have a right to be protected from harm.
- All staff, directors and trustees have a key role in prevention of harm and an equal responsibility to act on any suspicion or disclosure that may indicate a child or young person is at risk of harm, either at CACT or in the community, considering contextual safeguarding, in accordance with the guidance.
- We acknowledge that working in partnership with other agencies protects children and young people and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children and young people.
- Whilst CACT will work openly with parents and carers as far as possible, it reserves the right to contact Children and Young People's Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

1.3 CACT will:

- Ensure safer recruitment procedures are robust and in line with national legislation and a strict staff code of conduct is promoted.
- Ensure a suitably trained workforce who are confident to implement the outlined procedures for identifying and reporting cases (or suspected cases), of abuse and responding to reports of sexual violence and harassment between children and young people.

We recognise that because of CACT's contact with children and young people and day to day contact with young people, staff are well placed to observe the outward signs of abuse. CACT will therefore:

- Raise awareness of child protection issues and equip children and young people with the skills needed to keep themselves safe.

- Establish and maintain an environment where children and young people feel secure, are encouraged to talk, are listened to and have individual needs identified.
- Ensure children and young people know that there are adults in CACT whom they can approach if they are worried.
- Promote opportunities across CACT programmes for children and young people to develop the skills they need to recognise and stay safe from abuse.
- Work with Stakeholders to ensure their views and needs are listened to and imbedded into CACT activities in relation to safeguarding.

2 Statutory Framework

2.1 In order to safeguard and promote the welfare of children and young people, CACT will act in accordance with Working Together to Safeguard Children and Young People (February 2024) Keeping Children and Young People Safe in Education (September 2025) and other legislation, guidance and advice detailed in Appendix 2. This includes the closing of the loophole in 2022 of the Sexual Offences Act 2003 which now includes sports coaches and faith groups) in the Abuse of Trust legislation.

2.2 More specifically, we will:

- Ensure we have a Trustee at Board level with responsibility for Safeguarding and Child Protection and a Designated Safeguarding Lead (DSL) for child protection, who have received appropriate training and support for their roles.
- Ensure staff (including temporary), volunteers and Directors know the name, contact details and understand the role of the DSL.
- Have a comprehensive induction policy in place specifically outlining CACT's Safeguarding/CP Policy; the staff code of conduct; acceptable use of IT and social media (ICT including mobile phones and cameras); the safeguarding response to children and young people who go missing from CACT activities and identify the role of the DSL.
- Ensure all staff understand their responsibilities in being alert to the signs of abuse, responsibility for referring concerns to the DSL and have signed that they have read the Safeguarding Policy and other relevant safeguarding documents i.e., Keeping Children and Young People Safe in Education (September 2021) Annex A and Part 1, if appropriate.
- Ensure that parents understand the responsibility placed on CACT and staff for child protection by setting out its obligations in CACT's offer, prospectus, or website.
- Notify Social Care immediately (on the first day of absence) if there is an unexplained absence of a child on a Child Protection Plan.
- Contact the CACT DSL or social worker directly if there is an unexplained

absence of a child who is Looked After. This may then trigger actions identified in the "Joint Police and Social Care Protocol for Dealing with Children and young people Missing from Care.

- Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters.
- Keep detailed, accurate, secure written records of concerns about children and young people, even where there is no need to refer the matter immediately.
- Have procedures in place to re-assess concerns when a child or young person's situation fails to improve.
- Ensure all safeguarding and child protection records are kept securely, separate from the main student file, and in locked locations (This could also include electronic secure storage).
- Follow the procedures set out in section 14 of this document if an allegation is made against a member of staff.
- Ensure safer recruitment practices are always followed.
- Ensure clear protocols are in place for the appropriate supervision of visitors (including visiting speakers/educators) and that CACT's values are upheld.
- Have procedures in place to gather and respond to the views and/or concerns of students (Post 16) and attendees at CACT activities.
- Seek to hold more than one emergency contact number for each young person attending CACT activities.

3 Safeguarding Training

- 3.1 All staff members will receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff members will receive safeguarding and child protection updates (for example, via email, e-bulletins, and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children and young people effectively.
- 3.2 The Designated Safeguarding Lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The DSLs will undertake PREVENT awareness training. In addition to the formal training, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role.
- 3.4 Any newly appointed DSL will attend the DSL one-day training provided by the Royal Borough of Greenwich Direct Services to clubs or another accredited training providers, followed by the GSCP Working Together course before

taking lead responsibility for safeguarding. The deputy DSL will take a leading role on safeguarding for the short time that the DSL is waiting to receive training.

- 3.5 The Board of Trustees will undertake Safeguarding / Child Protection training annually.
- 3.6 The DSL will retain a training record evidencing staff attendance at safeguarding training so that absent staff can receive an update on their return. Additionally, the DSL will retain a record (via CACT's HR information system - BREATHE) showing staff have read the CACT Safeguarding Policy, Code of Conduct, and other relevant documents i.e., Keeping Children and Young People Safe in Education (September 2021) Annex A and Part 1, if appropriate.
- 3.7 All new members of staff will receive Safeguarding training as part of their induction programme.
- 3.8 Briefings and updates on child protection and safeguarding procedures will be provided on a regular basis, at least annually, but more frequently, when necessary, to ensure that all members of staff are familiar with any changes to the CACT Safeguarding Policy or in the national guidance materials as they occur.
- 3.9 At least one member of every appointment panel will have gained accreditation through the Safer Recruitment training (a statutory requirement). CACT will ensure that there are always enough suitably trained staff or Directors in post. (The Royal Borough of Greenwich recommends this is updated every 5 years.)

3.10 Record of Training (summary):

	Staff name	Date
Designated Safeguarding Person	Barry Simmons	January 2025
Safeguarding Level 3	Health Staff	January 2025
Prevent awareness	All Staff	Autumn 2024 on going
Advanced Adult Safeguarding	Health Staff – Ann Craft Trust	January 2025
Designated person for Looked-after Children and young people	Barry Simmons	December 2019
Board of Trustees Training	Whole Board	February 2025
Safer Recruitment	Programme Leads and appropriate staff.	January 2026 on going
Annual safeguarding/CP training for all staff	All staff Logged on BreatheHR	January 2026 on going
Honour Based Violence (FGM, forced marriage etc)	All staff	Feb 2023

Child Sexual Exploitation (CSE)	All staff	Feb 2023
Peer to peer abuse	All staff	Feb 2023
Child criminal exploitation - county lines	All staff	Feb 2023
E-Safety training	All staff	Feb 2023
Hate Crime	All staff	January 2022
First Aid	All staff	Jan 2026 on going

4 Board of Trustees, Executive Team and SMT Roles and Responsibilities

4.1 In line with the statutory guidance (2020) The CACT Board of Trustees and Executive Team including the CEO will ensure that systems and procedures to ensure all staff understand their role in safeguarding and promoting the welfare of children and young people are in place and will have overall responsibility for Safeguarding within CACT. The Safeguarding Trustee will have leadership responsibility for Safeguarding arrangements and procedural processes. The CEO will undertake the role as Senior Safeguarding Manager (SSM) The Board of Trustees and Executive Team will ensure:

- The policies and procedures adopted by CACT are fully implemented and followed by all staff.
- A clear and concise job description is in place for the DSL and that the DSL is a member of the Senior Management Team (SMT).
- Sufficient resources and time are allocated to enable the DSL and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children and young people.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice about children and young people, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistleblowing policies, where appropriate.
- Induction procedures are robust and meet the requirements outlined in statutory guidance.
- A barred list check is completed, and a risk assessment is in place ensure any individual who starts work at CACT before a DBS certificate is received, is appropriately supervised...
- Procedures are in place to refer to DBS any person dismissed or removed due to safeguarding concerns.
- CACT is satisfied that any alternative provider used by CACT has appropriate safeguarding procedures in place.

- The CACT Safeguarding Trustee is Ian Parkes, and the Senior Safeguarding Manager is Jason Morgan (CACT CEO).

