



First Kicks Sports

Safeguarding Policy

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1. Foreword

There are many sports clubs and organisations including voluntary and private sector providers that deliver a wide range of sporting activities to children. Some of these will be community amateur sports clubs, some will be charities. All should have the arrangements described in this chapter in place and should collaborate to work effectively with the safeguarding partners as required by any local safeguarding arrangements. Paid and volunteer staff need to be aware of their responsibilities for safeguarding and promoting the welfare of children, how they should respond to child protection concerns and how to make a referral to local authority children's social care or the police if necessary.

First Kicks Sports Ltd makes a positive contribution to a strong and safe community and recognises the right of every individual to stay safe. First Kicks Sports Ltd comes into contact with children and / or vulnerable adults through all the activities from Sports to Dance, they supply the Schools, Colleges, Leisure centres or Community centres.

The types of contact with children and / or vulnerable adults will be regulated and controlled activities. This policy seeks to ensure that First Kicks Sports Ltd undertakes its responsibilities with regard to- protection of children and / or vulnerable adults and will respond to concerns appropriately. The policy establishes a framework to support paid and unpaid staff in their practices and clarifies the organisation's expectations.

Background Information

First Kicks was established in 2011 to provide a wide range of sports coaching services for children and adults throughout London. First Kicks provide sports coaching and children's holiday activities all year round.

The company was founded by head coach Ellis Remy ex-professional football player for Wimbledon FC and Lincoln City FC and Samuel Okikiolu also ex-professional football player for Wimbledon FC and Clyde. Together we have over ten years of experience of working with young people in various schools and youth clubs.

First Kicks Sports Coaching is looking to work in partnership with Primary Schools, Secondary Schools, Councils, Youth clubs and Charities to help them achieve a healthy lifestyle through diet and sport for children and young people alike. This is now one of the main issues for the government due to the rising obesity rate in the UK. Healthy lifestyle is now included as part of Ofsted's inspection criteria along with government targets for sport in schools.

We have maintained strong links within the professional sports world and our main aim is to promote sports and healthy lifestyle throughout the communities.

We pride ourselves on employing coaches who have a passion for their sport which they use to enthuse all participants. Our sessions include basketball, taekwondo, football, boxing, cheerleading, street dance, athletics, hockey and many more.

Our Services

Schools

We work with you to provide the required number of hours for structured extra-curricular sport for your pupils, through Extra Curricular sessions, our very popular Multi Skills Sport breakfast, lunchtime or after school clubs. Our specialised PPA Cover also allows us to provide coaching to cover staff allowing for the 10% PPA time required for teachers.

Extra Curricular Sessions

These sessions can range from a minimum of one hour to full block days. This covers a wide variety of sports and dance classes.

Breakfast Club (Multi Skills/Sports)

This is becoming more and more popular. Normally delivered from 8am - 8:50am. Pupils begin the day with Physical Activity, helping to stimulate them ready for the school day ahead.

Lunchtime Sessions

Specialised coaching during lunchtime.

After School Clubs

Normally run for an hour 3.30pm until 4.30pm. These clubs give pupils the chance to further develop their skills in an activity outside school hours. All pupils participating in After School Clubs receive a medal, and trophies are given out in the final week's presentation to outstanding performers.

PPA Cover

By outsourcing your PPA Cover needs to our network of qualified, trained, CRB checked and fully insured coaches we are able to offer you the following benefits:

- A cost-effective supply service
- Fully qualified cover staff
- Staff continuity
- Subject flexibility

Our PPA provides structured learning delivered by qualified staff and carefully planned lessons which meet National Curriculum targets. Thus enabling us to effectively monitor progress and provide clear, insightful reporting processes and an excellent pupil experience.

Holidays Camps

Our holiday camps run in Enfield, Barking and Dagenham, Tower Hamlets, Haringey and Hackney.

Our Coaches

First Kicks Sports Ltd has a team of experienced, dedicated and reliable coaches who you can trust to deliver coaching sessions to a high standard. Our coaches are friendly and passionate about what they do, with proven track records of working with children and young people.

With experience of coaching in a range of environments including schools, colleges and the local community, you can be assured that our coaches will always deliver an enjoyable and well-structured coaching experience.

Ensuring we maintain a safe environment for all is extremely important to us, so all of our coaches are DBS checked and qualified in first aid for children. Our coaches are qualified in a wide variety of sports including:

Multi Sports	Girls Football
Table Tennis	Yoga
Athletics	Dodgeball
Hockey	Zumba
Basketball	Cricket
Boxing	Taekwondo
Netball	Hand Ball
Cheerleading	Karate
Tag Rugby	Tennis
Street Dance	Gymnastics
Boys Football	Ballet
Dance	Drama

1.1 Acknowledgements

The principal pieces of *Legislation; Regulations; Policies; Statutory Guidance & General Guidance* governing this policy are:

- *Working Together to Safeguard Children* – [Hyperlink to Document](#)
- *Keeping Children Safe in Education (Dept. of Education)*– [Hyperlink to Document](#)
- *CPU Child Protection in Sport Unit – Standards for Safeguarding and Protecting Children in Sport* – [Hyperlink to Document](#)
- *The Child Safeguarding Practice Review and Relevant Agency (England) Regulations 2018* – [Hyperlink to Document](#)
- *The United Nations Convention on the Rights of the Child 1991* – [Hyperlink to Document](#)
- *The Children Act 1989* – [Hyperlink to Document](#)
- *The Children Act 2004* – [Hyperlink to Document](#)
- *Data Protection Act 1998* – [Hyperlink to Document](#)
- *Human Rights Act 1998* – [Hyperlink to Document](#)
- *Sexual Offences Act 2003* – [Hyperlink to Document](#)
- *Protection of Freedoms Act 2012* – [Hyperlink to Document](#)
- *Children and Families Act 2014* – [Hyperlink to Document](#)
- *The Adoption and Children Act 2006* – [Hyperlink to Document](#)
- *The Children Act 2004* – [Hyperlink to Document](#)
- *Safeguarding Vulnerable Groups Act 2006* – [Hyperlink to Document](#)
- *Care Standards Act 2000* – [Hyperlink to Document](#)
- *Public Interest Disclosure Act 1998* – [Hyperlink to Document](#)
- *The Police Act 1997* – [Hyperlink to Document](#)
- *Mental Health Act 1983* – [Hyperlink to Document](#)
- *NHS and Community Care Act 1990* – [Hyperlink to Document](#)
- *Rehabilitation of Offenders Act 1974* – [Hyperlink to Document](#)
- *The Children and Social Work Act 2017* – [Hyperlink to Document](#)
- *The Equality Act 2010* – [Hyperlink to Document](#)
- *The Prevent Duty: safeguarding learners vulnerable to radicalisation* – [Hyperlink to Document](#)
- *The Position of Trust Offence (Sexual Offences Act 2003)* – [Hyperlink to Document](#)
- www.safeguardingschools.co.uk
- www.UKcoaching.org

- www.coachingnetwork.org.uk
- <https://www.londonscb.gov.uk/london-scb-contacts/>
- www.skillsforschools.org.uk
- www.emduk.org (*The National Governing Body for Group Exercise*)

1.2 Glossary

- **DSL** Designated Safeguarding Lead
- **CPSU** Child Protection in Sport Unit
- **FGM** Female Genital Mutilation
- **CYP** Children and Young People
- **LCSB** Local Children Safeguarding Board
- **LADO** Local Authority Designated Officer
- **COSHH** Control of Substance Hazardous to Health
- **OOSS** Out of School Setting

1.3 Definition of Safeguarding

Safeguarding is a term used in the United Kingdom and Ireland to denote measures to protect the health, well-being and human rights of individuals, which allow people — especially children, young people and vulnerable adults — to live free from abuse, harm and neglect.

Safeguarding is about embedding practices throughout the organisation to ensure the protection of children and / or vulnerable adults wherever possible. In contrast, child and adult protection is about responding to circumstances that arise.

First Kicks Sports Ltd abides by the duty of care to safeguard and promote the welfare of children and young people and is committed to safeguarding practice that reflects statutory responsibilities, government guidance and complies with best practice requirements.

Safeguarding children is defined in Working Together to Safeguard Children 2023 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 network⁴ through a kinship care arrangement, whenever possible and where this is in the best interests of the children

Children are clear about what they want from an effective safeguarding system. These asks from children should guide the behaviour of practitioners.

Children have said that they need:

- Vigilance - to have adults notice when things are troubling them
- Understanding and action - to understand what is happening; to be heard and understood; and to have that understanding acted upon
- Stability - to be able to develop an ongoing stable relationship of trust with those helping them
- Respect - to be treated with the expectation that they are competent rather than not
- Information and engagement - to be informed about and involved in procedures, decisions, concerns and plans
- Explanation - to be informed of the outcome of assessments and decisions and reasons when their views have not met with a positive response
- Support - to be provided with support in their own-right; as well as a member of their family
- Advocacy - to be provided with advocacy to assist them in putting forward their views
- Protection - to be protected against all forms of abuse and discrimination and the right to special protection and help if a refugee

Anyone working with children should see and speak to the child; listen to what they say; take their views seriously; and work with them and their families collaboratively when deciding how to support their needs. Special provision should be put in place to support dialogue with children who have communication difficulties, unaccompanied children, refugee's and those children who are victims of modern slavery and/or trafficking. This child-centred approach is supported by:

- *The Children Act 1989 / 2004*
- *The Equality Act 2010*
- *The United Nations Convention on the Rights of the Child (UNCRC) 1991*

2. The Purpose of this Policy

- To protect children and young people who receive First Kicks Sports Ltd Services. This includes the children of adults that use our services.
- To provide staff and volunteers with overarching principles that guide our approach to safeguarding and child protection

First Kicks Sports Ltd believes that a child or young person should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to practise in a way that protects them.

We recognise that:

- The welfare of the child is paramount, as enshrined in the Children Act 1989
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal opportunity from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues
- Working in partnership with children, young people, their parents, carers and other agencies is essential in promoting young people's welfare.

We will seek to keep children and young people safe by: -

- Valuing them, listening to, and respecting them
- Adopting child protection and safeguarding practices through procedures and a code of conduct for staff and volunteers

2.1 Keeping Children Safe in Education (KCSIE)

The KCSIE Guidance updates are monitored to ensure that this policy reflects all of the relevant changes that are needed to ensure the safeguarding of children within First Kicks Sports provided sessions.

To find the full guidance, please visit: [Keeping children safe in education 2024](#)

For KCSIE Summary of Changes by NSPCC CASPAR Briefing, please visit: [CASPAR briefings | NSPCC Learning](#)

2.2 Preventing Abuse of Positions of Trust in Sport

Introduction

As parents, coaches, officials, and volunteers working with young people, we must all help to promote responsible relationships within sport and prevent the manipulation and exploitation of young people.

Although young people aged 16 and 17 have reached the age of consent for sexual activity according to UK law, they could be vulnerable to sexual abuse and exploitation in certain situations. This includes sexual activity and manipulation by adults who hold a position of trust, responsibility, or authority in relation to them, and, as a result, have a considerable amount of power and influence on their lives.

As of 28 June 2022 the law in England and Wales states that those in a position of trust in sports organisations, such as a coach, cannot legally have a sexual relationship with young people they look after, under 18 years old. Within the new policy, sport is defined as:

- a) any game in which physical skill is the predominant factor, and
- b) any form of physical recreation which is also engaged in for purposes of competition or display

It is not the case that both (a) and (b) must be met to meet the definition – either one is sufficient.

Those in authority positions in sport can have a positive influence on the welfare of a young person, by providing role models or someone to turn to if they have a concern. But it is important to have clear boundaries in place for the safety of both the young people and the staff, to ensure exploitation cannot take place.

What is a position of trust?

Someone in a position of trust is a person in a position of authority or responsibility over another person. Those in positions of trust have a considerable amount of power and influence on a young persons' life. For example, a young person may be dependent on their coach, mentor or other adult for their sporting development, success, or position in a club, representative or national team.

Researching the nature of the problem in sport

High profile cases including those reported in the Football Abuse Scandal, and abuse in American elite gymnastics have received widespread media coverage, and inquiries have revealed a culture of abuse from those in positions of trust within sport

A significant number of people in positions of trust in sport have been convicted of child sexual abuse. Prosecutions for abuse, include individuals from a wide range of sports.

Listening to people with lived experiences of abuse within sport has demonstrated how difficult many young people have found it to voice their concerns and allegations, and have them believed and acted upon. By learning from lived experiences and from inquiries into abuse, national governing bodies, sports organisations and those who fund sport and physical activity, can work to strengthen their safeguarding practices and bring them into action.

What does the law say?

Sexual offences legislation in the UK underlines that any sexual activity between adults and with children under 16 is illegal and constitutes abuse. Furthermore, in defined circumstances, young people aged 16 and 17, despite reaching the age of consent for sexual activity, are vulnerable to sexual abuse and exploitation.

Following an NSPCC campaign in partnership with sport's governing bodies, the law, which previously only applied to roles like teachers and social workers, has now been extended to include a wider range of roles where adults hold a position of influence or power. This includes sports coaches and those in faith organisations.

In England and Wales, the law now states that those in positions of trust within sports organisations cannot legally have a sexual relationship with young people aged 16-17 years old.

The law in Northern Ireland has also received Royal Assent but cannot currently be commenced as there is no Northern Ireland Assembly. However, in advance of this the CPSU would encourage sports organisations to continue to respond thoroughly to any possible breaches of a position of trust.

A position of trust offence is committed when an adult in a position of trust engages in sexual activity with a child in their care, even if the child is over the age of consent (aged over 16 in the UK).

The updated law now defines a wider range of roles and settings where sexual activity between 16- and 17-year-olds and those in positions of trust, responsibility, or authority, constitutes a criminal offence.

Examples of specific roles include:

- teacher
- connexions personal advisors (England only)
- foster carers
- coach
- trainer
- supervisor or instructor in sport or a religion

Examples of specific settings:

- education institutions
- residential care homes

- hospitals
- youth offender institutions
- foster care homes
- sports organisations and regular activities
- religious organisations and regular activities

What can sports organisations do?

Sports organisations should clearly define within their codes of conduct that abuse of positions of trust is unacceptable behaviour, which could result in prosecution. Breaches of these codes should be robustly addressed in line with the law.

- Sports codes of conduct and linked disciplinary processes should be reviewed and amended to include wording that supports the maintenance of healthy and positive relationships between sports coaches and young people.
- The code of conduct should reference the organisation's definition of roles that constitute positions of trust and reference the law stating that any sexual relationships/activity between adults in those roles and 16–17-year-olds for whom they are in a position of authority constitutes an offence.
- The abuse of position of trust provision should be defined by the nature of the position in relation to the young person and not be dependent on the regularity of contact with the young person in question
- Safeguarding training for those working with young person in the sport sector should include material on the issue on abuse of trust guidance on maintain appropriate boundaries between adults and young people
- Safeguarding and disciplinary policies and procedures in England and Wales should include a requirement for referral to the Disclosure and Barring Service (DBS) when an individual, who is working in regulated activity, is deemed to be unsuitable to work with young people. This should be carried out even when a short-term cover/temporary member of staff is engaged.

What can sports coaches and others in positions of trust do?

As someone in a position of trust, you have a responsibility to maintain a positive, healthy relationship with the young people under your authority.

- Ensure that you read, understand, sign up to and comply with the code of conduct/behaviour your club, organisation or relevant sport's governing body has produced for the role you hold
- Maintain a relationship with all participants that is appropriate to your role and reflects positively on the club or organisation you work or volunteer for. Relationships between those in positions of trust and young people in sport should be supportive, positive and aimed at improving the young person's skills, and progress
- Whether or not the code explicitly refers to positions of trust (and what would constitute breach) as someone in a position of authority you should not seek to or engage in sexual activity or

sexualised communication or image sharing (including via social media) with 16- or 17-year-olds for whom you are responsible.

- If you think that a young person's behaviour indicated that they are seeking to develop or engage in an inappropriate relationship with you, immediately bring this to the attention of your club or organisation's welfare officer, designated safeguarding lead or manager. Be careful not to respond to the participant in any way that could be interpreted as encouraging the young person concerned. Make a written record of your concerns and relevant details.

Dealing with a concern about a possible abuse of trust

If you suspect that an abuse of a position of trust has occurred, is occurring or may occur, you should:

- immediately report to your welfare officer or designated safeguarding lead
- make a written record of your concerns and relevant details
- if you are unable to contact the welfare officer or designated safeguarding lead, or if you think someone is at risk of immediate harm, you must report it to the police or children's social care.

If you think your concern has not been dealt with appropriately, or there is no safeguarding officer, you can contact the following services whose duties include responding to concerns about potential breaches of positions of trust:

- England and Wales - consult with the Designated Officer whose details should be available through your local authority's Children's Social Care Department.
- Scotland - contact your local children's social work team. Their contact details can be found on the website for the local authority the child lives in.
- Northern Ireland - contact the relevant Health and Social Care Trust (HSCT) Gateway Services team. In circumstances that are not an emergency, the HSCT gateway services team is the first point of contact for all new referrals to children's social services.

You can find additional information on who to contact when dealing with a concern on the [CPSU Website](#)

Alternatively, you can seek advice from the NSPCC helpline on 0808 800 5000.

3. Definition and Categories of Abuse/Harm

Abuse/Harm is a selfish act of oppression and injustice, exploitation and manipulation of power by those in a position of authority. This can be caused by those inflicting harm or those who fail to act to prevent harm. Abuse is not restricted to any socio-economic group, gender or culture and it can take on many forms.

Children and adults may be vulnerable to neglect and abuse or exploitation from within their family and from individuals they come across in their daily lives. There are 4 main categories of abuse, which are: sexual, physical, emotional abuse, and neglect. It is important to be aware of more specific types of abuse that fall within these categories, they are:

- Physical abuse
- Child Sexual abuse/exploitation

- Child Criminal exploitation
- Child Trafficking
- Domestic abuse
- Emotional abuse
- Bullying and Cyberbullying
- Online abuse
- Grooming
- Historical abuse
- Female Genital Mutilation
- Neglect
- Financial (or material) abuse
- Radicalisation
- Extremism
- Modern Slavery

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

3.1 Serious Violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from 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.

3.2 Female Genital Mutilation

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher/coach must report this to the DSL and Police.

3.3 Contextual Safeguarding

Safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside the school or college. All staff, but especially the designated safeguarding lead (and deputies) should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare. Children's social care assessments should consider such factors, so it is important that schools and colleges provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the full context of any abuse.

3.4 County Lines

The NSPCC states:

County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young people to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). It can happen in any part of the UK and is against the law and a form of child abuse. Children and young people may be criminally exploited in multiple ways. Other forms of criminal exploitation include child sexual exploitation, trafficking, gang and knife crime. County lines gangs are highly organised criminal networks that use sophisticated, frequently evolving techniques to groom young people and evade capture by the police. Perpetrators use children and young people to maximise profits and distance themselves from the criminal act of physically dealing drugs (National Crime agency, 2018). Young people do the majority of the work and take the most risk. Dedicated mobile phone lines or “deal lines” are used to help facilitate county lines drug deals. Phones are usually cheap, disposable and old fashioned, because they are changed frequently to avoid detection by the police. Gangs use the phones to receive orders and contact young people to instruct them where to deliver drugs. This may be to a local dealer or drug user, or a dealer or drug user in another county.

Phrases that young people may use to refer to county lines include:

- ‘running a line’,
- ‘going OT/out there’
- ‘going country’
- ‘going cunch’.

These all refer to going out of town to deliver drugs or money.

Risks

County lines is a cross-cutting issue that often overlaps with other forms of abuse and criminal exploitation. It can lead to serious physical and emotional harm to young people (Home Office, 2020a).

Criminalisation

If adults who work with children don’t understand that county lines is a form of abuse, they may see children involved in county lines activity as criminals rather than as victims of criminal exploitation (Children’s Society, 2019). This can lead to children not getting the safeguarding support and protection they need.

Drugs

Perpetrators may use drugs and alcohol to entice young people into the gang lifestyle. In some cases gangs trick young people into incurring drug debts that they then have to pay off through county lines activity. This is often referred to as ‘debt bondage’.

Physical violence

There is a strong link between county lines activity and:

- serious violence such as knife and gun crime
- the use of substances such as acid as a weapon

- homicide (Home Office, 2018).

Conflict between rival gangs that are in dispute over who controls an area can lead to serious injury or death for young people who get caught in the wrong place.

The fear of serious physical violence as revenge for disrespecting, 'snitching' or 'grassing' is one of the things that prevents young people from leaving gangs or seeking help from the police and other agencies.

Sexual abuse and exploitation

As well as being used to transport drugs, county lines gangs may sexually abuse and exploit children of any gender (National Crime Agency, 2018).

This can happen through:

- young people being forced into sexual activity with gang members or for the gang's financial gain
- vulnerable children being made to work off drug debts through sexual exploitation as 'payment' (this might happen after the child has been coerced into becoming dependent on drugs by the gang)
- children being groomed into what they believe is a romantic relationship with a gang member which then leads to exploitation (National Crime Agency, 2018).

Some children are forced to transport drugs in ways that are invasive and harmful to their bodies. Young people may be forced to swallow bags of drugs to transport them, which could potentially be life threatening. The practice of 'plugging' is also common, whereby drugs are inserted into a child's rectum or vagina. This is a form of sexual abuse and in some cases it can cause a child's death (Ofsted et al, 2018).

Trafficking and missing children

Young people can be trafficked to locations far away from where they live for long periods of time by a county lines gang. They may end up staying in unsuitable accommodation in an area that is unknown to them. This might include short term holiday lets or budget hotels.

Cuckooing

Cuckooing happens when a county lines gang takes over the home of a vulnerable adult by coercion or force, and use it as a base to deal drugs from. The vulnerable adult may have issues with substance misuse or mental health problems, be elderly or disabled or be in debt to the gang. These factors can make it easier for the gang to exploit and control them. Children can be forced or coerced to stay at cuckooed addresses for long periods of time to deal drugs. They may be on call for the gang 24 hours a day (National Crime Agency, 2018). A cuckooed address is sometimes referred to as a 'bando' or a 'spot' by county lines gangs (Thurrock Council, 2020).

Financial exploitation and abuse

Gangs are known to launder money from drug sales through children's bank accounts, either by using an existing account or forcing or persuading the child to open a new one (Children's Society, 2019). County lines gangs might refer to 'squares' - meaning cash cards, and 'deets' - meaning bank details (Safe4Me, 2019).

Recognising

Grooming

The grooming process involves the gang:

- seeking out a child to exploit
- observing the child for vulnerabilities
- finding out what the child's needs and wants are
- manipulating the child into believing that being in the gang can fulfil these needs.

Once they have identified a child, the gang will make some form of contact and the grooming process will begin. This could be in person or via mobile phone. Social media profiles may also be used to glamourise gang life and entice young people. Some children are groomed through family members, for instance if they have a sibling or relative who is already involved with a county lines gang. County lines gangs offer money and status to attract young people. Children may also be attracted to joining a gang by the prospect of belonging to a 'family' that will protect them if their own family feels unstable or unsafe.

The following have been identified as key places where county lines gangs target and approach vulnerable young people:

- schools and further and higher educational institutions
- special educational needs schools
- places for alternative provision outside of mainstream education
- foster homes
- homeless shelters.

Once a child is part of a county lines gang their loyalty and commitment will be tested. The gang will begin to trap the child by making them feel powerless to leave. This might include threats of violence if they leave, making the child feel like they are betraying their new 'family', or telling the child they will get in trouble if they seek help because they have committed a criminal offence (Children's Society, 2019).

Who is vulnerable to county lines exploitation?

Any child could potentially be at risk of criminal exploitation by a county lines gang.

Factors that make a county lines gang more likely to target, groom and exploit a child include:

- the child having experienced neglect, physical and/or sexual abuse in the past
- social isolation or social difficulties
- poverty
- homelessness or insecure accommodation status
- connections with other people involved in gangs
- having a learning disability
- having mental health problems
- having substance misuse issues
- being in care or having a history of being in care
- being excluded from mainstream education (Home Office, 2020a).

Permanent exclusion from mainstream education has been identified as a critical event that can lead to young people becoming vulnerable to criminal exploitation (Child Safeguarding Practice Review Panel, 2020). County lines gangs can take advantage of the lack of structure, loss of a sense of belonging and feeling of rejection that exclusion can elicit in a young person. The average age of young people who are exploited through county lines activity is 15-16 years old, but children as young as 12 have also been reported to have been involved (Home Office, 2020a).

Signs that a young person may be involved in criminal exploitation

The following signs may indicate that a child is being exploited by a county lines gang:

- frequently going missing from school, home or care

- travelling to locations, or being found in areas they have no obvious connections with, including seaside or market towns
- unwillingness to explain their whereabouts
- acquiring money, clothes, accessories or mobile phones which they seem unable to account for
- receiving excessive texts or phone calls at all hours of the day
- having multiple mobile phone handsets or sim cards
- withdrawing or having sudden changes in personality, behaviour or the language they use
- having relationships with controlling or older individuals and groups
- unexplained injuries
- carrying weapons
- significant decline in school results or performance
- being isolated from peers or social networks
- associating with or being interested in gang culture
- self-harming or having significant changes in mental health (Ministry of Justice, 2019).

