



SAFEGUARDING & PREVENT POLICY

Policy Name	Safeguarding and Prevent Policy
Designated Safeguarding Lead	Gaynor Crompton
Company Directors	Kevin Glendon and Darren Royle
Regional Managers	Sam Shaw and Dean Hughes
Approved by	Joel Roberts
Date of last review	November 2018
Date of next review	November 2020

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1. **Purpose**
2. **Scope**
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4. **Procedure**
5. **Monitoring**

The NPL Football Academy is committed to safeguarding all young people and vulnerable adults who take part in education / training facilitated within our Academy Centres or externally by our assessors. We believe that all young people and vulnerable adults have a right to protection from abuse regardless of their age, race, religion, ability, gender, language or sexual identity.

All reasonable steps will be taken to ensure our commitment to safeguarding is met and all suspicions and allegations of abuse will be taken seriously and responded to quickly and appropriately.

Roles and Responsibilities for Safeguarding at the NPL Football Academy:

- **Company Directors** – Kevin Glendon and Darren Royle
- **Designated Safeguarding Lead** – Gaynor Crompton
- **Regional Managers** – Sam Shaw and Dean Hughes
- **Area Managers** - responsible for welfare and safeguarding of all young people at their respective Centres): Specific Area Managers are noted in Student Induction Handbook each academic year
- **Tutors & Coaches** - responsible for welfare and safeguarding of all young people at their respective Centres: specific tutors to be noted in Student Induction Handbook

All managers are responsible for ensuring that colleagues follow this policy and its related procedures and receive the safeguarding training they need in line with their responsibilities.

All colleagues are responsible for carrying out their duties in a way that actively safeguards and promotes the welfare of all. They must take any safeguarding concerns to the Designated Safeguarding Lead.

Sub-contractors are responsible for completing their own DBS checks and delivering safeguarding training as appropriate for colleagues in their organisation. They are also responsible for ensuring that their colleagues comply with their own Safeguarding Policy.

Useful Contacts:

The SCB Agency Link Person/s (for the respective regions the NPL Football Academy covers) can be contacted on:

- **Birmingham** - 0121 464 2612
- **Derbyshire** - 01629 533190
- **Cheshire East** - 0300 123 5012
- **Cheshire West** - 0151 356 6835
- **Manchester** - 0161 234 3330
- **Stoke-on-Trent** – 01782 235897
- **Wakefield** - 0345 8503 503

Other useful contacts:

- **Childline** - 0800 1111
- **NSPCC** - 0808 800 5000

A central register of all DBS (Disclosure - Barring - Service) checks and safeguarding training is maintained by the NPL Football Academy.

Finally, this policy is available to all colleagues, learners, parents and carers. It is available on request as a hard copy, on the NPLFA website, via Team App for staff and students (students will be made aware of accessibility upon induction and throughout the duration of the course). It will be reviewed annually to ensure that updates to legislation are reflected in practice and all colleagues are updated.

1. PURPOSE

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children (young persons under the age of 18) and their families and carers have a role to play in safeguarding children. In order to fulfil this responsibility effectively, all professionals should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child. The purpose of the Safeguarding Policy, Procedures and Training are to ensure the NPL Football Academy provides a safe environment for children, young people and adults at risk to learn.

The NPL FOOTBALL ACADEMY is committed to:

- Raising the awareness and identification of children or adults at risk who are at risk of significant harm and providing clear procedures for reporting concerns
- Raising the awareness of young people and adults at risk, including the importance of staying safe on-line
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff
- The safe recruitment of staff

2.Scope

No single professional can have a full picture of a child's or young adults needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

This policy applies to all NPL Football Academy staff, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used to denote all these groups.

NPL Football Academy staff will follow the guidance outlined in the safeguarding procedure.

NPL Football Academy has a statutory and moral duty to promote and safeguard the welfare of all our students under the age of 18 and adults at risk receiving education and training at the NPL Football Academy. This includes protecting them from situations where they may be abused.

The policy applies to all students under the age of 18 years of age, all adults at risk, all students over the age of 18 where there are minors in the household and abuse is disclosed and all staff without exception. The policy is also applied to all visitors and contractors.

3.Responsibility

The policy ensures all disclosures are referred to the Designated Safeguarding Lead, where they will be acted upon accordingly.

Operational responsibility for the implementation of the policy lies with the Regional Managers. This policy will be monitored by Company Directors and the Quality Director at appropriate intervals and will be reviewed on a regular basis.

The Company Directors have overall responsibility for Safeguarding.