5 The Designated Safeguarding Lead (DSL) Roles and Responsibilities

5.1 Broad areas of responsibility for the DSL for safeguarding:

- Recognise how to identify signs of abuse and neglect and when it is appropriate to make a referral to other agencies.
- Be the first point of contact for CACT, refer and manage cases of suspected safeguarding incidents, complaints, or allegations to the relevant statutory agencies (children and young people's social care or the police) or supports staff to do so. This also includes any reports that have to go to the appropriate football bodies.
- Act as a source of support, advice, and expertise to staff within CACT and lead on the implementation of Safeguarding arrangements for CACT.
- Seek advice from and share information with relevant statutory agencies before seeking consent or informing parents of a referral. Where practicable, concerns should be discussed with the family and agreement sought for a referral to Children and Young People's Services **unless** this may, either by delay or the behavioural response it prompts, place the child or young person at risk of significant harm. **(Consideration will be given that by alerting parents or carers about a referral could potentially jeopardise a police or criminal investigation, (The DSLs should seek advice if this is the case.)** Liaise with the Programme Managers and Directors where appropriate to inform them of any issues and ongoing enquiries under section 47 of the Children and Young People Act 1989 and police investigations and ensure there is always cover for this role.
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes, such as the Royal Greenwich Early Help Guidance.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively if required to do so.
- Ensure each member of staff has access to and understands CACT's Safeguarding/ Child Protection Policy and Procedures, especially new or part-time staff.
- Ensure all staff have robust induction training covering child protection and can recognise and report any concerns about children and young people's and young people's safety and welfare immediately they arise.
- Ensure all staff are aware of the guidance **'What to do if you're worried a child is being abused'**.
- Feedback and reassure staff who have raised a safeguarding concern.
- Be able to keep detailed, accurate, secure written records of referrals and/or concerns.

- Maintain an up-to-date awareness of safeguarding developments and distribute these as appropriate to all staff in line with advice from the Safeguarding Partnerships.
- Have attended at least one CPD event during the year.
- Coordinate the delivery of safeguarding Training across the Trust.
- Have access to the CACT Safeguarding Trustee to discuss cases and policy and procedure implementation and provide quarterly reports to the Board.
- Design, implement and monitor any safeguarding procedures in relation to activities and programmes.
- Ensure CACT's Safeguarding Policy and procedures are updated and reviewed annually and work with the Lead Safeguarding Trustee, Board of Trustees and SMT.
- Work in collaboration with the DSO from Charlton Athletic Football Club with 3 formal meetings on an annual basis.
- Ensure parents can see copies of the Safeguarding Policy and Procedures to alert them to the fact that referrals about suspected abuse or neglect may be made and the role of CACT in this, (published on CACT's website).

CACT Designated Safeguarding Officer is Barry Simmons 0208 850 2866 or barry.simmons@cact.org.uk

6 CACT Director's Roles and Responsibilities for Safeguarding

Statutory guidance provides the following information:

6.1 Safeguarding arrangements that CACT should have in place:

The Board of Trustees and Directors of CACT are accountable for ensuring that CACT has effective policies and procedures in place in accordance with this guidance, and for monitoring the organisations compliance with them. They should ensure that an appropriate senior member of staff is designated to take lead responsibility for dealing with child protection issues, providing advice and support to other staff liaising with the Local Authority and working with other agencies.

6.2 In light of this statutory guidance the Board of Trustees will nominate a Safeguarding Trustee who will be responsible for Safeguarding and Child Protection at Board level and will liaise with the DSL on matters relating to Safeguarding and Child Protection.

6.3 The Directors will ensure that:

- CACT has a Safeguarding Policy and Procedures in place that are in accordance with the EFL, Football Association, Local Authority guidance and locally agreed interagency procedures; the policy is available on the website, hard copies available on request.

- CACT operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with children and young people.
- CACT has procedures for dealing with allegations of abuse against members of staff that comply with guidance from the Local Authority and locally agreed interagency procedures.
- In addition to safeguarding training (every year) the DSL will undertake training to support inter-agency working.
- There is annual training for all staff to equip them to carry out their responsibilities for child protection effectively. Temporary staff or volunteers who work with children and young people are made aware of CACT's arrangements for child protection and their responsibilities.
- A Whistleblowing Policy and Procedure is in place and is reflected in staff training and staff behaviour policies e.g., Code of Conduct, to encourage staff or volunteers to report concerns regarding safeguarding.
- All allegations, safeguarding complaints or issues are investigated by the DSL and appropriate person from the SMT, and if appropriate, by an independent investigator who will be externally sourced.
- The DSL and SMT remedies without delay any deficiencies or weaknesses regarding child protection arrangements that are brought their attention.
- A member of senior staff or a director is nominated to be responsible for liaising with the Local Authority Designated Officer (LADO) in the event of allegations of abuse being made against any member of staff. (Contact details of the LADO are listed in section 14.7).
- The Board of Trustees and SMT review the Safeguarding Policy and the effectiveness of safeguarding procedures annually, or sooner if there are any changes to guidance or legislation.
- With staff welfare in mind, the Executive Team and SMT will consider the necessity and appropriateness of arranging 'safeguarding supervision' for the DSL and or deputy DSLs within CACT.

7 Roles and Responsibilities of CACT Staff

- 7.1 CACT staff should read the Safeguarding Policy and other relevant safeguarding guidance i.e., Keeping Children Safe in Education (2025) Part 1 and Annex A. Staff should be aware of the signs of abuse and neglect (Appendix 1) so that they are able to identify cases of children and young people who may need help or protection.
- 7.2 Staff members working with children and young people are advised to maintain an attitude of '**it could happen here**' where safeguarding is concerned. When concerned about the welfare of a child or young person, staff members should always act in the interest of the child.

7.3 Children and young people with Special Educational Needs (SEN) and disabilities can face additional safeguarding challenges. Staff are aware of the additional barriers in identifying possible abuse and neglect in these children and young people. Staff must:

- Understand that children and young people with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs.
- Overcome the barriers and difficulties in communication with these children and young people.

7.4 CACT staff will ensure they are aware of their responsibilities for safeguarding and child protection in being alert to the signs of abuse and of their responsibility to report and record concerns.

Staff must:

- Recognise that a disclosure may come directly from the child, or a third party, e.g., friend, neighbour, other family member. Alternatively, it may be through the suspicion of staff based on a variety of signs, symptoms, and knowledge of possible indicators of abuse.
- Recognise that peer-on-peer abuse in all forms, including physical and sexual violence and harassment, sexting, 'up skirting'¹ and bullying etc must be taken seriously and reported appropriately.
 - Read carefully any documentation provided by the DSL to update their safeguarding training.
 - Take seriously any disclosures made to them and provide reassurance to the discloser through their responses and behaviour (without promising they will not tell anyone).

7.5 It is recognised that a child or young person may disclose sensitive information at any time of the day, and this may occur outside of normal working hours, e.g., before/after CACT sessions during the daytime, evening or at weekends. It is important that **all** staff are aware of the signs and behaviour which **may** indicate abuse (See section 9 and Appendix 1).

7.6 All staff must demonstrate safer working practices and recognise that they are in a Position of Trust and the abuse of that may lead to disciplinary action and statutory referrals. Staff must be aware of their responsibilities about online interactions with young people, lone working and their use of IT. Please see the CACTs Code of Conduct, Lone Working Policy and Procedures and Acceptable IT use Policy

7.7 All staff and volunteers have a duty to raise concerns about poor or unsafe practice and potential failures in the CACT's safeguarding regime. Staff can refer to CACT Whistleblowing Policy for further guidance. Where a staff member feels unable to raise an issue or feels that their genuine concerns are not being addressed, the

following whistleblowing channels are open to them:

7.8

The **NSPCC Whistleblowing Helpline** is available for staff, who do not feel able to raise concerns regarding child protection failures internally.

Staff can call: **0800 028 0285** – line is available from 8:00 AM to 8:00 PM,

Monday to Friday and Email: help@nspcc.org.uk.

8 Early Help Guidance

8.1 Early Help supports children and young people and families with emerging needs. It promotes a shared responsibility to facilitate significant and sustained change in children and young people's lives, building resilience, preventing, and protecting children and young people from harm. Early Help is focused on developing and breaking intergenerational cycles of poverty through working with children and young people's parents/carers and families.

Professionals should be alert to the potential needs for early help for a child who:

- is disabled and/or has specific additional needs.
- has special educational needs.
- is a young carer.
- is showing signs of engaging in anti-social or criminal behaviour.
- is in a family with circumstance that are presenting challenges for the child, such as substance abuse, adult mental health, domestic violence etc.
- is showing early signs of abuse and/or neglect.

Further information can be found in the Appendix 2.

9 When to be Concerned.

9.1 All staff and volunteers must be aware that the main categories of abuse are:

- Neglect
- Physical abuse
- Sexual abuse
- Emotional abuse

9.1 All staff and volunteers must act in accordance with this Policy if a child or young person he/she presents with indicators of abuse (see Appendix 1 for details).