Responding to concerns about county lines exploitation

If you're worried that a child or young person might be or is at risk of being exploited by a county lines gang, you must share your concerns.

Reporting

If you think a child is in immediate danger, contact the police on 999. If you're worried about a child but they are not in immediate danger, you should share your concerns.

- *Follow your organisational child protection procedures.* Organisations that work with children and families must have safeguarding policies and procedures in place.
- *Contact the NSPCC Helpline on [0808 800 5000](tel:0808 800 5000) or by emailing help@nspcc.org.uk.* Our trained professionals will talk through your concerns with you and give you expert advice.
- *Contact the local child protection services.* Their contact details can be found on the website for the relevant local authority. The local authority the child comes from is responsible for the child's welfare. But it is also good practice to contact the local authority in the area the child is found, as they may need to be a part of the multi-agency response and there may be other children or vulnerable adults at risk.
- *Contact the police.*

National referral mechanism (NRM)

As part of county lines, young people are trafficked to different locations. You should refer children who have been trafficked to the National Referral Mechanism (NRM). Evidence of a referral can be used in a young person's defence in criminal and legal proceedings (Youth Justice Legal Centre, 2018).

Multi-agency working

A multi-agency response is needed to tackle county lines and protect any children involved from further exploitation. This should include participation from local authority children's social care, the local authority community safety team, schools, police and youth offending teams. The local authority the child comes from (if known) is responsible for the child's welfare (Ministry of Justice, 2019). They may need to liaise with child protection agencies in the area the child was found, in order to keep the child safe. Collaborative working and information sharing is essential in protecting the welfare of the child. Across the UK, Independent Child Trafficking Guardians (ICTGs) can act as sources of advice for children without a figure of parental responsibility in the UK who have been victims of trafficking and modern slavery (Home Office, 2020b). ICTG regional practice co-ordinators take on a more strategic role supporting children who do have

a figure of parental responsibility, working with professionals to encourage them to take a co-ordinated and multi-agency approach to child trafficking, modern slavery and county lines (Home Office, 2020b).

Supporting the young person who has been exploited

Adults who work or volunteer with children and young people are in a good position to build trusting relationships with them. This will help young people feel able to discuss issues that are affecting their lives and speak out if they need support about any issue, including county lines (Child Safeguarding Practice Review Panel, 2020).

Those who work with children need to be clear that county lines is not a lifestyle choice and that the young person is not to blame for being exploited by a gang. Young people who are involved with a county lines gang may push back when help is offered. They may not see themselves as being exploited or they may be scared of recriminations if they 'snitch' or 'grass' on gang leaders. Gangs convince young people that there is no way out for them, in order to trap and control them. This means it's important for adults to reassure young people that there is a way out of gang life and that help is available when they are ready to leave. Young people may finally reach out for help in the event of a major incident or emergency. This might include a serious injury or the threat of serious injury to themselves or someone they know, or if someone they know was killed. If professionals do not act quickly and effectively to intervene at this point, the child may be 're-groomed' or pressured back into the gang (Canterbury Community Safety Partnership, 2020).

Childline

If a child or young person needs confidential help and advice about gangs or anything else that's worrying them, you can always direct them to Childline. Calls to 0800 1111 are free and children can also contact Childline online. Childline provides information and advice for young people affected by gang activity, drugs or any other form of abuse. You can also download or order Childline posters and wallet cards.

Training

To help identify and support children who have experienced county lines, professionals need training which covers:

- signs and indicators of county lines exploitation
- the legislative framework around criminal exploitation
- the NRM referral process
- understanding the trauma experienced by young people (Children's Society, 2019).

Prevention

Schools and education

Schools and colleges can help raise awareness of county lines. This can be done through whole-school assemblies, class discussions or smaller group work. As well as discussing what county lines is and how children might be targeted by gangs, schools should ensure children know who they can talk to if they have any concerns. Schools are also well-placed to identify any children who may be at risk of county lines and form part of the multi-agency response.

Exclusion from school

If a child is at risk of being excluded from education, schools should always consider what immediate wrap around support can be put in place to protect them from county lines. This should include exploring what support is available from children's social care, and voluntary and community organisations.

Working with parents and carers

Engaging with parents and carers can help protect children and young people who are at risk of criminal exploitation. Parents and carers need support to manage any risk to their child. It's important for services

working with children at risk of county lines to understand what barriers might be in place for parents and carers.

These might include fears around:

- having their other children 'taken away' from them
- their child being excluded from school
- criminalising their child
- recriminations from the county lines gang

(Canterbury Community Safety Partnership, 2020; Child Safeguarding Practice Review Panel, 2020).

3.5 Definition of a Child

The Children Act 1989 definition of a child is: anyone who has not reached their 18th birthday, even if they are living independently, are a member of the armed forces or is in hospital. We also recognise a child as a person under the age of 18 (as defined in the United Nations convention on the Rights of a Child).

3.6 Definition of a Vulnerable Adult

A vulnerable adult is a person aged 18 years or over who may be unable to take care of themselves or protect themselves from harm or from being exploited, or:-

- An adult who has needs for care and support (whether the authority is meeting any of those needs or not).
- Is experiencing, or is at risk of, abuse or neglect, and
- As a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.

This may include a person who:

- Is elderly and frail
- Has a mental illness including dementia
- Has a physical or sensory disability
- Has a learning disability
- Has a severe physical illness
- Is a substance misuser
- Is homeless

3.7 Definition of Child Protection (in Sport)

While child protection and child safeguarding are often thought to have similar meanings, there is a distinction. Child safeguarding is about keeping all children safe from harm, abuse, violence, exploitation and neglect. Having effective child safeguarding measures in place means that your organisation or club is proactively working internally and externally to ensure that children are kept safe.

In contrast, child protection is protecting an individual that has been identified as being at risk of harm, abuse, violence, exploitation or neglect. Child protection forms part of child safeguarding measures, but

should be seen as the last line of defence in child safeguarding. A key part of child safeguarding is spreading the message about keeping children safe, to challenge community norms and build a community culture of always acting in the best interest of all children.

When individuals participate in sport they often:

- Have a coach, instructor or mentor; someone they admire and respect
- Develop a sense of belonging from being part of a team
- Train and change in close proximity

The factors listed above make it difficult for participants to speak out against abuse which they have been subjected to. It is also difficult to avoid the perpetrators who are respected individuals or close teammates.

The Convention on the Rights of the Child defines a child as anyone under the age of 18. Having effective safeguarding measures in place is primarily designed to protect this group.

Effective measures will safeguard everyone in sport, from participants through to coaches and organisational management. The benefits of having effective measures in place are relevant for all that participate in sport and include:

- Participants will know how to report a concern
- Coaches will be protected against false allegations
- Participants and coaches will know how to access support
- Management will know how to respond
- Everyone will know what is and is not acceptable conduct

Peer-to-peer abuse:

Unfortunately, it is commonly accepted that children can be excessively mean to each other; that children will laugh and make fun of other children. These behavioural patterns result in harm and are often referred to as bullying. *Bullying comes in many forms and can present itself in sport as:*

- Cyberbullying
- Taunting other participants about skills or clothing
- Excluding or not wanting to be on the same team as an individual
- Discriminating on the basis of gender, sexual orientation, religion, race, etc.

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

As outlined in Keeping Children Safe in Education Other forms of peer-on-peer abuse can manifest as:

- Sexual harassment - such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- Upskirting - typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

- Sexting - (also known as youth produced sexual imagery);
- Initiation/hazing type violence and rituals.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- Sexual violence - such as rape, assault by penetration and sexual assault; inappropriate touching.

Staff and volunteers in sport and development need to ensure that actions which could be described as bullying are not ignored. Acting upon such behaviour will set the stage for good conduct and will make all athletes feel emotionally and physically safe to participate and gain from the positive benefits sport has to offer.

All staff (paid or unpaid) have responsibility to follow the guidance laid out in this policy and related policies, and to pass on any welfare concerns using the required procedures. We expect all staff (paid or unpaid) to promote good practice by being an excellent role model, contribute to discussions about safeguarding and to positively involve people in developing safe practices.

3.8 Definition of Significant Harm

The Children Act 1989 introduced the concept of *Significant Harm* as the threshold that justifies compulsory intervention in family life in the best interests of children.

Section 47(1) of the Children Act 1989 states that: 'Where a local authority... have reasonable cause to suspect that a child who lives, or is found, in the area and is suffering, or is likely to suffer, Significant Harm, the authority shall make, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare... the enquiries shall be commenced as soon as practicable and, in any event, within 48 hours of the authority receiving the information.'

Under Section 31 of the Children Act 1989 a court may only make a Care Order (committing the child to the care of the local authority) or Supervision Order (putting the child under the supervision of a social worker, or a probation officer) in respect of a child if it is satisfied that:

- The child is suffering or is likely to suffer Significant Harm;
- The harm or likelihood of harm is attributable to a lack of adequate parental care or control.

Under Section 31(9) of the Children Act 1989, as amended by the Adoption and Children Act 2002:

- Harm means ill-treatment or impairment of health or development including for example impairment suffered from seeing or hearing the ill-treatment of another;
- Development means physical, intellectual, emotional, social or behavioural development;
- Health means physical or mental health;
- Ill-treatment includes sexual abuse and forms of ill-treatment which are not physical.

**The Adoption and Children Act 2002* broadens the definition of Significant Harm to include the emotional harm suffered by those children who witness domestic violence or are aware of domestic violence within their home environment.

There are no absolute criteria on which to rely when judging what constitutes Significant Harm. Consideration of the severity of ill-treatment may include:

- The degree and extent of physical harm;
- The duration and frequency of abuse or neglect;
- The extent of premeditation;
- The degree of threats and coercion;
- Evidence of sadism, and bizarre or unusual elements in child sexual abuse.

Each of these elements has been associated with more severe effects on the child, and/or relatively greater difficulty in helping the child overcome the adverse impact of the ill-treatment.

Sometimes, a single traumatic event may constitute Significant Harm. In other circumstances Significant Harm is caused by the cumulative effect of significant events, both acute and long-standing, or the damaging impact of neglect which interrupt and change or damage the child's physical and psychological development.

When judging what constitutes Significant Harm it is necessary to consider:

- The family context, including the family's strengths and supports;
- The child's development within the context of the family and within the context of the wider social and cultural environment;
- Any special needs, such as a medical condition, communication difficulty or disability that may affect the child's development and care within the family;
- The nature of harm in terms of the ill-treatment or failure to provide adequate care;
- The impact on the child's health and development;
- The adequacy of parental care.

Under Section 31(10) of the Children Act 1989: Where the question of whether harm suffered by a child is significant turns on the child's health and development, his health or development shall be compared with that which could reasonably be expected of a similar child. It is important always to take account of the child's reactions, and his or her perceptions, according to the child's age and understanding.

3.9 Indicators of Significant Harm

A number of factors may give rise to suspicion about the cause of an injury, the most obvious being a statement by the child and/or another person that the injury has been caused deliberately or not accidentally.

The following guidance is intended to help all professionals who come into contact with children. It should not be used as a comprehensive guide, nor does the presence of one or more factors prove that a child has been abused, but it may however indicate that further enquiries should be made. The following factors should be taken into account when assessing risks to a child. This is not an exhaustive list.

Professionals should be alert to situations where a child is injured and:

- The explanation provided by the parent or carer is apparently incompatible with the physical injury;
- There are conflicting or different explanations provided;
- There is no explanation provided or a lack of awareness of how the injury occurred;
- There is a reluctance on the part of the parent or carer to provide information about the current or previous injuries;

- There is a reluctance to agree to medical assessment;
- There is a delay or failure to seek appropriate medical attention for an injury;
- There are frequent minor injuries or presentations of the child at Accident and Emergency Departments;
- The parent or carer is impatient, angry or aggressive towards the child;
- The parent or carer is under the influence of alcohol or another substance;
- A child reacting in a way that is inappropriate to his/her age or development;
- The parent indicates difficulties in coping with the child;
- There is evidence of domestic abuse or parental mental ill health

Many families under stress are able to care for children and meet their needs in a warm loving and supportive environment. For other families, stress has a negative impact on the child's health, development and well-being either directly or because it affects the capacity of parents to respond to the child's needs. This is particularly the case where there is no other significant adult who is able to respond to the child's needs.

Many families are disadvantaged and lack a wage earner. Poverty may mean that children live in crowded or unsuitable accommodation, have poor diets, health problems or disability, are vulnerable to accidents, and lack ready access to good educational and leisure opportunities.

Racism and racial harassment are additional sources of stress for some families and children. Although racism causes Significant Harm it is not, in itself - a category of child abuse. The experience of racism is likely to affect the responses of the child and family to assessment and enquiry processes. Failure to consider the effects of racism will undermine efforts to protect children from other forms of significant harm.

4. The Prevent Duty

All Schools and Colleges in England, Scotland and Wales have a duty, as a specified authority under section 26 of the *Counterterrorism and Security Act 2015*, to identify vulnerable children and young people and prevent them from being drawn into terrorism and radicalisation. This is known as the Prevent duty. These organisations include:

- Schools
- Registered childcare providers
- Local authorities
- Police
- Prisons and probation services
- NHS trusts and foundations.
- Other organisations may also have Prevent duties if they perform delegated local authority functions.

Children can be exposed to different views and receive information from various sources. Some of these views may be considered radical or extreme.

4.1 Radicalisation & Extremism

Radicalisation is the process through which a person comes to support or be involved in extremist ideologies. It can result in a person becoming drawn into terrorism and is in itself a form of harm. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The Education department has published advice for schools on the Prevent duty. The advice is intended to complement the Prevent guidance and signposts other sources of advice and support, and our staff will be encouraged to review this document independently.

5. Designated Safeguarding Lead (DSL)

The role of the Designated Safeguarding Person was specified in the *Children Act 2004* and ensured the every organisation had a "named person" for safeguarding children and young people. Prior to that, the role had frequently been known as the Child Protection Officer. The Designated Safeguarding Person has a responsibility at both a strategic level within the organisation and on a day to day basis.

During term time (and during planned clubs, camps or sessions during school holidays) the designated safeguarding lead (or a deputy) should always be available for staff in the school, college or staff/coaches to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements (where necessary) for any out of hours/out of term activities.

5.1 Key Aspects of the Designated Safeguarding Lead (DSL) role

- Making sure all staff are aware how to raise safeguarding concerns
- Ensuring all staff understand the symptoms of child abuse and neglect
- Referring any concerns to social care
- Monitoring children who are the subject of child protection plans
- Maintaining accurate and secure child protection records

Keeping Children Safe in Education sets out the role of the Designated Safeguarding Lead.

Governing bodies and proprietors should ensure that the school or college designates an appropriate senior member of staff to take lead responsibility for child protection. This person should have the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

5.2 Managing Referrals (DSL)

Refer all cases of suspected abuse to the local authority children's social care and:

- The designated officer(s) for child protection concerns (all cases which concern a staff member),

- Disclosure and Barring Service (cases where a person is dismissed or left due to risk/harm to a child); and/or
- Police (cases where a crime may have been committed).
- Liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

The DSL understands that they must liaise directly with the relevant Local Authority Designated Officers (previously known as LADO's). Please see a copy of the 'Enfield' Council's LADO/Referral/Notification form for Allegations Against Staff and Volunteers Working with Children, as an example:

5.3 Training (DSL)

The designated safeguarding lead should receive appropriate training carried out every two years in order to:

- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.

- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the school's or college's child protection policy and procedures, especially new and part time staff.
- Be alert to the specific needs of children in need, those with special educational needs and young carers.
- Be able to keep detailed, accurate, secure written records of concerns and referrals.
- Obtain access to resources and attend any relevant or refresher training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

5.4 Raising Awareness (DSL)

The designated safeguarding lead should ensure that First Kicks Sports' policies are known and used appropriately:

- Ensure the *First Kicks Sports'* child protection and safeguarding policies are reviewed annually and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this, as necessary.
- Ensure the child protection and safeguarding policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college and First Kicks Sports in this.
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding.

5.5 Recording & Retention of Safeguarding Information (DSL)

Keeping Children Safe in Education states:

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

Why do we need to keep records?

Accurate and up to date recording of child protection or welfare concerns is essential for a number of reasons:

- It can help educational settings identify child protection or welfare concerns at an early stage
- It can help settings identify patterns of concerns
- It can enable settings to record seemingly minor issues to build a more complete picture of what life may be like for their learners

- It helps settings to monitor and manage safeguarding practices, including decision making, actions taken and agreed joint strategies with other agencies
- It can provide evidence to support professional challenge, both within educational settings and when working with external agencies
- It can support settings to demonstrate action taken to reduce impact of harm to a child
- It helps to evidence robust and effective safeguarding practice in inspections and audits.

The importance of good, clear child protection record keeping is identified as essential practice within statutory guidance for educational settings. *Keeping children safe in education 2018* highlights that ‘all concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. If in doubt about recording requirements, staff should discuss with the designated safeguarding lead or deputy’ (p.11). *Keeping children safe in education 2018* identifies that *Designated Safeguarding Leads (DSLs)* should refresh their knowledge and skills at regular intervals to ensure they ‘are able to keep detailed, accurate, secure written records of concerns and referrals’ (p.90). *The Early Years Foundation Stage Framework 2017* identifies the need for early years providers to maintain records (p16).

What do staff need to know about record keeping?

A formal record of welfare concerns, which could include child protection issues, must always be completed by staff, irrespective of their role in the setting. Best practice would be for educational settings to use a consistent welfare concern form. Record keeping templates can be found on Kelsi. DSLs may find it helpful to adopt a whole staff approach to introducing the settings record keeping system to staff. Ideally this should be in the context of child protection training and as part of induction; where this is not possible, formal meetings should be implemented. This approach will provide an opportunity to remind staff of their safeguarding responsibilities and the expectations on them to report and record concerns. Staff meetings can also be a useful forum for clarifying what is viewed as a “welfare concern”.

Some staff groups may have methods for recording information about learners e.g. class based notebooks or diaries. The use of these systems to record welfare related information or issues should be avoided as it runs the risk of essential information being lost; members of staff should be aware that all welfare concerns must be recorded and kept centrally by DSL. If staff have doubts as to whether an incident or information constitutes a concern, or should be formally recorded, they should consult with the DSL.

Safeguarding information is shared on a need to know basis, so it may be the DSL already has concerns regarding the learner, and the information could provide vital evidence. All staff should be mindful that records may be shared with others at some stage, for example when making a referral to statutory agencies, compiling a report for a Child Protection Case Conference, and in some cases, may be used as evidence in court proceedings.

It is important that staff always use clear and precise language (including recording any specific words used by a child) and they record facts, not opinion; any interpretation or inference drawn from what was observed, said or alleged should be clearly recorded as such. DSLs should ensure that all staff are clear

about how they as the DSL will respond to reported concerns; this could include providing appropriate feedback to the member of staff who completed the form.

Staff should be empowered to seek clarification on the action taken by the DSL, including why concerns have not been reported to the statutory agencies. Feedback on concerns raised should be an expectation; staff should not be passive in acquiring this and should seek a response if this is not forthcoming. It should be made clear to all staff that if concerns remain following a welfare concern, a consultation could be sought with their Area Safeguarding Advisor. Additionally, all staff should be made aware of the settings whistleblowing procedure if they are unhappy with the action taken by the DSL.

What should DSLs record on a welfare concern form?

The level of detail recorded will depend on the nature and seriousness of the concern highlighted, however, the following information should be recorded by DSLs on the welfare concern form:

- The full name of the DSL who received the concern form
- The date (time, day, month and year) the form was received
- If different to the above, the name of the DSL who acted and the date action was taken
- Action taken by DSLs to investigate the concern; examples could include;
- Recommendation for staff to monitor specific aspects of the learners' presentation, behaviour, attendance etc. and for how long
- Discussions and telephone calls, including professional consultations
- The decision to (or not to) refer concern to a statutory agency
- Any rationale for decision making

The Safeguarding File

When should I start a safeguarding file?

Once a welfare concern has been passed to the DSL and a record has been made of the action taken and/or decision making, these documents will require storage in a separate child protection/safeguarding filing system. This is regardless of whether formal child protection procedures have been initiated.

For some children, this single record will be the only concern held for them over their time in the setting. For others, further information will be brought to you from a variety of sources over time.

A stand-alone individual file for a child must be started when:

- Concerns for the child and consequently records of these and actions in the setting are increasing.
- The child has been referred to a partner agency for support.
- You have been made aware of the involvement of a partner agency with the child/family and are contributing to multi agency assessments. Information about child protection concerns and

referrals should be kept in a separate child protection file for each child, rather than in one 'concern log'.

The child protection file should be started as soon as you become aware of any concerns. It is recommended that DSLs ensure that several blank files are made available in preparation, so that record keeping can be appropriate from the beginning.

What should be included in a safeguarding file?

Keeping children safe in education identifies that 'All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing'.

Therefore, records included within a child's safeguarding file may include the following:

- All setting welfare concern forms.
- Any notes initially recorded in the form of notebooks or diaries.
- Records of discussions, telephone calls and meetings (with colleagues, other agencies or services, parents and children/young people).
- Records of the settings decision making, as well as action taken and appropriate justifications.
- Professional consultations.
- Letters sent and received.
- Print outs of emails or other electronic communications sent and received.
- Referral forms (both for external and education-based services).
- Minutes of meetings (copies for each child as appropriate).
- Formal plans linked to the child (e.g. Child Protection Plan).

In cases where information is held in this variety of formats it may be helpful to use a ring binder file and organise this on a 'modular' basis for ease of reference i.e. sections titled:

- Setting records
- Letters
- Multi-agency records
- Health

How do we keep/store records and who has access?

It is the responsibility of the DSL to keep detailed, accurate, secure written records of concerns and referrals. Child protection records must be kept separate from all other records relating to that child.

Child protection records should be stored in a locked cabinet preferably within the DSL's office with access only to those with direct child protection responsibility for children. It is essential to ensure that the settings leadership team know the arrangements for access to records in the absence of the DSLs.

This should form part of the settings child protection policy in respect of how welfare concerns for children will be managed if the DSL is not available. For Early Years providers, the *EYFS 2017* sec 3.69 states that, records must be easily accessible and available. With prior agreement from Ofsted or the childminder agency with which they are registered, these may be kept securely off the premises.

Confidential information and records about staff and children must be held securely and only accessible and available to those who have a right or professional need to see them.

How should we keep records as part of a team of DSL's?

In settings where there is a lead DSL supported by deputy DSLs there should be a clear system for ensuring that welfare concerns are managed appropriately to prevent duplication and avoid complacency. Examples of this could include the lead DSL being the main point of contact; staff should only speak with a deputy DSL if the lead is not available.

For larger settings they may consider asking sites, year groups/departments to report to a deputy DSL with regular and formally recorded meetings taking place between the lead and any deputies. The lead DSL will need to ensure they maintain a clear oversight of all safeguarding concerns. Lead DSLs may find it helpful to formally meet on a regular basis with any deputy DSLs and/or other pastoral staff to ensure information sharing takes place.

Within *Keeping children safe in education guidance*, it is suggested that the DSL should keep all cases (including early help) under constant review and consider escalation processes if the child's situation does not appear to be improving.

DSLs should keep a list of children within the setting who are:

- Known to early help
- Child in Need
- Children who are subject to a Child Protection plan
- Children in Care

Such a list can be used to ensure that all relevant members of staff are clear about which agencies are involved with which children. This will also enable staff to cross reference any other concerns as they arise, such as behavioural issues. This list can also be anonymised as evidence to demonstrate that DSLs have a clear understanding and oversight of children with multi-agency plans within the setting.

Can we use electronic record keeping systems?

Many settings are now opting to use electronic record keeping systems to log and manage child protection and welfare concerns. Educational settings should use the recording system approach that work best for them, whilst still maintaining appropriate child protection records in line the *General Data Protection Regulations (GDPR) and Data Protection Act 2018*.

Electronic systems have both benefits and downsides; the physical layout of the site, storage availability, technology access, budgets and the local context will all influence the usefulness of electronic approaches, however the decision to opt for electronic approaches is down to individual settings.

What are my responsibilities under data protection?

Neither the parent nor the child has an automatic right of access to child protection records. However, it is best practice to share information written by staff unless there is a valid reason to withhold it. For example, child protection records may be exempt from the disclosure provisions of the *Data Protection Act 2018* in cases where disclosure may cause serious physical or emotional harm to the child or any other person.

However, the exemption only applies to the information that may cause harm and is not a blanket exemption for the whole file. The right of access, commonly referred to as subject access, gives individuals the right to obtain a copy of their personal data as well as other supplementary information. Under this right and individual is entitled only to their own personal information and not to information relating to other people (unless they are acting on behalf of that person).