General Principles

The NPL Football Academy recognises that it has a statutory obligation under the Children Act 1989, the Children Act 2004, section 175 Education Act 2002, section 55 of the Borders, Citizenship and Immigration Act 2009 and Keeping Children Safe in Education 2018, to safeguard and promote the welfare of its individuals. This document offers guidance and outlines procedures that should be followed in all cases of suspected abuse and situations of serious risk. It applies to all individuals under the age of 18 or those over 18 who are considered to be “adults at risk”. Adults at risk are people aged over 18 who are affected by mental ill health, have a learning difficulty or disability, or a physical disability or impairment.

Safeguarding and promoting the welfare of children is defined as protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

In relation to adults at risk the government set out key principles in The Care Act 2014 (Chpt 14)

NPL Football Academy also recognises its responsibility to safeguard children and adults at risk in the wider community. For instance, if an individual has younger siblings or an adult at risk within their family.

This policy applies to all “children” i.e. young persons under the age of 18 years or those over 18 considered to be an adult at risk

The welfare of the child/learner is, at all times, of paramount importance, irrespective of where any harm takes place.

3.Procedure

Throughout the Safeguarding Policy and Procedures, references are made to ‘children and young people’, this term is used to mean ‘those under the age of 18’. NPL Football Academy recognises that some adults are also vulnerable to abuse, hence this policy will also refer to adults at risk. We are committed to ensuring that we:

- Provide a safe environment to learn for children, young people and adults at risk.
- Identify children, young people and adults at risk who may benefit from early help. Ensure the appropriate staff and/or external agencies are involved in an early help assessment.
- Identify children, young people and adults at risk who are suffering, or likely to suffer significant harm, and take appropriate action to see that such children, young people and adults at risk are kept safe, both at home and at the NPL Football Academy
- Establish clear procedures for reporting and dealing with allegations of abuse.
- Establish a clear training schedule to ensure all staff are trained and familiar with the Safeguarding Policy and Procedures.

- Provide appropriate support to students who have been abused. For example, signposting them appropriately to the services of a counsellor/mentor
- Establish clear procedures for reporting and dealing with allegations of abuse against members of staff.
- Establish the safe recruitment of staff in compliance with the Disclosure and Barring Service (DBS) regulations, including DBS checks and additional barring checks to ensure that staff are not prohibited from teaching as well as obtaining and checking of references and identity checks
- Ensure all staff who work for the NPL Football Academy are made aware during induction, of the Sexual Offences Act 2003 and that it is an offence for a person over the age of 18 to have a relationship with a child under the age of 18 where that person is in a position of trust in respect of that child, even if the relationship is consensual. This applies where the child is in full-time education and the person works at the same establishment as the child, even if he/she does not teach the child.

In developing the Safeguarding Policy, the NPL Football Academy have consulted with and taken into account, guidance issued by the Department for Education (DfE), the NSPCC, CEOP, UK Council for Child Internet Safety (UKCCIS), Relevant Agencies, CSE Co-ordinators and Social Care.

The NPL Football Academy will refer concerns that a child, young person or adult at risk is at risk of significant harm to Social Care and/or the Police.

Designated Staff with Responsibility for Child Protection

There will be a member of the NPL Football Academy Management Team, with lead responsibility for child protection and adult at risk protection who reports to the Company Directors. The designated member of staff with lead responsibility for child protection and adult at risk protection is Gaynor Crompton, assisted by, the Regional Managers and the Area Managers. The Designated Safeguarding Lead will be required to update their LSCB training every 2 years.

All staff undergo safeguarding and child protection training at induction, all staff receive updates at least annually to ensure they are equipped with the skills and knowledge to safeguard children effectively. Refresher training takes place annually, with full training at least every 3 years.

The Company Directors will receive on an annual basis, a report on safeguarding issues and duties discharged (as well as a termly update). The designated member of staff with lead responsibility for child protection and adults at risk protection is responsible for reporting deficiencies in procedure or policy identified by the LSCB (or others) to the Company Directors.

The Company Directors have the lead responsibility for Safeguarding and Child Protection .

The Designated Safeguarding Lead has a key duty to take lead responsibility for raising awareness with staff of issues relating to the welfare of children and young people, and the promotion of a safe environment for the children and young people learning within the NPL Football Academy.

