

Primary Sports Giants Safeguarding & Child Protection Policy 2026-27



**“Version 2
Published September 2024**

Updates July 2026

1. Annex A removed: The condensed summary shortcut for non-teaching staff is gone.
2. Mandatory reading: Every single member of staff (both teaching and non-teaching) must now read Part One in full.

**based on DfE ‘Keeping Children Safe in
Education’ 2024**

Suitable for use from 1st September 2024



Using the Child Protection Policy Template: Guidance Notes

'[Keeping Children Safe in Education](#)' (KCSIE) 2024 states that individual schools and colleges should have '*an effective child protection policy*' which

- reflects the approach to child-on-child abuse.
- reflects the school/participants reporting systems.
- describes procedures which are in accordance with government guidance.
- refers to locally agreed multi-agency safeguarding arrangements put in place by the safeguarding partners.
- includes policies as reflected elsewhere in Part two, such as online safety, serious violence (as appropriate) and special educational needs and disabilities (SEND).
- includes appropriate filtering and monitoring on school/participants devices and school/participants networks.
- is available publicly, for example on the school/participants website.
-

Primary Sports Giants will ensure to have the policies in place for the provision catered for.

This template will support education leaders in schools and colleges to ensure their child protection policies and procedures are in line with statutory requirements and are relevant to their pupil/student needs and local context. Leaders and Designated Safeguarding Leads (DSLs) should adapt this template to include specific local information, named points of contact, as well as their own organisation specific procedures and expectations. These decisions and details will vary between settings, so the template should be considered as a starting framework; it will not be appropriate to adopt the template in its entirety and unnecessary content should be removed.

- **Blue font** indicates that the school/participants should insert relevant information.
- **Red font** highlights suggestions to assist DSLs/leaders in amending sample statements and ensuring content is appropriate. This content is provided as guidance notes only and **should not** be left in individual school/participants final policies.

A child protection policy is a working document and should be regularly reviewed (at least annually) to ensure it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. Settings may wish to publish a working draft whilst awaiting ratification from the governing board. Where minor changes are required, for example, new phone numbers, names of new DSLs, the policy should be updated as soon as changes are in place, however it is unlikely to be necessary to require the policy be re-ratified.

Updated content for 2024-25

The content for 2024-25 was initially published in July 2024 and updated in September 2024. Where possible, new, moved and updated content for 2024-25 is **highlighted in yellow** and updates for version 2 **are highlighted in green**.

Disclaimer

The Kent County Council LADO Education Safeguarding Advisory Service make every effort to ensure that the information in our templates is accurate and up to date, however, ultimate responsibility for ensuring their individual policies are appropriate remains the responsibility of the school/participants leadership and management team. If errors are brought to our attention, we will correct them as soon as practicable.

The copyright of these materials is held by Kent County Council. However, educational settings that work with children and young people are granted permission to use all or part of the materials for not-for-profit use, providing Kent County Council copyright is acknowledged and we are informed of its use."

PRIMARY SPORTS GIANTS



Child Protection Policy

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

Date written: **July 2025**

Date of last update: **20 July 2025**

Date agreed and ratified by: **Tom Humphreys - Director & DSL, seconded by Kelly Flint**

Date of next full review: **July, 2027**

This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.

Key Contacts

	Name	contact information
Designated Safeguarding Lead (DSL)	Tom Humphreys - Director	Tom@primarysportsgiants.co.uk 07795546455
Deputy Designated Safeguarding Lead(s)	Kelly Flint	Kelly Flint < k.flint@st-anselms.org.uk > admin@primarysportsgiants.co.uk
Other key staff	Ellen King	Administration lead & DSL Info@primarysportsgiants.co.uk

Primary Sports Giants

Safeguarding & Child Protection Policy 2026-27

Child Protection Policy

Updates-

1. Annex A removed: The condensed summary shortcut for non-teaching staff is gone.

2. Mandatory reading: Every single member of staff (both teaching and non-teaching) must now read Part One in full. Contents

1. Child Focused Approach to Safeguarding

1.1 Introduction

1.2 Policy context

1.3 Definition of safeguarding

1.4 Related safeguarding policies

1.5 Policy compliance, monitoring and review

2. Key Responsibilities

2.1 Governance and leadership

2.2 Designated Safeguarding Lead (DSL)

2.3 Members of staff

2.4 Children and young people

2.5 Parents and carers

3. Child Protection Procedures

3.1 Recognising indicators of abuse, neglect and exploitation

3.2 Responding to child protection concerns

3.3 Recording concerns

3.4 Multi-agency working

3.5 Confidentiality and information sharing

3.6 Complaints

4. Specific Safeguarding Issues

4.1 Child-on-child abuse

4.2 Child-on-child sexual violence and sexual harassment

4.3 Nude and/or semi-nude image sharing by children

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

4.5 Serious violence

4.6 Modern Slavery

4.7 So-called Honour Based Abuse (HBA)

4.8 Preventing radicalisation

4.9 Cybercrime

4.10 Domestic abuse

4.11 Mental health

5. Supporting Children Potentially at Greater Risk of Harm

5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND)