All third-party information should be removed, or consent sought for its disclosure from source. If a Subject Access Request (SAR) is made, you must act on the request without undue delay, and, at the latest within one month of receipt. Further information about Subject Access Requests can be found on Kelsi at www.kelsi.org.uk/school-management/data-andreporting/access-to-information/the-data-protection-act-1998

Cases of alleged abuse that result in court proceedings may require the setting to disclose their records, either through the police or social services. Records (suitably anonymised) may also be requested for use in disciplinary proceedings. In all court cases, a requesting solicitor or other third party should be advised that a Witness Summons or Subpoena should be obtained. In these situations, the advice of your Area Safeguarding Advisor and/or legal department should be sought.

What information can be shared?

Whilst, among other obligations, the *Data Protection Act 2018* and the *General Data Protection Regulations (GDPR)* places duties on organisations and individuals to

process personal information fairly and lawfully and to keep the information they hold safe and secure, this is not a barrier to sharing information where the failure to do so would result in a child being placed at risk of harm. Fears about sharing information cannot be allowed to stand in the way of the need to promote the welfare and protect the safety of children. All information held by the setting should be shared with Specialist Children's Services, police and health professionals as appropriate, where there is a concern that a child is at risk of significant harm. *Section 47 of the Children Act 1989* authorises all agencies to share information in these circumstances. For further generic information on information sharing, you can access and download 'Information sharing – advice for safeguarding practitioners' 2018 www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice

How do education settings transfer safeguarding files?

When learners transfer from one education setting to another and records of child protection/welfare concerns have been kept, they must be sent to the receiving setting's DSL. DSLs must ensure that child protection files are transferred to new school / setting / college as soon as possible as part of transition. This is essential; as part of the transition process is to enable receiving settings to make appropriate safeguarding, risk management and resource decisions. It is the responsibility of the transferring setting to ensure that records are sent to the receiving setting.

However, DSL's in receiving settings should always seek to proactively ensure that positive communications are in place with any feeder settings at transition to check that child protection files have been sent. The transfer of safeguarding records should be secure and arranged separately from the main child file, in line with DfE guidance, and must be transferred under confidential cover. For example, the transferring DSL arranges to meet the receiving DSL and the records are physically exchanged between them. If a school sent information relating to a pupil who was not attending the new school in September, then this potentially could be a data protection breach.

A receipt should be requested by the transferring setting and presented by the receiving setting. Where the physical transfer of files is not possible or appropriate, the best possible secure delivery of these files should take place, with a receipt being provided by the receiving setting. It is possible that there may be exceptional circumstances where during the summer break something happens to prevent the learner joining the new setting. This is rare and should be dealt with on a case per case basis. Similarly, consideration must be given to whether it is appropriate to transfer a safeguarding file overseas.

How long are records kept for?

Guidance from the *Records Management Society* is when a child with a child protection record reaches statutory school leaving age, the last school/setting attended should keep the child protection file until the child's 25th birthday. Following this, the file should be shredded; a record should be kept of this having been done including the date, and why.

(Also see Appendix 3 Data Protection Policy)

5.6 First Kicks Sports' Designated Safeguarding Lead (DSL) Contact Information & Qualification

First Kicks Sports Ltd's nominated [Designated Safeguarding Lead](#) is also our Director:-

Ellis Remy

(m) 07984 165 626 Work Mobile

(m) 07415 105 214 Office

(email) ellis@firstkickssports.co.uk

(email) office@firstkickssports.co.uk

First Kicks Sports Ltd's nominated [Deputy Designated Safeguarding Lead](#) is also our Director:-

Samuel Okikiolu

(m) 07903 686 922 Work Mobile

(m) 07415 105 214 Office

(email) samuel@firstkickssports.co.uk

(email) office@firstkickssports.co.uk

6. Code of Conduct for Staff and Volunteers

As a member of staff or a volunteer at our club or sessions, we'd like you to...

- Implement our safeguarding policy and procedures
- Aim to arrive 20 minutes ahead of your session and ensure you plan your journey to the venue ahead of time and inform the First Kicks office and The School/Venue immediately if you are running late
- Ensure you have your original DBS Certificate and Photo ID on your person during the session
- Report any concerns or allegations of abuse or poor practice to our DSL in a timely manner
- Listen to any concerns that parents or young people might have
- Consider your behaviour – do not engage in any behaviour that constitutes any form of abuse
- Respect your position of trust and maintain appropriate boundaries and relationships with young people (engaging in sexual behaviour with any child under the age of 16 is illegal)
- Keep any coaching and safeguarding training up to date
- Keep children in your sessions safe by supervising appropriately, using safe methods and techniques and by putting children's safety first
- Make sure you've got appropriate staffing ratios of adult to participant before the session begins
- Ensure equipment is fit for purpose, safe to use and accessible
- Respect children's trust and rights whilst being honest and open with them
- Champion everyone's right to take part and celebrate difference in our club or by not discriminating against anyone, regardless of gender, race, sexual orientation or ability
- Stop play if an injury happens, administer minor first aid and call for help when necessary and report to the First Kick's DSL and School's Medical/Admin Team in a timely manner
- Treat & Report ANY Head Injuries, adhering to the First Kick's Reporting Procedure, completing the Head Injury FORM and informing the First Kick's DSL and the School's Medical/Admin Team in a timely manner as well as informing the child's Parent/Carer using the Head Injury FORM
- Use constructive and positive methods of developing children's skills, without humiliating or harming them
- Behave appropriately online in accordance with our online safety policy
- Challenge and address instances of poor, negative, aggressive or bullying behaviour amongst young people
- Lead by example when it comes to good sportsmanship, positive behaviour and commitment to the sport
- Develop positive relationships with parents and catch up with them where possible about their child's development

- Make our club a friendly and welcoming place to be

As a member of staff or a volunteer at our club or sessions, we understand you have the right to...

- Enjoy the time you spend with us and be supported in your role
- Be informed of our safeguarding and reporting procedures and what you need to do if something isn't right
- Have access to ongoing training in all aspects of your role
- Be listened to and be involved and contribute towards decisions within our organisation
- Be respected and treated fairly by us
- Feel welcomed, valued and not judged based on your race, gender or sexuality
- Be protected from physical or emotional abuse from children or parents and be supported to resolve conflicts

Continued issues and repeated breaches of this code may result in us taking disciplinary action and/or dismissal (as necessary).

7. Code of Conduct for Children and Young People

As a young person taking part in our clubs, camps, matches or sessions, we would like you to...

The Essentials

- Keep yourself safe by listening to your coach, behaving responsibly and speak out when something isn't right
- When you're with us, stay in the places where you're supposed to, don't wander off or leave without telling your coach
- Take care of our equipment and premises as if they were your own
- Make it to sessions or matches on time
- Bring the right kit to practise and wear appropriate kit for the weather

Behaviour

- Respect and celebrate difference in our sessions and not discriminate against anyone else on the grounds of gender, race, sexual orientation or ability
- Report any incidents of bullying to your coach, even if you're just a witness
- Treat other young people with respect and appreciate that everyone has different levels of skill and talent
- Make our sessions a welcoming activity and a friendly place to be
- Support and encourage your team mates
- Respect our coaches
- Be a good sport, celebrate when we win and be gracious when we lose
- Play by the rules and have fun
- Follow our online safety policy

As a young person taking part in our clubs, camps, matches or sessions, we understand you have the right to...

- Enjoy the time you spend with us and know that you're safe
- Be told who you can talk to if something is not right
- Not listened to
- Be involved and contribute towards decisions within the club, match or session
- Be respected by us and other team members and be treated fairly
- Feel welcomed, valued and not judged based on your race, gender, sexual orientation or ability
- Be encouraged and develop skills with our help
- Be looked after if there's an accident or injury and have your parents informed if needed

Continued issues and repeated breaches of this code may result in us regrettably asking you to leave the session, club, match or camp, either temporarily or permanently, if we feel it impacts on the welfare of other young people or our coaches. This is something we never want to do.

8. Code of Conduct for Parents and Carers

As a parent of a child or young person taking part in our clubs, camps, matches or sessions, we would like you to...

The Essentials

- Make sure your child has the right kit for the session as well as enough food and drink (where applicable)
- Try to make sure your child arrives to sessions on time and is picked up promptly; or let First Kicks/the School/Venue know if you're running late or if your child is going home with someone else
- Complete all consent, contact and medical forms and update us straight away if anything changes
- Make sure your child wears any protective kit we provide for them
- Maintain a good relationship with your child's coach and catch up with them as much as you can about your child's development
- Talk to us if you have any concerns about any part of your child's involvement – we want to hear from you

Behaviour

- Try and learn about your child's sport/activity and what it means to them
- Take the time to talk to your child about what you both want to achieve through the sessions
- Remember that children get a wide range of benefits from participating in sport, like making friends, getting exercise and developing skills. It's not all about wins and losses.
- Listen when your child says they don't want to do something
- Behave positively on the sidelines – shout encouragement, say "well done" and let your children know you're proud of what they are doing
- Think about how the way you react and behave affects not just your child but other children too

- Use social media responsibly when referring to our clubs, sessions, matches or camps or other young people
- Encourage your child to play by the rules and ensure that your child understands their code of conduct
- Treat our coaches with respect and escalate any concerns with our coaches directly to the First Kicks Sports office (and the School/venue where appropriate) and in a timely manner.

As a parent of a child or young person taking part in our clubs, camps, matches or sessions, we understand you have the right to...

- Be assured that your child is safeguarded during their time with us
- Request to any of our policies and procedures (with reasonable notice)
- Request copies of coaching qualifications and/or DBS Certificate of our coaches (with reasonable notice)
- Know who the Designated Safety Lead officer is and have access to their contact details
- Be informed of problems or concerns relating to your child
- Know what happens if there's an accident or injury, be informed if your child is injured and see records of any accidents
- Have your consent sought for anything outside of our (or the School's) initial consent form, such permission to travel to another venue for the session or any photography
- Have any concerns about any aspect of your child's welfare listened to and responded to

Continued issues and repeated breaches of this code may result in us regrettably asking you (and/or your child) to leave the club, session, match or camp, either temporarily or permanently, especially if we feel that the welfare or enjoyment of young participants is impacted by your behaviour. This is something we never want to do.

9. Reporting & Responding

First Kicks Sports Ltd recognises its duty to report concerns about a Child's Welfare or allegations against its staff (paid or unpaid) within the organisation or by a professional from another organisation.

Information will be gathered, recorded and stored in accordance with the following policies: Data Protection Policy & Confidentiality Policy. All staff must be aware that they have a professional duty to share information with other agencies in order to safeguard children and vulnerable adults. The public interest in safeguarding children and vulnerable adults may override confidentiality interests. However, information will be shared on a need to know basis only, as judged by the Designated Senior Manager.

All staff must be aware that they cannot promise service users or their families/ carers that they will keep secrets.

First Kicks Sports Ltd is aware of the GSCB policy on resolution of professional disagreements in work relating to the safety of children / Escalation Policy (at www.gscb.org.uk) and if necessary, this will be taken forward by Samuel Okikiolu or Ellis Remy.

Conflicts in respect of safety of vulnerable adults will be taken forward by Samuel Okikiolu or Ellis Remy via the *GCC Community and Adult Care Directorate*.

Communication, Discussion of safeguarding issues and Learning from Safeguarding Cases

Commitment to the following communication methods will ensure effective communication of safeguarding issues and practice and ensure learning from safeguarding cases:

- Team meetings
- SMT meetings
- Board meetings
- One-to-one meetings (formal or informal),

Support

We recognise that involvement in situations where there is risk or actual harm can be stressful for staff concerned. The mechanisms in place to support staff include:

- Debriefing support for paid and unpaid staff so that they can reflect on the issues they have dealt with.
- Seeking further support as appropriate e.g. access to counselling.
- Staff who have initiated protection concerns will be contacted by line manager / DSL within a 1 week

The process outlined (in brief) below details the stages involved in raising and reporting safeguarding concerns at First Kicks Sports Ltd:

Immediately Communicate your concerns with the School Administration Team and the

Designated Safeguarding Lead (DSL) by telephone and

Complete & Submit the FORM 'Logging a concern about a child's safety and welfare' to the

Designated Safeguarding Lead (DSL)



Seek medical attention for the child or vulnerable person if needed



Discuss with parents of child Or with vulnerable person.

Obtain permission to make referral if safe and appropriate



DSL to, if needed, seek advice from the Children and Families helpdesk or Adults helpdesk



DSL to Complete the Local Authority Safeguarding Vulnerable Groups Incident Report Form if required and submit to the local authority within 24 hours of making a contact



DSL to ensure that feedback from the Local Authority is received and their response recorded

9.1 Allegations against First Kicks Staff/Coaches or School Staff

Duties as an employer and an employee

This part of the guidance is about managing cases of allegations that might indicate a person would pose a risk of harm, if they continue to work in regular or close contact with children in their present position, or in any capacity. It should be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) in a school or college that provides education for children under 18 years of age has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

This part of the guidance relates to members of staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

Initial considerations

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements should be followed to resolve cases without delay.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The designated officer(s) should be informed of all allegations that come to a school's or college's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate.

The following definitions should be used when determining the outcome of allegation investigations:

- *Substantiated*: there is sufficient evidence to prove the allegation;
- *Malicious*: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;
- *False*: there is sufficient evidence to disprove the allegation;
- *Unsubstantiated*: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence;
- *Unfounded*: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The headteacher or principal or (where the headteacher or principal is the subject of an allegation) the chair of governors, or the chair of the management committee or proprietor of an independent school (the 'case manager'), should discuss the allegation immediately with the designated officer(s). The purpose of an initial discussion is for the designated officer(s) and the case manager to consider the nature, content and context of the allegation and agree a course of action. The designated officer(s) may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and about the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager should discuss the allegations with the designated officer(s) in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it should be recorded by both the case manager and the designated officer(s), and agreement reached on what information should be put in writing to the individual concerned and by whom. The case manager should then consider with the designated officer(s) what action should follow both in respect of the individual and those who made the initial allegation.

The case manager should inform the accused person about the allegation as soon as possible after consulting the designated officer(s). It is extremely important that the case manager provides them with as much information as possible at that time.

However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager should not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused. Employers must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or college or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension should be considered prior to taking that step.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion should be convened in accordance with the statutory guidance *Working Together to Safeguard Children*. If the allegation is about physical contact, the strategy discussion or initial evaluation with the police should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the designated officer(s) should discuss the next steps with the case manager. In those circumstances, the options open to the school or college depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position: an individual should be suspended only if there is no reasonable alternative. In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the designated officer(s) should discuss with the case manager how and by whom the

investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's or college's staff.

However, in other circumstances, such as lack of appropriate resource within the school or college, or the nature or complexity of the allegation, the allegation will require an independent investigator. Many local authorities already provide for an independent investigation of allegations, often as part of the personnel services that maintained schools and colleges can buy in from the authority. It is important that local authorities ensure that schools and colleges have access to an affordable facility for independent investigation where that is appropriate.

Employers have a duty of care to their employees. They should act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual should be advised to contact their trade union representative, if they have one, or a colleague for support. They should also be given access to welfare counselling or medical advice where this is provided by the employer.

The case manager should appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. For staff in maintained schools and colleges, that may include support via the local authority occupational health or employee welfare arrangements. Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of the child or children involved should be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager should not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers should also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed but the parents or carers of the child should be told the outcome in confidence.

Parents and carers should also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the *Education Act 2002* If parents or carers wish to apply to the court to have reporting restrictions removed, they should be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, should consider what support the child or children involved may need.

Confidentiality

It is extremely important that when an allegation is made, the school or college make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. *The Education Act 2002* introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State or the General Teaching Council for England publishes information about an investigation or decision in a disciplinary case arising from the allegation. The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so. The provisions commenced on 1 October 2012.

The legislation imposing restrictions makes clear that “publication” of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.” This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public).

In accordance with the *Authorised Professional Practice* published by the College of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates’ court to request that reporting restrictions be lifted.)

The case manager should take advice from the designated officer(s), police and children’s social care services to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation; and
- how to manage press interest if, and when, it should arise.

Managing the situation and exit arrangements

Resignations and ‘settlement agreements’

If the accused person resigns, or ceases to provide their services, this should not prevent an allegation being followed up in accordance with this guidance. A referral to the DBS *must* be made, if the criteria are met. Schools and sixth form colleges must also consider whether a referral to the Secretary of State is appropriate. If the accused person resigns or their services cease to be used and the criteria are met, it will not be appropriate to reach a settlement/compromise agreement. Any settlement/compromise agreement that would prevent a school or college from making a DBS referral even though the criteria for referral are

met, is likely to result in a criminal offence being committed. This is because the school or college would not be complying with its legal duty to make the referral.

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible, the accused should be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be substantiated on the basis of all the information available, should continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, should not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

Record keeping

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on record retention.

References

Cases in which an allegation was proven to be false, unsubstantiated or malicious should not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious should also not be included in any reference.

Timescales

It is in everyone's interest to resolve cases as quickly as possible and is consistent with a fair and thorough investigation. All allegations should be investigated as a priority to avoid any delay. Target timescales are shown below: the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but these targets should be achieved in all but truly exceptional cases. It is expected that 80 per cent of cases should be resolved within one month, 90 per cent within three months, and all but the most exceptional cases should be completed within 12 months.

For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the employer to deal with it, although if there are concerns about child protection, the employer should discuss them with the designated officer(s). In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should instigate appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days.

Oversight and monitoring

The designated officer(s) has overall responsibility for oversight of the procedures for dealing with allegations, for resolving any inter-agency issues, and for liaison with the three safeguarding partners. The designated officer(s) will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces should also identify officers who will be responsible for:

- liaising with the designated officer(s);
- taking part in the strategy discussion or initial evaluation;
- subsequently reviewing the progress of those cases in which there is a police investigation; and
- sharing information on completion of the investigation or any prosecution.

If the strategy discussion or initial assessment decides that a police investigation is required, the police should also set a target date for reviewing the progress of the investigation and consulting the *Crown Prosecution Service (CPS)* about whether to: charge the individual; continue to investigate; or close the investigation. Wherever possible, that review should take place no later than four weeks after the initial evaluation. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the meeting if the investigation continues.

Suspension

The possible risk of harm to children posed by an accused person should be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension should not be an automatic

response when an allegation is reported: all options to avoid suspension should be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the community or the teacher's family, those concerns should be reported to the designated officer(s), children's social care or the police as required. But suspension is highly unlikely to be justified on the basis of such concerns alone.

Suspension should be considered only in a case where there is cause to suspect a child or other children at the school or college is/are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person should not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college or until the allegation is resolved, and may wish to seek advice from their personnel adviser and the designated officer(s). In cases where the school or sixth form college is made aware that the Secretary of State has made an interim prohibition order in respect of an individual who works at the school or sixth form college, immediate action should be taken to ensure the individual does not carry out work in contravention of the order, i.e. pending the findings of the TRA investigation, the individual must not carry out teaching work.

The case manager should also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the designated officer(s), police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager should be as inventive as possible to avoid suspension.

Based on assessment of risk, the following alternatives should be considered by the case manager before suspending a member of staff:

- redeployment within the school or college so that the individual does not have direct contact with the child or children concerned;
- providing an assistant to be present when the individual has contact with children;
- redeploying to alternative work in the school or college so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted; or
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or college or work for the local authority or academy trust.

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

If immediate suspension is considered necessary, the rationale and justification for such a course of action should be agreed and recorded by both the case manager and the designated officer(s). This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not

acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the proprietor of the school, or governing bodies of the school or college who are the employers of staff at the school or college. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the designated officer(s) should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school or college consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment.

Information sharing

In a strategy discussion or the initial evaluation of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible the employer should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Children's social care services should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

Specific actions

Following a criminal investigation or a prosecution

The police should inform the employer and designated officer(s) immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after the person has been charged. In those circumstances, the designated officer(s) should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

On conclusion of a case

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the designated officer(s) should discuss with the case manager and their personnel adviser whether the school or college will decide

to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; and, in the case of a member of teaching staff at a school or sixth form college, whether to refer the matter to the TRA to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil or student at the school or college.

In respect of malicious or unsubstantiated allegations

If an allegation is determined to be unsubstantiated or malicious, the designated officer(s) should refer the matter to the children's social care services to determine whether the child concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the headteacher, principal or proprietor should consider whether any disciplinary action is appropriate against the pupil or student who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she were not a pupil or student.

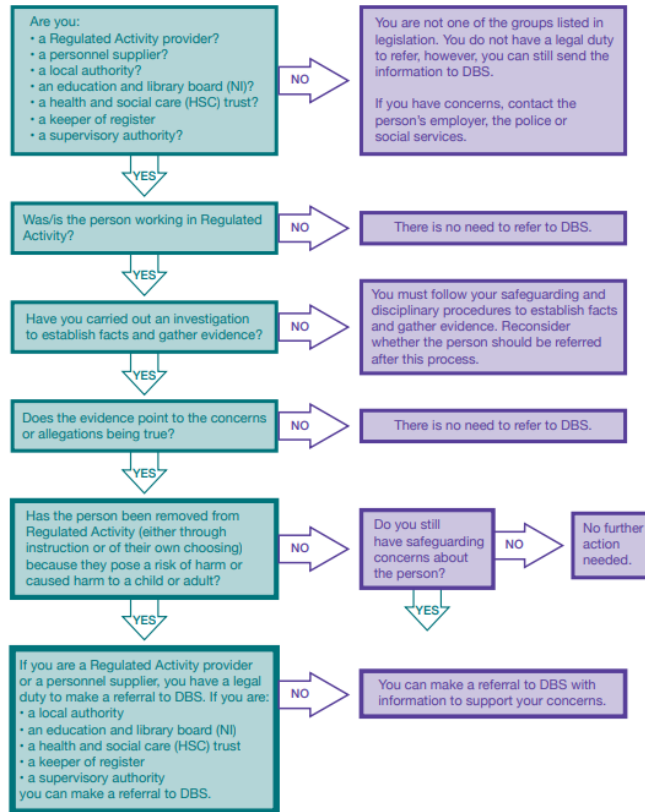
Learning lessons

At the conclusion of a case in which an allegation *is* substantiated, the designated officer(s) should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's or college's procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designated officer(s) and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

DBS Referrals Flowchart

Barring referral flow chart

We have put together the following flow chart to help you decide if it is appropriate to refer someone to us.



9.2 Allegations against other Children or Young People

Background

The new *'Keeping children safe in education'* statutory guidance says that 'governing bodies... should ensure that there are procedures in place to handle allegations against other children' (paragraph 40). Having such procedures is a new feature to this guidance. In most instances, the conduct of students towards each other will be covered by the school's behaviour policy. Some allegations may be of such a serious nature that they may raise safeguarding concerns.

These allegations are most likely to include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is also likely that incidents dealt with under this policy will involve older students and their behaviour towards younger students or those who are vulnerable. As the headteacher of a school for young people with social, emotional and behavioural difficulties, it wasn't unusual to admit students who had been within the youth justice system having committed criminal offences.

Students might be tagged or subjected to bail conditions or curfews. Young people such as these present risks to other students and thorough risk assessments are important. It is likely that allegations regarding these students would be covered by this policy.

Key Issues

- What are Safeguarding allegations?
- What steps should be taken?
- Who else should be informed?
- Should this safeguarding allegation trigger a social care referral?
- Should this safeguarding allegation trigger a police investigation?

At First Kicks Sports Ltd we believe that all children have a right to attend our clubs, sessions, matches and sports camps and learn in a safe environment. Children should be free from harm by adults in the sessions and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under our Managing Challenging Behaviour Policy (Appendix 6)

Safeguarding allegations

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that to be considered a safeguarding allegation against a pupil, some of the following features will be found.

The allegation:

- is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other pupils in the school
- indicates that other pupils may have been affected by this student
- indicates that young people outside the school may be affected by this student

Examples of safeguarding issues against a student could include:

Physical Abuse

- violence, particularly pre-planned
- forcing others to use drugs or alcohol

Emotional Abuse

- blackmail or extortion
- threats and intimidation

Sexual Abuse

- indecent exposure, indecent touching or serious sexual assaults
- forcing others to watch pornography or take part in sexting

Sexual Exploitation

- encouraging other children to attend inappropriate parties
- photographing or videoing other children performing indecent acts

In areas where gangs are prevalent, older students may attempt to recruit younger pupils using any or all of the above methods. Young people suffering from sexual exploitation themselves may be forced to recruit other young people under threat of violence.

Minimising the risk of safeguarding concerns towards pupils from other students

On occasion, some students will present a safeguarding risk to other students. The school should be informed that the young person raises safeguarding concerns, for example, they are coming back into school following a period in custody or they have experienced serious abuse themselves. These students will need an individual risk management plan to ensure that other pupils are kept safe and they themselves are not laid open to malicious allegations. There is a need to balance the tension between privacy and safeguarding.

What to do

When an allegation is made by a pupil against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed.