10 Dealing with a Disclosure/Reporting Concerns (See Appendix 3 - flowchart)

10.1 If a member of staff has a concern about a particular child or young person in their care, they must immediately report their concerns to, and seek advice

from the DSL, or in their absence, the Deputy DSL. Staff must provide the DSL with a signed and dated written record of their concerns.

10.2 All staff must be aware of the process for making referrals to children and young people's social care and for statutory assessments under the Children and Young People's Act 1989, especially Section 17 (Children and Young People in Need) and Section 47 (a child suffering, or likely to suffer, significant harm) that may follow referral, along with the role they might be expected to play in such assessment.

10.3 If a child or young person discloses that he or she has been abused in some way the member of staff should:

- Find time and, if necessary, a suitable place to listen to the child or young person, when information about possible abuse comes to light.
- Listen to what is being said without displaying shock or disbelief.
- Do not make false promises which may not be able to be fulfilled and do not promise confidentiality.
- Allow the child or young person to talk freely. Do not cross examine, interview, probe or ask to see any injury that is not visible. Listen, only asking questions when necessary to clarify. Ask open questions such as "tell me, and how did that happen". Remember - Tell, Explain, Describe (TED).
- Do not criticise the alleged perpetrator.
- Reassure the child or young person that what has happened is not his or her fault.
- Stress that it was the right thing to tell.
- Explain what must be done next and who must be told.
- Find out just enough (TED) to be sure of the need to refer, and keep any questions open rather than closed.
- Make records that are factual, accurate and relevant and avoid opinion or subjective judgements. It is not the member of staff responsibility to 'check out' what any child tells, nor should any abuser be questioned.
- Sign and date the record of disclosure.
- Speak with the DSL and provide him/her with the signed and dated written record, using the agreed CACT proforma, without delay.

10.4 The same approach to receiving a disclosure must be taken if the disclosure is not from the alleged abused child or young person but another third-party child or adult.

10.5 CACT is a referrer, not an investigative agency for child protection matters. An

incident may eventually end up as a legal process (court case) and children and young people's evidence can all too easily be compromised by leading questions or repeated recital.

- 10.6 When the DSL, or in his or her absence, the Deputy DSL has been informed, they will make the decision whether to refer the concern to Social Care. Children's Services commonly known as The Multi Agency Safeguarding Hub (MASH) will be consulted when there is uncertainty about whether to refer a case.

Royal Borough of Greenwich MASH Consultation Line:	0208 921 2267
London Borough of Bexley:	020 3045 5440
Kent County Council:	03000 41 11 11

The referrer should contact the Children's Services Department in the local authority the child or young person lives.

- 10.7 Referrals will be made as soon as possible by telephone and the appropriate forms completed and sent at the same time. Referrals to Children and Young People's Social Care must be made to the Multi-Agency Safeguarding Hub Teams (**MASH**) (see contact details below) or the referrer should contact the Children's Services Department in the area the child or young person lives.

Royal Greenwich Borough
Multi Agency Safeguarding Hub
Children and Young People's Services
Safeguarding and Social Care,
1st Floor
The Woolwich Centre,
Wellington Street,
Woolwich, London
SE18 6HQ

Kent County Council
(via the KCC Children's Portal)
on the KCC Website Kent.gov.uk

London Borough of Bexley
Multi Agency Safeguarding Hub
Civic Offices,
2 Watling Street,
Bexleyheath DA6 7AT

- 10.8 If the DSL has raised a safeguarding concern but does not feel that appropriate action has been taken by Children and Young People's Services, they should use the Local Safeguarding Children and Young People's Partnership Escalation Policy to take this further. (This is available on the Local Authority websites, look for LSCB, click on the professional's tab).

Additional guidance is provided in Appendix 3.

11 Confidentiality

- 11.1 Safeguarding children and young people raises issues of confidentiality that must be clearly understood by all staff. All staff have a responsibility to share relevant information about the protection of children and young people with other professionals. This sharing of information is outlined in the guidance 'Information sharing advice for practitioners providing safeguarding services to children and young people, young people, parents and carers' (July 2018). It identifies seven golden rules for sharing information and remind practitioners that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law **are not barriers to justified information sharing** but provide a framework to ensure that personal information about living individuals is shared carefully and appropriately.
- 11.2 If a child or young person discloses to a member of staff and asks that the information is kept secret, it is important that the member of staff tells the child in a manner appropriate to the child's age or stage of development that they cannot promise complete confidentiality – instead, he/she must explain that he/she may need to pass information to other professionals to help keep the child or other children and young people safe.
- 11.3 Staff who receive information about children and young people and their families in the course of their work shall share that information only within appropriate contexts.

12 Communication with Parents and Carers

- 12.1 Parents and carers will be made aware of CACT Safeguarding Policy. Parents and carers will be informed that in certain circumstances there may be a need to contact other agencies without first notifying them. This decision will be made in partnership between CACT and Social Services. It will be made clear that this is a legal obligation and not a personal decision.
- 12.2 CACT makes this policy available to parents, carers and children and young people through the CACT website. A hard copy is also available on request.

13 Record Keeping

- 13.1 All concern forms/body maps and chronology sheets should be signed and dated. They should together provide an accurate factual account of the concern and action taken by CACT.
- 13.2 The completed forms/records will be kept for the duration of seven years by CACT and then will be destroyed and the date recorded of their destruction.
- 13.3 All reports will be logged on the Safeguarding platform My Concern which is a secure software system for recording safeguarding concerns. Cases on the portal will be regularly reviewed and those that are completed will be filed in the archive section of My Concern.
- 13.4 The reports function on My concern will be used to provide staff, management and SLT updates on trends and the types of incidents that CACT is facing. This will also be used for reporting to the Board of Trustees and the annual safeguarding review. Bi Monthly case updates / reviews will be completed by the DSL with staff.

- 13.5 The information contained will be regarded as confidential. Any request for access to the information by non CACT partners and agencies (e.g., Solicitor, investigating agent) will be referred to the DSL who is advised to seek legal advice before acting.

14 Dealing with Allegations Against Staff

(Also refer to: Keeping Children Safe in Education September 2025, Part 4, Working Together to Safeguard Children, March 2018 for further details see flowchart in Appendix 3)

- 14.1 An allegation is any information which indicates that a member of staff may have:

- Behaved in a way that has, or may have, harmed a child.
- Possibly committed a criminal offence against or in relation to a child.
- Behaved towards a child/children or young person in a way that indicates he or she may pose a risk of harm to children and young people; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Behaved in a way contrary to the CACT Staff Code of Conduct.

CACT acknowledges it has a Duty of Care to all its beneficiaries who attend events, programmes, and activities.

- 14.2 This applies to any child the member of staff has contact with in their personal, professional or community life.
- 14.3 To reduce the risk of allegations, all staff must be aware of safer working practice and must be familiar with the Government document, '*Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings.*' (Safer Recruitment Consortium 2019, and 2020 update). EFL, Member Clubs, Guide to Safer Working Practice
- 14.5 Any allegation should be reported immediately to the DSL or to the Programme Manager (unless the allegation concerns the latter, see 14.10). They should take the matter seriously and keep an open mind. They should not investigate or ask leading questions if seeking clarification; it is important not to make assumptions. Confidentiality must not be promised, and the person must be advised that the concern will be shared on a „need to know" basis only.
- 14.6 Actions to be taken include making an immediate accurate, written record of the allegation using the informant's words – including time, date, and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record must be signed and dated.
- 14.7 The recipient of an allegation must not unilaterally determine its validity, and failure to report it in accordance with procedures is a potential disciplinary matter.

- 14.8 The DSL will not investigate the allegation itself, or take written or detailed statements, but will assess whether it is necessary to refer the concern to the Local Authority Designated Officer (LADO).