5.2 Children requiring mental health support

5.5 Children who may benefit from Early Help

5.6 Children who need a social worker (child in need and child protection plans)

5.7 Looked after children, previously looked after children and care leavers

5.8 Children who are Lesbian, Gay, Bisexual, or Gender Questioning/Trans (LGBT)

6. Online Safety

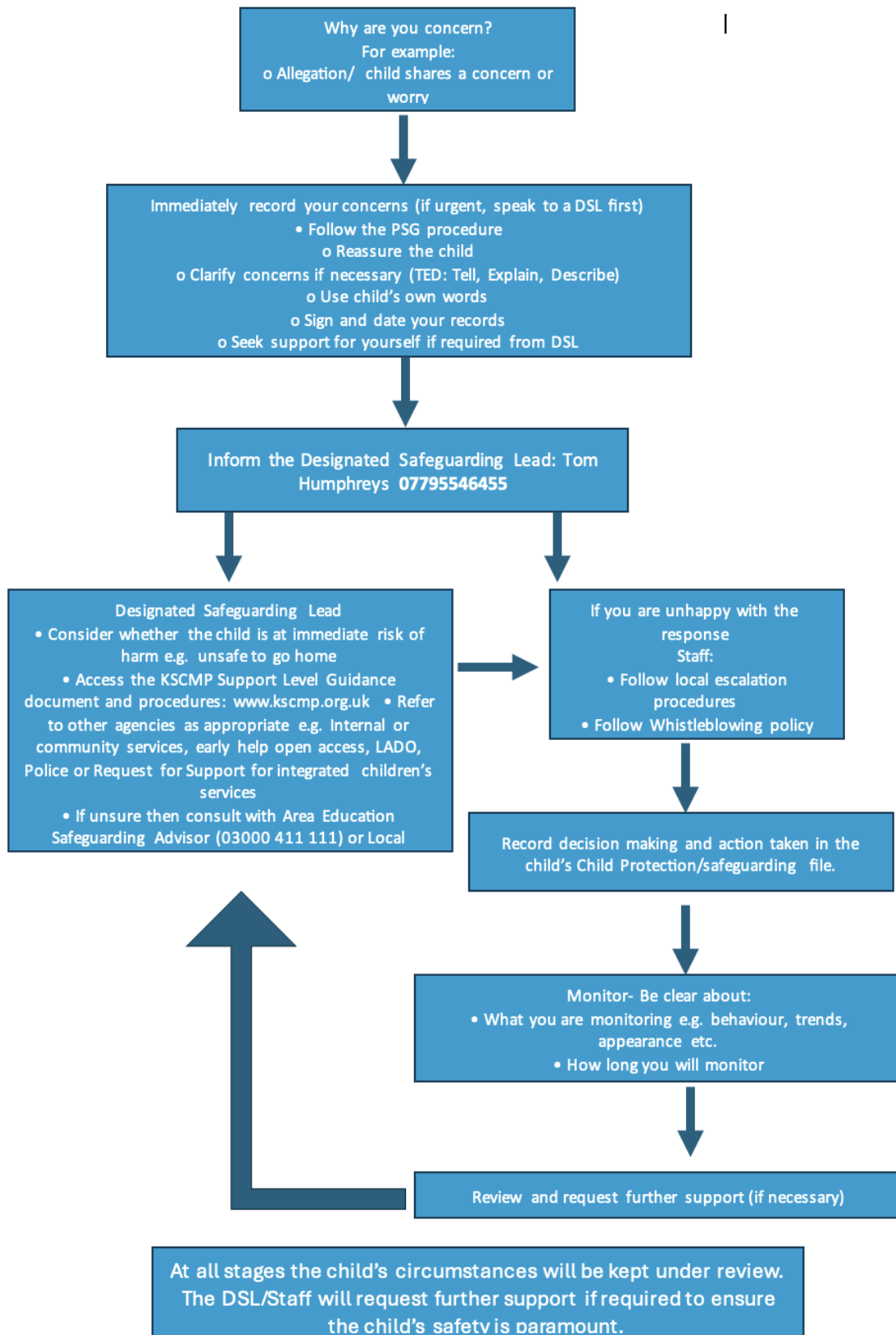
6.1 Policies and procedures

- [6.2 Appropriate filtering and monitoring on school/participants devices and networks](#)
- [6.3 Information security and access management](#)
- [6.4 Remote/Online learning](#)
- [6.5 Online Safety Training for Staff](#)
- [7. Staff Engagement and Expectations](#)
 - [7.1 Staff awareness, induction and training](#)
 - [7.2 Safer working practice](#)
- [8. Safer Recruitment and Allegations Against Staff](#)
 - [8.1 Safer recruitment and safeguarding checks](#)
 - [8.2 Allegations/concerns raised in relation to staff, volunteers and contractors](#)
 - [8.2.1 Concerns that meet the 'harm threshold'](#)
 - [8.2.2 Concerns that do not meet the 'harm threshold'](#)
 - [8.3 Safe Culture](#)
- [9. Opportunities to Teach Safeguarding](#)
- [10. Physical Safety](#)
 - [10.1 Use of 'reasonable force'](#)
 - [10.2 Site security](#)
- [11. Local Support](#)
- [Appendix 2: Support Organisations](#)

Contents

What to do if you have a welfare concern in Primary Sports Giants - flow charts	4
1. Child Focused Approach to Safeguarding	5
1.1 Introduction	6
1.2 Policy context	7
1.3 Definition of safeguarding	7
1.4 Related safeguarding policies	8
1.5 Policy compliance, monitoring and review	9
2. Key Responsibilities	9
2.1 Governance and leadership	9
2.2 Designated Safeguarding Lead (DSL)	10
2.3 Members of staff	11
2.4 Children and young people	11
2.5 Parents and carers	11
3. Child Protection Procedures	12
3.1 Recognising indicators of abuse, neglect and exploitation	12
3.2 Responding to child protection concerns	13
3.3 Recording concerns	15
3.4 Multi-agency working	15
3.5 Confidentiality and information sharing	16
3.6 Complaints	17
4. Specific Safeguarding Issues	17
4.1 Child-on-child abuse	17
4.2 Child-on-child sexual violence and sexual harassment	18
4.3 Nude and/or semi-nude image sharing by children	20
4.4 Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)	21
4.5 Serious violence	21
4.6 Modern Slavery	21
4.7 So-called Honour Based Abuse (HBA)	21
4.8 Preventing radicalisation	22
4.9 Cybercrime	22
4.10 Domestic abuse	23
4.11 Mental health	25
5. Supporting Children Potentially at Greater Risk of Harm	24
5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND)	24
5.2 Children requiring mental health support	24

5.5 Children who may benefit from Early Help	25
5.6 Children who need a social worker (child in need and child protection plans)	25
5.7 Looked after children, previously looked after children and care leavers	25
5.8 Children who are Lesbian, Gay, Bisexual, or Gender Questioning/Trans (LGBT)	25
6. Online Safety	26
6.1 Policies and procedures	26
6.2 Appropriate filtering and monitoring on school/participants devices and networks	27
6.3 Information security and access management	27
6.4 Remote/Online learning	27
6.5 Online Safety Training for Staff	27
7. Staff Engagement and Expectations	28
7.1 Staff awareness, induction and training	28
7.2 Safer working practice	28
8. Safer Recruitment and Allegations Against Staff	29
8.1 Safer recruitment and safeguarding checks	30
8.2 Allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors	30
8.2.1 Concerns that meet the 'harm threshold'.....	30
8.2.2 Concerns that do not meet the 'harm threshold'.....	31
8.3 Safe Culture	31
9. Opportunities to Teach Safeguarding	32
10. Physical Safety	32
10.1 Use of 'reasonable force'	
10.2 Site security	32
11. Local Support	33
Appendix 1: Categories of Abuse	34
Appendix 2: Support Organisations	36



Staff quick reference guide

What to do if you have a welfare concern in [Primary Sports Giants \(psg\)](#)

Why are you concerned?