The Designated Safeguarding Lead is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations to Social Services
- Identifying deputy designated safeguarding leads and ensure they are appropriately trained.
- Ensuring during term time the designated safeguarding lead and or a deputy is available at the NPL Football Academy to discuss safeguarding concerns.
- Ensuring that adequate and appropriate cover is available for out of hours/out of term activities.
- Providing advice and support to other staff on issues relating to child protection
- Maintaining a proper record of any child protection referral, complaint or concern, even where that concern does not lead to a referral (see section 16 Confidentiality and section 17 Written Records
- Liaising with the Company Directors in relation to ongoing enquiries under Section 47 of the Children Act 1989 and police investigations
- Ensuring that parents of children and young people within the NPL Football Academy are aware of the Safeguarding Policy
- Liaising with the relevant local authority, and other appropriate agencies
- Liaising with secondary schools which send pupils to the NPL Football Academy to ensure that appropriate arrangements are made for the pupils
- Liaising with employers and training organisations that receive children or young people from the NPL Football Academy on work experience or long-term placements to ensure that appropriate safeguards are put in place
- Ensuring that staff receive appropriate training in child protection issues and are aware of the NPL Football Academy child protection procedures.

Other designated members of staff with responsibility for safeguarding issues are the Regional Managers and Area Managers

These designated staff members:

- Report to the senior member of staff with lead responsibility
- Will know how to make an appropriate referral (however, the Designated Safeguarding Lead will make referrals to Social Care / Police, if available to do so)
- Will ensure that all referrals to Social Care / Police will be made verbally and via the appropriate referral form as directed by the LSCB
- Will be available to provide advice and support to other staff on issues relating to child protection
- Have particular responsibility to be available to listen to children and young people studying at the NPL Football Academy

- Have received training in child protection issues and inter-agency working, as required by the relevant agencies, and will receive refresher training at least every 2 years
- Will ensure that all referrals, complaints or concerns remain confidential (see section 16 Confidentiality and section 17 Written Records)

The Safeguarding Committee

This meets termly to address issues such as safeguarding policy/procedure, staff training programme, student activities, maintaining outstanding safeguarding and other relevant issues. Members of the Committee are Gaynor Crompton, Kevin Glendon/Darren Royle, Sam Shaw/Dean Hughes and one representative from the Area Manager Team.

Definitions of child or adult at risk, abuse and neglect

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

All staff are made aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

The NPL Football Academy recognises the following as definitions of abuse:

Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child whom they are looking after. This situation may be described as fabricated or induced illness by carer.

Emotional abuse

Emotional abuse is the persistent emotional ill treatment of a child or adult at risk such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate or valued only in so far as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. It may involve causing children frequently to feel frightened or in danger, for example, by witnessing domestic abuse within the home or by being bullied, or, the exploitation or corruption of children. This also includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. Some level of emotional abuse is involved in all types of ill treatment of a child, though it may occur alone

Sexual abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or in watching sexual activities, or encouraging children to behave in sexually inappropriate ways. Sexual abuse towards adult at risks includes rape and sexual assault or sexual acts to which the adult at risk has not or could not consent and/or was pressured into consenting.

Neglect

Neglect is the persistent failure to meet a child or adult at risk basic physical and/or psychological needs, likely to result in the serious impairment of the child or adult at risk's health or development. It may involve a parent or caregiver failing to provide adequate food, shelter and clothing, failing to protect a child or adult at risk from physical harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child or adult at risk basic emotional needs.

Bullying & harassment and cyber bullying

Bullying & harassment and cyber bullying are also forms of abuse which are addressed in the Anti-Bullying & Harassment Policy.

Child sexual exploitation (CSE)

CSE involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

The definition of child sexual exploitation:

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage of increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual

activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.⁵

Female Genital Mutilation (FGM)

FGM professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Staff should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

If a teacher, in the course of their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police.

Private fostering

Private fostering is very different from the care of children provided by local councils under the Children Act 1989. Children under 16 (or 18 if disabled) are classed as privately fostered when they are cared for on a full-time basis by adults, who are not their parents or a close relative (brother, sister, aunt, uncle, or grandparents by birth or marriage) for a period of 28 days or more.

Usually a birth parent chooses and arranges private foster placements, which could take many forms. These include:

- children coming from abroad to access the education and health systems
- children living with a friend's family after separation, divorce or arguments at home
- teenagers living with the family of a boyfriend or girlfriend
- people who come to this country to study or work, but antisocial hours make it difficult for them to care for their own children.
- Sometimes it's the young person themselves who chooses to live elsewhere and their parents do not object.

There are many reasons why a parent may be unable to look after their child full time, such as:

- Being admitted to hospital
- Going abroad for lengthy periods
- A breakdown in relationship between a parent and young person

Should the NPL Football Academy become aware of a private fostering arrangement in place for a learner this will be reported to the relevant local authority, to ensure they are aware.

The NPL Football Academy understands that the local authority has a duty to ensure that children are well cared for in a safe and suitable home.