Local Authority Designated Officer (LADO) Contact Details

Royal Greenwich Borough Sadie Bates

Contact number: 0208 921 3930 or

Email: childrenandyoungpeoples-LADO@greenwich.gov.uk

London Borough Bexley Marie Jackson

Contact number 0203 045 3436

Email: LADO@bexley.gov.uk

Kent County Council

Contact number: 03000 41 08 88

kentchildrenslado@kent.gov.uk

- 14.9 If the allegation meets any of the five criteria set out in section 14.1 then the Programme Manager or DSL will contact the **LADO** without delay and provide the LADO with written confirmation/referral of the allegation. Consideration were appropriate will be given to referring the issue to the police if a criminal offence has been committed and to the FA if the allegation concerns a member of the football coaching staff.
- 14.10 The Programme Manager or DSL shall, as soon as possible, following a briefing from the LADO inform the subject of the allegation. CACT will also take direction from the LADO as whether to suspend the member of staff or move them to other non-regulatory activities.
- 14.11 If there is an allegation or concern raised against a Programme Manager or the DSL, the Director overseeing that programme, or the Safeguarding Trustee will be contacted. (Contact details for the Directors and Safeguarding Trustee on page 15):

Jason Morgan – Chief Executive CEO (Coms and Marketing issues)

jason.morgan@cact.org.uk Tele: 0208 850 2866

Safeguarding Trustee – Ian Parkes

Zanele Moyo Condon - Director of Finance, Governance and Compliance

zanele.moyo-condon@cact.org.uk Tele: 0208 850 2866

David James - Director of Football and Sports Development

david.james@cact.org.uk Tele: 0208 850 2866

Charlie Macdonald – Director of Health, Early Help and Youth Services

charlie.macdonald@cact.org.uk – Tele: 0208 850 2866

- 14.12 In the event of allegations or concerns against the Programme Manager or DSL then the appropriate Director or Safeguarding Trustee will contact the LADO, whose contact details are given in 14.8 above.
- 14.13 If a conflict of interests exists in an investigation concerning a member of staff i.e. personal relationship arrangements will be made for other senior staff including the Lead Trustee for Safeguarding to manage this.
- 14.14 If no LADO process is required or on the advice of the LADO then CACT will start its investigation process. This will be usually done by a senior manager. This should be impartial and address all the aspects of the concern raised. This needs to be recorded. CACTs HR Officer will normally be involved to record the conversations arising from the investigations. All meetings and notes from the Investigation will be recorded on My Concern and by HR on the personnel files.
- 14.15 The CACT Lead Trustee will also be informed on any issue related to staff or volunteers.
- 14.16 CACT will ensure staff are allocated to support all those involved with the allegations including the alleged victims, those who reported the concern and the person subject to the concern. This will include progress and update reports as well the outcome of the investigation. Any Stakeholders (i.e., funders etc) will be notified as well.
- 14.17 CACT has a comprehensive Complaints Policy that details how complaints are administered that is available to staff and users of CACTs programmes and activities. CACT also has a Disciplinary Policy and Procedure which will be used to guide any resulting disciplinary process and possible dismissal.
- 14.18 At the end of the process CACT will make referrals to DBS if it meets the threshold and to the Charity Commission similarly.

15 Allegations Concerning other Children and Young People (Peer on Peer)

- 15.1 CACT recognises that children and young people can abuse their peers. Staff are aware that any allegations will be investigated appropriately by reporting concerns to the DSL and will never be tolerated or passed off as “banter” or “part of growing up”. Any form of inappropriate touching, physical abuse such as hitting, kicking, shaking, biting and hair pulling, or evidence of ‘initiation procedures, sexting, up-skirting (or other inappropriate use of new technology) will be robustly followed up.
- 15.2 Victims of peer-on-peer abuse will be supported as for any other form of abuse and in their best interests.
- 15.3 Peer-on-peer abuse can manifest itself in many ways. CACT provides opportunities to help children and young people safeguarding themselves from new technology and through learning about personal safety. (See also ICT policy, and Equality and Diversity policy.)

16 Low Level Concerns

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

- is inconsistent with the CACT Staff code of conduct, including inappropriate conduct outside of work.
- doesn't meet the threshold of harm or is not considered serious enough for CACT to refer to the local authority or police.

16.2 Low-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.

16.3 Examples of such behaviour could include:

- Being over friendly with children
- Having favourites
- Staff 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.

16.4 If a member of staff has a low-level concern about a member of staff they must report their concerns to, and seek advice from the DSL, or in their absence, the Deputy DSL. Staff must provide the DSL with a signed and dated written record of their concerns usually via My Concern.

17 Monitoring, Evaluation, Review and Promotion

17.1 The responsibility for ensuring that the Safeguarding/Child Protection Policy and procedures are in place, available to parents and reviewed annually lies with the CACT Executive Team, Safeguarding Trustee and DSO. This Policy will be reviewed in line with the timescale and details set out on the front cover.

17.2 CACT will ensure that when the policy is reviewed it will also seek and consider feedback from beneficiaries of CACT programmes. This will be done via for example the Youth Forum, surveys from young people and their parents and via statutory agencies via Section 11 audits.

17.3 The CACT Safeguarding Policy will be available to staff on the HR Portal BREATH which will include a notification requirement that staff have read it, on the Share Documents file available to staff, via hard copy at all the CACT venues and upon request and on the CACT website. Any updates will be communicated by an all-staff E mail or via the CACT updates sessions.

18 CACT Related Policies and Procedures

- Adults at Risk Policy
- Anti-Bullying Policy
- Code of Conduct
- Data Protection Policy
- DBS Check Policy
- E Safety Policy
- Equality Policy
- Health and Safety Policy

- Induction Process and Procedures
- Safer Recruitment Policy
- Travel Trips and Tournaments Policy
- Whistleblowing Policy

19 Safer Recruitment

CACT has a robust safer recruitment process that involves the following.

- Authority to recruit sign off by Executive Officer
- Advert including the notification that appropriate positions will require an Enhanced DBS check and CACT's commitment to safeguarding.
- The development and signing off a role description highlighting safeguarding responsibilities.
- Completion of an application form.
- Attendance at an interview. This includes the use of Werner Style questions and the identification for reasons for any gaps in employment, The questions at interview will also ascertain the candidate's motivation for working with young people, what constitutes professional boundaries and acceptable behaviour and their understanding of what safeguarding young people entails.
- Within casual coaching roles interviewees will be asked to conduct a supervised coaching session to help ascertain their suitability to work with Young People
- Successful candidates will be sent an offer of employment letter.
- An Enhanced DBS Check against the barring list if appropriate
- Verification of identity, qualifications and right to work in the UK.
- Two references from previous employers.
- Full induction including safeguarding roles and responsibilities, policies, and procedures.
- Successful completion of probation period with adequate supervision and performance review.

Staff that are involved in recruitment will also have to attend Safer Recruitment Training.

19 Rehabilitation of Offenders

- 19.1 As an organisation CACT assesses applicant's suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020), using criminal record checks processed through the Disclosure and Barring Service (DBS). The amendments to The Rehabilitation of Offenders Act that came into force in December 2020 provides that when applying for certain jobs and activities certain convictions and cautions are considered "protected." This means that they do not need to be disclosed to employers and, if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the Ministry of Justice Website and applicants are given information on where to obtain advice, for example, NACRO or UNLOCK.

- 19.2 The Rehabilitation of Offenders Act 1974 ("1974 Act") primarily exists to support the rehabilitation into employment of reformed offenders who have stayed on the right side of the law.
- 19.3 Under the 1974 Act, following a specified period which varies according to the disposal administered or sentence passed, cautions and convictions (except those resulting in prison sentences of over four years and all public protection sentences*) may become spent. As a result, the offender is regarded as rehabilitated.
- 19.4 CACT complies fully with the DBS Code of Practice and undertakes to treat all applicants fairly. CACT undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information needed.
- 19.5 An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts, and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position. All applicants will be subject to CACT's Safer Recruitment process.
- 18.6 CACT ensures that staff who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences. CACT also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of offenders, e.g., the Rehabilitation of Offenders Act 1974.
- 18.7 CACT ensures that an open and measured discussion takes place about any offences or other matter that might be relevant to the position. Any member of staff that has content on their DBS when presenting themselves for an activity will have been risk assessed and will have been deemed as presenting no risk to any person on that activity. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment. This is in line with the English Football League recommendations.
- 18.8 CACT will ensure that project delivery partners where appropriate have a safer recruitment process which will include the required level of DBS check and that staff have undergone safeguarding training within the last 3 years. This will be stipulated in any Service Level Agreement or contact with that third party.

19 Assessment of Partner's Safeguarding Policies and Procedures

- 19.1 If working in partnership with partners for the purpose of the delivery of programmes and activities CACT will ask as minimum for evidence of:
- Safeguarding Policies and reporting procedures including allegations made against staff and whistleblowing procedures.