For example:

- Something a child has said, for example, an allegation of harm
- Child's appearance; may include unexplained marks/bruises as well as dress
- Behaviour change(s)
- Witnessed concerning behaviour

Act immediately and record your concerns: If urgent, speak to a DSL first

Follow the [psg](#) procedure

- Reassure the child
- Clarify any concerns using open questions, if necessary (TED: Tell, Explain, Describe)
- Record **facts and not opinions** and use child's own words. Sign and date your record
- Seek support for yourself as required from DSL

Inform the [PSG Designated Safeguarding Lead](#) ([Tom Humphreys, 07795546455](#) Tom@primarysportsgiants.co.uk or [Kelly Flint](#))

- If a child is at risk of immediate harm and/or is unsafe to go home, make an urgent [Request for Support to the Front Door Service via the portal](#) or call the Police on 999.
- If no immediate risk of harm, provide internal support and/or refer to other agencies in line with [Kent Safeguarding Support Level Guidance and KSCMP procedures](#), as appropriate. For example, signposting to community services and/or early help open access, a non-urgent call to the Police via 101, reporting allegations against staff to the County LADO Service, or make a Request for Support via the [Front Door Service Portal](#).
- Where the [PSG](#) is unsure, advice can be sought from a Local Authority Social Worker at the Front Door Service via **03000 411 111**
- Where support is required out of working hours, contact the Out of Hours Service via **03000 41 91 91**.

If you are unhappy with the response:

DSLs/Staff:

- Follow [PSG](#) whistleblowing procedures ([link](#) or information on how to access)
- Follow Kent [safeguarding partnership escalation](#) procedures.

Pupils/attendees or Parents:

- Follow [PSG](#) complaints procedures ([Via our website](#) or email info@primarysportsgiants.co.uk)

Record decision making and action taken in the [PSG](#) child protection file/folder

Monitor

Be clear about:

- What you are monitoring, for example, behaviour trends, appearance.
- How long you will monitor
- Where, how and to whom you will feedback, and how you will record

Review and request further support if necessary.

At all stages, the child's circumstances will be kept under review
The DSL/staff will request further support if required to ensure the **child's safety is paramount**

1. Child Focused Approach to Safeguarding

1.1 Introduction

- **PSG** recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is **everybody's** responsibility and everyone has a role to play. All members of our community (staff, volunteers, leaders, parents/carers, wider family networks, and pupils/students/participants) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- **PSG** believe that the best interests of children always come first. All children (defined in law and in this policy as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children for **PSG** will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend the provision but may also apply to other children connected to **PSG**, for example, siblings, or younger members of staff (under 18s) or children on student/work placements.
- **PSG** recognises the importance of providing an ethos and environment within our provision that will help children to be safe and to feel safe. In our settings children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- **PSG** recognises the importance of adopting a trauma informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.
- Our core safeguarding principles are:
 - **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
 - **Protection:** following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
 - **Support:** adopt a child centred approach and provide support for all participants, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
 - **Collaboration:** with both parents where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2024.

1.2 Policy context

- This policy is implemented in accordance with our compliance with the current statutory guidance from the Department for Education, 'Keeping Children Safe in Education' (KCSIE), which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related national and local guidance. This includes but is not limited to:
 - Keeping Children Safe in Education (KCSIE)
 - Working Together to Safeguard Children (WTSC)
 - Early Years and Foundation Stage Framework (EYFS)
 - Ofsted: Education Inspection Framework
 - Framework for the Assessment of Children in Need and their Families, 2000
 - [Kent and Medway Safeguarding Children Procedures](#)
 - The Education Act 2002
 - Education and Inspections Act 2006
 - The Education (Independent School Standards) Regulations 2014
 - The Non-Maintained Special Schools (England) Regulations 2015
 - The Human Rights Act 1998
 - The Equality Act 2010 (including the Public Sector Equality Duty)
- **PSG** will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.

1.3 Definition of safeguarding

- In line with 'Working Together to Safeguard Children' 2023 and KCSIE, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
 - [providing help and support to meet the needs of children as soon as problems emerge](#)
 - [protecting children from maltreatment, whether that is within or outside the home, including online](#)
 - [preventing impairment of children's mental and physical health or development](#)
 - [ensuring that children grow up in circumstances consistent with the provision of safe and effective care](#)
 - [promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child\(ren\)](#)
 - [taking action to enable all children to have the best outcomes.](#)
- [Child protection](#) is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- **PSG** acknowledges that safeguarding includes a wide range of specific issues including, but not limited to:
 - Abuse and neglect
 - Bullying, including cyberbullying
 - Child-on-child abuse
 - Children with family members in prison
 - Children who are absent or missing from education
 - Child missing from home or care
 - Child Sexual Exploitation (CSE)
 - Child Criminal Exploitation (CCE)

- o Contextual safeguarding (risks outside the family home)
- o County lines and gangs
- o Domestic abuse
- o Drugs and alcohol misuse
- o Fabricated or induced illness
- o Faith abuse
- o Gender based abuse and violence against women and girls
- o Hate
- o Homelessness
- o Human trafficking and modern slavery
- o Mental health
- o Nude or semi-nude image sharing, also known as youth produced/involved sexual imagery or “Sexting”
- o Online safety
- o Preventing radicalisation and extremism
- o Private fostering
- o Relationship abuse
- o Serious violence
- o Sexual violence and sexual harassment
- o So-called ‘honour-based’ abuse, including Female Genital Mutilation (FGM) and forced marriage
- o ‘Upskirting’

(Also see Part one and Annex B within ‘Keeping Children Safe in Education’)

1.4 Related safeguarding policies

- This policy is one of a series in the [PSG](#) integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
 - o Anti-bullying
 - o Attendance
 - o Behaviour, including behaviour management and use of physical intervention
 - o Complaints
 - o Confidentiality & Data protection and information sharing
 - o Emergency procedures, such as evacuations and lockdowns
 - o Health and safety
 - o First aid and accidents, including medication and managing illness, safer eating and allergies, health and safety, and infection
 - o Image use
 - o Managing allegations against staff
 - o Mobile and smart technology
 - o Online safety
 - o Personal and intimate care
 - o Risk assessments, such as events and camps, use of technology.
 - o Safer recruitment
 - o Social media
 - o Staff behaviour policy/code of conduct/handbook
 - o Whistleblowing

Supporting Guidance (to be read and followed alongside this document)

- o Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings - [Safer Recruitment Consortium](#)
- o [What to do if you are worried a child is being abused](#)

- These documents can be found in / at: [Staff shared policy folder and event folder](#).

1.5 Policy compliance, monitoring and review

- [Primary Sports Giants](#) will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.
- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One of KCSIE as appropriate. This is on the shared PSG data folder and in the Holiday Camp folder on site at all camps. This is emailed out to working staff ahead of sports camps at least once a year.
- Parents/carers can obtain a copy of the Child Protection Policy and other related policies on request.
- The policy forms part of our development plan and will be reviewed annually by the lead DSL's who have responsibility for oversight of safeguarding and child protection systems and reporting.