A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

The DSL should contact social services to discuss the case. It is possible that social services are already aware of safeguarding concerns around this young person.

The DSL will follow through the outcomes of the discussion and make a social services referral where appropriate.

The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both pupils' files.

If the allegation indicates a potential criminal offence has taken place, the police should be contacted at the earliest opportunity and parents informed (of both the student being complained about and the alleged victim).

It may be appropriate to exclude the pupil being complained about for a period of time according to the school's behaviour policy and procedures.

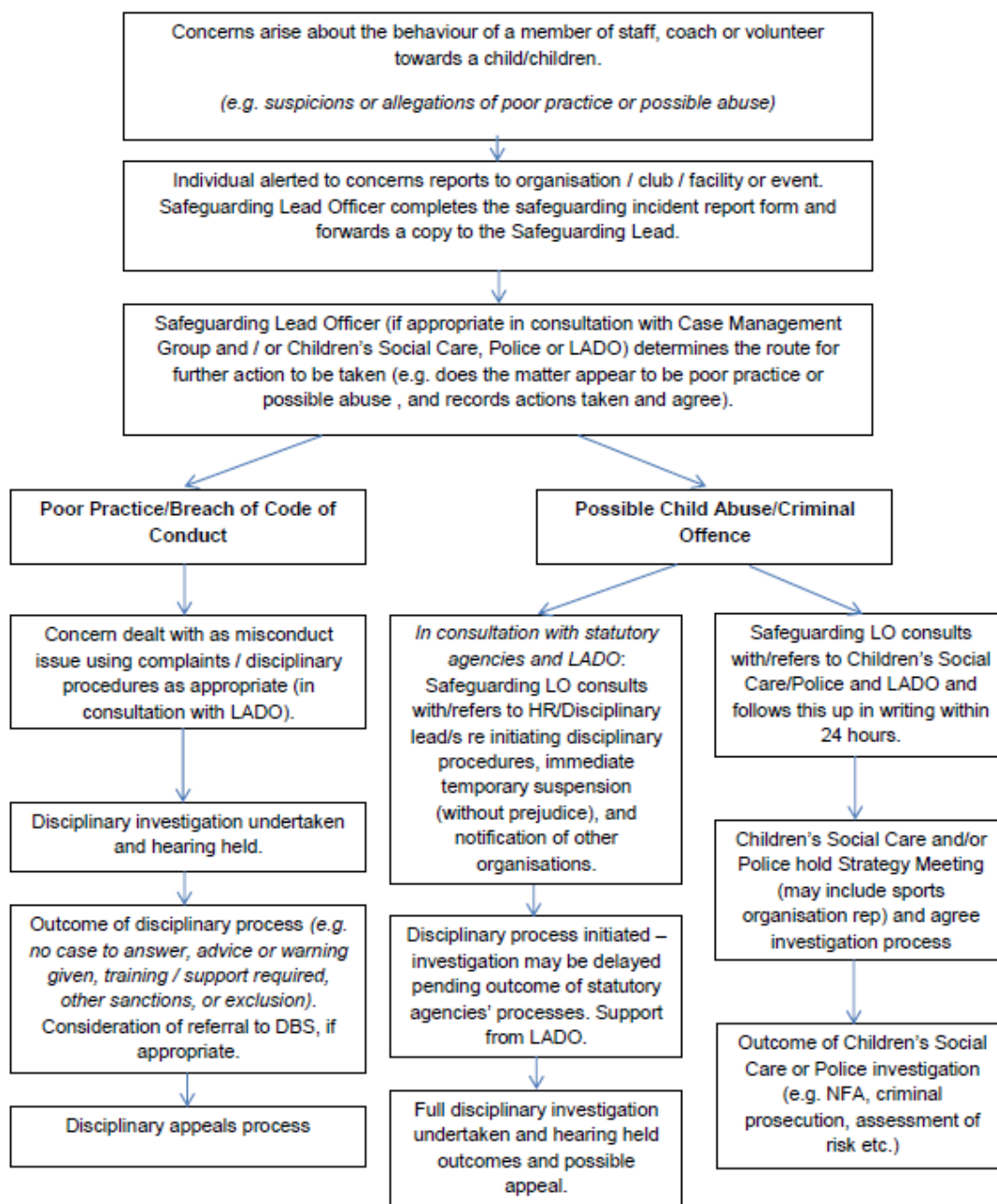
Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.

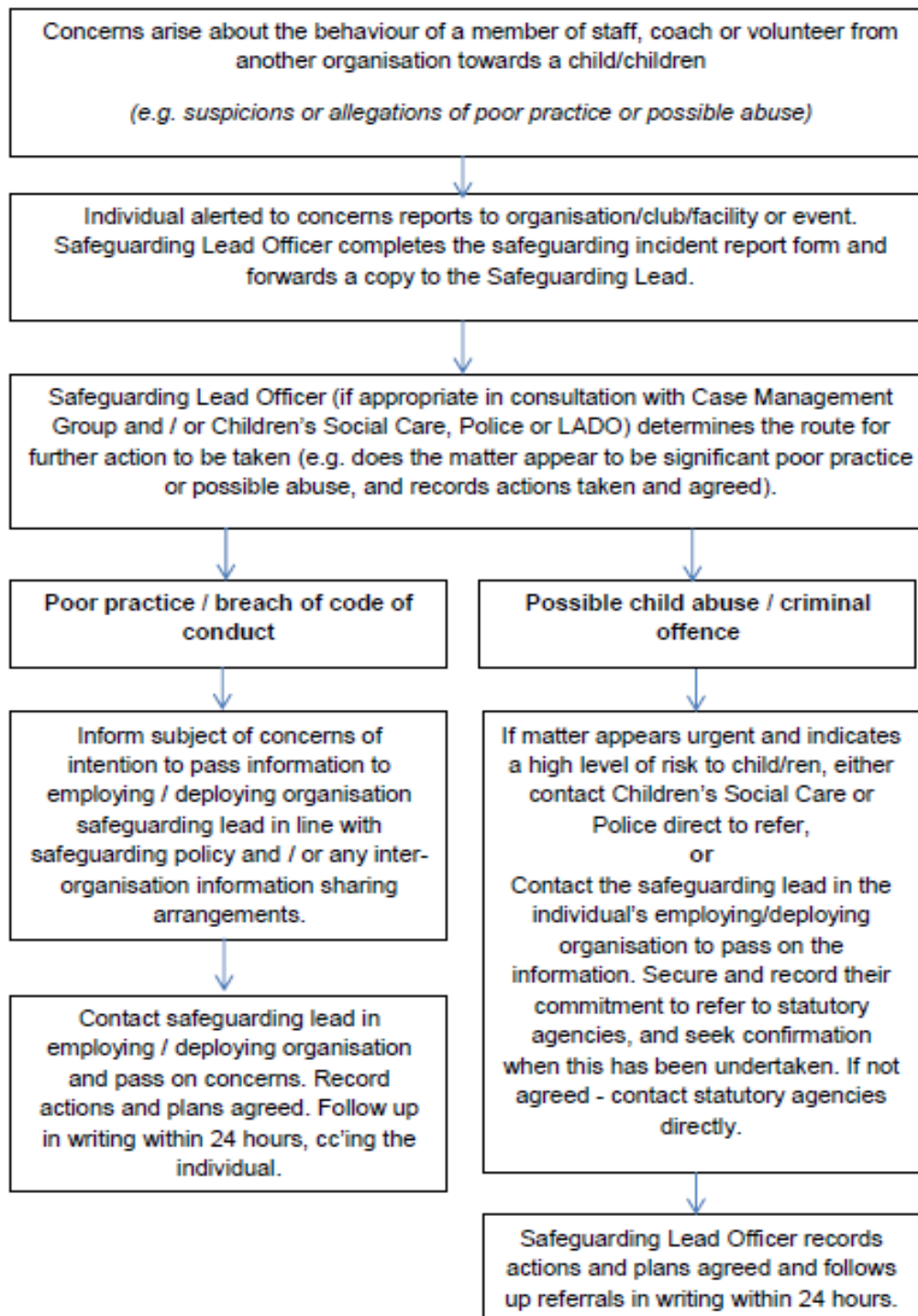
The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

Reporting Flowcharts

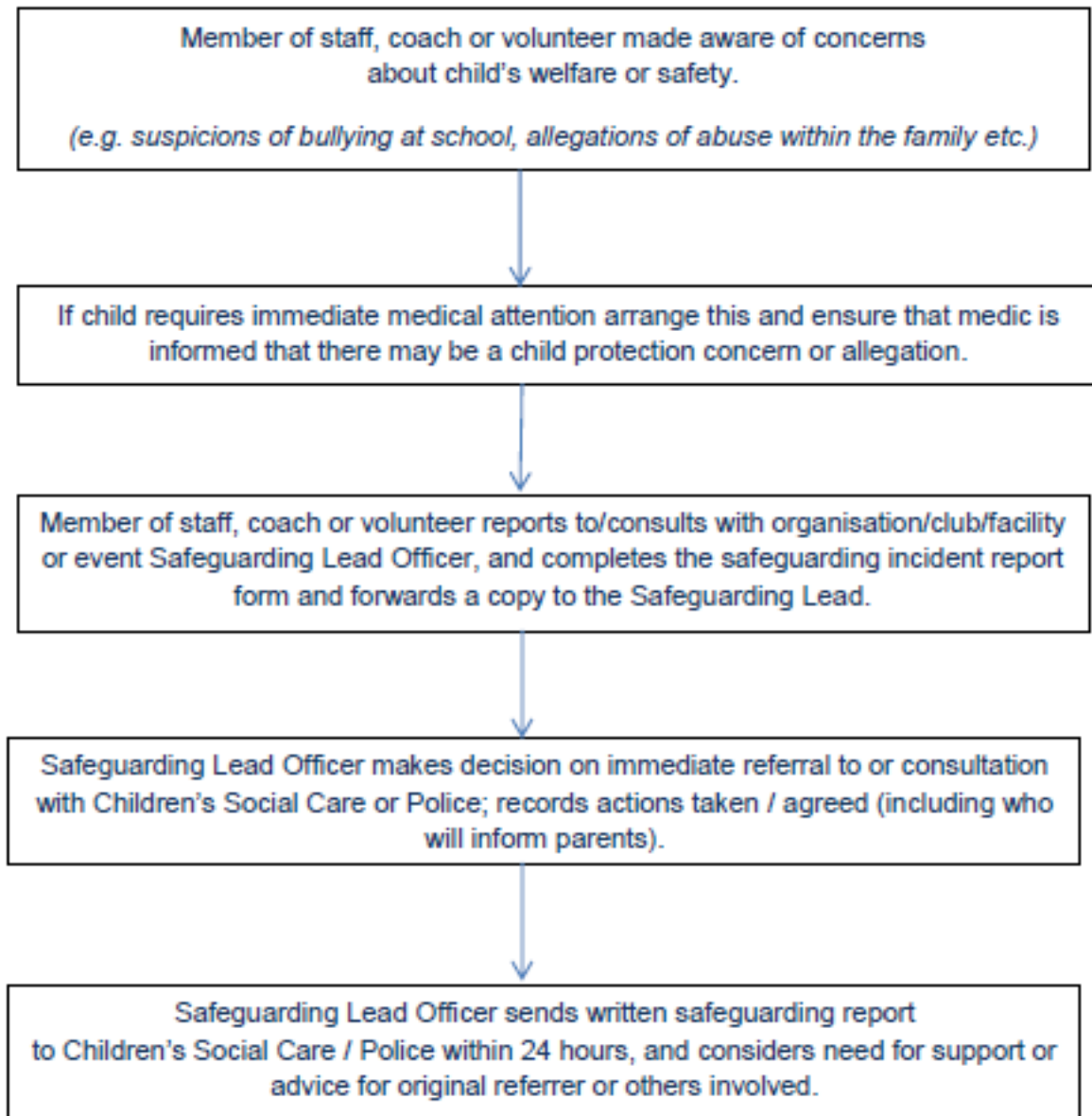
Safeguarding Reporting Procedure Concerns – about the behaviour of the our organisations staff member or volunteer (e.g. allegation about a coach or officer's behaviour towards a child)..



Safeguarding Reporting Procedure Concerns – about the behaviour of the another organisations staff member or volunteer (e.g. allegations reported about an individual working for a partner organisation)..



Safeguarding Reporting Procedure Concerns – about children and young people arising outside of sport (e.g. at home, school or in the community)..



9.3 Incidents; Accidents; Injuries & Medical Emergencies

First Kicks Sports Ltd's coaches are aware of our Reporting Procedure, for *Accidents; Injuries & Medical Emergencies*, as follows..

Calmly assess the situation



Provide First Aid and/or Seek medical attention for the person if needed



Immediately inform

1) Medical staff / School Admin Team onsite and

2) First Kick's Sports DSL Designated Safeguarding Lead Officer or Deputy DSL



Complete the Forms

1) Accident Record and

2) Accident Tracking Form or

3) Incident Form

And Provide Copies to First Kicks Sports Ltd DSL Designated Safeguarding Lead Officer




Discuss with Parents/Carers of child

Or with vulnerable person and ask them to sign the Accident/Incident Record Form

(Also see DSL Designated Safeguarding Lead)

First Kicks Sports Ltd use the following FORMS for reporting Incidents; Accidents; Injuries or Medical Emergencies..

Head Injury Form



**Out of School Club
Head Injury Notification**

Dear Parent or Carer,

..... bumped his/her head at the club today.

Today's date:

Time that the injury occurred:

Approximate location of bump:


Although your child seems well at the moment, in any case of head injury the condition of the child may become more serious at any time, particularly in the first 48 hours. You should therefore keep watch for any of the following signs which may be important:

- Increasing drowsiness or actual unconsciousness which can be detected by you being unable to rouse the child
- A headache which becomes more severe
- Repeated vomiting or nausea
- Dizziness
- Any weakness of arm or leg
- Disturbed vision (eg. loss of focus/double vision)
- Sensitivity to bright light
- Any change in the child's condition which you are not satisfied with, such as restlessness, irritability, loss of concentration, increasing loss of memory.

If you notice any of these signs there is no need for alarm but you must seek medical advice AT ONCE. Contact your GP or seek help from your local Accident and Emergency Department.

Accident Record Form

**Out of School Club
Accident Record**



Accident tracking no:

Record completed by: Name:		Person who had the accident: Name:	
Address:		Address:	
Job title:	Postcode:	Tel:	Postcode:
Details of accident: Date:		Time:	
Where did the accident occur?			
Describe the events:			
Witnesses:			
Injuries suffered:			
Actions taken or treatment given:			

(In the event of a head injury, review the child's condition after 15 minutes and then continue to review at 15 minute intervals (if you have any concerns.)

Record completed by: (Signature)


Record read by: (Signature of parent or carer)

Date:

This form should be filed with individual child records

Incident Record Form

**After School Club
Incident Record**



Record completed by: Name:		Person involved in incident: Name:	
Address:		Address:	
Job title:	Postcode:	Tel:	Postcode:
Details of incident: Date:		Time:	
Where did the incident occur?			
Describe the events:			
Witnesses:			
Other comments:			
What actions were taken?			

Record completed by: (Signature)

Record read by: (Signature of parent or carer)

Date:

This form should be filed with individual child records

First Kicks Sports Ltd should be alerted to a participant's Pre-existing Medical Issues; Injuries or Allergies at the point of registration:-

Accident Tracking Form

**Out of School Club
Accident Tracking**




Tracking the cause or location of an accident can help to reduce the risk of similar incidents occurring in the future.

Accident tracking no.	Date	Injury sustained	Location and/or equipment involved

Permission to Administer Medicine Form

**Out of School Club
Permission to administer medicine form**



Child's name:		Date of birth:
Child's address:		
Parent's contact no:		
Doctor's name:		Telephone no:
Address of surgery:		
Reason for medicine:		
Name of medicine:		Storage requirements:
Dosage:		
Times to be administered:		

I give permission for medicine to be given to my child in accordance with the details above.

Parent's signature:

Parent's name:

Date:

- Staff at the **Out of School Club** will only be permitted to administer medication to your child if you complete and return this form.
- Under no circumstances will members of staff administer medication against the will of a child.
- Note that we can only administer medication containing aspirin if prescribed by a doctor.

If you have any concerns or questions, please contact the **Out of School Club** manager.

Allergy List Form



Out of School Club Allergy List

Attach photo here	Child's name: Allergic to:	Attach photo here	Child's name: Allergic to:
Attach photo here	Child's name: Allergic to:	Attach photo here	Child's name: Allergic to:
Attach photo here	Child's name: Allergic to:	Attach photo here	Child's name: Allergic to:
Attach photo here	Child's name: Allergic to:	Attach photo here	Child's name: Allergic to:
Attach photo here	Child's name: Allergic to:	Attach photo here	Child's name: Allergic to:

Allergy Management Plan Form



Out of School Club Allergy Management Plan

Child's name: Address: Date of birth:	Attach photo here
Doctor's name: Doctor's address:	
Allergy to / triggered by?	
Reactions/symptoms include:	
Treatment:	
Medicine form attached? Yes <input type="checkbox"/> No <input type="checkbox"/> (tick as appropriate)	
Parent / Carer's name: Contact details:	

Pre-existing Injuries Form

Medical Form



After School Club

Record of injuries sustained before coming to club



Record completed by:	Name of child:
Job title:	
Date and time injury identified:	
Please give a brief description of the nature of injury and the explanation given for the cause:	
Record completed by: (Signature)	Record read by: (Signature of parent or carer)
Date:	Date:

Out of School Club Medical Form



Child's name:	Date of birth:
Doctor:	
Doctor's address:	
Doctor's telephone:	
Does your child or the child in your care have any known medical problems or additional needs? (Please list)	
Please detail any medical needs your child has/medication taken: (please provide full details, if medication is needed an additional medication consent form will need to be completed)	
Does your child have any known allergies? (an Allergy Management Plan will be put in place where required)	
Does your child have any dietary requirements?	
Any other information relevant to your child's health	
Parent/Carer emergency contact telephone numbers:	

In the event that my child is involved in a serious accident I expect to be contacted immediately on the above telephone numbers.

In the event that my child requires immediate medical treatment before I can get to the hospital I hereby authorise the staff member present to consent to any emergency medical treatment necessary to ensure the health and safety of my child on my behalf.

Signed:

Date:

Registration Form (After-School Clubs)

Tick if EYFS child



Out of School Club Registration Form

Child's Details Date of Registration:

First name:	Surname:	What s/he likes to be called:
Date of birth and current age:	School attended: First language:	Name of key person:

Parent/Guardian details

Title:	First name:	Surname	Title:	First name:	Surname
Home address:			Home address (if different):		
Does this child normally live at this address? Yes / No			Does this child normally live at this address? Yes / No		
Work address:			Work address:		
Home number:	Mobile number:	Work number:	Home number:	Mobile number:	Work number:
Email address:			Email address:		
Does this person have parental responsibility? Yes / No			Does this person have parental responsibility? Yes / No		
Does anyone else have parental responsibility for this child? Yes / No (if yes, please provide details overleaf.)					

Emergency Contact Details (please provide details of two people we can contact if we are unable to get hold of you)

Name:	Telephone number:	Mobile number:
Address:		Relationship to the child:
Name:	Telephone number:	Mobile number:
Address:		Relationship to the child:

Child's Doctor

Name of Doctor:	
Address:	Telephone:

About your child

Please detail any additional/special needs your child has: (please provide full details)

Please detail any dietary requirements / food allergies for your child: (please provide full details)

Is there anything your child doesn't like (food, games etc) or is scared of?

What are your child's favourite activities?

Signature of Parent/Carer _____ Date: _____

Registration Form (Holiday Camps)

First Kicks Sports Ltd Summer Camp Proposal 2018

Example Registration Form

First Kicks Summer Camp Registration Form

Name of child: _____
 School: _____
 Date of birth: _____

Please tick the dates your child will be attending the Summer Camp. Children must sign up for at least 3 days over the two weeks (they do not need to be consecutive days).

Week 1

Monday 1st	Tuesday 2nd	Wednesday 3rd	Thursday 4th	Friday 5th

Please tick one:

My child will be collected by an adult from the Summer Camp

Please list the names and contact numbers of adults your child can be picked up by. We will only allow your children to go with these named adults.

Name of adult/relationship to the child	Contact Number

My child is allowed to walk home alone after the Summer Camp

Please fill in the details as accurately, and in as much detail, as possible.

Child's Details	
Child's Full Name	
Child's DOB	
Male or Female	
Address	

First Kicks Sports Ltd Summer Camp Proposal 2018

Postcode	
Telephone number	
Email	
School	
Medical Information	
Does your child have any disabilities we need to be aware of? If yes, please outline the support they require.	Yes No
Does your child have any medical issues we need to know about. If yes, please outline the support and/or medication they require.	Yes No
Does your child have asthma?	Yes No
Does your child have any allergies? If yes please outline.	Yes No

If your child has asthma they must be provided with an asthma pump.
 If your child requires medication for their allergy this must be provided in a labelled bag.

EMERGENCY CONTACTS			
	Name	Relationship to the child	Contact number
Contact 1			
Contact 2			
Contact 3			

Agreement (Please Tick)

I will ensure my child attends the Summer Camp on the days I have stated and is on time. I understand that if my child arrives late their place may be taken. If they are consistently picked up late they may not be able to continue attending.

I will ensure the correct payment has been made. (Failure to do so will result in your child being unable to attend.)

I will ensure that my child is provided with a suitable packed lunch and a bottle of water.

I understand that if my child's behaviour is unsatisfactory, or they do not listen to the coaches, they may not be able to continue attending.

I allow photographs of my child to be taken strictly for the use of First Kicks Ltd. Promotion.

I understand that once payment has been made there will be no refunds. (If your child is ill they will be allowed to come another day)

I allow First Kicks staff to administer first aid to my child and make medical decisions in my absence (We will always contact parents should a medical situation arise). Please ensure you save our number upon arrival and always answer the phone.

Signed _____

Printed Name _____

Relationship to the child _____

Date _____

First Aid Training

All First Kicks Sports Ltd's Coaches are expected to have basic knowledge of First Aid, for those who need training, we provide a recommended CPD provider, [HighSpeed Training](#).

9.4 Whistleblowing & Complaints

Whistleblowing

Safeguarding children, young people and adults at risk requires everyone to be committed to the highest possible standards of openness, integrity and accountability.

We are committed to encouraging and maintaining a culture where people feel able to raise a genuine safeguarding concern and are confident that it will be taken seriously.

You may be the first to recognise that something is wrong but feel that you cannot express your concerns as this may be disloyal to your colleagues or you may be concerned that you will be the victim of harassment or victimisation as a result.

Children, Young People and Adults at risk need someone like you to safeguard their welfare.

What is whistle blowing?

In the context of safeguarding, "whistle blowing" is when someone raises a concern about the well-being of a child or an adult at risk.

A whistle blower may be:

- a player;
- a volunteer;
- a coach;
- other member of staff/sponsor/supporter;
- an official;

- a parent;
- a member of the public

Reasons for whistle blowing:

Those involved in the championship must acknowledge their individual responsibilities and bring matters of concern to the attention of the relevant people and/or agencies. Although this can be difficult it is particularly important where the welfare of children may be at risk.

Each individual has a responsibility for raising concerns about unacceptable practice or behaviour:

- To protect or reduce risk to others
- To prevent a problem from becoming worse or more widespread
- To prevent becoming implicated yourself

What prevents those individuals from whistle blowing:

- Starting a chain of events that they have no control of
- Disrupting work or training
- Fear of getting it wrong or making a mistake
- Fear of repercussions
- Fear of damaging careers
- Fear of not being believed

If a child or an adult at risk is in immediate danger or risk of harm, the police should be contacted by calling 999.

Where a child or an adult at risk is not in immediate danger the first person you should report your suspicion or allegation to *The DSL Designated Safeguarding Officer or Deputy at First Kicks Sports Ltd.* Alternatively you can contact the Local Authority Designated Officer (LADO) or the NSPCC on 0808 800 5000. (*See DSL Contact Information*)

Information to include when raising a concern

The whistle blower should provide as much information as possible regarding the incident or circumstance which has given rise to the concern, including:

- their name and contact details (unless they wish to remain anonymous);
- names of individuals involved;
- date, time and location of incident/circumstance; and
- whether any witnesses were present

First Kicks Sports Ltd assures that all involved will be treated fairly and that all concerns will be properly considered. In cases where suspicions prove to be unfounded, no action will be taken against those who report their concerns, provided they acted in good faith and without malicious intent.

What happens next?

- You should be given information on the nature and progress of any enquiries – this may vary depending on the nature and result of the investigations.
- All concerns will be treated in confidence. During the process of investigating the matter, every effort will be made to keep the identity of those raising the concern to the minimum number of individuals practicable.
- No action will be taken against you if the concern proves to be unfounded and was raised in good faith
- Malicious allegations may be considered a disciplinary offence

The Public Interest Disclosure Act 1998 protects whistle blowers from victimisation, discipline or dismissal where they raise genuine concerns of misconduct or malpractice. If the whistle blower does not believe that the concern has been dealt with appropriately and wishes to speak to someone outside the organisation, the NSPCC Whistleblowing advice line should be contacted on 0800 028 0285 or by emailing help@nspcc.org.uk

Complaints

This procedure applies to all children, young people and adults who participate in or have contact with any *First Kicks Sports Ltd* activity or service.