- A Designated Safeguarding Officer and their level of training (DSO Level 3 as a minimum)
- Training of staff and at what level and frequency
- Safer recruitment procedures including interview, induction, and probation.
- Staff code of conduct
- Completion of DBS checks if appropriate for the roles.

CACT reserves the right to use their own Safeguarding Policies and Procedures if concerned about the response of a partner to any safeguarding issue. This will be reflected in the Service Level Agreement.

20 Specific Projects

20.1 National Citizen Service (NCS)

The NCS Team will report all issues to the CACT Safeguarding Officer who will follow the procedures for reporting abuse and allegations against staff as laid down in this policy, but these will be also uploaded onto the NCS Pharos system. The NCS Safeguarding Team will categorise the issue from a Level of One (most serious) to Level Five (least serious). Certain safeguarding issues will have involvement with the NCS Safeguarding Team (usually Level One and Two issues). The CACT NCS Team and the CACT Designated Officer will work with the NCS Safeguarding Team to resolve these.

20.2 Health Team

Most of the cases with the Health Improvement Team will use the CACT reporting procedures as detailed in this policy. In the case of the CACT / Oxleas NHS Trust Healthy Schools Programme, if a safeguarding issue is raised via questionnaires in schools, these must be reported to the school's Designated Safeguarding Officer with the CACT Safeguarding Officer copied in. Oxleas NHS Trust will also be notified with appropriate details by the Health Improvement Team. All other safeguarding issues will be reported via the Health Teams CRM system.

21 New Programmes and Activities

New programmes or activities, or a programme that has been revised will include safeguarding in the planning brief, influenced by any known risks that may be encountered. Any known information about the group and activity will consider any knowledge held by third party agencies and / or stakeholders including information sharing governance.

The views of the programme beneficiaries including young people and parents / carers will also be considered with regard to the development of the new programmes and activities both in the overall design of the latter but also the safeguarding policies and procedures of the latter.

22 Contextual Safeguarding

Contextual safeguarding recognises the impact of the public/social influences on young people's lives and consequently their safety. Contextual safeguarding seeks to identify and respond to harm and abuse posed to young people

outside their home, either from adults or other young people. Examples of this include influences on young people from being online, within their peer groups, from activities they attend and from their school or college.

CACT will seek to understand these influences and build this into its programmes of activity which will include preventative, diversionary and educational activities to allow young people to hopefully identify and move away from negative influences.

23 Consent

Consent must be gained for all young people to take part in any CACT activities from parents, guardians, or carers. This includes consent for any images of young people to be used in any social media medium or photo / video images.

24 Travel Trips and Tournaments

All travel; trips and tournaments must be conducted in a manner to keep young people safe. This includes

- Consent gained for their involvement
- Risk Assessments completed on the travel, venue and activity.
- Obtaining the Hosts Risk Assessment if appropriate
- Procedures in place to deal with and Safeguarding concerns or incidents
- Offsite packs for staff back in the office etc.

Further information and guidance can be found in CACTs Travel, Trips and Tournament Policy.

APPENDIX 1

Types and Indicators of Abuse (to be read in conjunction with Keeping Children and Young People Safe in Education Part 1).

This guidance is provided as a useful reminder of the types and indicators of abuse but should always be considered within the context of a comprehensive training programme and not as a substitute for more in-depth consideration.

There are four categories of abuse, which may result in a child being placed on the Child Protection Register. They are:

- Physical Abuse
- Emotional Abuse
- Sexual Abuse
- Neglect

Definitions of Child Abuse

'Child Abuse and neglect' is a generic term encompassing all ill treatment of children and young people including serious physical and sexual assaults as well as cases where the standard of care does not adequately support the child's health or

development. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse can occur in a family, an institutional or community setting. The perpetrator may be known or not known to the child.

Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

Children may be abused by:

- Family members (more likely)
- Friends
- People working or volunteering in organisational or community settings.
- People they know.
- Strangers.

There are 4 broad categories of abuse which are used for the purposes of registration. These categories overlap and an abused child may suffer more than one type of abuse.

Physical Abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, or suffocating a child. It may also be caused when a parent or carer feigns the symptoms or deliberately causes ill health to a child (now described as 'fabricated or induced illness').

Possible indicators of Physical Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Unexplained injuries including burns, particularly if they are recurrent.
- Improbably excuses given to explain injuries.
- Refusal to discuss injuries.
- Untreated injuries.
- Admission of punishment which seems excessive.
- Bald patches.
- Withdrawal from physical contact.
- Arms and legs covered, even in hot weather.
- Fear of returning home.
- Fear of medical help.
- Self-destructive tendencies.

- Aggression towards others.
- Running away.

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It may involve:

- conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- feature age or developmentally inappropriate expectations being imposed on children and young people. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction.
- seeing or hearing the ill-treatment of another (including witnessing domestic violence).
- serious bullying (including cyber bullying), causing children and young people frequently to feel frightened or in danger, or the exploitation or corruption of children and young people.

Possible Indicators of Emotional Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Physical and/or mental and/or emotional development lags.
- Admission of punishment that appears excessive.
- Over-reaction to mistakes.
- Continual self-deprecation.
- Sudden speech disorders.
- Fear of new situations.
- Inappropriate emotional responses to painful situations.
- Neurotic behaviour e.g., thumb sucking, hair twisting, rocking.
- Self-mutilation.
- Fear of parents being contacted.

- Extremes of passivity or aggression.
- Drug/solvent abuse.
- Running away.
- Compulsive stealing or scavenging.

Sexual Abuse

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

Possible Indicators of Sexual Abuse - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused:

- Sudden changes in behaviour, attendance or in performance.
- Displays of affection in a sexual way, inappropriate to age.
- Tendency to cling or need reassurance.
- Regression to younger behaviour e.g., thumb sucking, acting like a baby, playing with discarded toys.
- Complaints of genital itching or pain, or anal pain.
- Distrust of a familiar adult, or anxiety about being left with a relative, babysitter or lodger.
- Unexplained gifts or money (grooming).
- Depression and withdrawal.
- Apparent secrecy.
- Bedwetting, daytime wetting and/or soiling.
- Sleep disturbances, nightmares.
- Chronic illness, e.g., throat infection, venereal disease, or other STD * Anorexia, bulimia.

- Unexplained pregnancy.
- Fear of undressing, e.g., for sport.
- Phobias or panic attacks.

Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Abandoning and exposing children to harm.

Possible Indicators of Neglect - Some of these indicators would clearly suggest child abuse, whilst others, when combined, may suggest that a child is being abused.

- Constant hunger.
- Poor personal hygiene.
- Constant tiredness.
- Poor state of clothing.
- Emaciation.
- Frequent lateness or non-attendance at activities
- Untreated medical problems.
- Destructive tendencies.
- Low self-esteem.
- Neurotic behaviour.
- No social relationships.
- Running away.
- Compulsive stealing or scavenging.

Additional Safeguarding Issues

Honour Based Abuse

So-called 'honour-based' violence (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubts staff should speak to the designated safeguarding lead. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBA.

Online Safety

All staff and programmes need to ensure that the young people they are working with are safe online including any involvement in gaming or E Sports activities. All CACT IT mediums have the appropriate technology in place to prevent children and young people for accessing inappropriate materials. If Staff become aware of any young person accessing inappropriate / illegal sites or involved in activities such as sharing inappropriate images etc these must be reported following the guidance in this Policy,

Female Genital Mutilation (FGM)

Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It is also known as female circumcision or cutting. The age at which FGM is carried out varies. It may be carried out when a child is new-born, during childhood or adolescence, just before marriage or during pregnancy (Home Office et al, 2016). FGM is child abuse. There are no medical reasons to carry out FGM. It is dangerous and a criminal offence.

FGM Mandatory reporting of female genital mutilation procedural information can be found at:

<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

Possible Indicators of Female Genital Mutilation (FGM):

- Holiday requests made to CACT for significant lengths of time (Pre warning).
- Long periods of time away from the classroom during the day with bladder or menstrual problems.
- Avoidance of P.E.
- Difficulty walking, sitting, or standing.
- Prolonged absences from activities.
- Noticeable behaviour changes.
- Withdrawal.
- Depression.

- Recurrent Urinary Tract Infections (UTI) or complaints of abdominal pain

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture to coerce a person into marriage. Staff can play an important role in safeguarding children and young people from forced marriage.