2. Key Responsibilities

2.1 Governance and leadership

- The PSG team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The PSG DSL team have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The PSG DSL team will facilitate a whole company approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.
- The PSG DSL team are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the Kent Safeguarding Children Multi-Agency Partnership ([KSCMP](#)).
 - o This includes but is not limited to safeguarding all members of our community (for example, staff, participant, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
- The PSG DSL team and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The PSG DSL team will ensure that our child protection and safeguarding policies and procedures adopted are understood, and followed by all staff.
- The PSG DSL team will ensure an appropriate senior member of staff, from the PSG team, is appointed to the role of designated safeguarding lead. The leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.

- PSG has a nominated Director for safeguarding. The nominated director will support the DSL and have oversight in ensuring that the PSG has an effective policy which interlinks with other related policies, that locally agreed procedures are in place and being followed, and that the policies are reviewed at least annually and when required.

2.2 Designated Safeguarding Lead (DSL)

- PSG has appointed ([Tom Humphreys, Director & Kelly Flint Camp manager](#)), to act as our Designated Safeguarding Lead (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place).
- PSG has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence:
 - [Ellen King, Camp manager & administrative roles](#)
- Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.
- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE. This includes but is not limited to:
 - Acting as the central contact point for all staff to discuss any safeguarding concerns.
 - Maintaining a confidential recording system for safeguarding and child protection concerns.
 - Coordinating safeguarding action for individual children.
 - When supporting children with a social worker or looked after children, the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child, with the DSL liaising closely with the designated teacher.
 - Liaising with other agencies and professionals in line with KCSIE and WTSC.
 - Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the [Kent Safeguarding Children Multi-Agency Partnership](#) (KSCMP) procedures, including referrals, are followed, as necessary.
 - Managing and monitoring the PSG role in any multi-agency plan for a child.
 - Being available during term time (during event hours) for staff to discuss any safeguarding concerns.
 - Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
 - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with staff.
 - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
 - Liaising with the DSL & staff to inform them of any safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)).
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated at least annually through a variety of methods at regular intervals.

2.3 Members of staff

- Our staff play a particularly important role in safeguarding as they are in a position to observe changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- All members of staff have a responsibility to:
 - o provide a safe environment in which children can learn.
 - o be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
 - o know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact this can have upon a child.
 - o be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
 - o be prepared to identify children who may benefit from early help and understand the early help process and their role in it.
 - o understand PSG's safeguarding policies and systems.
 - o undertake regular and appropriate training which is regularly updated.
 - o be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
 - o know how to maintain an appropriate level of confidentiality.
 - o reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
- Staff at [Primary Sports Giants](#) recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.
- Staff at [Primary Sports Giants](#) will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff behaviour and pupil/student/participant behaviour policies.

2.4 Children and young people

- Children and young people have a right to:
 - o Feel safe, be listened to, and have their wishes and feelings taken into account.
 - o Confidently report abuse, neglect or exploitation, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
 - o Contribute to the development of PSG safeguarding policies.
 - o Receive help from a trusted adult.
 - o Learn how to keep themselves safe, including online.

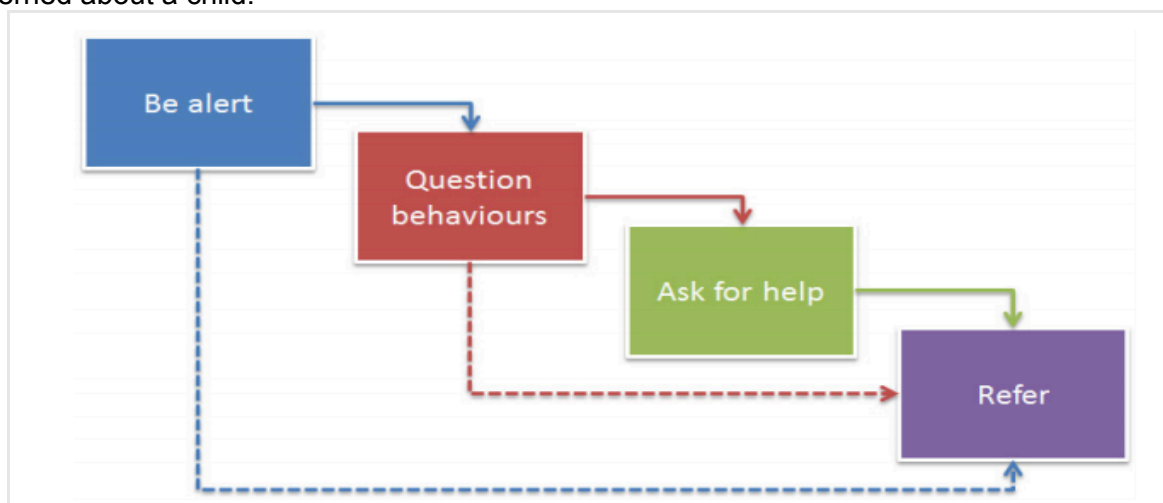
2.5 Parents and carers

- Parents/carers have a responsibility to:
 - o Understand and adhere to the relevant [PSG](#) policies and procedures.
 - o Talk to their children about safeguarding issues and support the [PSG](#) in their safeguarding approaches.
 - o Identify behaviours which could indicate that their child is at risk of harm, including online.
 - o Seek help and support from the [PSG](#) or other agencies.

3. Child Protection Procedures

3.1 Recognising indicators of abuse, neglect and exploitation

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'. This is outlined locally within the [Kent Support Levels Guidance](#).
- [Primary Sports Giants](#) recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
 - o Physical abuse
 - o Sexual abuse
 - o Emotional abuse
 - o Neglect
- By understanding the indicators of abuse, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:



[‘What to do if you are worried a child is being abused’](#)

- [Primary Sports Giants](#) recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse, neglect and exploitation do not automatically mean a child is being harmed, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- [Primary Sports Giants](#) recognises abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

- Parental behaviors can indicate child abuse, neglect or exploitation; so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Children may report abuse, neglect or exploitation happening to themselves, their peers, or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside of PSG events. Children can be at risk of abuse, neglect or exploitation in situations outside their families; extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.
- [Primary Sports Giants](#) recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse or exploitation online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- [Primary Sports Giants](#) recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the [PSG behaviour policy](#). The DSL (or deputy) will be informed of any searching that may be required, parents/guardians will be informed. The DSL (or deputy) will then consider the circumstances of the [pupil/student/participant](#) to assess the incident against any potential wider safeguarding concerns.
 - o Staff will involve the DSL (or deputy) without delay if they believe that a search needs to be completed as safeguarding risk.

3.2 Responding to child protection concerns

- If staff are concerned about the safety or welfare of a child, they are expected to:
 - o listen carefully to child, reflecting back the concern.
 - o use the child's language.
 - o be non-judgmental.
 - o avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED).
 - o not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
 - o be clear about boundaries and how the report will be progressed.
 - o record the concern using the facts as the child presents them, in line with PSG record keeping requirements.
 - o inform the DSL (or deputy), as soon as practically possible.
- All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
- [Primary Sports Giants](#) will respond to safeguarding concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).