It is not intended to be used by staff or volunteers who are unhappy about their own experience in the workplace. In these circumstances, staff should use the *grievance policy and procedures*.

It is also not intended to cover concerns that a staff or volunteer may have about issues of possible malpractice or misconduct in the workplace. These should be dealt with under the *Whistle-Blowing section above*.

If anyone, whether a staff member, volunteer, child/young person or adult is concerned that a safeguarding issue has happened and some is at risk of harm, they should refer to the [First Kicks Sports Ltd Reporting & Responding section of this Policy – Section 10.0](#).

We will seek to deal with complaints by:

- Defining clearly what we mean by a complaint
- Setting out a procedure that can easily followed and understood
- Making sure that everyone knows about the policy and procedure
- Producing child, young people and adult friendly material explaining this policy and procedure
- Reassuring people that they will not be penalised in any way for using the complaints procedure and that we will respond positively to any complaints made in good faith

- Offering extra support to those who may need help making a complaint
- Taking a staged approach to complaints that takes into account the level of seriousness and the possibility of resolution at different points
- Investigating each complaint as objectively and fully as we reasonably can
- Keeping the complainant informed during the course of the investigation and of the outcome of his/her complaint
- Keeping clear records of complaints and how they were resolved

Complaints procedure

What do you mean by a complaint?

A complaint is a statement from someone that he/she is not happy about the service provided to him/her by *First Kicks Sports Ltd* and would like this improved:

The complaint might be about:

- The behaviour of a staff member or volunteer
- The behaviour of other service users
- The level of service received
- The type of service received
- Being refused a service altogether
- Written information
- Service received over the telephone
- A person feeling that they have been treated unfairly or in a way that is discriminatory
- Anything else related to the service provided by *First Kicks Sports Ltd*

Procedure for making a complaint

1. If possible, the person should discuss the complaint with their contact at *First Kicks Sports Ltd*
2. The *First Kicks Sports Ltd* contact will, in the first instance, try to resolve the matter informally. This is often possible and can mean that the problem is sorted out simply and quickly
3. If an informal solution has been tried before and has not worked, or if the complainant does not feel that informal discussions are adequate or likely to be effective, stage one of the complaints procedure should be followed.
4. The complainant should put their concerns in writing to the relevant staff member at *First Kicks Sports Ltd*, if the staff member is the subject of the complaint, to the staff member's manager. If he/she needs help to do this, and someone is not able to offer this support, help should be provided by the staff member, or, if the staff member is the subject of the complaint, by another member of staff identified by the manager.
5. The member of staff should give the written complaint to the manager within 24 hours.

The manager should then acknowledge the complaint within two working days by sending a brief letter to:

- Thank the complainant for getting in touch
 - Express regret that a complaint has been necessary
 - Assure him/her that the matter will be investigated
 - Set a provisional timescale for the investigation that is achievable but avoids delay as much as possible
 - Explain when the manager will next be in contact
 - Offer a contact in case the complainant has any questions in the meantime
 - Make any temporary arrangements that may be necessary pending the outcome of the investigation into the complaint.
6. Normal service to the complainant should continue during the investigation into the complaint. (i.e. a participant in an activity should be allowed to continue in other activities) If this is not possible then this should be acknowledged.
7. If the complaint is about a specific member of staff, volunteer or other person, then that person should be informed within two working days (or as soon as possible) that a complaint has been made against him/her and the nature of the complaint. However, the person should not be informed if doing so would compromise anyone's safety or a police investigation.
8. The manager should normally be responsible for the investigating a stage one complaint. The manager should plan the investigation according to the nature of the complaint, taking into account any witnesses or specialist opinion that should be sought. As a minimum, the complainant where possible (and parent/carer if needed) should be interviewed. Any person who might be subject of the complaint should also be interviewed, provided that doing so would not compromise anyone's safety or a police investigation.
9. If the complaint is about access to a service, the reasoning behind a decision to offer or not offer a particular service should be examined.

10. Safer Recruitment & Vetting/DBS Checks

Safe recruitment

First kicks Sports Ltd ensures safe recruitment through the following processes (in brief):

- Providing the following safeguarding statement in recruitment adverts or application details – 'recruitment is done in line with safe recruitment practices.'
- Job or role descriptions for all roles involving contact with children and / or vulnerable adults will contain reference to safeguarding responsibilities.
- There are person specifications for roles which contain a statement on core competency with regard to child/vulnerable adult protection/ safeguarding.

- Shortlisting is based on formal application processes/forms and not on provision of CVs.
- Interviews are conducted according to equal opportunity principles and interview questions are based on the relevant job description and person specification.
- CRB/DBS checks will be conducted for specific roles for all staff (paid or unpaid) working with children and vulnerable adults. Portable/ carry over CRB/DBS checks from another employer will not be deemed to be sufficient. It is a criminal offence for individuals barred by the ISA to work or apply to work with children or vulnerable adults in a wide range of posts.
- No formal job offers are made until after checks for suitability are completed (including CRB/DBS and 2 references).

The 'Child Protection in Sport Unit' advises the following:

Sport relies on thousands of well-motivated staff and volunteers without whom most clubs, activities and events would not exist. Safe recruitment and selection procedures help to ensure a safe workforce by deterring and screening out unsuitable individuals. This briefing outlines the key steps in a safe recruitment process.

Effective recruitment and selection procedures benefit everyone:

- Staff and volunteers have clearly defined roles and responsibilities
- Parents/carers are assured that measures are taken to recruit only suitable people to work with children
- Organisations reduce the risk to their reputation.

The same procedures should be adopted whether staff is paid or unpaid, full or part-time.

Key safe recruitment steps for each post:

Job Role/Job Description

- Describes the full range of tasks, duties and responsibilities of the role and helps everyone to understand the extent and nature of the role Person Specification
- Describes the type of skills, experience and attributes required for this role (e.g. specific experience, sports or other qualifications, and other requirements, such effective communication with children). Job/Role Advert
- Involves advertising or promoting paid jobs or volunteer roles to attract the widest response and demonstrate an open recruitment process. This could be through: the club or sport's newsletters or notice boards (including online); in local papers; local newsagents; church bulletins; etc. Indicate that the post involves working with children, and (if appropriate) that a criminal records check will be undertaken.

Application Form

- Require all applicants to complete an application form. Many sports governing bodies (NGBs), County Sports Partnerships (CSPs) and Local Authorities (LAs) have developed standard application forms that include all relevant questions – affiliated clubs or organisations should use these. A copy of this form should be retained by the local club/organisation to inform a subsequent interview/meeting with the candidate and identify any gaps in the employment/volunteering history.
- For eligible posts this form should include (or link to) a section allowing the individual to self-declare relevant convictions or information and give their consent for a criminal records check to be undertaken. Further information, CPSU has developed Self-declaration template for sport. The form should state that failure to disclose information may result in their exclusion from the club, organisation or event. It should capture relevant information about the person's experience, qualifications and employment history (paid and voluntary).

Self Declaration

Self-declaration doesn't replace the need for a DBS disclosure check for eligible roles, but can provide additional information that a DBS check will not.

Self-declaration can be part of an organisation's safer recruitment process. It involves requiring an individual to provide information to be used as part of a decision on their suitability for a particular role with children. Some organisations use a separate self-declaration form, while others embed self-declaration questions within their overall application form.

Benefits of self-declaration:

- providing a means to test the openness/honesty of a candidate (particularly when information provided is matched against DBS disclosure information)
- allowing relevant questions about an applicant's background/experience that do not feature in the DBS process
- facilitating the applicant to sign to confirm a wider range of consents/agreements than a DBS application form (e.g. a commitment to inform the employer if the individual is subsequently arrested/investigated in relation to safeguarding concerns; agreement to comply with safeguarding policies and a code of conduct)
- clarifying that consent is given to the organisation taking steps to clarify information arising on a DBS disclosure
- confirming understanding that the organisation may share information with other organisations if this is considered necessary to safeguard children

Written References

- Obtain at least two written references, preferably including their last employer (paid role) or deployer (voluntary role). Include someone who can comment on the applicant's previous work with children. Ideally, references should be sought on all short-listed candidates and obtained before interview. Ideally referees should be contacted directly e.g. by phone.
- Guidance should clarify where responsibility for this task lies (e.g. at local/club level or at NGB/organisational level).

- Take care to ensure that information from all sources is provided to those with responsibility for making a decision on the individual's suitability for the role.

Risk Assess Information

- Establish a case management group or other system to risk assess information returned from any of the above sources – do not employ or deploy the individual until this is complete. Risk assessments of any concerning information arising during the recruitment process should be undertaken by an appropriately experienced/trained individual, for example chaired by the person with lead safeguarding responsibilities.

Interview

- Ensure staff or volunteers undertake an interview or have a meeting with at least two representatives of the organisation.
- Check out any gaps in the application form and ensure the applicant has the ability and commitment to meet the standards required to adhere to the safeguarding policy.
- You may want to explore the applicant's attitude to power, authority and discipline, and ask for a response to a problem faced in your club/organisation to assess their commitment to promoting good practice and their ability to communicate with children and young people

Identity and Qualification Checks

- Take steps to confirm the candidate's identity (e.g. request photographic identification), qualifications, experience and right to work in the UK. Clarify any apparent gaps in employment.

Criminal Records Checks

- The organisation should have and follow clear guidelines to establish which roles are eligible for criminal records checks, and ensure that applicants for eligible posts are required to comply. Information about previous criminal convictions or other concerns should be risk assessed as above.
- The organisation carries out relevant checks where required for applicants who have lived/ worked overseas for 6 months or longer.

Probationary/Trial Period

- Set a probationary/trial period (usually 6 months) and review the post holder's performance against the job description after this time.
- Ensure all appointments are made by the Executive Committee and not by any individual member/s of the organisation/club.

Induction

- Ensure that all new recruits go through an induction process as soon as possible (this introduces them to all important aspects of their new environment) so that they are familiar with the club/organisation or event's safeguarding policies and procedures and the responsibilities of the post.
- Require new recruits to be familiar with and sign up to the club/organisation's constitution and rules and any guidelines, codes of conduct, regulations and policies of that club, sport or event.
- Require all new recruits to register as a member of the club if not already a member.
- Establish what training would be useful/required for the new recruit, based on their role and experience. Ensure that all new recruits have either recently undertaken adequate safeguarding training (if appropriate in line with any relevant NGB requirements) or now do so as soon as possible and no later than six months after taking up their post.

Criminal Bureau Records Gap Management

The organisation commits resources to providing Criminal Bureau Records check on staff (paid or unpaid) whose roles involve contact with children and /or vulnerable adults. In order to avoid CRB/DBS gaps, the organisation will maintain and review a list of roles across the organisation which involve contact with children/ vulnerable adults. In addition to checks on recruitment for roles involving contact with children/ vulnerable adults, for established staff the following processes are in place.

First Kicks Sports Ltd will ensure that their established staff and roles are regularly reviewed using:

- A 3-year rolling programme of re-checking CRB/DBS's is in place for holders of all identified posts.
- Existing staff (paid or unpaid) who transfer from a role which does not require a CRB/DBS check to one which involves contact with children / vulnerable adults will be subject to a CRB/DBS check.

Service delivery of contracting and sub-contracting

- There will be systematic checking of safeguarding arrangements of partner organisations
- Safeguarding will be a fixed agenda item on any partnership reporting meetings.
- Contracts and memorandums of agreement for partnership delivery work will include clear minimum requirements, arrangements for safeguarding and non-compliance procedures.

See our Reporting Flowcharts under section 9.2. [Allegations against First Kicks Staff/Coaches or School Staff – Safeguarding Reporting Procedure Concerns](#) – about the behaviour of the another organisations staff member or volunteer (e.g. allegations reported about an individual working for a partner organisation).

First Kicks Sports Ltd commits resources for induction, training of staff (paid and unpaid), effective communications and support mechanisms in relation to Safeguarding.

Induction will include:

- Discussion of the Safeguarding Policy (and confirmation of understanding)

- Discussion of other relevant policies
- Ensure familiarity with reporting processes, the roles of line manager and Designated Senior Manager (and who acts in their absence)
- Initial training on safeguarding including: safe working practices, safe recruitment, understanding child protection and the alert guide for adult safeguarding

Safer recruitment of coaches/staff from overseas

Many sports have well-established systems for appointing coaches and other staff from outside the UK in a range of roles in this country. These individuals often play a vital role in the development of their sport – often at an elite level.

However, enthusiasm to secure the services of top class sports technicians should not impact on the organisation’s existing safer recruitment practice. It is important that recruiters address safeguarding elements, despite the challenges that may arise in these circumstances.

This outlines our key safer recruitment responsibilities.

Safer Recruitment – the basics - A safer recruitment process includes:

- a clear job description (what the post holder will do)
- a person specification (what skills and qualities are required for the role)
- an application form to elicit key information (including a full employment history and an explanation for any gaps)
- identity verification
- an interview process
- references - both professional and personal
- criminal records checks (where role/post is eligible)
- sign up to the organisation’s safeguarding policy and codes of conduct.

Overseas applicants – additional challenges

Most of this process can be undertaken regardless of where the applicant originates from. However, there are a number of differences and challenges when considering an applicant from outside the UK.

Technical qualifications

There may be issues about the equivalence of sports qualifications, and difficulties in communicating with both sports and statutory bodies abroad.

Right to work checks

Employers must prevent illegal working in the UK by carrying out document checks on people before employing them to make sure they are allowed to work. More information about Right to Work checks, can be found at: <https://www.gov.uk/government/publications/right-to-work-checks-employers-guide>

We provide our clients with a 'Pre-employment Check' Document, which is updated each time a new staff member attends the school. This details the full name, DBS number and DBS valid from date.

Criminal Records Checks

The most significant challenges often arise when considering overseas applicants for roles that are eligible for criminal records checks. These include:

- the absence of equivalent systems for holding and sharing criminal records information
- variations in the reliability of information, and in its availability to UK agencies
- differences in criminal legislation, definitions and thresholds
- variations in data protection and data sharing standards and arrangements.

There is no direct equivalent elsewhere to the UK's criminal records checking system. However, the UK government has established, or is working to establish, arrangements with a growing number of countries to facilitate information exchange about individuals. What information is available, and how it may be obtained, is different for each country.

More information about how to apply for information about overseas applicants can be found on one of these websites:

- Disclosure and Barring Scheme - DBS (formally CRB) (England and Wales)
- Disclosure Scotland (Scotland)
- AccessNI (Northern Ireland) Undertake a criminal records check (where the post or role entitles you to do so) as this will cover any period (or periods) an individual has been resident in the UK, and in a small number of cases will facilitate a check on criminal records information from overseas which is held by the DBS.

Top tips in recruiting from overseas

Criminal records checks represent just one element of a sound recruitment process, and sports organisations considering applicants from overseas are also recommended to:

- take robust steps to verify the applicant's identity (guidance is available through the respective Home Country disclosure service websites) and legal entitlement to work
- seek out and follow guidance about accessing criminal records or equivalent information and checks from the relevant country (where the role or post is eligible). See Criminal records checks for overseas applicants for more information.
- contact the applicant's home sports governing body or federation to establish currency and validity of qualifications, and establish if any safeguarding concerns or complaints have arisen and if disciplinary action was taken
- seek and follow up written references including those from the applicant's last employer and from someone able to comment on the applicant's experience in working with children or young people

- ensure that the individual is provided with a thorough induction process that establishes their level of safeguarding awareness and experience, and includes familiarization with the organisation’s safeguarding policies, procedures and practices
- If it is not possible to check an individual to the level required for UK applicants, the organisation should establish additional safeguards. These may include:
 - additional supervision or monitoring by staff who have been appropriately vetted
 - updated safeguarding training
 - taking particular care to explain the required standards of behaviour (there may be significant differences from one country to another about what are considered acceptable ways to relate to and deal with children); and so on.

First Kicks Sports Ltd are ‘verified checkers’ of the DBS / Barring System and we use First Advantage Online Disclosures to manage our DBS Applications. <https://fadv.onlinedisclosures.co.uk>



These are the types of checks available to those working with children:

Type of Check	What the check involves	Positions eligible for this level of check
<i>Standard Check</i>	Check of Police National computer records of convictions, cautions, reprimands and warnings.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exemptions) Order 1975.
<i>Enhanced Check</i>	Check of the Police National Computer records plus additional information held by police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exemptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002.
<i>Enhanced criminal record check with children’s and / or adult’s barred list information</i>	Check of the Police National Computer records plus additional check of the DBS	The position must be eligible for an enhanced level criminal record check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check.

First Kicks Sports Ltd always apply for Enhanced Criminal Record Checks, showing any disclosures on the DBS Children's Barred List. We periodically review expiry dates of our coaches' certificates and prompt them for renewal at least 6 weeks prior to expiry to ensure sufficient time for the renewed application, not allowing for any over-lap.

All Coaches are required to have on their person for every session, match, or Holiday Camp, their original DBS Certificate and Photo ID.

Vetting and Barring Checks

Keeping Children Safe in Education sets out the required checks:

For most appointments, an enhanced DBS certificate, which includes barred list information, will be required as the majority of staff will be engaging in regulated activity. In summary, a person will be considered to be engaging in regulated activity if as a result of their work they: will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children; or will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; engage in intimate or personal care or overnight activity, even if this happens only once.

Checks on Volunteers

Although many schools and authorities have been doing this for some time, the expectation of vetting checks for volunteers has been clarified: volunteers may have Enhanced checks, but not barred list checks.

DBS Update Service

Joining the DBS Update service allows for vetting checks to have 'portability', that is say be taken from one employer to another, as long as the person has registered with the update service at the point the check was received or within 19 days of receiving it.

Keeping Children Safe in Education states:

Before using the Update Service schools or colleges must:

- obtain consent from the applicant to do so;
- confirm the certificate matches the individual's identity; and
- examine the original certificate to ensure that it is for the appropriate workforce and level of check, e.g. enhanced certificate/enhanced including barred list information.

Transfer of child protection files

Child Protection files must be transferred 'as soon as possible', but now the following guidance is included: '*ensuring secure transit and confirmation of receipt should be obtained.*'

Individual staff may make a direct referral to social services

Whilst the previous version of *Keeping Children safe in Education* said that ‘anybody can make a referral’, the new guidance says, “*In exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken, staff members can speak directly to children’s social care.*”

In rare circumstances where we need to appoint a coach who has convictions showing on their DBS certificate or where we are awaiting the disclosure, First Kicks use a detailed ‘DBS Check Risk Assessment’ form.

11. Supervising Children and Young People’s Sport and Activities

The Child Protection in Sport Unit states:

This guidance is for anyone with responsibility for planning or delivering activities for children and young people, or for establishing good practice guidelines.

Why are supervision ratios important?

It is important to ensure that, in planning and running sports activities for children and young people, consideration is given to providing an appropriate staffing/supervision ratio of adults to participants. Benefits include:

- minimising any risks to participants
- enhancing the benefits children draw from the activity
- reassuring parents/carers
- providing some protection for those responsible for providing, funding or commissioning the activity in the event of concerns or incidents arising.

Key considerations

Due to the number of potential variables, it is not possible to recommend “one size fits all” guidance to cover all activities involving children and young people. There are, however, a number of key considerations that are recommended as good practice:

What makes an individual suitable to supervise children?

It is the responsibility of those commissioning, planning or providing sessions/activities to ensure the suitability of those running the activity. This includes:

- being appropriately qualified for their role and the activity
- being subject to a safe recruitment process, including criminal records checks for eligible roles
- having insurance appropriate to their activity
- signing up to comply with a code of practice
- understanding their responsibility to safeguard children

What factors inform appropriate supervision levels?

- Whatever the recommended ratio of adults to participants is, a minimum of two adults should be present. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of one participant requiring the attention of an adult during the activity following an accident).
- In the planning of all activities, and regardless of any other assessments that may be required (for example of equipment or for Health and Safety purposes), a risk assessment should be undertaken which specifically informs decision-making about appropriate supervision levels.

Key factors to assess include

- Ages of children - Additional supervision/support needs of some or all participants (for example due to disability or age)
- Competence/experience of participants for the specific activity
- Nature of activity (for example climbing or swimming sessions may require higher levels of supervision than an aerobics class)
- Nature of the venue - whether closed (e.g. a swimming pool) or open (e.g. parkland); private and exclusive to the group or open and accessible to the public); and what types of equipment children may have access to.

Sport specific guidance

Many sports governing bodies, facilities and other activity providers have issued guidance on minimum supervision ratios (and a range of other factors linked to the welfare and safety of participants) for specific sports or activities which may exceed the guidance below. Where relevant to the activity these should be adhered to as minimum standards

Recommended minimum supervision ratios

While the risk assessment may well indicate the need for an enhanced level of supervision and staffing for a particular activity, the following table shows recommended adult to child ratios. These are based on Ofsted guidelines and would be suitable for most organisations working with children and young people - *Remember that regardless of the overall ratio, a minimum of two supervisors is recommended.*

<i>Child / Young Person's Age</i>	<i>Number of Adults</i>	<i>Number of Children</i>
<i>0-2</i>	<i>1</i>	<i>3</i>
<i>2-3</i>	<i>1</i>	<i>4</i>
<i>4-8</i>	<i>1</i>	<i>6</i>
<i>9-12</i>	<i>1</i>	<i>8</i>
<i>13-18</i>	<i>1</i>	<i>10</i>

Young people as supervisors

Many sports provide opportunities for under 18's to coach, officiate or organise events for other children, including achieving qualifications and awards.. These positive opportunities allow young people to develop skills, experience and confidence but should not mean that organisations should depend on them to take full responsibility for managing groups of children. Under18 year olds in coaching or other roles should only supplement the adult with overall responsibility for supervising the activity.

Parents and carers as supervisors

Although the CPSU encourages parents/carers to accompany children to activities, we do not recommend those planning or providing activities include carers in supervision calculations, unless the carers/parents are acting in a formal volunteering or other capacity during the activity. In these circumstances, this should mean that those parents/carers meet all appropriate requirements in terms of:

- appropriate checks,
- clarity about their role
- who has overall responsibility for the group
- what is acceptable practice

As an organisation, we commit to implementing this policy adhering within these guidelines.

Transporting Children to and from Events

The NSPCC States:

You may need to provide transport to get children and young people to and from the event or activity. If you're using a bus, coach or taxi company, make sure they are reputable, have the right insurance and that their drivers are fully vetted.

Ensure children and young people are adequately supervised on the journey and take the necessary safety precautions depending on what kind of transport you're using (for example making sure everyone is wearing a seat belt).

Avoid using private cars to transport children and young people, unless this involves parents or carers making private transport arrangements with each other. If this is the case, make it clear that this is a private arrangement and not something your group or organisation has set up.

Make sure parents or carers know what time and where to drop off and pick up their children. Make sure they tell you in advance who will be picking up their children if they aren't doing so themselves.

The 'CPSU Child Protection in Sport Unit' States:

The issue of transporting children to and from their sports activities safely can present challenges for sports clubs. Many sports clubs could not operate without the good will of volunteers and parents/carers ensuring that children are transported to and returned home from events in a private car.

It is reasonable for clubs and activity organisers to place full responsibility on parents for ensuring appropriate transport arrangements are made. Where parents/carers transport their own children, or make private arrangements with other parents/carers to deliver or collect their children, they are responsible for their children's safety and for the suitability of any travel arrangements.

However, where the activity deliverer, club or coach is organising transportation of its young members and asks or requires parents to transport other people's children on the club's behalf the organiser has a responsibility to take reasonable steps to safeguard these young people for whom they have a duty of care.

What are the Issues?

The CPSU encourages coaches or other volunteers/staff not to take children on journeys alone in their car. The vast majority of coaches and volunteers will help out through their genuine desire to see children or their particular sport develop. Unfortunately we must face the reality that a minority of others will join a sports club to gain access to children to harm them.

There have in the past been many opportunities within the sport setting for those who wish to harm children to isolate a particular child. Thankfully Sports Governing Bodies are reducing this possibility in most coaching sessions, but the inappropriate transport arrangements can still leave children vulnerable.

Key considerations

Best practice is clearly to avoid transporting a child alone, but we recognise that in some circumstances it is an essential part of a child's participation in training and competition. If all alternatives have been exhausted and an adult has to transport a child, there are a number of safety measures that should be put in place to minimise the risk:

- Establish the suitability of any driver. The driver like all coaches/volunteers who have unsupervised access to children in your organisation, should have agreed to a vetting check (where appropriate) and be carried out as part of wider safe recruitment procedures.
- Parents/carers should be informed of transport arrangements including the person who will be transporting their child, the reasons why and how long the journey will take.
- A person other than the planned driver should talk to the child about transport arrangements to check they are comfortable about the plans.
- Organisations/clubs must ensure drivers representing the club have valid car insurance, MOT and driving licence prior to carrying any passengers.
- We advise the individual/driver to check with their own insurance company if they want to use their car as part of their paid/volunteer role.
- Organisations/clubs should try to ensure there is more than one child in the car.
- When transporting children after a match or training session coaches/volunteers should alternate which child is dropped off last. Ideally two children would be dropped off at an agreed point such as one of their family homes.
- The person who returns the children to the agreed point, such as family home, should
- be alternated; this would reduce the risk of any one individual frequently being alone with a particular child or group.
- The driver should have a point of contact and mobile phone should they break down.