Other safeguarding issues include:

- Bullying including cyber bullying
- Children missing from home, care or education
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls
- Hate
- Mental health
- Preventing radicalisation
- Relationship abuse
- Trafficking

Additional forms of abuse relevant to adult at risks:

- Financial/Material Abuse. This includes theft, fraud, pressure around wills, property or inheritance or misuse of benefits.
- Discriminatory Abuse. This includes racist, sexist, or other forms that are based on a person's disability and other forms of harassment, or similar treatment.
- Self-Neglect. This is not a direct form of abuse but staff need to be aware of it in the general context of risk assessment/ risk management and to be aware that they may owe a duty of care to a vulnerable individual who places him/herself at risk in this way.

Forced Marriage

The tradition of arranged marriages has operated successfully within many communities and many countries for a very long time. A clear distinction must be made between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether to accept the arrangement remains with the individuals. In forced marriage, at least one party does not consent to the marriage and some element of duress is involved. Forced marriage is primarily an issue of violence against women. Most cases involve young women and girls aged between 13 and 30 years, although, there is evidence to suggest that as many as 15% of victims are male. Forced Marriage is a criminal offence, the offences can include, abduction, physical violence, threatening behaviour. Sexual Intercourse without consent is rape.

How to proceed if you suspect a student may be forced into a marriage against their will;

If you suspect that one of your students is being forced into a marriage against their will, contact a Designated Safeguarding Officer, who will make an assessment whether to contact Social Services or go directly to the Forced Marriage Unit with the Police.

If a female ethnic minority student leaves unexpectedly and without explanation, contact a Designated Safeguarding Officer, who will try to find out why this student has 'suddenly' left without explanation and monitor any concerns.

Procedure to follow in the event of a disclosure or concern being raised with regards to child protection or adult at risk Protection

If a student discloses to a member of staff that abuse has taken place, they should be listened to carefully. The following points give guidance on how to proceed with a student who makes an allegation.

- The member of staff receiving the disclosure should remain calm
- The student should be listened to carefully, but not interviewed or asked to repeat the account. As soon as it becomes clear that the student is making an allegation of abuse, it is important that the student is gently informed, that the member of staff cannot keep this information to themselves, that they have a legal duty to pass it on to the Designated Safeguarding Officer. Confidentiality cannot be offered to the student.
- The student should not be interviewed. Questions can be asked without pressure to ensure the member of staff fully understands what the student is telling them. The questions must be simple and not leading. For example, if a student states that they have been hurt, ask 'How were they hurt' as opposed to 'Did someone hit you'. Care should be taken to ensure assumptions are not made about what a student is saying.
- As soon as possible, all of the details should be noted down on a Safeguarding Report Form (attached), including timing, setting, who was present, and what was said. Make sure the account reported is verbatim to the students own words or as close as is possible.
- The completed Safeguarding Report Form must be given to a Designated Safeguarding Officer. No other paper or electronic copies should be kept.
- The Designated Safeguarding Officer will discuss the line of action they have to take, so that the student is informed of the next stage. It may be appropriate for the Designated Safeguarding Officer to meet with the student.
- If a Designated Safeguarding Lead is not available, the appropriate Regional Manager will assume responsibility. If the Designated Safeguarding Lead cannot be contacted, the Regional Manager will make a decision on action to be taken in line with this policy, which could include referral to Social Care or the Police. If a Regional Manager is unavailable, a Company Director must be contacted.

The statutory guidance states that any member of staff can make a referral if they have concerns about a child or adult at risk. However, the NPL Football Academy policy is for all referrals to be made via the Safeguarding Officers so that referrals can be managed and monitored effectively.

However, if a child or adult at risk is in immediate danger or is at risk of harm a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. Where referrals are not made by the designated safeguarding lead the designated safeguarding lead should be informed, as soon as possible, that a referral has been made.

If the student is over the age of 18, is suffering a form of abuse, but is not deemed an adult at risk, but as an organisation we are aware that there may be other siblings under the age of 18 in the environment, then a Designated Safeguarding Lead must be informed, using the Safeguarding Report Form.

Where a disclosure has been made learners will be signposted and supported to source counselling support if required

Reporting on Allegations of a Student abusing another Student

All staff are made aware that children, young people and adults at risk are capable of abusing their peers. Peer on peer abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up". Should an allegation of abuse be made against a student by another student, the Designated Safeguarding Lead needs to be contacted immediately. The Designated Safeguarding Lead will inform Social Services to determine if the police should be contacted as a matter of course.

Both sets of parents or carers will be informed and a decision will be made whether to suspend the accused student, pending outcome of any investigation by Social Care and the Police. Victims of peer abuse will be supported through the NPL Football Academy student support teams and processes and where appropriate in partnership with external agencies.

Gender based bullying

All staff will be made aware of gender issues that can be prevalent when dealing with peer on peer abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

Sexting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows you to share media and messages.