- o The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
- In Kent, Early Help and Preventative Services and Children's Social Work Services are part of [Integrated Children's Services](#) (ICS) and are accessed via the 'Front Door Service'/[Kent Children's Services Portal](#).
- 'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local authorities and their partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.
 - o If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.
 - o Where Intensive Support Early Help (provided by ICS, outlined in the [KSCMP support levels guidance](#)) is considered to be appropriate, the DSL (or deputy) will make a 'request for support' via the [Kent Children's Services Portal](#).
 - o Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment.
 - o The DSL will keep all Early Help cases under constant review and consideration will be given to escalating concerns and/or seeking advice from the Front Door Service if the situation does not appear to be improving or is getting worse.
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger (for example, under section 17 or 47 of the Children Act), intensive or specialist support is required and a 'request for support' will be made immediately to Kent [Integrated Children's Services](#) (via the [portal](#)) and/or the police, in line with the [Kent Support Level Guidance and KSCMP procedures](#).
 - o [Primary Sports Giants](#) recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
 - o The DSL may seek advice or guidance from a social worker via the Front Door Service before deciding next steps.
- The DSL, or a deputy DSL in the absence of the DSL will have the overall responsibility for making referrals. However, [all staff are made aware of the local process for making referrals to Integrated Children's Services and for statutory assessments under the Children Act 1989, especially section 17 \(children in need\) and section 47 \(a child suffering, or likely to suffer, significant harm\) that may follow a referral, along with the role they might be expected to play in such assessments.](#)
- [If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL \(or deputy\). In exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff.](#)
 - o [Staff will speak to a member of the PSG DSL team, request a consultation with a social worker from the Front Door Service, or make a request for support to the Front Door Service themselves; for contact information, see flowchart in event folder.](#)
 - o [In these circumstances, any action taken by staff will be shared with a DSL as soon as possible.](#)

- In the event of a request for support to the Front Door Service being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will always be informed in the case of a request for support being submitted by the [PSG DSL team](#), unless there is a valid reason not to do so, for example, if informing them may put a child at risk of harm or could undermine a criminal investigation.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving, or concerns regarding receiving a decision or the decisions made, staff or the DSL will re-refer (if appropriate) and/or DSLs will follow the [Kent Escalation and Professional Challenge Policy](#) to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- DSLs and staff will be mindful of the need for PSG to ensure any activity or support implemented to support children and/or families is recorded. Support provided by PSG where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network.

3.3 Recording concerns

- All safeguarding concerns, discussions, decisions, and reasons for those decisions, will be recorded in writing on the PSG shared drive in the Incidents Folder, safeguarding forms are in the event folder and should be passed without delay to the DSL.
- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries to a child have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records are kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- Where the [PSG](#) receives child protection files from another setting, the DSL will ensure key staff such as the [Special Educational Needs Co-Ordinators \(SENCOs\)](#)/ [named person with oversight for SEN](#), will be made aware of relevant information as required.
- Where a [pupil/student/participant](#) joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the [pupil/student/participant](#), and if so, if the files have been sent.

3.4 Multi-agency working

- [Primary Sports Giants](#) recognises the pivotal role we have to play in multi-agency safeguarding arrangements and is committed to its responsibility to work within the [KSCMP](#) multi-agency safeguarding arrangements as identified within 'Working Together to Safeguard Children'.
- The [PSG DSL](#) leadership team will work to establish strong and co-operative local relationships with professionals in other agencies, including the safeguarding partners in line with local and national guidance.
- [Primary Sports Giants](#) recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare

and protect them from harm. This includes contributing to [KSCMP](#) processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

- PSG will allow access for Kent Children's Social Work Service and, where appropriate, from a placing local authority, to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.
- The [PSG DSL team](#) are aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)) where there is a need for detention, treatment and questioning by police officers and will respond to concerns in line with our [behaviour policy](#).

3.5 Confidentiality and information sharing

- [Primary Sports Giants](#) recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE.
- Where reasonably possible PSG will hold more than one emergency contact number for each pupil/student. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm.
- The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on [PSG](#) and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
 - [Primary Sports Giants](#) has an appropriately trained Data Protection Officer (DPO) as required to ensure that PSG is compliant with all matters relating to confidentiality and information sharing requirements.
 - All staff will be provided with training and information to ensure they have due regard to the relevant data protection principles, which allow them to share and/or withhold personal information.
 - KCSIE, the [Information Commissioner's Office](#) (ICO), DfE [Data Protection in schools guidance](#) and DfE '[Information sharing advice for safeguarding practitioners](#)' guidance provides further details regarding information sharing principles and expectations. [In event folder](#).
- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy. Staff also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate.
- In regard to confidentiality and information sharing, staff will only involve those who need to be involved, such as the DSL (or a deputy) and Kent Integrated Children's Services (**or equivalent**). All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.

3.6 Complaints

- All members of the [PSG](#) community should feel able to raise or report any concerns about children's safety or potential failures in the [PSG](#) safeguarding regime. PSG has a complaints procedure available to parents, pupils/students/participants and members of staff and visitors who wish to report concerns or complaints. This can be addressed in person or reported to Tom@primarysportsgiants.co.uk, info@primarysportsgiants.co.uk, admin@primarysportsgiants.co.uk
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse in education can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
 - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at [Primary Sports Giants](#) will take all concerns reported seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
 - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4. Specific Safeguarding Issues

- [Primary Sports Giants](#) is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part one, DSLs, leaders and staff who work directly with children will read Annex B of KCSIE which contains important additional information about the following specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

4.1 Child-on-child abuse

- All members of staff at [Primary Sports Giants](#) recognise that children can abuse other children; this is known as child-on-child abuse and can happen both inside and outside of [PSG](#) and online.
- [Primary Sports Giants](#) recognises that child-on-child abuse can take many forms, including but not limited to:
 - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
 - Abuse in intimate personal relationships between children
 - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
 - Sexual violence and sexual harassment
 - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
 - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
 - Upskirting (which is a criminal offence), which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
 - Initiation/hazing type violence and rituals

- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE (in particular, part two and five).
- Primary Sports Giants** adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys”; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- Primary Sports Giants** recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
- In order to minimise the risk of child-on-child abuse, **Primary Sports Giants** will:
PSG implement a robust anti-bullying policy, providing an age/ability appropriate PSHE and RSE curriculum, providing a range of reporting mechanisms, for example, worry boxes, dedicated reporting emails monitored by DSLs, online report forms. Post camp tell us more charts.
- Primary Sports Giants** want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated policies, including child protection, anti-bullying, and behaviour. **Pupils/students/participants** who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Concerns about **pupils/student/participants**’ behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with **pupils/students/participants** and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
Taking reports seriously, listening carefully, avoiding victim blaming, providing appropriate pastoral support, working with parents/carers, reviewing educational approaches, following procedures as identified in other policies.