- Ensure that children are aware of their rights to be safe and that they have someone to turn to or report any concerns they may have. If a culture of safety is created within the club then the child is more likely to talk to another person if they are feeling uncomfortable about a situation.
- Late collections can present clubs and coaches with particular difficulties. Parents/carers should be provided with guidelines addressing the issue and outlining their responsibility and the consequences of late collections. Clubs should have contact numbers for parents/carers and if possible be provided with an alternative contact number. Parents/carers should have a contact number for the club/coach to inform them of emergencies and possible late collections.
- Children should wear seatbelts at all times. The following is guidance regarding the seat-belt law which was introduced in September 2006, for more information please visit <https://www.gov.uk/seat-belts-law/overview>.

Children *must* have an appropriate child restraint or seatbelt when travelling in a car or goods vehicle.

- Under 12 years old or 135cm tall must use the right type of booster chair or booster cushion
- Older children should use an adult seatbelt

Alternative transport

If taxis are used by your organisation/club, there is no child restraint available; children can travel in the back seat of taxis. Those over 3 must use the adult seatbelt.

Sometimes parents/carers may be asked to drive a minibus on behalf of the organisation/club. Passengers on minibuses will be required to wear seat belts where fitted and the driver will be responsible for making sure that children under 14 use their seatbelts. If seatbelts are fitted on a bus, passengers must use them. The driver will be responsible for letting people know that they must use seat belts.

These are European rules so they apply in the UK, the Republic of Ireland and all countries in the European Union.

12. Equality

This section is to ensure that everyone is treated fairly and with respect and that First Kicks Sports Ltd is equally accessible to them all.

First Kicks Sports Ltd is responsible for setting standards and values to apply throughout the club at every level. Football belongs to and should be enjoyed by, anyone who wants to participate in it.

Our commitment is to confront and eliminate discrimination whether by reason of gender, sexual orientation, marital status, race, nationality, ethnic origin, colour, religion or belief, ability or disability and to encourage equal opportunities.

First Kicks sports Ltd, in all its activities will not discriminate, or in any way treat anyone less favourably on grounds of gender, sexual orientation, marital status, race, nationality, ethnic origin, colour, religion or belief, ability or disability.

First Kicks Sports Ltd will ensure that it treats people fairly and with respect and that it will provide access and opportunities for all members of the community to take part in, and enjoy, its activities.

First Kicks Sports Ltd Football Club will not tolerate harassment, bullying, abuse or victimisation of an individual, which for the purposes of this section and the actions and sanction applicable is regarded as discrimination. This includes sexual or racially based harassment or other discriminatory behaviour, whether physical or verbal.

First Kicks Sports Ltd will work to ensure that such behaviour is met with appropriate action in whatever context it occurs.

First Kicks Sports Ltd is committed to taking positive action where inequalities exist and to the development of a programme of ongoing training and awareness raising events and activities in order to promote the eradication of discrimination and promote equality in football.

First Kicks Sports Ltd is committed to equal treatment of all members and requires all members to abide and adhere to these policies and the requirements of the relevant equalities legislation – *Race Relations Act 1976*, *Sex Discrimination Act 1975* and *Disability Discrimination Act 1995* as well as any amendments to these acts and any new legislation.

First Kicks Sports Ltd commits itself to the immediate investigation of any claims when brought to its attention, of discrimination on the above grounds and where such is found to be the case, a requirement that the practice stop and sanctions are imposed as appropriate.

Working Together to Safeguard Children states:

The *Equality Act 2010*, which puts a responsibility on public authorities to have due regard to the need to eliminate discrimination and promote equality of opportunity. This applies to the process of identification of need and risk faced by the individual child and the process of assessment. No child or group of children must be treated any less favourably than others in being able to access effective services which meet their particular needs.

Keeping Children Safe in Education states:

When using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions, schools and colleges should in considering the risks carefully recognise the additional vulnerability of these groups. They should also consider their duties under the *Equality Act 2010* in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty. By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, schools and colleges can reduce the occurrence of challenging behaviour and the need to use reasonable force.

As an organisation, we commit to implementing this section and addressing any concerns within a timely manner and within these guidelines.

13. Risk Assessments

The Children in Sport Protection Unit states:

Creating a safe environment for children Safe sport events, activities and competitions Pre-event risk assessment Assessing the risks at any event, large or small, is absolutely essential, even if the event has been successfully run before.

The principles outlined in the following information apply to any event, but you will need to assess the relevance for your particular activity in terms of scale, venue and locality, participants, staff, volunteers and so on. Establish whose responsibility it will be to undertake risk assessments of which elements of the event. Your club, governing body, school, local authority or other organisation may well have its own risk assessment procedures, but it is sensible to check these against this guidance.

Some of the key issues to consider are:

- venues, facilities and equipment, including accessibility
- ratio of supervisors to children/young people
- one-to-one contact
- changing room supervision
- transport
- health and safety
- communication
- manual handling
- photography

Ratio of supervisors to children/young people

In planning and running events for children and young people, it is important to consider the appropriate staffing/supervision ratio of adults to participants. This will minimise any risks to participants, enhance the benefits they draw from the activity, reassure carers, and provide some protection for those responsible for providing the activity in the event of concerns or incidents arising. You should consider supervision levels for all parts of the event, including travelling to and from it, non-competition periods and “down time”. Anyone undertaking the supervision role should have been recruited and vetted for suitability, and understand their role and responsibilities.

The ratio of supervisors to children/young people will depend on a number of factors:

- age of participants
- gender
- behaviour

- abilities within your group
- nature and duration of activities
- competence and experience of staff involved
- requirements of location, accommodation or organisation
- any special medical needs
- specialist equipment needed

Regardless of the overall supervision ratio agreed, at least two adults should be supervising children/young people at all times.

Risk Assessing for Events

Supervising comfort breaks and toilet ratios

Adults who haven't previously volunteered and haven't had the necessary vetting checks, should not be left alone with children or take them to the toilet unaccompanied. It may therefore be a good idea, in larger groups of children, to encourage bigger groups to take a comfort break together. If the group has children of mixed genders, there should be at least one responsible adult of each gender supervising visits to the toilet.

Missing participants

Despite organisers' best efforts, children and young people do sometimes go missing during events. It is therefore essential that you have plans and procedures in place to provide clear guidance on how staff and volunteers should respond in these circumstances. When a child is reported missing, you should generally allow a maximum of 20 minutes before calling the police. Times of particular concern are when children are arriving at/leaving the event or when they are transferring between venues and facilities. You should advise parents, children and young people that they must notify the relevant member of your event team of any changes they wish to make to arrival or leaving arrangements, eg collecting a child.

Registration Event organisers should have a system in place to track the number and name of any children and young people for whom they are responsible at any point during the event. This is vital if someone is injured or if there is a major incident, such as a fire, when you need to account for everyone.

How you manage registration will depend on the nature and size of your event. Even when it may be difficult to secure written parental consent (eg in activities aimed at hard-to-reach young people on the street), best practice is to list the names of all those involved. For drop-in activities (event level 1), it is essential that organisers make their expectations clear at the outset, eg whether or not younger (or all) children need to be accompanied and supervised by a parent or other suitable adult at any time. You should clearly state on posters at all entrances to the event that parents are responsible for leaving, registering and collecting their children and/or promote this in any pre-event publicity, posters or flyers.

Responsibility for care of children must be clear at all times. The person with overall responsibility for the event (or a nominated representative) must undertake registration prior to the event. Your registration process should be clearly documented in your event safeguarding plan and allow sufficient time (and personnel) to ensure it is undertaken efficiently and effectively.

You must clarify and confirm with all parties the point at which responsibility for a participant transfers, both from their parent/carer to your event organiser at the start of the event and when it returns to the parent/carer at the end. These transfer points are a significant time of risk for children and young people. Sports coordinators at larger events should collect the details and photographs of participants, and send these to the event coordinator at least four weeks prior to the event.

Consents

Event organisers should ensure that written consents from parents/carers of children and young people under 16 have been obtained in advance of the event. Consents need to cover all relevant aspects of the particular event.

In some circumstances, you may simply need to ensure that existing consent forms (eg general parental consent forms used in schools, or an annual registration/consent form used by many sports clubs) cover all aspects relevant to the event and activity. However, for many events (particularly event levels 3, 4 and 5), you may need to produce specific consent forms. In some rare circumstances, it may not be possible to obtain written parental consent, eg activities designed specifically to engage children in the wider community who are hard to reach, where gaining written parental consent may be impossible and effectively jeopardise the very basis of the activity.

In such circumstances, organisers should record what steps they have taken to try to secure consent, their reasons for proceeding without it and what alternative safeguards they have put in place, eg ensuring they register attendees and obtain core information from the young people. To ensure that consent by parents/carers is always informed, you should link consent forms to clear information about relevant aspects of the event. It is sensible to cover all consent issues on one form, including participation in sport and non-sport activities, emergency medical treatment, photography and the use of personal images. Use the forms to ascertain who has legal parental responsibility for the participant, which is particularly important where a child is looked after by someone other than their birth parents or is in local authority care. Forms may incorporate registration information and refer to codes of conduct. It is vital to obtain details of next of kin and emergency daytime/evening contact information.

Medical information

- Ask parents/carers to provide information about any disability, medical condition or allergies their child may have or that may arise during the event.
- Parents/carers must provide sufficient medication for the duration of the event and agree how this will be held and administered, ie by the young person or an identified member of the event staff.

- Where medication will be held by a young person sharing a room with others, incorporate this into your overall risk assessment.
- Parents and the club, team, school or event staff should fully discuss the implications for a child of any disability, medical condition or allergy, considering the needs of the child and anyone supervising or caring for them, and any relevant aspect of the sporting activity or its wider context, eg travelling arrangements and overnight stays.
- Develop a clear, written agreement that covers all these areas, as appropriate to the individual child.
- Manage personal information sensitively and confidentially, but ensure this information is available to any member of staff with responsibility for the young person before, during and after the competition or sports activity.

Ask parents to discuss any non-sport related issues that may affect their child's participation at the event (eg a recent family bereavement) with the team manager, safeguarding coordinator or person with overall responsibility for the event. Information for participants, parents, staff and volunteers It is essential to provide everyone at an event with safeguarding information appropriate to their role in a suitable format.

You should integrate relevant information into the induction materials, training or pre-event briefings for all staff and volunteers at the event, including those associated with the venue. You may also make information available online, although you should take care to ensure that information provided for children and young people is in a language and format appropriate to them.

Everyone should be clear about:

- how they are expected to behave at the event
- their safeguarding responsibilities, including a duty to report concerns
- the kinds of concerns that will require a response
- to whom and how concerns should be reported, including use of the incident report form
- sources of support.

First Kicks Sports Ltd our Club Activity (After-School Club Session, Matches or Activities) or Events (Sports Summer Camps) fall into either Level 2 or Level 3, as follows...

Level 2: Single-school or single-club events

These are single or intra-club or intra-school activities or competitions that do not involve competing against other teams beyond the sports club or school. These could include school sports days, intra-club activities, annual club competitions or school holiday activities. Such events equate to the School Games competition level 1 and involve existing members (or pupils), staff, volunteers or coaches rather than those from other clubs, schools or organisations, or the wider public.

This level of event will have a basic staffing structure with two key safeguarding roles:

- person with overall responsibility for the event (the event manager/organiser or coordinator)

- person with lead responsibility for safeguarding

These roles should be undertaken by different members of the event team. Sports clubs and schools should already have safeguarding policies and procedures in place. For most events at this level, the event safeguarding plan does not need to be lengthy and may comprise a folder of existing organisational (club, national governing body or school) safeguarding documents, rather than a single document specifically developed for the event.

However, you should take care to ensure that the event safeguarding plan addresses all aspects of the particular event. The event safeguarding plan should be informed by our top 10 tips and developed or amended accordingly to ensure it addresses all aspects of the event.

A. Event coordinator, event manager or event organiser

This is the person assigned responsibility for organising and overall running of the event. Within a school or club, this person may be the head or lead coach, head of physical education or the head teacher. This person should have undertaken at least basic safeguarding awareness training.

Responsibilities include:

- being ultimately responsible for safeguarding, health and safety matters, and the duty of care towards participants and the event staff team
- appointing a suitable person to take on lead safeguarding responsibilities for the event
- in partnership with the event safeguarding lead, ensuring that an event safeguarding plan is developed, promoted and effectively implemented; where this constitutes existing organisational policies and procedures, ensuring that all aspects of the event are adequately addressed
- undertaking or delegating a pre-event risk assessment, including site facilities
- ensuring planning includes: - staffing levels and safe recruitment - medical/first-aid provision - details for local medical, police and children's social care/social services - registration and consents arrangements - sign up to codes of conduct for participants and event staff.

B. Lead for safeguarding

This is the person with lead responsibility for safeguarding. Within a club or school this is likely to be the existing designated safeguarding person, eg the club welfare or safeguarding officer or the designated teacher. This person should have undertaken at least basic safeguarding awareness training.

Responsibilities include:

- being responsible for safeguarding participants and other young people at the event
- developing, promoting and implementing the event safeguarding plan
- undertaking a pre-event risk assessment, including site facilities
- receiving, responding to and managing any safeguarding issues that arise at or following the event

- ensuring that all event staff and volunteers understand their safeguarding responsibilities and know how to respond if concerns or allegations arise at the event
- providing pre-event safeguarding training/briefings for staff and volunteers
- ensuring that all parental registration, consents and medical information have been received before the event
- if relevant, ensuring an appropriate event level of security at the venue to prevent both unauthorised persons gaining access and participants going missing
- ensure that all participants, staff and volunteers have signed up to the relevant codes of conduct and principles of participation (linked to the appropriate complaints/disciplinary procedure)
- having contact numbers for local statutory services (including medical, social care and police numbers), national governing body or local authority lead safeguarding officer, and for the local authority designated officer (LADO) in England.

C. Other event staff, coaches and volunteers Staff and volunteers should have:

- received the appropriate level of safeguarding training
- understood their safeguarding responsibilities and what to do in the event of a safeguarding concern arising
- familiarised themselves with the event safeguarding plan and appropriate lines of communication
- read and signed up to the relevant event code of conduct.

Level 3: Local, multi-club/inter-school sport events

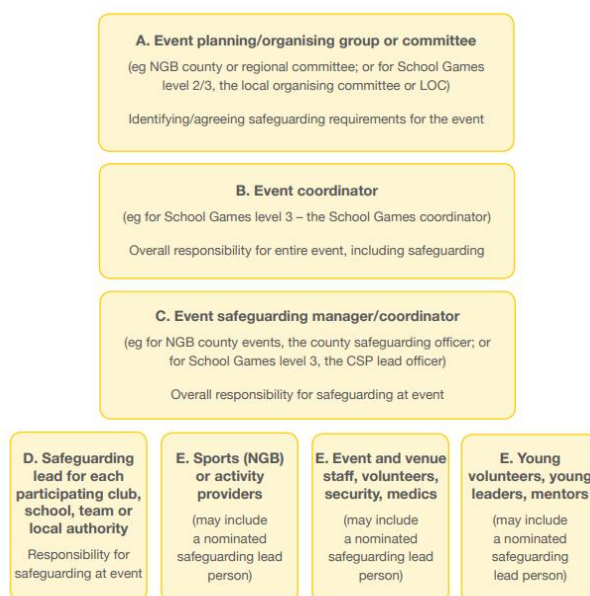
These are events, activities or competitions held on a local or county basis, such as club versus club, school versus school.

These could include school or sports clubs festivals, such as the Mini/Midi Festival, or county sports competitions, such as the Youth Games or Inclusion Games.

Typically, they do not necessitate significant travel or overnight stays.

They equate to School Games competition level 2 and School Games Festival level 3.

Example of a safeguarding structure for event level 3:



First Kicks Sports Ltd’s FORMS for assisting with Planning & Reporting of Health & Safety and Risk Assessment, include:

- Accident Record
- Accident Tracking
- After School Club Visual Risk Assessment
- Holiday Camp Risk Assessment – Part 1
- Holiday Camp Risk Assessment – Part 2
- Holiday Camp Risk Assessment – Part 3
- Holiday Camp Risk Assessment – Part 4
- Part 5
- PAR-Q Physical Activity Readiness Questionnaire
- Allergy List
- Allergy Management Plan
- Collection by Unknown Person
- Equipment Risk Assessment
- Fire Drill Record
- Fire Evacuation Plan
- Fire Procedure
- Head Injury
- Incident Log
- Medical Form
- Permission to Administer Medicine
- Permission to use Photographs
- Play Plan
- Play Plan – Summer
- Play Risk - Benefit Assessment
- Record of Medication Given
- Record of pre-existing Injuries
- Registration
- Visitor Log
- DBS Check Risk Assessment
- Daily Register
- Logging a SFG Concern
- Escalation Procedure & DSL Contact Info

An example of our Risk Assessment for our After-School Club Sessions, Matches or Activities (Level 2 Activity):

First Kicks Sports Ltd
Risk Assessment
After School Club Sessions

VISUAL CHECK RISK ASSESSMENT COMPLETE?

Yes No

School / Session Name: _____

Date & Timing: _____

Instructors Names: _____

Number of Participants: _____

The following items should be checked before the start of every session:

(Please X each item once checked)

Checked	Items to Check	Checked	Items to Check
	Floor Clean and Dry		Any Equipment used should be operational
	Location of Fire Alarms		No sharp objects
	Location of fire extinguishers and use of each		Lights all working in area
	Fire Evacuation point / meeting point		No broken glass
	Clear Fire Escapes and unlocked		All cuts, etc to be covered
	First Aid Box in area		Long hair to be tied back, no hats
	Safe Equipment		Location of nearest useable telephone
	Tied up Trainers		No Chewing Gum
	General Room Check – i.e. nails from walls, holes in the floor		Correct / Safe Footwear
	No Jewellery		

Signed: _____

Print: _____

Date: _____

First Kicks Sports Ltd
Risk Assessment
After School Club Sessions

Risks	Protocols
Children/adults injuring themselves during the sessions.	<ul style="list-style-type: none"> Coaches to ensure all activities are safe and the equipment has been safety checked prior to each session. At least one qualified first aider will always be on site with first aid kit. Parents will be asked to inform coaches of any previous injuries children may suffer from prior to the sessions.
Children/adults suffering asthma attack during training.	<ul style="list-style-type: none"> Children/adults made aware they should bring asthma pumps to sessions and inform the coaches. At least one qualified first aider will always be on site.
Children leaving the venue.	<ul style="list-style-type: none"> Children will not be allowed to leave the designated area under any circumstances during the session.
Children going to the toilet during sessions.	<ul style="list-style-type: none"> Children will be informed they must tell the coach when they go to the toilet and when they return.
Children being dismissed to the correct adult following the session.	<ul style="list-style-type: none"> Children will be led to the door by the lead coach and dismissed directly to the correct adult. Home alone children will be dismissed separately. Coaches will be the last people to leave the venue once the last child has been dismissed. Coaches will use emergency contact details if a child has not been collected.
Fire during the session/fire drill during the session	<ul style="list-style-type: none"> Coaches will be aware of the venue's fire procedures and lead all participants to the designated safe place ensuring all participants are accounted for using the register.
Child Protection Disclosure	<ul style="list-style-type: none"> Coaches have all attended safeguarding training. if a disclosure is made during the club then the relevant people will be informed to deal with the situation. (need to confirm with school prior)*

An example of our Risk Assessments (Parts 1 to 4) for a Summer Camp / Holiday Sports Club (Level 3 Activity):-

Holiday Sports Camp
Risk Assessment: Part 1
General information

Date of Holiday Sports Camp:	
Time:	
Destination address and contact number:	
Transport to be used:	
Number of children participating: Age 4-8?	Age 9-11?
Adult : Child ratio? <i>(Take into account any additional needs when considering ratios)</i>	
Nature of outing:	
Staff members attending:	Contact details:
Volunteers attending:	Contact details:

Holiday Sports Camp
Risk Assessment: Part 2
Checklist of actions to be taken to minimise risk

Leader will have responsibility for	Action completed
Checking public liability insurance details are correct.	
Ensuring everyone is aware who the named Supervisor/Leader is.	
Ensuring all adults are aware who the Named First Aider is.	
Taking accident record forms to record events promptly, to be filed upon return.	
Ensuring all adults are aware of the procedures that need to be followed in the event of an emergency. (Circulate Missing Child policy any other relevant policy & procedures prior to the outing)	
Ensuring all adults are aware of meeting times and areas.	
Taking register and contact details in a format that ensures their confidentiality.	
Collecting required permissions, taking them on outing and storing them confidentially.	
Taking stocked first aid kit.	
Naming and appropriate storage of any necessary medications.	
Ensuring all adults are aware of any special precautions as identified by the Outing Risk Assessment.	
Taking mobile phone and ensuring that it is charged, with credit available and with emergency contact numbers stored.	
Issuing children with emergency contact details. [eg stickers, bracelets etc]	
Ensuring the appropriate staff:child ratios are met.	
Coordinating any additional volunteer helpers.	
Ensuring that only adults who have DBS checks will have unsupervised contact with the children.	



Holiday Sports Camp

Risk Assessment: Part 3

Daily Environment Checks

All areas to be checked before each session

Date: _____ Time: _____ Checked by: _____

Area assessed	Yes	No	Comments/actions
1 Entrance Hall <ul style="list-style-type: none"> Free of trip hazards Exit routes unobstructed Electrical sockets free from damage Clean and tidy External doors locked and / or alarmed Lights switched on Cleaning cupboard locked 			
2 Large Room <ul style="list-style-type: none"> External doors locked and / or alarmed Layout of equipment allows free movement Electrical wires positioned safely Heaters guarded appropriately Clean and tidy Toys and play equipment in good order Bins lined Phone switched on First Aid kit accessible Room temperature suitable Free of trip hazards 			
3 Small Room <ul style="list-style-type: none"> Layout of equipment allows free movement Electrical wires positioned safely Heaters guarded appropriately Clean and tidy Toys and play equipment in good order Room temperature suitable Free of trip hazards 			
4 Kitchen <ul style="list-style-type: none"> Clean and tidy Inaccessible to unsupervised children Appliances and equipment positioned safely Cleaning products/materials stored securely Food stored appropriately Fridge temperature within safe range Anti-bac soap available for handwashing 			Fridge temperature is: _____
5 Toilets <ul style="list-style-type: none"> Clean and tidy Accessible to all Cleared of cleaning products Sufficient toilet roll, paper and paper towels Hand washing posters in place 			
6 All exits <ul style="list-style-type: none"> Cleared of obstructions In working order Clearly identified 			
7 Outside areas <ul style="list-style-type: none"> Entrance safe/ clear of obstruction (eg ice) Play area litter-free (eg glass, animal faeces) Outdoor equipment in good order and safe to use Any workmen/strangers in the play area? Gates closed / locked 			



Holiday Sports Camp

Risk Assessment: Part 4

Please see separate Risk Assessment in relation to COVID-19

What are the hazards	Who might be harmed and how	Risk Low/Medium/High	Actions implemented to reduce risk/hazard	Action by whom
Coaches and staff at risk from injury (During set up/teaching)	All coaches and staff including volunteers.	Low	<ul style="list-style-type: none"> Coaches to endeavour, where possible, to set up in pairs and at least two coaches to always be on site. Coaches to ensure they do not lift heavy equipment unaided. Ensure First aider <u>is on premises at all times</u>. Ensure First Aid kit is accessible. First Kicks Sports directors to be aware of any pre-existing medical conditions which may affect coaches' ability to carry out certain activities. Coaches should not join in contact games with children e.g. football matches etc. 	-First Kicks Sports Directors -Coaches and staff on site.
Children at risk from injury during activities.	All children.	Medium	<ul style="list-style-type: none"> Medical details to be taken on registration forms prior to children entering the site. Ensure First aider <u>is on premises at all times</u>. Ensure First Aid kit is accessible. Coaches to ensure children have suitable clothing and footwear to carry out sports activities. Area and equipment checked daily for hazards e.g. sharp objects on the floor, broken equipment etc and reported to directors and site manager if required. Children to be briefed prior to each activity on how it should be carried out safely. Behaviour management strategies in place to ensure children are not at risk from injury from others. Parents contact details collected prior to camp and always accessible to members of staff in case of injury. Accidents and injuries to be recorded and First Kicks Directors to be informed. 	-First Kicks Sports Directors -Coaches and staff on site. -Site manager of premises.