Creating and sharing sexual photos and videos of under 18's is illegal. Advice issued by UK Council for Child Internet Safety (UKCCIS) has issued the phrase 'youth produced sexual imagery' instead of sexting.

This covers the following types of incident –

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18

Disclosing private sexual photographs and films with intent to cause distress is a criminal offence.

However the NPL Football Academy is aware of the consequences of criminalising children and follows the guidance issued by the Police when dealing with cases of sexting to ascertain full circumstances and identify whether the act is:-

- Aggravated – Criminal or abusive elements
- Adult involvement or criminal or abusive behaviour by minors such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts.
- Experimental – Youths sending, receiving or forwarding sexually explicit messages, photographs or images of themselves: 1) to share with established boy or girlfriends 2) To create romantic interest in another youth 3) For reasons such as attention seeking (no criminal element or intent)

In the first instance the NPL Football Academy will follow guidance issued by UKCCIS and existing safeguarding procedures when alerted to concerns regarding sexting. Should instances of sexting be disclosed or uncovered by the NPL Football Academy, which are thought to be aggravated these will be referred to the CSE Co-coordinator (Police) at the relevant local authority.

Reporting and Dealing with Allegations of Abuse against Members of Staff

In rare instances, staff of education institutions have been found responsible for child abuse. Due to their frequent contact with children and young people in a variety of situations, including the wider caring role, staff may have allegations of abuse made against them. Staff relationships with students may lead to allegations against them being made by students or parents. The NPL Football Academy recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. The NPL Football Academy therefore needs policies and procedures on the management of situations where there are allegations of abuse.

These procedures outline the steps to be followed and considerations to be made for the reporting and subsequent management of an allegation of abuse against a member or

members of staff. It is imperative that those dealing with an allegation maintain an open mind and those that investigations are thorough and not subject to delay.

The NPL Football Academy recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It also recognises that hasty or ill-informed decisions in connection with a member of staff can irreparably damage an individual's reputation, confidence and career.

Therefore, those dealing with such allegations within the NPL Football Academy will do so with sensitivity and will act in a careful, measured way.

These procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers. The word "staff" is used to denote all these groups.

Making an allegation regarding concerns over another staff member

There are two ways to raise concerns regarding the conduct of another staff member. Staff can either report the allegation directly to the Designated Safeguarding Lead or a Company Director or they may use the Whistleblowing Procedure. If they choose to use the Whistleblowing Procedure, then the staff member must be made aware that anonymity cannot be guaranteed if the matter is subsequently dealt with by the Police or other external organisation. The Whistleblowing Procedure outlines how a member of staff can report an allegation. The Quality Director will then decide on how to deal with the matter and will then follow the normal procedure, which may/will result in a referral to the Local Area Designated Officer (LADO).

These procedures outline the steps to be followed and considerations to be made for the reporting and subsequent management of an allegation of abuse against a member or members of staff.

It is imperative that those dealing with an allegation maintain an open mind and those investigations are thorough and not subject to delay.

Receiving an Allegation from a Child

A member of staff who receives an allegation about another member of staff from a child should follow the guidelines for dealing with disclosure. The allegation should be reported immediately to a Company Director (unless the Company Director is the person against whom the allegation is made, in which case the report should be made to Designated Safeguarding Lead)

Immediately upon an allegation being made, as well as consulting with the Local Authority Designated Officer (LADO) at Social Care and/or the Police, the Company Director should:

- Obtain written details of the allegation, signed and dated from the person who received the allegation. (Not from the student who made and/or was the subject of the allegation)

- The written details should be countersigned and dated by the Designated Safeguarding Lead (or designated person) .
- Record information about times, dates, locations and names of potential witnesses.

Contact LADO, complete the referral form and email it to the appropriate LADO for the area in which the complaint was made.

Initial Assessment by The Company Director (or designated person)

The Company Director (or designated person) should make an initial assessment of the allegation (ensuring consultation with the Designated Safeguarding Lead and the relevant Safeguarding Children Board as appropriate).

Where the allegation is considered to be either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to a LADO at Social Care. It is important that the Company Director (or designated person) does not investigate the allegation. The initial assessment should be on the basis of the information received and is a decision whether or not the allegation warrants further investigation.

Other potential outcomes are:

- The allegation represents inappropriate behaviour or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the child. The matter should be addressed in accordance with the NPL Football Academy disciplinary procedures.
- The allegation can be shown to be false because the facts alleged could not possibly be true.