4.2 Child-on-child sexual violence and sexual harassment

- When responding to concerns relating to child-on-child sexual violence or harassment, **Primary Sports Giants** will follow the guidance outlined in Part five of KCSIE.
- Primary Sports Giants** recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of ‘it could happen here.’ **Primary Sports Giants** recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- All** victims of sexual violence or sexual harassment will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.

- Abuse that occurs online or outside of the [PSG](#) will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example [anti-bullying](#), [behaviour](#), [child protection](#), [online safety](#).
- [Primary Sports Giants](#) recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to [pupils/students/participants](#) that avoids alarming or distressing them.
- [Primary Sports Giants](#) recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
 - o The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE and relevant local/national guidance and support, for example [KSCMP](#) procedures.
 - o The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adult students and staff and any actions that are required to protect them.
 - o Any concerns involving an online element will take place in accordance with relevant local/national guidance and advice.
- Reports will initially be managed internally and where necessary will be referred to [Integrated Children's Services](#) (Early Help and/or Children's Social Work Service) via the Children's Portal and/or the police. Important considerations which may influence this decision include:
 - o the wishes of the victim in terms of how they want to proceed.
 - o the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behavior has been displayed.
 - o the ages of the children involved.
 - o the developmental stages of the children involved.
 - o any power imbalance between the children.
 - o if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
 - o that sexual violence and sexual harassment can take place within intimate personal relationships between children.
 - o understanding intra familial harms and any necessary support for siblings following incidents.
 - o whether there are any ongoing risks to the victim, other children, adult students, or staff.
 - o any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The [school/participants](#) will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject

to discussion with other agencies (for example Children's Social Work Service and/or the police) to ensure a consistent approach is taken.

- If at any stage the DSL is unsure if a request for support is appropriate, advice may be sought from the Front Door Service.

4.3 Nude and/or semi-nude image sharing by children

- [Primary Sports Giants](#) recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or “sexting”) can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:
 - o to report any concerns to the DSL immediately.
 - o never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
 - o not to delete the imagery or ask the child to delete it.
 - o to avoid saying or doing anything to blame or shame any children involved.
 - o to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
 - o not to investigate or ask the child(ren) involved to disclose information regarding the imagery
 - o to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
 - o The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
 - o Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
 - o All decisions and action taken will be recorded in line with our child protection procedures.
 - o A referral will be made to ICS via the Children's Portal and/or the police immediately if:
 - the incident involves an adult (over 18).
 - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
 - the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
 - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
 - o The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.
 - o If DSLs are unsure if a request for support is appropriate, advice may be sought from the Front Door Service.

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

- [Primary Sports Giants](#) recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.
- [Primary Sports Giants](#) recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).
- [Primary Sports Giants](#) recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example through others sharing videos or images of them on social media. CSE can affect any child who has been coerced into engaging in sexual activities and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

4.5 Serious violence

- All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, increased absence from school, 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 and may be at risk of CCE.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

4.6 Modern Slavery

- Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Statutory Guidance: [Modern slavery: how to identify and support victims](#).
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

4.7 So-called Honour Based Abuse (HBA)

- So-called 'honour'-based abuse (HBA) encompasses incidents or 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 HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.
- All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage. Staff can also contact the Forced Marriage Unit if they need advice or information: 020 7008 0151 or fm@fcdo.gov.uk
- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific legal reporting duty on teachers.
 - Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to personally report to the police where they discover that FGM appears to have been carried out on a girl.
 - It will be rare for staff to see visual evidence, and they should not be examining [pupils/students/participants](#), however staff who do not personally report such concerns may face disciplinary sanctions. Further information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#) and [FGM Mandatory reporting Duty Fact Sheet](#).
 - Unless the staff has good reason not to, they are expected to also discuss any FGM concerns with the DSL (or a deputy), and Kent Integrated Children's Services should be informed as appropriate.

4.8 Preventing radicalisation

[The Prevent duty: safeguarding learners vulnerable to radicalisation - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

- [Primary Sports Giants](#) recognises that children may be susceptible to radicalisation into terrorism.
- [Primary Sports Giants](#) is aware of our duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), to have "due regard to the need to prevent people from being drawn into terrorism", also known as the Prevent duty and the [specific obligations](#) placed upon us as an education provider regarding risk assessments, working in partnership, staff training, and IT policies.
- Lead staff have received appropriate training to enable them to be alert to changes in children's behaviour which could [indicate that they may need help or protection from radicalisation](#).
- Staff will be supported to use their judgement in identifying children who might be at risk of radicalisation and will act proportionately; staff will report concerns to the DSL (or a deputy), who, where appropriate, will follow the [local procedures](#) in regard to making a Prevent referral. If there is an immediate threat to safety, the police will be contacted via 999.

4.9 Cybercrime

- [Primary Sports Giants](#) recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline

but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.

- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.
- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection policy and other appropriate policies.

DSLs may also seek advice from Kent Police and/or the Front Door Service

4.10 Domestic abuse

- [Primary Sports Giants](#) recognises that:
 - domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
 - domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.
 - children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
 - anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
 - domestic abuse can take place within different types of relationships, including ex-partners and family members.
 - there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
 - domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
 - domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
 - it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.
- [Primary Sports Giants](#) work in partnership with Kent Police to provide support to children experiencing the effects of domestic abuse.

4.11 Mental health

- All staff recognise 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.

- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff 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.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

5. Supporting Children Potentially at Greater Risk of Harm

- Whilst **all** children should be protected, **Primary Sports Giants** acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups.

5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND)

- **Primary Sports Giants** acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect or exploitation.
- **Primary Sports Giants** recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse, neglect and exploitation, such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND, or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges PSG will always consider implementing extra pastoral support and attention for children with SEND. The DSL/Manager will work closely to plan support as required.

5.2 Children requiring mental health support

- **Primary Sports Giants** has an important role to play in supporting the mental health and wellbeing of our **pupils/students/participants**. 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.
- Where there are concerns regarding possible mental health problems for **pupils/students/participants and staff**, staff should report all concerns to the DSL team.

5.5 Children who may benefit from Early Help

- Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
 - o is disabled or has certain health conditions and has specific additional needs
 - o has special educational needs (whether or not they have a statutory Education, Health and Care plan)
 - o has a mental health need
 - o is a young carer
 - o is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
 - o is frequently missing/goes missing from education, home or care,
 - o has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
 - o is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
 - o is at risk of being radicalised or exploited
 - o has a parent or carer in custody, or is affected by parental offending
 - o is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
 - o is misusing alcohol and other drugs themselves
 - o is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
 - o is a privately fostered child.
- Where it is identified a child may need early help, staff and DSLs will respond in line with section 3 of this policy.