The Forced Marriage Unit has published multi-agency guidelines, with pages 32-36 focusing on the role of agencies. CACT staff can contact the Forced Marriage Unit for advice or information. Contact: 020 7008 0151 or email: fmf@fco.gov.uk

Further information is available on Royal Borough of Greenwich Safeguarding Children and Young People Partnership website:

www.greenwichsafeguardingchildrenandyoungpeople.org.uk

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE) 28. Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual, and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in:

Possible Indicators of CSE Child Sexual Exploitation (CSE):

- Inappropriate sexual or sexualised behaviour.
- Repeat sexually transmitted infections.
- Having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs).

- Going to hotels or other unusual locations to meet friends.
- Getting in/out of different cars driven by unknown adults.
- Going missing from home or care.
- Having older boyfriends or girlfriends.
- Associating with other young people involved in sexual exploitation.
- Truancy, exclusion, disengagement with CACT, opting out of education altogether.
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual).
- Drug or alcohol misuse.
- Getting involved in crime.
- Injuries from physical assault, positive handling (physical restraint), sexual assault.

Private Fostering

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent or a 'close relative'. This is a private arrangement made between a parent and a carer, for 28 days or more. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles, or aunts (whether of full blood, half blood or marriage/affinity). To help keep children and young people safe and support families, all parents and private foster carers must notify MASH of care arrangements for children and young people so they can ensure a child is well cared for. If a member of CACT staff suspects a child may be being privately fostered without formal arrangement it is important you share this information in case a child is at risk of harm.

Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Protecting children from other forms of harms and abuse, protecting children from this risk should be a part of the CACT's safeguarding approach.

Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Radicalisation refers to the process by which a person comes to support terrorism

and extremist ideologies associated with terrorist groups.

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

PREVENT - Section 26 of the Counter terrorism and Security Act 2015 (“the CTSA 2015”) (Revised 2021 under Section 29), places a duty on organisations to have due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent Duty. Paragraphs 57-76 of the revised Prevent duty guidance: for England and Wales is specifically concerned with organisations (but also cover childcare)

The statutory “Revised Prevent Duty Guidance for England and Wales” (for organisations) summarises the requirements in terms of four general themes:

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

It is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children’s behaviour, which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. This will be achieved by using the normal CACT reporting procedures if the threshold is met.

CACTs designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral such as to the Channel Panel in Royal Greenwich Borough.

CACT will ensure that all delivery staff attend PREVENT Training. `

The Prevent Duty

CACT are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty should be part of CACT’s wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales.

The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies. There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

Child Criminal Exploitation: County Lines

Criminal exploitation of children and young people is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are periods of absence from CACT when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 98 should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from CACT activities, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs. All staff should be aware of the associated risks and understand the measures in place to manage these.

Child on Child abuse

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence, such as rape, assault by penetration and sexual assault.
- sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- “upskirting”, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to

obtain sexual gratification, or cause the victim humiliation, distress, or alarm.

- sexting (also known as youth produced sexual imagery); and
- initiation/hazing type violence and rituals.

All staff should be clear as to CACTs policy and procedures with regards to peer-on-peer abuse.

As with other safeguarding risks, staff should be alert to changes in children and young people's behaviour which could indicate that they may need help or protection. Staff should use their judgement in identifying children and young people who might be at risk of exploitation or radicalisation and act appropriately.

Mental Health

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

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

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

Information regarding the definition and signs of further specific safeguarding issues including homelessness, domestic abuse, children, and young people with family members in prison and children and young people and the court system etc can be found in Annex A of Keeping Children and Young People Safe in Education 2020.

Health and Safety

All staff must ensure that session delivery is safe in terms of Health and Safety and all must be done as reasonably practicable to ensure that there is a safe environment to prevent accidents and incidents occurring. All activities must be risk assessed which includes the facility, equipment and particulars to the delivery of the activity, Please see Ccat Health and Safety Policy for more information.

APPENDIX 2

Statutory Guidance, Legislation and Advice include:

- The Children and Young People Act 1989 & 2004.
- Working Together to Safeguard Children 2018.
- EFL Safeguarding Children Policy
- Keeping Children and Young People Safe in Education (September 2025).
- Dealing with Allegations of Abuse Against people in Positions of Trust.
- What to do if you Worried a Child is Being Abused - Advice for Practitioners.
- Sexual violence and sexual harassment between children and young people in schools and colleges (May 2018).
- Searching, screening and confiscation (January 2018).
- F A Safeguarding Children Policy
- Information sharing advice for practitioners providing safeguarding services to children and young people, young people, parents, and carers (July 2018).
- UKCCIS Guidance: Sexting in schools and colleges, responding to incidents, and safeguarding young people (2017).
- Children and Young People Missing Education, September 2016.
- London Child Protection Procedures, May 2018.
- Relationships Education, Relationships and Sex Education (RSE) and Health Education, April 2019.
- Sexual Offences Act 2003 – Sports Coaches now includes under the Abuse of Trust Law making it illegal for them to have sex with 16- and 17-year-old in their care.

Note: All Staff must read and be assisted to understand and discharge their roles and responsibilities set out in Part one of Keeping Children Safe in Education, 2020., Annex A provides further information which also should be read by CACT staff and Directors.

APPENDIX 3

Record Keeping and Referral Guidance

It is essential that CACT keeps clear records based on observation and evidence, which separate fact, allegation, hearsay, opinion, or unsubstantiated evidence and which clearly indicate decisions and actions taken.

Child protection information will be kept in separate files by the designated person and will only be discussed with staff on a need-to-know basis. Staff need to know when a child is at risk and what plan has been decided by case conference but may not need to know all the confidential details.

All records, notes and observations made by staff as part of ongoing monitoring of children and young people on the child protection register or causing concern, must be completed on the appropriate incident/concern form, and immediately handed to the DSL. Documents (paper copy and electronic) must be dated and an indication of the person completing the form recorded.

All child protection conference minutes must be stored in the confidential files kept by the Designated Safeguarding Lead. CACT uses the electronic safeguarding system My Concern to store all records of safeguarding issues.

Initial Concerns

Initial concerns, incidents or disclosure by a child must be reported to the DSL using the incident/concern form. A copy of the form and body map in Appendix 4 should be used to record injuries/marks/bruises.

The following information must be recorded:

- time, date, place, and people who were present.
- exact details of what was said by the child and/or others (no interpretation or opinion).
- the child's emotional or physical condition.
- details of the behaviour(s) causing concern and the context in which it occurred.

Details of injuries, marks, or bruises - the position of these must be marked on the appropriate body drawing and suitably annotated to provide further detail (number, length of marks, description of marks, colour of marks/bruises etc.). Other relevant details - including information about previous incidents which may not have been reported but now seem relevant.

Ongoing Concerns / Monitoring

- A chronology should be maintained.
- Staff in regular contact with a child may be required to keep a running record noting information about particular aspects of a child's behaviour, physical and/or emotional condition or remarks they may make - either because concerns are ongoing or as part of a child protection plan. These need to be written on yellow

incident sheets and handed to the DSL. Any records passed to the DSL electronically must be password protected.

Referrals

The DSL must keep detailed, contemporaneous notes of:

- discussions with staff.
- discussions with the child.
- discussion with parents.
- information provided to social services.
- decisions taken (with times, dates and signed).

The designated person will confirm verbal and telephone referrals to social services in writing within 48 hours of the referral.