Holiday Sports Camp



Risk Assessment: Part 4

			<ul style="list-style-type: none"> - Parents must be informed of any minor injuries on pick up (if children are home alone parents should be called). - Any injuries to the head/face (however minor) parents should be informed straight away via phone. - Serious injuries parents to be informed straight away via phone. 	
Children using the toilets; risk of injury/safeguarding.	All children.	Low	<ul style="list-style-type: none"> - Check toilets prior to session to ensure they are safe e.g. floors not wet, soap available, toilets working. - Ensure children know the location of the toilets prior to the sessions starting. - Establish rules of toilet trips. - Younger children to go in pairs to the toilet. - Children must ALWAYS tell a coach before they go to the toilet and the coach will monitor the time child has gone. - Ensure premises manager alerts coaches should any contractors be accessing the toilets. 	<ul style="list-style-type: none"> -Coaches and staff on site. -Site manager of premises.
Children leaving the premises with the incorrect adult and/or unsupervised.	All children	Low	<ul style="list-style-type: none"> - Pick up arrangements to be collected on child registration forms. This includes names and contact details of other adults who have permission to collect children. - On first day of the camp pick up arrangements to be further checked with the parent. - Contact details to be further checked. - Daily register to be completed. - Coaches to release children one at a time to designated parent/adult. Coach to check relationship to child and if not parent to check they are designated adult on registration form. 	<ul style="list-style-type: none"> -First Kicks Sports Directors -Coaches and staff on site. -DSL of the <u>schools</u> children attend. -Parents



Holiday Sports Camp



Risk Assessment: Part 4

			<ul style="list-style-type: none"> - Home alone children to be directed to go straight home. Only children with parental permission should ever be allowed home alone. - First Kicks Directors to be informed by the schools of any adults who are not allowed (due to court orders etc/safeguarding etc) to pick up/be in contact with children. 	
Children and coaches being injured/unwell as a result of weather related issues e.g. icy/wet floors, sunburn, heat exhaustion.	Children and staff.	Low	<ul style="list-style-type: none"> - Indoor facility to be available in case of bad weather. - Coaches to assess the grounds prior to activities taking place; if the ground is too wet or is icy then activity will take place inside until ground is suitable. - Indoor floors to be dried in wet weather to ensure they are not slippery. - Parents to be advised children have sun cream and hat in hot weather. - Children to only be outside for short bursts of activity in hot weather. - Children to have constant access to water throughout the day and water breaks to be included in timetables. - In windy conditions equipment to be removed which may pose a hazard e.g. nets. 	<ul style="list-style-type: none"> -First Kicks Sports Directors -Coaches and staff on site. -Site manager of premises. -Parents
Contractors onsite during summer holidays. Safeguarding issues.	Children - non-DBS checked individuals onsite. Adequate supervision of contractors - safe zones for working	Low	<ul style="list-style-type: none"> - The school / Premises will inform First Kicks Sports Ltd when the contractors will be onsite and what areas will be inaccessible/closed off. - Camp Lead will inform the team of work schedule with timetable of works and duration on. - SC team to ensure they are familiar with any areas out of bounds and ensure no children from their group are anywhere near the area. - Children to reminded not to speak to unfamiliar adults. 	<ul style="list-style-type: none"> -First Kicks Sports Directors -Coaches and staff on site. -Site manager of premises.



Holiday Sports Camp



Risk Assessment: Part 4

Children at risk from allergic reactions and/or symptoms linked to medical conditions.	All children.	Medium	<ul style="list-style-type: none"> - Allergies and medical condition details to be taken on children's registration forms and further checked on first day of arrival. - Medication e.g. asthma pumps and epi-pens etc must be on site before a child is left by the parent. - First aider to always be on site and aware of medical conditions of the children. - First aid kit to always be accessible. - Parents to be encouraged not pack items which contain nuts in their child's packed lunch to keep all children safe. - Adaptations made, where necessary, to activities to take account of medical conditions; this may include extra rest breaks. - Lunchtimes to be supervised. - Parent contact details to be constantly accessible to all members of staff in case of emergency. 	<ul style="list-style-type: none"> -First Kicks Sports Directors -Coaches and staff on site. -Parents
Fire procedures	All children and staff members.	-	<ul style="list-style-type: none"> - School fire procedures are in place. - All staff are aware of fire procedures and the designated point to evacuate. - Coaches to do head count based on the daily register to ensure that all children are accounted for. - Children to be collected from toilet if they are in there. - A well-maintained fire alarm is in place. - Fire detectors are in place. - Fire extinguishers are located in relevant areas. - Fire doors are in place. 	<ul style="list-style-type: none"> -First Kicks Sports Directors -Coaches and staff on site. -Site manager of premises.
General Safeguarding	Children may be at risk of harm if correct procedures are not followed.	-	<ul style="list-style-type: none"> - Safeguarding procedures are in place for all children attending. All employees are aware of safeguarding procedures. - Sufficient and up to date training has been completed in safeguarding. 	<ul style="list-style-type: none"> -First Kicks Sports Directors -Coaches and staff on site.



Holiday Sports Camp



Risk Assessment: Part 4

			<ul style="list-style-type: none"> - All staff on site are DBS enhanced checked. - A camp leader will be on site each day. - DSL for each camp will be established prior to camp (usually linked to the school). - Coaches will know the procedure and contact details of DSL should a safeguarding issue arise. - First Kicks Sports Ltd will provide DBS certificates to school office of any new sports coaches onsite as required. - Any known safeguarding concerns children are to be shared by the school. - Headteacher will then share information with the camp lead on a need to know basis, keeping information as secure as possible. This will be the same for SEND children. 	<ul style="list-style-type: none"> -Headteacher and /or DSL of school children at the camp attend.
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14. Employers & Public Liability Insurance

Sports leaders are required to have appropriate insurance that covers personal accidents and public liability. This is often included as part of the affiliation fee for many sports governing bodies, but sports leaders should ensure they are covered before working with children and young people.

A copy of First Kicks Sports Ltd insurance certificates can be provided on request.

Additionally, even though it is strongly recommended that sports leaders do not use personal vehicles when transporting athletes to sporting venues, if there is no alternative, proper licencing and insurance must be secured.

15. Staff Training & Development

Training Matrix

First Kicks Sports Ltd have a Training Matrix in place so we can track our staff's Training requirements including expiry dates of the coaches' Safeguarding Training & DBS Certificates, and a process in place with reminders to prompt renewal where necessary.

Safeguarding Training

First Kicks Sports Ltd will ensure an appropriate level of safeguarding training is available to its Coaches; Volunteers and any relevant persons linked to the organisation who requires it (e.g. sub-contracted coaches).

At a minimum the following will be covered:

- Understand what safeguarding is and their role in safeguarding children
- Recognise a child potentially in need of safeguarding children
- Understand how to report a safeguarding alert
- Understand dignity and respect when working with children
- Have knowledge of our safeguarding policy

All our coaches are encouraged to hold the minimum Safeguarding Training requirements, either obtained themselves online or via one of our In-house Training programmes.

'The Child Protection in Sport Unit' states:

Once recruited, all staff and volunteers should be well informed, trained, supervised and supported to ensure that they effectively safeguard children and know how to respond to any concerns.

The organisation should ensure that training and resources are available to encourage the development of staff and volunteers.

This should include:

- An induction to the work and the organisation

- A trial period in which to develop skills whilst supervised
- Ongoing support and monitoring

There are currently no formal qualifications specifically for safeguarding and protecting children in sport.

However, training developed by sports and other organisation's is available to strengthen the skills and knowledge of the sporting children's workforce to safeguard children and young people.

Training plays an important role in equipping staff and volunteers to do their job safely and effectively. Different safeguarding training is available depending on the person's role.

'The Child Protection in Sport Unit' states:

Basic requirements of staff and volunteers with safeguarding responsibilities

Ideally, anyone with a safeguarding role and responsibilities at events should be able to demonstrate:

- commitment to promoting the interests, rights and welfare of young people
- experience in a safeguarding role (eg as a club welfare officer or designated teacher; or by virtue of a relevant background, eg in social care, education or the police)
- relevant safeguarding training and an understanding of the core safeguarding principles
- ability to relate well to others, particularly children and young people.

First, ascertain the level of your event and then follow the corresponding *pathway* for descriptions of the different safeguarding roles and responsibilities of staff and volunteers, as well as examples:

- Level 1: Organised but less formal events
- [Level 2: Single-school or single-club events](#)
- [Level 3: Local, multi-club/inter-school sport events](#)
- Level 4: Regional or national events
- Level 5: International events

[First Kicks Sports Ltd our Club Activity \(After-School Club Session, Matches or Activities\) or Events \(Sports Summer Camps\) fall into either Level 2 or Level 3.](#)

Keeping Children Safe in Education states:

Governing bodies and proprietors should ensure that all staff undergo safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local three safeguarding partners.

In addition, all staff should receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Governing bodies and proprietors should recognise the expertise staff build by undertaking safeguarding training and managing safeguarding concerns on a daily basis. Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

Working Together to Safeguard Children states:

Section 11 of the Children Act 2004 places a duty on:

- local authorities and district councils that provide children's and other types of services, including children's and adult social care services, public health, housing, sport, culture and leisure services, licensing authorities and youth services
- NHS organisations and agencies and the independent sector, including NHS England and clinical commissioning groups, NHS Trusts, NHS Foundation Trusts and General Practitioners
- the police, including police and crime commissioners and the chief officer of each police force in England and the Mayor's Office for Policing and Crime in London
- the British Transport Police
- the National Probation Service and Community Rehabilitation Companies³⁵
- Governors/Directors of Prisons and Young Offender Institutions (YOIs)
- Directors of Secure Training Centres (STCs)
- Principals of Secure Colleges
- Youth Offending Teams/Services (YOTs)

These organisations and agencies should have in place arrangements that reflect the importance of safeguarding and promoting the welfare of children, including:

- a clear line of accountability for the commissioning and/or provision
- a senior board level lead with the required knowledge, skills and expertise or sufficiently qualified and experienced to take leadership responsibility for the organisation's/agency's safeguarding arrangements
- a culture of listening to children and taking account of their wishes and feelings, both in individual decisions and the development of services
- clear whistleblowing procedures, which reflect the principles in Sir Robert Francis' Freedom to Speak Up Review and are suitably referenced in staff training and codes of conduct, and a culture that enables issues about safeguarding and promoting the welfare of children to be addressed³⁶
- clear escalation policies for staff to follow when their child safeguarding concerns are not being addressed within their organisation or by other agencies
- arrangements which set out clearly the processes for sharing information, with other practitioners and with safeguarding partners
- a designated practitioner (or, for health commissioning and health provider organisations/agencies, designated and named practitioners) for child safeguarding. Their role is to support other practitioners in their organisations and agencies to recognise the needs of children, including protection from possible abuse or neglect. Designated practitioner roles should always be explicitly defined in job descriptions. Practitioners should be given sufficient time, funding, supervision and support to fulfil their child welfare and safeguarding responsibilities effectively
- safe recruitment practices and ongoing safe working practices for individuals whom the organisation or agency permit to work regularly with children, including policies on when to obtain a criminal record check
- appropriate supervision and support for staff, including undertaking safeguarding training
- creating a culture of safety, equality and protection within the services they provide

In addition:

- Employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children and creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role.

First Aid Training

First Kicks Sports Ltd's coaches are encouraged to hold as minimum, a Basic First Aid Certificate, either obtained themselves or via one of our In-house Training Programmes.

(see Incidents; Accidents; Injuries & Medical Emergencies, for more details on First Aid Training)

Coaching Qualifications

First Kicks Sports Ltd will take the lead from each individual School, regarding the suitability of each assigned coach, regarding the level of qualifications required for their role.

'UK Coaching' states:

Qualifications and Skills Required to Coach in a School

When employing coaches, UK Coaching recommends adherence to our sector guidance on the qualifications, training and legal requirements that all coaches should meet.

The guidance includes recommendations across the following five areas:

- Minimum age — 18 years old for all paid coaches working in schools
- Appropriate qualifications — the minimum qualification, *recommended* by the National Partners, for a coach or professional working in a primary school context is usually considered to be a UKCC level 2 coaching qualification or equivalent in the activity being delivered. It is acknowledged, however, that other volunteers including Level 1 assistant coaches, and under-18s including young leaders, may support delivery. *This must be under the direct supervision of a qualified teacher or Level 2 coach.*
- Appropriate insurance cover for the duties you have asked them to carry out at the school
- Policies and procedures. As a minimum, your school should have in place the following policies: code of practice, equality, participant welfare, health and safety. You should require a coach to sign up to these as part of a thorough school induction
- A DBS check completed where necessary.

First Kicks Sports Ltd obtains copies of Coaching and other Training Certificates & Qualifications during the application process.

'Skills for Sports' in partnership with Unison, states:

Sports coaches, assistants, coordinators, or instructors help pupils get the most out of sports and PE activities in schools. They can organise and plan sporting activities and support the work of a PE teacher. Teaching assistants can also support sports in schools.

What's involved

A sports coach's role can cover:

- implementing the school sport programme effectively
- promoting physical fitness and healthy lifestyles
- teaching students about safety in such areas as swimming pools, athletics fields, gymnasiums
- making sure all pupils you work with are included and involved

Skills and experience needed

School sports coaches generally need to have:

- interest and enthusiasm for many sports
- good spoken communication skills
- the ability to inspire confidence and motivate performance
- the ability to analyse problems
- perseverance and patience
- good organisational skills
- a sensitive and supportive approach
- first aid skills
- excellent team working abilities
- enjoy working with young people

Entry requirements

It is up to schools and local authorities (LAs) to decide what qualifications and experience applicants need to have, so it is important to check locally.

Some may employ people on the basis of their experience and potential alone. Others may require a qualification. Qualifications in subjects such as coaching, sports science, sports studies, movement studies, physical education, instructing exercise and fitness, are desirable.

If you are assisting a coach, you are unlikely to need a formal qualification to get started but a Level 1, sport-specific qualification will give you more confidence in your ability. To coach independently, you would usually be required to have a minimum standard of training - often leading to a Level 2 sports-specific coaching qualification.

The following qualifications are available for those not yet employed in the role:

- Level 2 Award in Support Work in Schools
- Level 3 Award in Supporting Teaching and Learning in Schools

However, these awards are solely theory-based, without requiring a placement in a school, so it is important to check with the school or LA whether they would accept the qualification.

Training and development

As a sports coach in a school, you may also be interested in becoming a higher level teaching assistant. To progress in your coaching, may wish to take a Level 3 qualification or deepen your skills in a particular area by attending a training course.

The Chartered Institute for the Management of Sport and Physical Activity (CIMSPA) run a continuing professional development programme. Visit the [CIMSPA website](#) for details.

‘The Coaching & Mentoring Network’ states:

What background do I need to be a coach?

The diversity of coaching and mentoring means that every coach will have a different route into becoming a coach. The most common career backgrounds for business coaches are (in no particular order) occupational psychology, OD consultancy, training, HR, counselling and senior management / leadership.

Within the personal or life coaching environments, backgrounds are even more diverse from sports coaches to hairdressers, from counsellors to councillors and from senior executives to actors. Coaching is usually about facilitating your client to come up with their own ideas and solutions, to develop and manage their own learning.

To be a good coach, therefore, means being able to listen and facilitate objectively without telling the client what you think the answers are! If you are thinking about becoming a coach because you like to solve peoples’ problems for them, then it may be worth considering a career in an advisory capacity rather than coaching.

What training or qualifications do I need?

Training is increasingly important. There are many different coach training companies all offering something different in terms of content, delivery and style so it’s important to find the course which both matches your personal learning style and will best equip you for the market you want to work in.

There is no legal requirement for a qualification or specific accreditation and different training organisations offer training at different levels from foundation through to doctorate. It is essential that, although there is no standard accreditation, you *take appropriate training and maintain your professional and personal development on an ongoing basis.*

In choosing a training company consider what market they aim at (eg life coaching, business, internal mentoring, executive coaching etc), and how this relates to your plans and strengths, how they deliver training (face-to-face, distance etc) and how long the course is. You might also want to consider who verifies the quality of the course or issues the qualification. For instance, some offer their own certification, others are accredited by Universities or academic bodies.

16. Influencing & Communication

Safeguarding Policy & Policy Statement

A copy of our Safeguarding Policy & our Safeguarding Policy Statement can be found on our website or shared on request.

Communication of Safeguarding information to our coaches, staff & volunteers

A copy of our Safeguarding Policy and Safeguarding information is communicated to the coaches on a regular basis via email. All staff are required to reply by return to confirm they have received, read and understood the information and this is recorded by our Administration team.

Coaches Pack

A copy of our Safeguarding Policy and Safeguarding information is sent to all new coaches via email during the application process, as they form part of the 'Coaches Pack' as they are required to read all of the information and sign to say that they have read and understood all of the information within the application form.

The Coaches Welcome Pack (which forms part of the Induction process) includes:

- Application Form for Employment
- Coaches Safeguarding Reporting Procedure & DSL Contact Details
- Code of Conduct – Coaches, Staff & Volunteers
- Code of Conduct – Children & Young People
- Code of Conduct – Parents & Carers
- FK Accident Record Form
- FK Coaches Medical Incident Reporting Procedure & DSL Contact Information
- FK Escalation Procedure & Emergency Referral Contact Information
- FK Head Injury Form
- FK Incident Record Form
- FK Logging a Safeguarding Concern Form
- FK Manual Handling Procedure
- Safeguarding Policy 2025
- Safeguarding Policy Statement
- H&S Policy
- H&S Law leaflet
- HMRC Starter Checklist – PAYE
- Invoice Template – PAYE or Self Employed
- KCSIE Safeguarding Key Points Poster 2019
- NSPCC Definitions and Signs of Abuse Fact Sheet 2020
- Understanding your right to work in the UK
- Visual Check Risk Assessment Form

- What is a share code

School's Information Pack & Partner's Information Pack

Our Safeguarding Policy and Safeguarding information are sent to the Schools and Partnership companies in the form of both an electronic 'Pack'. Hard copies will be distributed where necessary. This is to enable all (Coaches, School staff and Partnership Companies) to have access to the necessary resources to ensure any incidents are recorded and communicated appropriately.

The School's Information Pack & Partner's Information Pack includes:

- Safeguarding Policy Statement
- KCSIE Safeguarding Key Points Poster 2019 (for Coaches and School Staff)
- Code of Conduct – Coaches, Staff & Volunteers
- Code of Conduct – Children & Young People
- FK Accident Record FORM
- FK Accident Tracking FORM
- FK Head Injury FORM
- FK Incident FORM
- FK Escalation Procedure & Emergency Safeguarding Referral Contact Information

Partnership; Funding, Commissioning & Venue Leasing/Booking

Our Safeguarding Policy; Policy Statement and Safeguarding information is referred to when booking any venues and when entering into any Partnerships with external companies e.g. Holiday Camps.

Holiday Camp Information Pack

Our Safeguarding Policy Statement and Safeguarding information is distributed to coaches and venue managers ahead of commencement of any Holiday Camp.

The Holiday Camp Information Pack includes:

- Holiday Camp Risk Assessment – Part 1 - General Information
- Holiday Camp Risk Assessment – Part 2 - Checklist of Actions to be taken to minimise risk
- Holiday Camp Risk Assessment – Part 3 - Daily Environment Checks
- Holiday Camp Risk Assessment – Part 4 - Implementation Plan
- Safeguarding Policy Statement
- KCSIE Safeguarding Key Points Poster 2019 (for Coaches and Staff)
- NSPCC Definitions and Signs of Abuse Fact Sheet 2020
- FK Escalation Procedure & Emergency Safeguarding Referral Contact Information
- Coaches SFG Concern Reporting Procedure & DSL Contact details
- Coaches MEDICAL or INCIDENT Reporting Procedure & DSL Contact details
- Code of Conduct – Coaches, Staff & Volunteers
- Code of Conduct – Children & Young People
- Code of Conduct – Parents & Carers
- FK Accident Record FORM

- FK Accident Tracking FORM
- FK Head Injury FORM
- FK Incident FORM
- FK Logging a SFG Concern FORM
- FK Daily Register FORM
- FK Visitors Log FORM
- FK Photograph permission FORM
- FK Collection by Unknown Person FORM
- FK Medical FORM
- FK Record of Pre-existing Injuries FORM
- FK Permission to administer Medication FORM
- FK Record of Medication given FORM
- FK Allergy List FORM
- FK Health Management Plan FORM
- Fire Evacuation Plan POSTER
- Fire Evacuation Plan

Safeguarding Posters

These Safeguarding Posters are also published on our Website to enable all to have access to the information, including Coaches, Schools, Children & Young People:



17. Useful Contacts

First Kicks Sports Ltd's nominated Designated Safeguarding Lead is also our Director:-

Ellis Remy

(m) 07984 165 626 Work Mobile

(m) 07415 105 214 Office

(email) ellis@firstkickssports.co.uk

(email) office@firstkickssports.co.uk

First Kicks Sports Ltd's nominated Deputy Designated Safeguarding Lead is also our Director:-

Samuel Okikiolu

(m) 07903 686 922 Work Mobile
(m) 07415 105 214 Office
(email) samuel@firstkickssports.co.uk
(email) office@firstkickssports.co.uk

Education Safeguarding Consultant – Early Years

Nikki Baird

Nikki.Baird@learningtrust.co.uk

(t) 020 8820 7276

CEOP – www.ceop.police.uk

National Society for the Prevention of Cruelty to Children (NSPCC)

Weston House, 42 Curtain Road

London, EC2A 3NH

Tel: 020 7825 2500

nspcc.org.uk

NSPCC Helpline – 0808 800 5000

Leading children's charity fighting to end child abuse in the UK and Channel Islands

Child Protection in Sport Unit

NSPCC National Training Centre

3 Gilmour Close, Beaumont Leys

Leicester, LE4 1EZ

Tel: 0116 366 5590

thecpsu.org.uk

Working in partnership with all key stakeholders in sport to develop safeguards for children in sport

Sport England

21 Bloomsbury Street

London, WC1B 3HF

Tel: 020 7273 1551

sportengland.org

Sport England aims to lead the development of sport in England by influencing and serving the public, commercial and voluntary sectors

UK Sport

21 Bloomsbury Street

London, WC1B 3HF

Tel: 020 7211 5100

uksport.gov.uk

Providing strategic investment to enable Great Britain's Olympic and Paralympic sports and athletes to achieve their full medal winning potential

UK Coaching

Chelsea Close, Armley
Leeds, LS12 4HP
Tel: 0113 274 4802
ukcoaching.org

Helping create an active nation inspired through great coaching

Disclosure and Barring Service

PO Box 3961
Royal Wootton Bassett, SN4 4HF
Tel: 03000 200190
gov.uk/DBS

Helping employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children

Department for Education

Piccadilly Gate, Store Street
Manchester, M1 2WD
Tel: 0370 000 2288
gov.uk/dfes

Responsible for children's services and education, including early years, schools, higher and further education policy, apprenticeships and wider skills in England

Home Office

2 Marsham Street
London SW1P 4DF
Tel: 020 7035 4742
gov.uk/homeoffice

The first duty of the government is to keep citizens safe and the country secure. The Home Office plays a fundamental role in the security and economic prosperity of the UK

[Enfield Locality Team](#)

Advice – Child Protection Advisors:	020 8489 1061 / 7976 / 5426
Referrals – First Response Service:	0208 379 2507
Out of Hours Emergency Team:	0208 379 1000
Enfield Local Safeguarding Children Board (LSCB):	0208 379 2767

[Hackney Locality Team](#)

Emergency Duty Social Worker (Out of Hours Service):

Emergency Duty Team for Children (Aged 0-18): 0208 356 2710

City of London Children & Families Team: 0207 332 3621

Hackney First Access Screening Team (FAST): 0208 356 6956

[Children's Safeguarding Contacts London](#)

If you have concerns about the safety or the well-being of a child, please contact your local authority children's social care team. Contact details are available below:

Barking & Dagenham

Telephone: 020 8227 3811

Out of hours: 020 8594 8356

Secure Email: childrenservices2@lbbd.gov.uk

[residents/children-and-family-support/child-protection-and-care/child-protection/contact-our-protection-team/](#)

Barnet

Telephone: 020 8359 4066

Fax: 08715948766

Email: MASH@Barnet.gov.uk

Secure Email: mash@barnet.gcsx.gov.uk

Bromley

Telephone Children's Services (Mon-Fri 8.30 5.00pm): 020 8461 7373 / 7379 / 7026

Out of hours/weekends/public holidays: 0300 303 8671

Email (MASH): mash@bromley.gov.uk

Bexley

Telephone: (Mon-Fri, 9am – 5pm) 020 3045 5440

Out of hours (including weekends): 020 8303

7777 or 020 8303 7171

Secure

Email: Childrensocialcare.admin@bexley.gov.uk

City of London

Telephone Children's Services : 020 7332 3621 (9.00am- 5.00pm, Mon – Fri)

Email: children.duty@cityoflondon.gov.uk

Secure

email: Children.Duty@cityoflondon.cjsm.net

Out of hours: 020 8356 2710

Email: emergency.duty@hackney.gov.uk

Brent

Telephone: 020 8937 4300

Out of hours: 020 8863 5250

Fax: 020 8397 1986

Secure Email: Family.FrontDoor@brent.gov.uk

Web link: <https://www.brent.gov.uk/services-for->

Camden

Telephone: 020 7974 3317 (9.00am- 5.00pm)

Out of hours: 020 7974 4444

Email: LBCMASHadmin@camden.gov.uk

Secure

email: LBCMASHadmin@camden.gov.uk.cjsm.net

Croydon

Croydon MASH Team
Tel: 020 8726 6400
Email: childreferrals@croydon.gov.uk

Ealing

Telephone: 020 8825 8000
Out of hours: 020 8825 8000
Fax: 020 8825 5454
Email: ECIRS@ealing.gov.uk
Secure Email: Via Egress – please telephone if unable to access Egress directly.