Enquiries and Investigations

Safeguarding enquiries by Social Care or the Police are not to be confused with internal, disciplinary enquiries by the NPL Football Academy. The NPL Football Academy may be able to use the outcome of external agency enquiries as part of its own procedures. The safeguarding agencies, including the police, have no power to direct the NPL Football Academy to act in a particular way; however, the NPL Football Academy should assist the agencies with their enquiries. Social Care and the Police would be likely to convene a Senior Strategy Meeting and a representative of the NPL Football Academy would be expected to participate.

The NPL Football Academy shall hold in abeyance its own internal enquiries while the formal Police or Social Services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.

If there is an investigation by an external agency, for example the Police, the Company Director (or designated person) should normally be involved in, and contribute to, the inter-

agency strategy discussions. The Company Director (or designated person) is responsible for ensuring that the NPL Football Academy gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The Company Director (or designated person) shall advise the member of staff that he/she should consult with a representative, for example, a trade union.

Subject to objections from the Police or other investigating agency, the Company Director (or designated person) shall:

- Inform the child/children/adult at risk/parent/carer making the allegation that the investigation is taking place and what the likely process will involve
- Ensure that the parents/carers of the child making the allegation are aware that the investigation is taking place and what the likely process will involve
- Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve
- Inform the Educational Partners (Loughborough/PM) of the allegation and the investigation

The Company Director (or designated person) shall keep a written record of the action taken in connection with the allegation (see section 16 Confidentiality and section 17 Written Records).

Media attention during an investigation of an allegation can add to the problems for the member of staff and may even hinder an investigation. The NPL Football Academy will carefully manage all media relations sensitively and appropriately.

Regrettably, it is often the case that the media become aware of allegations through parents or students. Any briefings to staff will emphasise the need to avoid media coverage in accordance with the Staff Code of Conduct. Staff have the Human Rights Act 2000 to protect "privacy". Advising the member of staff of any early indications of media interest and or coverage will be essential.

Potential Outcomes from Senior Strategy Meeting

There are several possible outcomes from a strategy meeting. If the matter is referred to the Police or Social Services, the NPL Football Academy will be guided by these agencies on how to deal with the matter. It is likely that this will result in an external investigation. Decisions on whether to suspend the member of staff and/or invoke the disciplinary procedure will be done in consultation with these organisations. The strategy meeting may decide that the NPL Football Academy can investigate the matter and report back the outcome back to the strategy group. If this is the case, then the matter will be dealt with using the NPL Football Academy's disciplinary procedure. Alternatively, the Senior Strategy Meeting conclude that there was no case to investigate.

Suspension of Staff

Please refer to the disciplinary procedure for guidance on suspension of staff. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

The parents/carers of the child/adult at risk making the allegation will be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the student making the allegation of the suspension

The Disciplinary Investigation

The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures. The student/s making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to NPL Football Academy of the member of staff (if suspended).

The Company Director (or designated person) should give consideration to what information should be made available to the general population of the NPL Football Academy.

The NPL Football Academy will support the legal requirement to make a referral to the Disclosure & Barring Service (DBS) where they think an individual has engaged in conduct that harmed (or is likely to harm) a child or if the person otherwise poses a risk of harm to a child.

Allegations without foundation

Obviously false allegations may be indicative of problems of abuse elsewhere. A record should be kept and consideration given to a referral to Social Care in order that other agencies may act upon the information.

In consultation with the Designated Safeguarding Lead, the Company Director shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or safeguarding action will be taken. Consideration should be given to offering counselling/support.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome
- Where the allegation was made by a child/adult at risk other than the alleged victim, consideration to be given to informing the parents/carers of that child/adult at risk
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken

Records

It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file (see section 16 Confidentiality and section 17 Written Records). These records should be kept until the member of staff's normal retirement age or for a period of 10 years from the date of allegation if that is longer.

If a member of staff is dismissed or resigns before the disciplinary process is completed, he/she should be informed about the NPL Football Academy's statutory duty to inform the Disclosure and Barring Service (DBS).

Monitoring Effectiveness

Where an allegation has been made against a member of staff, the Company Directors, together with the Designated Safeguarding Lead should, at the conclusion of the investigation and any disciplinary procedures, consider whether there are any matters arising from it that could lead to the improvement of the NPL Football Academy's procedures and/or policies and/or which should be drawn to the attention of the Relevant Agency/Social Care. Consideration should also be given to the training needs of staff.

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.10

Recruitment and Selection Procedures

The NPL Football Academy pays full regard to DfE guidance "Keeping Children Safe in Education", May 2018, ensuring that all appropriate measures are applied in relation to everyone who works in the NPL Football Academy e.g. staff, volunteers and staff employed by contractors). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and DBS checks and compliance with the Disclosure & Barring Service (DBS) regulations as well as a barred list check prior to the commencement of employment.