5.6 Children who need a social worker (child in need and child protection plans)

- The DSL will hold details of social workers working with children so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform [PSG](#) decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

5.7 Looked after children, previously looked after children and care leavers

- [Primary Sports Giants](#) recognises the common reason for children becoming looked after is as a result of abuse, neglect and/or exploitation, and a previously looked after child also potentially remains vulnerable.

5.8 Children who are Lesbian, Gay, Bisexual, or Gender Questioning/Trans (LGBT)

- The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm, however, [Primary Sports Giants](#) recognises that children who are LGBT or are perceived by other children to be LGBT (whether they are or not) can be targeted by other children or others within the wider community.
- When supporting a trans or gender questioning child, PSG will consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare

circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying.

6. Online Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. [Primary Sports Giants](#) will adopt a whole [company](#) approach to online safety which will empower, protect, and educate our [pupils/participants](#) and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- [Primary Sports Giants](#) will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- [Primary Sports Giants](#) identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
 - Content: being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
 - Contact: being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
 - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
 - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- [Primary Sports Giants](#) recognises that technology and the risks and harms related to it evolve and change rapidly. PSG carry out ongoing reviews of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.
- The [director](#) will be informed of any online safety concerns by the DSL, as appropriate. The named DSL will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

6.1 Policies and procedures

- The DSL has overall responsibility for online safety within the [company](#) but will liaise with other members of staff, for example IT technicians and curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our [Anti-bullying policy](#), [Social Media policy](#) and [behaviour policies](#).
 - Internal sanctions and/or support will be implemented as appropriate.
 - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- [Primary Sports Giants](#) uses a wide range of technology. This includes: laptops, tablets and other digital devices, the internet, our learning platform and email systems.

- [Primary Sports Giants](#) recognises that generative artificial intelligence (AI) tools may have many uses which could benefit our community. However, it is important to recognise that AI tools can also pose risks; this is including, but not limited to, bullying and harassment, abuse and exploitation (including child sexual abuse), privacy and data protection risks, plagiarism and cheating, and inaccurate, harmful and/or biased material, and additionally its use can pose moral, ethical and legal concerns.
 - o Staff will be made aware of the benefits and risks of using AI tools;
 - o Staff are required to carry out a risk assessment
 - o [Primary Sports Giants](#) will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying, behaviour and child protection.
 - o Where PSG believe that AI tools may have facilitated the creation of child sexual abuse material, including the sharing of nude/semi-nude images by children, PSG will respond in line with the UKCIS guidance '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance.
- [Generative artificial intelligence \(AI\) in education - GOV.UK \(www.gov.uk\)](#)
- [Data protection in schools - Artificial intelligence \(AI\) and data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](#)
- [Artificial Intelligence and Online Safety | SWGfL](#)
- [Using artificial intelligence \(AI\) safely | Internet Matters](#)
- [Primary Sports Giants](#) recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities. In accordance with KCSIE and EYFS
 - o [Primary Sports Giants](#) has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.

6.2 Appropriate filtering and monitoring on school/participants devices and networks

- [Primary Sports Giants](#) will do all we reasonably can to limit children's exposure to online harms through [school/participants](#) provided devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.
- When implementing appropriate filtering and monitoring, [Primary Sports Giants](#) will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our [pupils/students/participants](#); effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.
 - o Internet use will be supervised by staff as appropriate to [pupils/students/participants](#) age, ability and potential risk of harm:

6.2.1 Responsibilities

- Our [director](#) has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed, and that the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.

6.3 Information security and access management

- [Primary Sports Giants](#) is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and [pupils/students/participants](#).
- [Primary Sports Giants](#) will review the effectiveness of our procedures periodically to keep up with evolving cyber-crime technologies.

6.4 Remote/Online learning

- [Primary Sports Giants](#) will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
- All communication with [pupils/students/participants](#) and parents/carers will take place using [school/participants](#) provided or approved communication channels; for example, [school/participants](#) provided email accounts and phone numbers [and/or](#) agreed systems: [Google workspace](#), [school office](#) or [equivalent](#).
 - o Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and [pupils/students/participants](#) will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.

6.5 Online Safety Training for Staff

- [Primary Sports Giants](#) will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.

7. Staff Engagement and Expectations

7.1 Staff awareness, induction and training

Note- Annex A of KCSIE is a condensed version of Part one which can be provided instead of Part one to

- All members of staff have been provided with a [copy of part one or annex A](#) of the current version of 'Keeping Children Safe in Education' which covers safeguarding information for staff.
 - o [school/participants](#) leaders, including the DSL and [staff](#) will read KCSIE in its entirety.
 - o DSL leaders and all members of staff who work directly with children will read annex B of KCSIE.
 - o All members of staff have signed to confirm that they have read and understood the national guidance shared with them. [All kept on our safer recruit staff tracking document](#).
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training

- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns. [Pre holiday camp training information](#)
- Online safety training for staff will be integrated, aligned and considered as part of the whole [company](#) safeguarding approach and wider staff training.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. [Once known they will be emailed to staff.](#)
- [Primary Sports Giants](#) recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis, and staff are encouraged to contribute to and shape [PSG](#) safeguarding arrangements and child protection policies.

7.2 Safer working practice

- PSG takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.
- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the [staff handbook/ behaviour policy/code of conduct](#).
- The DSL will ensure that all staff (including contractors) and volunteers are aware of the [PSG](#) expectations regarding safe and professional practice.
- Staff will be made aware of the [PSG](#) behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures, and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant policies including staff behaviour policy, mobile and smart technology, and social media.

8. Safer Recruitment and Allegations Against Staff

8.1 Safer recruitment and safeguarding checks

- [Primary Sports Giants](#) is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our [pupils/students/participants](#) and staff. We recognise that we must ensure that people working with children in our setting are suitable, have the relevant qualifications/training and have passed any required checks to fulfil their roles.
 - o [Primary Sports Giants](#) will follow Part three, 'Safer recruitment' of Keeping Children Safe in Education and relevant guidance from The Disclosure and Barring Service (DBS)
 - o The leadership team are responsible for ensuring that the [school/participants/staff](#) follows safe recruitment processes as outlined within guidance.
 - o The [leadership team](#) will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- PSG maintains an accurate Single Central Record (SCR) in line with statutory guidance.

- [Primary Sports Giants](#) are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where PSG organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE.