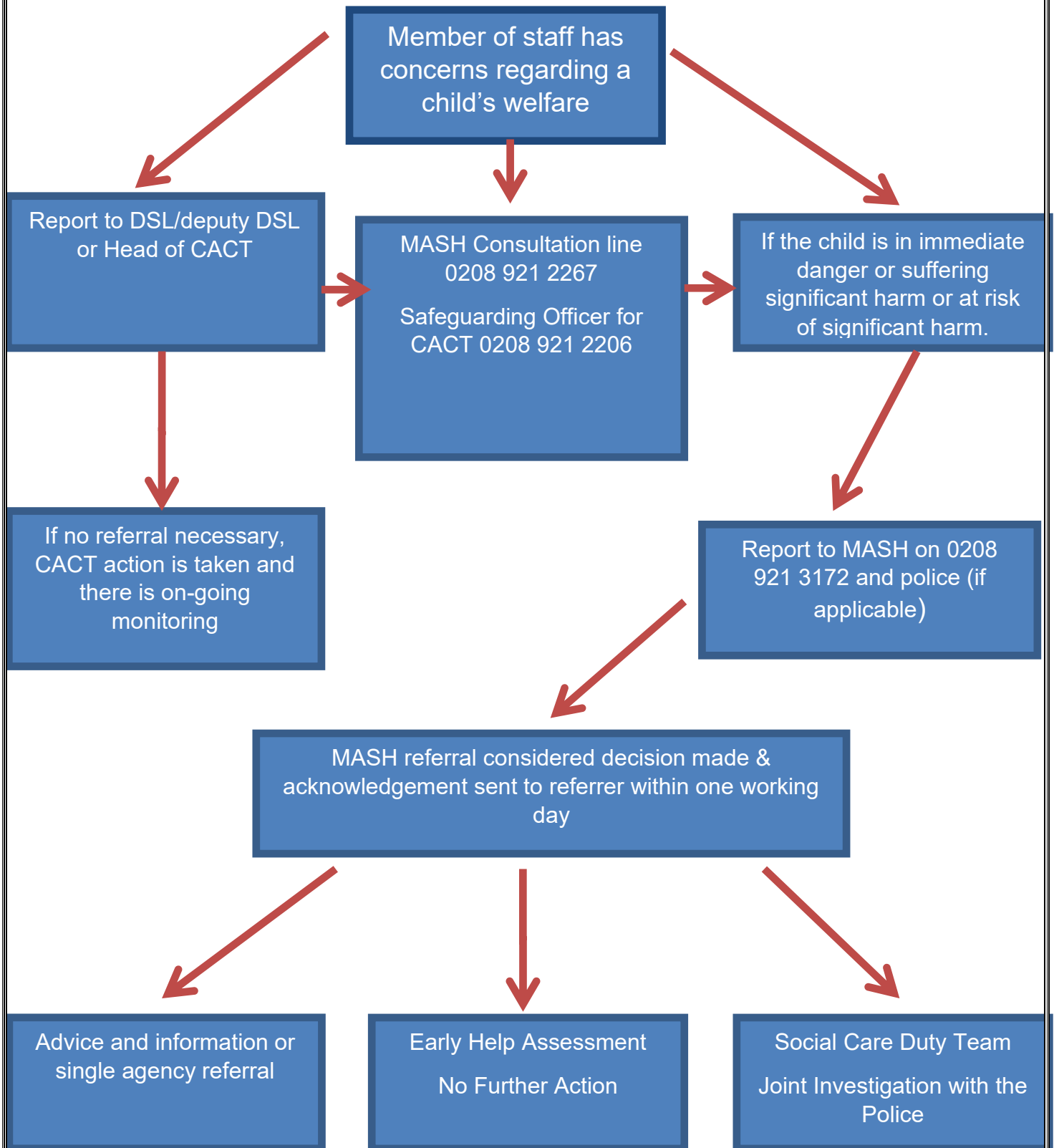
Reports for Child Protection Conferences / Core Group Meetings

Reports for child protection conferences must be written on the agreed pro-forma. They should focus on the child's educational progress and achievements, attendance, behaviour, participation, relationships with other children and young people and staff and, where appropriate, their appearance and concerns.

They should provide clear information. Staff should be aware that these reports will be made available to parents at the child protection conference.

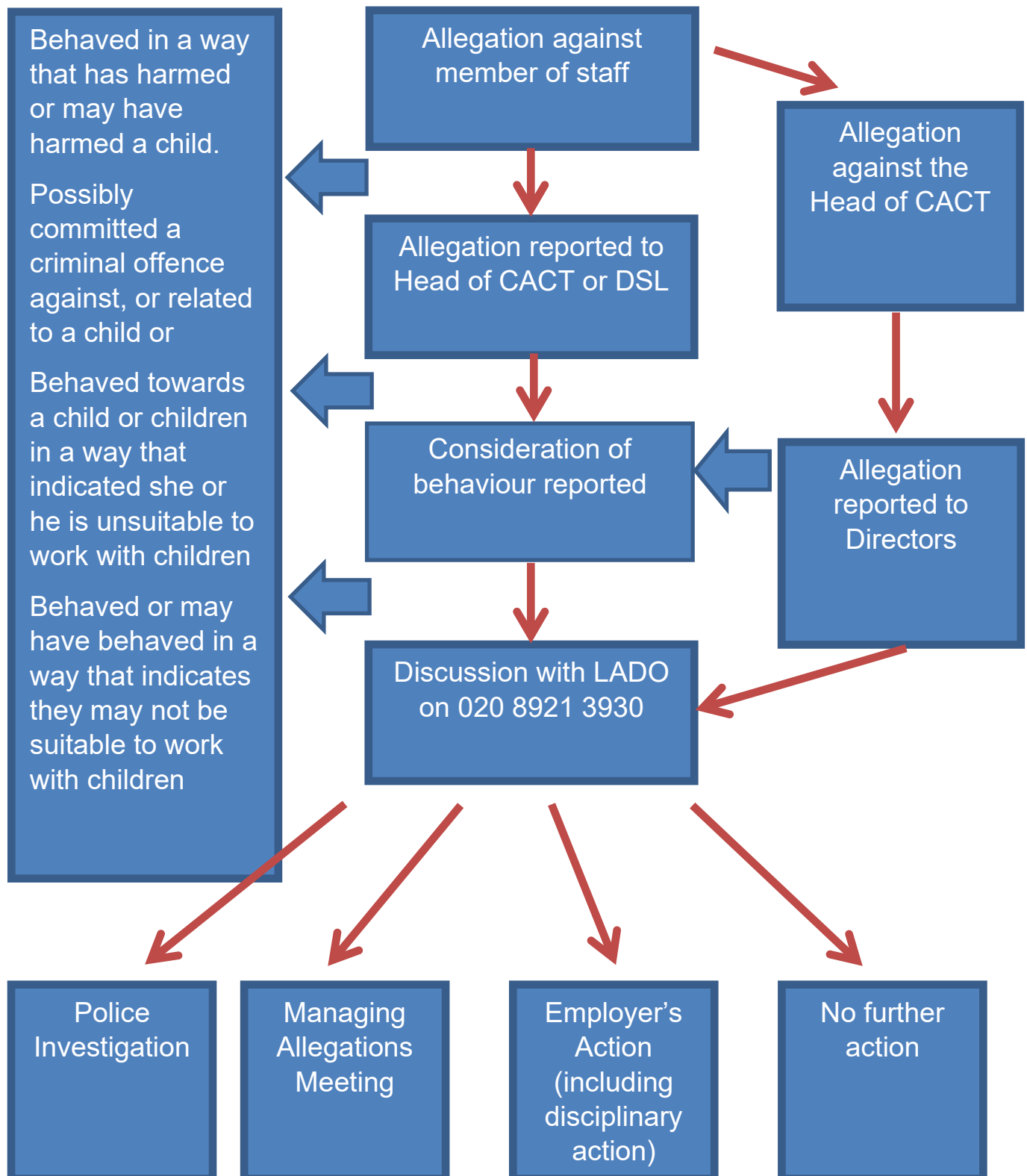
Appendix 3 (continued) Reporting Concerns About a Child

Flow Chart for Reporting Concerns



Appendix 3 (continued)
Reporting Allegations Against CACT Staff and Volunteers

Managing Allegations Against Staff and Volunteers



APPENDIX 4

This Covid-19 Addendum summaries key Covid-19 related changes to this Safeguarding Policy, updated on 5 July 2020

It is envisaged that the CACT Safeguarding procedures in terms of reporting will remain the same during the COVID 19 Pandemic. However, there will be changes to programme delivery and this the following arrangements will be in place.

- 1) Youth Service sessions will be delivered virtually via Zoom. A specific Risk Assessment is in place, procedures for staff and a code of conduct for young people. Additional safeguards will include.
 - Parents and carers will have to consent for their children to be involved.
 - The environment the young person uses must be suitable for the Zoom session and there must be a parent / carer in the same room.
 - If a safeguarding concern is raised, then staff will act accordingly in line with CACT Safeguarding Policy.
 - If a third party is delivering a session, then CACT staff will oversee the delivery.
 - No personal equipment will be used to deliver the sessions and the Zoom Accounts will be those owned by CACT.
 - Staff will deliver in pairs and must dressed appropriately for the session. All sessions are recorded and held centrally.
- 2) The CACT mentoring programme will continue virtually and the same safeguards will be in place as above. Where a meeting is held externally then this must be in a public area with a parent or carer present. With the Current COVID 19 situation it is not suitable for a member of staff to meet a mentee in the latter's home, CACT facility or any other building until the guidance changes.
- 3) When safe to do so driven by guidance from the Government, Public Health, Local Authorities DFE and Sport's Governing Bodies other programmes will recommence such as Football Development and NCS with appropriate risk assessments and procedures in place. These will be signed off by the CACT Executive and Senior Management Teams, shared with CACT Trustees and if appropriate signed off by external partners such as the Local Authority, Premier League and EFL.
- 4) When programmes do recommence, specific guidelines will be developed to demonstrate to young people and their parents / carers the manner in which CACT will keep young people safe following the guidance regarding social distancing, hand washing, sanitising, and cleaning equipment. These methods will be available via CACTs official social media sites and will be sent to parents / carers if they have a child that books on any activity.