As part of the NPL Football Academy's induction procedure all staff members receive Part One of Keeping Children Safe in Education (September 2018) and undergo safeguarding and child protection training. All staff receive annual refresher training. This is outlined further in the NPL Football Academy's Recruitment and Selection Policy.

Responsibilities of NPL Football Academy Staff

The NPL Football Academy has a Staff Code of Conduct which all employed staff must read and adhere to. Full compliance is essential to ensure the wellbeing of students and staff. As well as safeguarding children/adult at risk, the Code of Conduct is also intended to protect

staff from the potential risk of a safeguarding allegation being made against them. Staff must ensure they are aware of the NPL Football Academy's safeguarding policy and procedures and know the identity of the Safeguarding Officers. Staff will monitor attendance closely and follow up non-attendance promptly to minimise the risk of learners missing from education, therefore reducing the risk of learners becoming vulnerable to abuse and harm. The NPL Football Academy will also use disciplinary procedures to reinforce positive behaviour and address instances of poor behaviour including bullying. All staff will wear an NPL Football Academy staff lanyard and ID badge.

Educational Visits and Work Placements

All NPL Football Academy trips, activities and placements will be assessed to safeguard and promote the welfare of students and staff, and ensure they are not exposed to any potential safeguarding risks.

Trips, residential and activities

These will be assessed via the relevant Health & Safety Educational Visits checks and paperwork. Learners will be made aware of their responsibilities in relation to safeguarding themselves and others.

Work Placements

Employers and training organisations will be asked to co-operate with the NPL Football Academy in putting in place and subscribing to appropriate safeguards. Health and Safety Procurement (HASP) paperwork will be completed by staff with Health & Safety qualifications. Training organisations and employers will be asked to make a commitment to safeguarding learners' welfare by endorsing an agreed statement of safeguarding principles.

Enhanced DBS checks cannot be requested for staff supervising 16 and 17 year olds in the workplace. However, a representative from the NPL Football Academy will meet any person whose normal duties will include regular caring for, training, looking after or supervising a child in the workplace where that person has been specifically designated to have responsibility for such activities.

Volunteering

The NPL Football Academy will instigate a Partnership Agreement for volunteering placements that will outline the responsibilities of external organisations and the NPL Football Academy.

The NPL Football Academy will;

- take a written volunteering opportunity form from the organisation that will also act as a checklist/registration form
- carry out inspection and initial meeting with the external organisation.

- ensure that the organisation has adequate safeguarding procedures in place.
- ensure that the organisation has adequate DBS checking procedures in place if appropriate.
- help with pre-selection screening of student volunteers as part of referral process.
- ensure that adequate induction and training are offered to volunteers.
- ensure proper supervision and provide a dedicated contact for volunteers in case of concerns or difficulties.

Bullying and Harassment

The NPL Football Academy is committed to providing a caring, friendly and safe environment for all our learners so they can learn in a relaxed and secure atmosphere. Bullying of any kind is unacceptable. If bullying does occur, all learners should be able to tell a member of staff and know that incidents will be dealt with promptly and effectively. Staff are required to inform the Designated Safeguarding Lead of any incidence of bullying as soon as they are aware that it has occurred.

Further guidelines can be found in the Anti-Bullying & Harassment Policy.

Supporting Vulnerable/At Risk Learners

Services and support are available in NPL Football Academy to assist and support those students who are vulnerable or may be at risk. Staff, tutors and coaches are trained to recognise signals that students may be struggling or may be experiencing difficulties. Full time students meet regularly with their tutor to monitor their progress, attendance and general wellbeing.

Swift referral can be made via the external partners to support services such as the Welfare team, Learning Support team, as well as referral to external support services.

Risk assessments to identify vulnerable learners (such as those in care, care leavers, young carers, learners with learning difficulties and/or disabilities, learners with mental health problems, adults at risk, etc.) are undertaken prior to enrolment to ensure the students are adequately supported. The At Risk system enables staff to identify and closely monitor students.

Any unauthorised absence is followed up by an Area Manager to check why the student was not in. Any persistent absence is discussed with parents of under 18s. The unexplained absence of any child, young person or adult at risk should be referred to the Designated Safeguarding Lead as their absence may be an indication of potential abuse or concern. The Designated Safeguarding Lead will then contact appropriate external agencies and parents/carers.

The NPL Football Academy recognises that Children and adults with special educational needs (SEN) and disabilities can face additional safeguarding challenges. During training reference is made to the additional barriers that can exist when recognizing abuse and neglect in this group of children, such as

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child or adult disability without further exploration
- Children and adults with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Guidance regarding the recruitment of students who have previous criminal convictions, cautions or reprimands can be found in the Admissions Policy and Procedure.