8.2 Allegations/concerns raised in relation to staff, volunteers and contractors

- Any concerns or allegations about staff will be recorded and dealt with appropriately in line with Part four of KCSIE and the [local Kent allegations arrangements, including discussions as necessary with the Local Authority Designated Officer \(LADO\)](#). In depth information can be found within our 'Managing Allegations against Staff' and/or [staff behaviour policy/code of conduct](#) policy. This can be found [in the event folder and google workspace for policies](#).
- Any concerns or allegations about staff will be recorded and dealt with in line with Part four of KCSIE and local [Kent allegations arrangements](#). Ensuring concerns are dealt with effectively will protect those working in or on behalf of PSG from potential false allegations or misunderstandings.
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the [DSL team](#) (and if they have been involved, [the LADO](#)) will consider the facts and determine whether any lessons can be learned and if any improvements can be made.
- In the situation that the [PSG](#) receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), we will follow our safeguarding policies and procedures, including informing the LADO.

8.2.1 Concerns that meet the 'harm threshold'

- [Primary Sports Giants](#) recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers/coaches) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This includes when someone has:
 - o behaved in a way that has harmed a child, or may have harmed a child
 - o possibly committed a criminal offence against or related to a child
 - o behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children
 - o behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be responded to and managed in line with Part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the [DSL team](#) who will contact [the LADO](#) to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the [DSL team](#), staff are advised that allegations should be reported to the either of the 3 DSL team, who will contact the LADO.

8.2.2 Concerns that do not meet the 'harm threshold'

- **Primary Sports Giants** may also need to take action in response to 'low-level' concerns about staff. Additional information regarding low-level concerns is contained within our [staff behaviour policy/code of conduct/staff handbook](#) – this includes what a low-level concern is, the importance of sharing them and the confidential procedure to follow when sharing them.
- **Primary Sports Giants** has an open and transparent culture in which all concerns about all adults working in or on behalf of the [school/participants](#) are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the [school/participants](#) are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
 - A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the [school/participants](#) may have acted in a way that is inconsistent with our [staff behaviour & handbook policy/code of conduct](#), including inappropriate conduct outside of work and does not meet the 'harm threshold' or is otherwise not serious enough to consider a referral to [the LADO](#).
 - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
- It is crucial that all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Low-level concerns will be recorded in writing and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified.
 - Records will be kept confidential and will be held securely and retained and in compliance with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) and other relevant policies and procedures (for example data retention policies).
 - Where a pattern is identified, PSG will implement appropriate action, for example consulting with [the LADO](#) and following our disciplinary/HR procedures.

8.3 Safe Culture

- As part of our approach to safeguarding, PSG has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our [staff handbook](#) are constantly lived, monitored and reinforced by all staff (including supply teachers/coaches, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the [PSG](#) safeguarding regime. The leadership team at [Primary Sports Giants](#) will take all concerns or allegations received seriously.
- All members of staff are made aware of the [PSG](#) Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- **Primary Sports Giants** has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.
 - If these circumstances arise in relation to a member of staff at our **company**, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the [LADO](#)

9. Opportunities to Teach Safeguarding

- **Primary Sports Giants** will ensure that children are made aware of safeguarding, as part of providing a broad and balanced provision.
- **Primary Sports Giants** recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse, neglect or exploitation, and children with SEND.
- PSG systems support children to talk to a range of staff. All children will be listened to and heard, and their concerns will always be taken seriously and acted upon as appropriate.

10. Physical Safety

10.1 Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our [behaviour policy](#) and is in line with the DfE '[Use of reasonable force in schools](#)' guidance.

10.2 Site security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into **PSG** as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's sticker or be accompanied by a PSG staff whilst on site.
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance. We have a code red lock down procedure in place.

- PSG will not accept the behaviour of any individual (parent or other) that threatens [school/participants](#) security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the [school/participants](#) site.

11. Local Support

- All members of staff in [Primary Sports Giants](#) are made aware of local support available.
 - **Kent Integrated Children's Services/ Children's Social Work Services**
 - [Kent Integrated Children's Services Portal](#) – select 'urgent' if there is an immediate risk/concern
 - Front Door Service: 03000 411111
 - Out of Hours Number: 03000 419191
 - **Local Early Help and Preventative Services and Family Hubs**
 - [Schools/colleges should insert relevant local links/networks which can be found at:](#)
 - [Early Help and Preventative Services - KELSI](#)
 - [Early Help contacts - KELSI](#)
 - [Kent Family Hubs - Kent County Council](#)
 - **Kent Police**
 - 101 or 999 if there is an immediate risk of harm
 - [Insert details for local support. For example, local PCSO, school officer.](#)
 - **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
 - www.kscmp.org.uk
 - 03000 421126 or kscmp@kent.gov.uk
 - **Adult Safeguarding**
 - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk
 - **Kent LADO Education Safeguarding Advisory Service (LESAS) – Support for Kent Children's Workforce**
 - [Local Authority Designated Officer \(LADO\) - Kent Safeguarding Children Multi-Agency Partnership](#)
 - To speak to the LADO regarding an allegation against a member of staff, complete a referral on the [Kent Integrated Children's Services Portal](#).
 - To raise a LADO, strategic education safeguarding or online safety enquiry, commission a review or enquiry about bespoke training or other safeguarding products, please use the [LESAS enquiry form](#).

Appendix 1: Categories of Abuse

All staff should be aware that abuse, neglect, exploitation and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

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

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour, for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, for example, anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing, for example for PE
- Secrecy relating to use of technology
- Sexually transmitted disease or pregnancy
- Fire setting

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries, such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns, such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Inappropriate/harmful medication usage
- Aggressive behaviour or severe temper outbursts.

- Injuries that cannot be accounted for. Inadequate, inconsistent, or excessively plausible explanations for an injury, or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Secrecy relating to use of technology
- Excessive need for approval, attention, and affection

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

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: Support Organisations

Note- Relevant local links should be added; additional links can also be found in Part two and Annex B KCSIE

NSPCC ‘Report Abuse in Education’ Helpline

- [0800 136 663](tel:0800136663) or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk
- Centre of Expertise on Child Sexual Abuse: www.csacentre.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Online Safety Helpline: www.saferinternet.org.uk/helpline
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

Support for pupils/students

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

Kent Resilience Hub

- <https://kentresiliencehub.org.uk/>

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): www.nicco.org.uk/

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: <https://respectphoneline.org.uk>

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org
- County Lines Toolkit for Professionals:
www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit
- Multi-agency practice principles for responding to child exploitation and extra-familial harm:
<https://tce.researchinpractice.org.uk/>

Honour Based Abuse

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet:
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information:
www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information
- The right to choose - government guidance on forced marriage:
www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Child-on-Child abuse, including bullying, sexual violence and harassment

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com
- Kidscape: www.kidscape.org.uk
- Centre of expertise on Child Sexual Abuse: www.csacentre.org.uk

Online Safety

- NCA-CEOP: www.ceop.police.uk and www.thinkuknow.co.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/online-safety
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices:
<https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: <https://moodspark.org.uk>
- Young Minds: www.youngminds.org.uk
- We are with you: www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/