- 5) All programmes will be booked in advance and there will be no open access so numbers can be controlled in line with the social distancing procedures.
- 6) There will be no changes to CACT's Safer Recruitment Policy and Procedures. Adjustments may be made to the interview process which may be conducted virtually but the other aspects such as DBS check, request for references etc will remain the same. During the COVID 19 general recruitment may also be halted.

APPENDIX 5

CACT Concern Form

Please complete this form if you have any concerns about a pupil.
(Pastoral, Medical or Safeguarding)

Student Name:		
Date:	Class	
Member(s) of staff noting concern:		Job/Role:

Concern (Please describe as fully as possible)

Body Map attached Yes/ No

Immediate Action Taken

Date	Person acting	Action taken

Form passed to Designated Safeguarding Lead

Date/time:

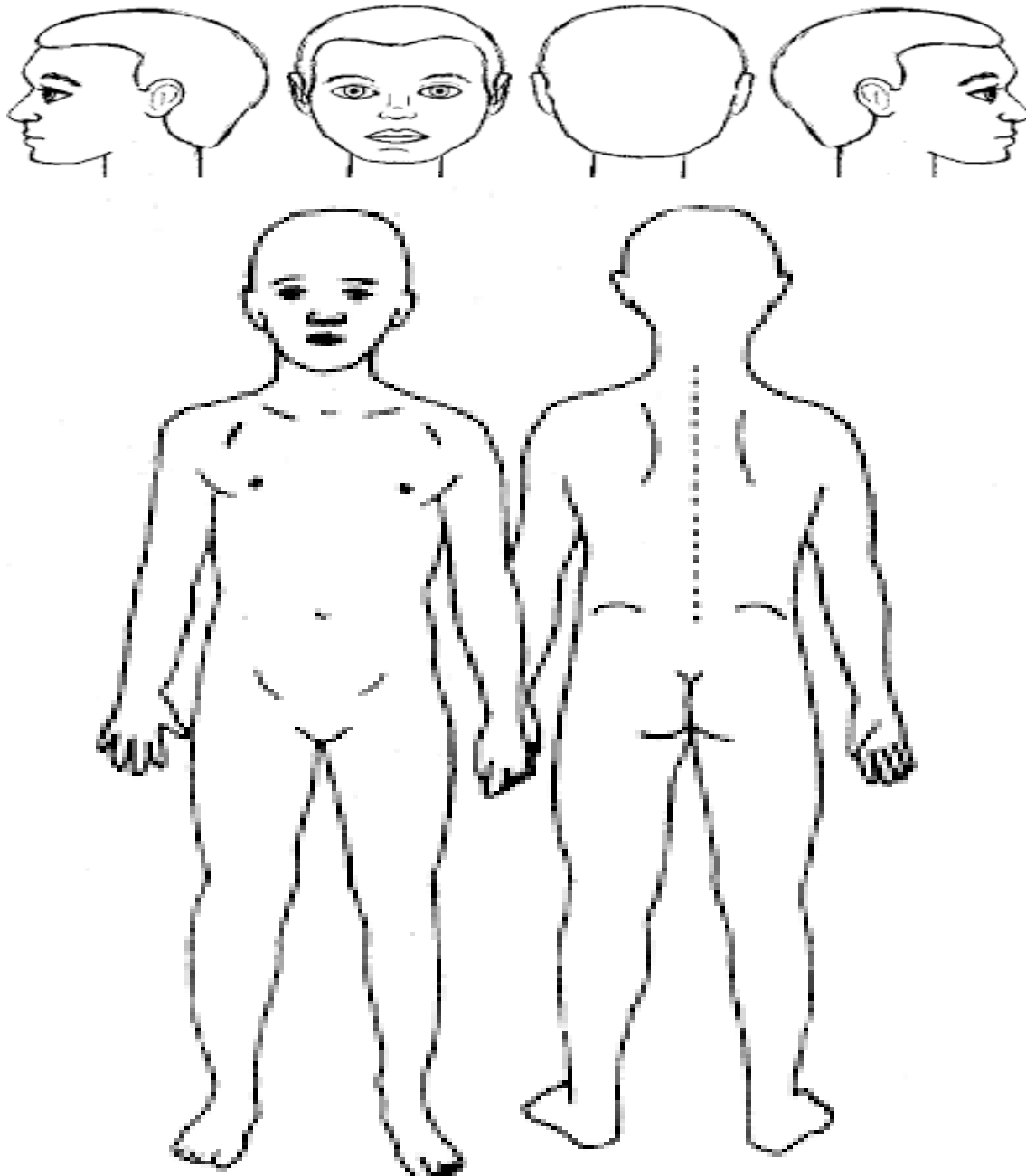
Date	Further Action

Body Chart

Once completed attach this body chart to the Concern Form

This chart must be used together with the Concern Form Show clearly the location of your concern and label with a number and a brief description, e.g. '1. Burn about 4cm.' On the Concern Form refer to the injury using the same number and description.

Child's Name -----



Observations made by----- Signed-----Date

Signs and symptoms of physical injury can be indicators of abuse, however there may be other reasons they are not fail-safe mechanisms. **Red indicates a possible non-accidental injury.** **Green is the more usual sites for accidental injuries.**

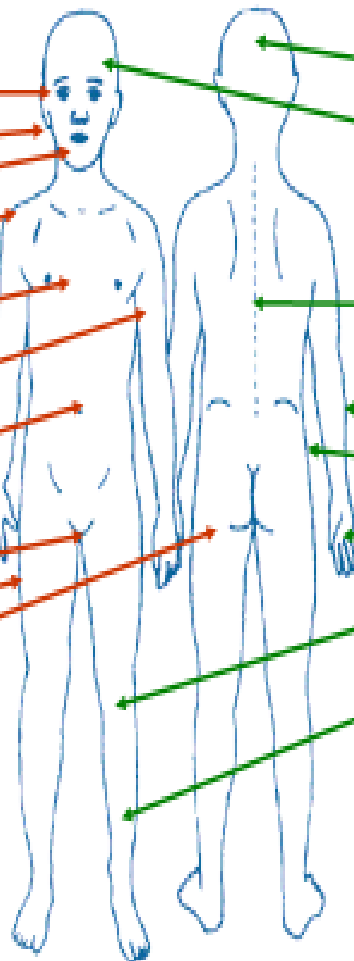
Common Sites

Non-accidental

eyes
ears
mouth
neck
shoulder
chest
upper arms
inner arms
stomach
hands (backs)
genitals
thighs
buttocks

Accidental

crown
forehead
bony spinal
protuberances
elbow
iliac crest (hip)
hands (palms)
knees
shins



**Concern Received
Date Check List**

Name _____ Year _____

2020	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
September																															
October																															
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June																															
July																															

Review

Reviewed:	November 2020	Approved:	February 2021
Reviewed:	November 2021	Approved	June 2022
Reviewed	May 2023	Approved	May 2023
Reviewed	May 2024	Approved	June 2024
Reviewed	May 2025	Approved	June 2025
Next review	May 2026		

CACT CEO

As the Chief Executive Officer, I endorse this Policy to be current and a true reflection of CACT's Safeguarding Policies and Procedures



Signed

Jason Morgan CACT CEO SSM

Date 03/09/2025

CACT Safeguarding Trustee

As the Trustee Lead for safeguarding, I endorse this Policy to be current and a true reflection of CACT's Safeguarding Policies and Procedures

Signed:

CACT Safeguarding Trustee

Ian Parkes

Date 03/09/2025

Safeguarding Officer and Designated Safeguarding Lead

As the Designated Safeguarding Lead, I endorse this Policy to be current and a true reflection of CACT's Safeguarding Policies and Procedures



Signed

Barry Simmons CACT Designated Safeguarding Lead

Date 03/09/2025