5. Monitoring

Curriculum

The NPL Football Academy will ensure learners are taught about Safeguarding, including Staying Safe on-line, through teaching and learning opportunities. Children, Young People and Adults at Risk can develop an understanding of why and how to keep safe. The Tutorial programme includes key topics such as, Bullying, Cyber Bullying, Internet Safety, Abuse, Prevent, British Values, Equality & Diversity, Sexting, Peer on Peer, Health and Well-Being and Health and Safety. Awareness raising begins at enrolment and induction involving students, staff and parents.

Safeguarding Information for Learners

All learners know that we have staff with responsibility for safeguarding and know who they are. We inform learners of whom they might talk to, their right to be listened to and what steps can be taken to protect them from harm. We make learners aware of these arrangements through appropriate tutorial provision, induction and clear signposting throughout all venues. NPL Football Academy's arrangements for consulting with and listening to learners are clearly outlined in the Learner Involvement Policy. The NPL Football Academy consults with learners to identify and address their safeguarding and health and safety concerns.

Confidentiality

In order to meet the needs of children, young people and adults at risk, the NPL Football Academy recognises the importance of information sharing between professionals and local agencies.

Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children, young people and adults at risk. Interagency working and information sharing are vital in identifying and tackling all forms of abuse, it is clear they are especially important to identify and prevent child sexual exploitation.

All suspicions and investigations are kept confidential and shared only with those who need to know. Any information is shared under the guidance of the local Safeguarding Boards. Consent to share information is obtained prior to information sharing, except where a

young person or adult at risk is at risk from harm. A Safeguarding register is kept electronically, however these do not contain the details of referrals as this is confidential. Notes are made to show there has been Safeguarding staff involvement.

Written Records

The Nominated Member of Staff shall retain a copy of:

- Any reports
- Any notes, memoranda or other correspondence dealing with the matter
- Any other relevant materials
-

The nominated member of staff will also keep copies of Children in Care Statutory Reviews, risk assessments, YJS behaviour plans, etc.

- Records are electronic where possible and held on a shared drive, with limited user access.
- Paper copies will be securely destroyed once electronic versions are uploaded.
- Copies of paper reports, notes etc. if held are stored in a securely locked filing cabinet in the NPL Football Academy office accessible only by the nominated Safeguarding Staff. They are kept for a minimum period of 7 years (or until learners reach the age of 25).
- Copies of reports regarding allegations made against staff shall be kept securely until the member of staff's normal retirement age or for a period of 10 years from the date of allegation if that is longer.

Radicalisation & PREVENT Strategy

Introduction

The NPL Football Academy is committed to providing students with the necessary skills and knowledge to keep themselves and others safe. Education, like other key sectors, has a responsibility to promote values of openness and tolerance and to facilitate free debate which is characteristic of being a British citizen. It is in this context that the NPL Football Academy provides a 'Radicalisation and PREVENT Strategy'. The strategy is formed from the National Strategy known as CONTEST. It has four elements Pursue, Protect, Prepare and PREVENT. The area in which organisations have the most influence is PREVENT which aims to stop people becoming terrorists or supporting terrorism.

Context

The aim of this strategy is to:

- Identify and assess the risks that learners may face
- Ensure external speakers and events are appropriately risk assessed
- Develop and regularly update the Prevent action plan in order to mitigate risk
- Establish effective partnerships in order to comply with the Prevent duty
- Ensure appropriate training is available for all staff across the NPL Football Academy
- Embed the Prevent duty through the exemplifying of British Values throughout curriculum and the tutorial process
- Ensure appropriate welfare support is in place for learners
- Ensure existing policies and procedures including Equality and Diversity and the IT policies make specific reference to the duty
- Appropriate steps are taken to ensure the monitoring and enforcement of the duty
- Ensure there is a clear response to concerns, including referral to Channel
- Develop an awareness of PREVENT in the NPL Football Academy
- Recognise current practice which contributes to the PREVENT agenda
- Identify areas for improvement
- To contribute to the development of a coordinated action plan

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PREVENT sits within the realm of the NPL Football Academy's Safeguarding Policy. All staff are trained and regularly updated on the Policy and associated professional practice and conduct.

Staff

All staff receive awareness training on an on-going basis ensuring that they are up to date with PREVENT matters.

All staff are responsible for responding appropriately to students with challenging and inappropriate behaviour. Staff will be supported and use the skills required to challenge appropriately, as part of this strategy.

Students

Students will receive awareness training on radicalisation and how to protect themselves through the tutorial system. British Values are embedded and promoted throughout all aspects of learners programmes at the NPL Football Academy.