Enfield

Telephone: 020 8379 5555
Out of hours: 020 8379 1000
Email: spoe@enfield.gov.uk
Secure Email: spoe@enfield.gcsx.gov.uk

Greenwich

Telephone referrals: 020 8921 3172 (Mon-Thur, 9.00-5.30pm, Fri 9.00-4.30pm)
Out of hours: 020 8854 8888
Fax: 020 8921 3180
Secure Email: MASH-referrals@royalgreenwich.gov.uk

Hackney

Hackney First Access Screening Team (FAST)
Email: fast@hackney.gov.uk
Secure Email: fast@hackney.gov.uk or fast.account@hackney.cjsm.net
Tel: 020 8356 5500
Tel: 020 8 356 2710 (Out of Hours)
Fax: 020 8356 5516 / 17

Hammersmith and Fulham

Telephone: 020 8753 6600
Out of hours: 020 8748 8588
Fax: 020 8753 4209
Email: familyservices@lbhf.gov.uk

Haringey

MASH Telephone: 020 8489 4470
MASH email: MASHReferral@haringey.gov.uk
Out of hours: 020 8489 0000
LSCB Telephone: 020 8489 3145 / 5837
LSCB Email: lscb@haringey.gov.uk

Harrow

Telephone: 020 8901 2690
Out of hours: 020 8424 0999
Fax: 020 8861 1816
Secure
Email: duty&assess@harrow.gov.uk.cjsm.net

Havering

Telephone: 01708 433 222
Out of hours: 01708 433 999
Fax: 01708 433 375
Email: tmash@havering.gov.uk
Secure email: tmash@havering.gcsx.gov.uk

Hillingdon

Telephone: 01895 556633
Out of hours: 01895 556633
Email: lbhmash@hillingdon.gov.uk

Hounslow

Team number: 0208 583 6600 (option 2 and then 3) Out of hours: 0208 583 2222
Team
email: childrensocialcare@hounslow.gov.uk

Islington

Telephone: 020 7527 7400
Out of hours: 020 7226 0992
Email: CSCreferrals@islington.gov.uk
Secure Email: CSCreferrals@islington.gov.uk

Kensington and Chelsea

Telephone: 020 7361 3013
Out of hours: 020 7373 3227
Fax: 020 7368 0228
Email: socialservices@rbkc.gov.uk

Kingston Upon-Thames

Contact our children's Single Point of Access (SPA) Team (Open 8.00-6.00 pm, Mon-Fri)
Telephone: 020 8547 5008
Secure
Email: spa.referrals@achievingforchildren.org.uk

Out of Hours Duty Social Worker:
If you need to speak to someone urgently outside of hours, please ring the Duty Social Worker on:-
Telephone: 020 8770 5000

Lambeth

Telephone: 020 7926 5555 (24 hours)
Email: helpandprotection@lambeth.gov.uk
Secure Email: helpandprotection@lambeth.cjsm.net

Lewisham

Telephone: 020 8314 6660
Out of hours: 020 8314 6000
Secure Email: mashagency@lewisham.gov.uk

Merton

Telephone: 020 8545 4866/3736
Out of hours: 020 8770 5000

Fax: 020 8545 4198
Email: mertonLSCB@merton.gov.uk
Merton MASH: 020 85454227 (Out of Hours: 020 8770 5000)
Secure
Email: MertonLSCB@merton.gov.uk.cjsm.net

Newham

Telephone: 020 8430 2000
Triage Golden Number: 020 3 373 4600
Fax: 020 8430 1003
EDT: 020 8430 2000
Secure Email:
ChildrensTriage@newham.gcsx.gov.uk

Redbridge

Telephone: 020 8708 3885
Out of hours: 020 8708 5897 (after 5.00pm and weekends)
Email: cpat.referrals@redbridge.gov.uk

Richmond

Contact our children's Single Point of Access (SPA) Team (8.00-6.00pm, Mon-Fri)
Telephone: 020 8547 5008
Out of hours: 020 8770 5000
Secure
Email: spa.referrals@achievingforchildren.org.uk

Southwark

Telephone: 020 7525 1921
Out of hours: 020 7525 5000
Fax: 020 7525 7992
Secure Email: MASH@southwark.gov.uk

Sutton

Telephone: 020 8770 6001
Out of hours: 020 8770 5000

Email: mash@sutton.gov.uk

Secure Email: mash@sutton.gov.uk.cjism.net

Tower Hamlets

Telephone: 020 7364 5606 / 5601

Out of hours: 020 7364 4079

Fax: 020 7364 2656 / 2655

Secure Email: MASH @towerhamlets,gcsx.gov.uk

Waltham Forest

Telephone: 020 8496 2310

Out of hours: 020 8496 3000

Fax: 020 8496 2313

Secure Email: MASH

requests@walthamforest.gov.uk

Wandsworth

Telephone: 020 8871 6622

Out of ours (after 5pm): 020 8871 6000

Email: IPOC@wandsworth.gov.uk

Secure Email: ipoc@wandsworth.cjism.net

Westminster

Telephone: 020 7641 4000

Out of hours: 020 7641 6000

Fax: 020 7641 7526

Email: accesstochildre services@westminster.gov.uk

Child Protection Policy

Contents

- Introduction
- Policy statement/aims
- Promoting good practice
- Good practice guidelines
- Use of photographic/filming equipment
- Recruitment and training of staff and volunteers
- Responding to allegations or suspicions
- Reporting concerns about poor practice or suspected abuse
- Confidentiality
- Enquiries and further action
- Bullying
- Reporting concerns outside the immediate sporting environment (e.g. a parent or carer)
- Providing information to police or social services

Introduction

All sporting organizations which make provision for children and young people must ensure that:

- The welfare of the child is paramount
- All children, whatever their age, culture, disability, gender, language, racial origin religious beliefs and/or sexual identity have the right to protection from abuse
- All suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately
- All staff (paid/unpaid) working in sport have a responsibility to report concerns to the appropriate officer

First Kicks Sports coaches are not trained to deal with situations of abuse or to decide if abuse has occurred.

Policy statement/aims

First Kicks Sports Ltd has a duty of care to safeguard all children involved in First Kicks Sports Ltd from harm. All children have a right to protection, and the needs of disabled children and others who may be particularly vulnerable must be taken into account.

First Kicks Sports Ltd will ensure the safety and protection of all children involved in First Kicks Sports Ltd through adherence to the Child Protection guidelines adopted by First Kicks Sports Ltd.

A child is defined as a person under the age of 18 (The Children Act 1989).

Policy aims

The aim of the First Kicks Sports Ltd Child Protection Policy is to promote good practice:

- Providing children and young people with appropriate safety and protection whilst in the care of First Kicks Sports Ltd
- Allow all staff / volunteers to make informed and confident responses to specific child protection issues

Promoting good practice

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgment about the appropriate action to take. Abuse can occur within many situations including the home, school and the sporting environment. Some individuals will actively seek employment or voluntary work with young people in order to harm them. A coach, instructor, teacher, official or volunteer will have regular contact with young people and be an important link in identifying cases where they need protection. All suspicious cases of poor practice should be reported following the guidelines in this document. When a child enters the club activity having been subjected to child abuse outside the sporting environment, sport can play a crucial role in improving the child's self-esteem. In such instances the club activity organizer must work with the appropriate agencies to ensure the child receives the required support.

Good practice guidelines

All personnel should be encouraged to demonstrate exemplary behavior in order to promote children's welfare and reduce the likelihood of allegations being made.

The following are common sense examples of how to create a positive culture and climate.

Good practice means:

- Always working in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets)
- Treating all young people/disabled adults equally, and with respect and dignity
- Always putting the welfare of each young person first, before winning or achieving goals
- Maintaining a safe and appropriate distance with players (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with a child or to share a room with them)
- Building balanced relationships based on mutual trust which empowers children to share in the decision-making process
- Making sport fun, enjoyable and promoting fair play
- Ensuring that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the Coach Education Programme. Care is needed, as it is difficult to maintain hand positions when the child is constantly moving. Young people and their parents should always be consulted and their agreement gained

- Keeping up to date with technical skills, qualifications and insurance in sport
- Involving parents/carers wherever possible. For example, encouraging them to take responsibility for their children in the changing rooms. If groups have to be supervised in the changing rooms, always ensure parents, teachers, coaches or officials work in pairs
- Ensuring that if mixed teams are taken away, they should always be accompanied by a male and female member of staff. However, remember that same gender abuse can also occur
- Ensuring that at tournaments or residential events, adults should not enter children's rooms or invite children into their rooms
- Being an excellent role model - this includes not smoking or drinking alcohol in the company of young people
- Giving enthusiastic and constructive feedback rather than negative criticism
- Recognizing the developmental needs and capacity of young people and disabled adults - avoiding excessive training or competition and not pushing them against their will
- Securing parental consent in writing to act *in loco parentis*, if the need arises to administer emergency first aid and/or other medical treatment
- Keeping a written record of any injury that occurs, along with the details of any treatment given
- Requesting written parental consent if club officials are required to transport young people in their cars

Practices to be avoided

The following should be *avoided* except in emergencies. If cases arise where these situations are unavoidable it should be with the full knowledge and consent of someone in charge in the club or the child's parents. For example, a child sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a child up at the end of a session:

- Avoid spending time alone with children away from others
- Avoid taking or dropping off a child to an event or activity

Practices never to be sanctioned

The following should *never* be sanctioned. You should never:

- Engage in rough, physical or sexually provocative games, including horseplay
- Share a room with a child
- Allow or engage in any form of inappropriate touching
- Allow children to use inappropriate language unchallenged
- Make sexually suggestive comments to a child, even in fun
- Reduce a child to tears as a form of control
- Fail to act upon and record any allegations made by a child
- Do things of a personal nature for children or disabled adults, that they can do for themselves
- Invite or allow children to stay with you at your home unsupervised

N.B. It may sometimes be necessary for staff or volunteers to do things of a personal nature for children, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of parents and the players involved. There is a need to be responsive to a

person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

Incidents that must be reported/recorded

If any of the following occur you should report this immediately to the appropriate officer and record the incident. You should also ensure the parents of the child are informed:

- If you accidentally hurt a player
- If he/she seems distressed in any manner
- If a player appears to be sexually aroused by your actions
- If a player misunderstands or misinterprets something you have done

Use of photographic/filming equipment at sporting events

There is evidence that some people have used sporting events as an opportunity to take inappropriate photographs or film footage of young and disabled sportspeople in vulnerable positions. All clubs should be vigilant and any concerns should be reported to the Club Child Protection Officer.

Videoring as a coaching aid

There is no intention to prevent club coaches and teachers using video equipment as a legitimate coaching aid. However, performers and their parents/carers should be made aware that this is part of the coaching programme and their consent obtained, and such films should be stored safely.

Recruitment and training of staff and volunteers

First Kicks Sports Ltd recognizes that anyone may have the potential to abuse children in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children. Pre-selection checks must include the following:

- All volunteers/staff should complete an application form. The application form will elicit information about an applicant's past and a self disclosure about any criminal record
- Consent should be obtained from an applicant to seek information from the Criminal Records Bureau / DBS Barring Service
- Two confidential references, including one regarding previous work with children. These references must be taken up and confirmed through telephone contact
- Evidence of identity (passport or driving license with photo)

Interview and induction

All employees (and volunteers) will be required to undergo an interview carried out to acceptable protocol and recommendations. All employees and volunteers should receive an induction, during which:

- A check should be made that the application form has been completed in full (including sections on criminal records and self-disclosures)
- Their qualifications should be substantiated
- The job requirements and responsibilities should be clarified
- Child protection procedures are explained and training needs are identified

Training

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:

- Analyze their own practice against established good practice, and to ensure their practice is not likely to result in allegations being made.
- Recognize their responsibilities and report any concerns about suspected poor practice or possible abuse.
- Respond to concerns expressed by a child or young person.
- Work safely effectively with children.

First Kicks Sports Ltd requires:

- Coaching staff to attend a recognized 3-hour good practice and child protection awareness training workshop, to ensure their practice is exemplary and to facilitate the development of a positive culture towards good practice and child protection.
- Non-coaching staff and volunteers to complete recognized awareness training on child protection.
- Relevant personnel to receive advisory information outlining good practice and informing them about what to do if they have concerns about the behavior of an adult towards a young person.
- Relevant personnel to gain national first aid training (where necessary).

Responding to allegations or suspicions

It is not the responsibility of anyone working in First Kicks Sports Ltd, in a paid or unpaid capacity to decide whether or not child abuse has taken place. However there is a responsibility to act on any concerns by reporting these to the appropriate officer or the appropriate authorities.

First Kicks Sports Ltd will assure all staff/volunteers that it will fully support and protect anyone, who in good faith reports his or her concern that a colleague is, or may be, abusing a child.

Where there is a complaint against a member of staff there may be three types of investigation:

- A criminal investigation
- A child protection investigation
- A disciplinary or misconduct investigation

The results of the police and child protection investigation may well influence and inform the disciplinary investigation, but all available information will be used to reach a decision.

Reporting concerns about poor practice and suspected abuse

Poor practice

If, following consideration, the allegation is clearly about poor practice the designated/Club Child Protection Officer will deal with it as a misconduct issue.

If the allegation is about poor practice by the First Kicks Sports Ltd Child Protection Officer, or if the matter has been handled inadequately and concerns remain, it should be reported to the relevant (*Sport Governing Body*) officer who will decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

Suspected Abuse

Any suspicion that a child has been abused by either a member of staff or a volunteer should be reported to the First Kicks Sports Ltd, Child Protection Officer, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.

The First Kicks Sports Ltd Child Protection Officer will refer the allegation to the social services department who may involve the police.

The parents or carers of the child will be contacted as soon as possible following advice from the social services department.

The First Kicks Sports Ltd Child Protection Officer should also notify the relevant (*Sport Governing Body*) officer who in turn will inform the (*Sport Governing Body*) Child Protection Officer who will deal with any media enquiries.

If the First Kicks Sports Ltd Child Protection Officer is the subject of the suspicion/allegation, the report must be made to the appropriate Manager or in his/her absence the (*Sport Governing Body*) Child Protection Officer who will refer the allegation to Social Services.

Confidentiality

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. This includes the following people:

- The Club Child Protection Officer
- The parents of the person who is alleged to have been abused
- The person making the allegation
- Social services/police
- The First Kicks Sports Ltd Regional Development Manager and (*Sport Governing Body*) Child Protection Officer

Seek social services advice on who should approach the alleged abuser (or parents if the alleged abuser is a child).

Information should be stored in a secure place with limited access to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

Internal enquiries and possible suspension

The First Kicks Sports Ltd) Child Protection Officer will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries.

Irrespective of the findings of the social services or police inquiries the First Kicks Sports Ltd Disciplinary Committee will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled.

This may be a difficult decision; particularly where there is insufficient evidence to uphold any action by the police. In such cases, the First Kicks Sports Ltd Disciplinary Committee must reach a decision based upon the available information which could suggest that on a balance of probability; it is more likely than not that the allegation is true. The welfare of the child should remain of paramount importance throughout.

Support to deal with the aftermath of abuse

Consideration should be given to the kind of support that children, parents and members of staff may need. Use of helplines, support groups and open meetings will maintain an open culture and help the healing process.

The British Association for Counseling Directory is available from The British Association for Counseling, 1 Regent Place, Rugby CV21 2PJ, Tel: 01788 550899, Fax: 01788 562189, *E-mail: bac@bacp.co.uk*
www.bacp.co.uk

Consideration should be given to what kind of support may be appropriate for the alleged perpetrator.

Allegations of previous abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children).

Where such an allegation is made, the club should follow the procedures as detailed above and report the matter to the social services or the police. This is because other children, either within or outside sport, may be at risk from this person. Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the details of the Protection of Children Act 1999.

Bullying

Every child has the right to experience sport in a safe environment free from abuse and bullying. Sports organizations play an important role in creating a positive club ethos that challenges bullying by empowering young people to understand the impact of bullying, how best to deal with it and agree standards of behavior.

Reporting concerns outside the immediate sporting environment (e.g. a parent or carer)

Report your concerns to the Club Child Protection Officer, who should contact social services or the police as soon as possible.

If the Club Child Protection Officer is not available, the person being told of or discovering the abuse should contact social services or the police immediately.

Social Services and the Club Child Protection Officer will decide how to involve the parents/carers.

The Club Child Protection Officer should also report the incident to the First Kicks Sports Ltd Governing Body. The Governing Body should ascertain whether or not the person/s involved in the incident play a role in First Kicks Sports Ltd and act accordingly.

Maintain confidentiality on a need to know basis only.

Providing information to police or social services

Information about suspected abuse must be accurate and a detailed record should always be made at the time of the disclosure/concern. It should include the following:

- The child's name, age and date of birth of the child
- The child's home address and telephone number
- Whether or not the person making the report is expressing their own concerns or those of someone else
- The nature of the allegation. Include dates, times, any special factors and other relevant information
- Make a clear distinction between what is fact, opinion or hearsay
- A description of any visible bruising or other injuries. Also any indirect signs, such as behavioral changes
- Details of witnesses to the incidents
- The child's account, if it can be given, of what has happened and how any bruising or other injuries occurred
- Have the parents been contacted?
- If so what has been said?
- Has anyone else been consulted? If so record details
- If the child was not the person who reported the incident, has the child been spoken to? If so what was said?
- Has anyone been alleged to be the abuser? Record details
- Where possible referral to the police or social services should be confirmed in writing within 24 hours and the name of the contact who took the referral should be recorded

If you have any concerns about a child or young person call the NSPCC on 0808 800 5000, text 88858 or visit www.nspcc.org.uk for immediate advice.

Appendix 2

Online Safety & Social Media Policy

The NSPCC States:

Undertaking remote teaching safely

With every UK nation in lockdown or high-level coronavirus restrictions, most children are learning remotely. Just like with face-to-face teaching, safeguarding and child protection is vital when teaching remotely, especially as the usual child protection systems are under increased pressure during the pandemic. It's important that you take steps to ensure children are protected.

We've updated our information to help you carry out remote teaching safely. It includes:

- safeguarding considerations for remote teaching
- recognising and responding to child protection concerns
- providing extra support when needed
- information about the government guidance across the UK.

Remote teaching

You should consider what safeguarding measures you need to put in place when teaching children remotely. These measures should be included in your safeguarding and child protection policies and procedures.

Here are some things you need to take into account:

- **Recruiting suitable staff and volunteers**
- Anyone working or volunteering with children, whether face-to-face or online, needs to be recruited following safer recruitment principles to help ensure they are suitable to work with children.
- **Which platform will you use?**

Always make sure the platform you are using is suitable for the children's age group, stage of development and ability. Set up school accounts for any online platforms you use (don't use teachers' personal accounts). Double check the privacy settings.

First Kicks Sports Ltd currently uses Google Classrooms and Zoom for Remote teaching.

Consent

You should make sure parents, carers and children understand the benefits and risks of online lessons and get written consent for children to be involved. Talk to your staff about how you plan to deliver remote lessons – are they comfortable with teaching online?

Parent's consent is managed by the Schools or Third Parties we are providers to.

Livestreaming and recording sessions

If you plan to record or livestream lessons, assemblies or other activities via an online platform, you need to assess any risks and take appropriate actions to minimise harm.

You need to think about how to carry out your sessions in a way that meets your needs and the needs of the children you're working with.

Decide whether you're going to do a livestream or record a session for children to watch later.

Recorded webinars might be more suitable if children and families need flexibility about when they learn at home. Livestreaming might help teachers engage with children to help them learn and monitor their progress.

If you're livestreaming a lesson or activity, think about whether you will ask children to turn their cameras on.

Some children might not feel comfortable turning their webcams on. They may be shy, unsure of the technology or have had a bad experience using video calls in the past. Some children, parents and carers may be uncomfortable with classmates being able to see into their home. And some might want to hide something going on at home, such as abuse and neglect.

Every child is different. Some children might be more confident about asking questions with their cameras off, and others might prefer it with the camera on.

If a child doesn't want to turn their camera on, try to find out why. Consider whether you need to check in with them and their family separately to make sure everything is okay.

Make sure your school has clear child protection procedures for staff to follow if they are concerned about anything they have seen on a video call.

Maintaining professional boundaries

Teaching online is different to teaching face-to-face. But adults should always maintain professional relationships with children and young people.

Remind staff of your code of conduct and make it clear how you expect them to behave.

If you're recording or live streaming lessons, make sure teachers are in a neutral area where nothing personal or inappropriate can be seen or heard in the background. You should also make sure that children are in a neutral area if they can be seen on camera.

Adult to child ratios

It's best practice to have at least two adults present when working with children and young people. This applies both on- and offline.

The number of adults you need for online lessons will vary depending on the children's age and stage of development, and the activities being carried out.

For example, if you're using 'breakout rooms' on an online platform, you need to consider how will these be supervised.

Contacting children at home

Sometimes staff might need to contact children individually, for example to give feedback on homework.

You should also think about how your staff will check on children's wellbeing while they are spending more time at home. Consider how best to do this in a way that is suitable for each child and their family, and also helps you make sure the child is safe and supported.

School staff should only contact children during normal school hours, or at times agreed by the school leadership team (DfE, 2020)¹.

Any one-to-one sessions, for example pastoral care meetings, should be risk assessed and approved by the school's leadership team (DfE, 2020)². Make sure staff know what safeguarding measures to take if they are having a one-to-one conversation with a child, and what to do if they have any concerns about a child's welfare.

Make sure staff know how to respond if a child tells them that something isn't right at home.

Use parents' or carers' email addresses or phone numbers to communicate with children, unless this poses a safeguarding risk. Use school accounts to communicate via email or online platforms, never teachers' personal accounts.

Make sure any phone calls are made from a blocked number so teacher's personal contact details are not visible.

If staff members are accessing families' contact details at home, ensure they comply with the Data Protection Act 2018.

Child protection and wellbeing

Child protection concerns

If children aren't seeing trusted adults at school every day, it's even more important that staff are able to identify any child protection concerns and take appropriate action.

For example, concerns may arise when:

- a staff member sees or hears something worrying during an online lesson
- a child discloses abuse during a phone call or via email.

Remind all your staff of your safeguarding and child protection policy and procedures. Make sure they know how to recognise and respond to the signs of abuse.

Remember that anyone can contact our helpline for advice if they are worried about a child's wellbeing. Our trained professionals will talk through your concerns with you and take action to protect the child if necessary. You can call us on [0808 800 5000](tel:08088005000) or email help@nspcc.org.uk.

Online safety

Children and young people are likely to spend more time online during high-level restrictions. Talk to them regularly about the benefits and risks of the online world and give them space to ask questions and talk about anything that worries them.

Children who need extra support

Your school should be aware of any children who need extra support while they are learning at home. This might be because:

- they have additional needs or special educational needs and disabilities (SEND)
- their families need extra support
- they have mental health issues
- they are at risk of abuse and neglect.

Think about how you will keep in regular contact with these children, support their learning and monitor their wellbeing.

Online technology continues to advance and change the way people communicate and interact on a daily basis. Sports organisations, coaches and others involved in providing activities for children and young people are increasingly using the internet and social media to promote sport and communicate with them. These forms of digital media and communication can provide great benefits. However, they can also pose potential safeguarding risks to children and young people.

Online safety risks for young people can include, but are not limited to:

- posting personal information that can identify and locate a child offline
- potential for inappropriate relationships between adults in positions of trust and the young people they work with
- sexual grooming, luring, exploitation and abuse, or unwanted contact
- exposure to inappropriate content, including pornography, racist or hate material or violent behaviour
- glorifying activities such as drug taking or excessive drinking

What online safety means for sport:

Communicating with children and young people online can have great benefits for an organisation, from encouraging a team ethos, to gaining new club members. Unfortunately, having negative experiences online can affect a young person's enjoyment of sport as well as their performance. Organisations should make sure they put appropriate safeguards in place to protect children from potential risks whilst in their care or communicating with them online.

Social media sites allow users to create their own content and share it with a vast network of individuals. When young people set up profiles on websites and apps such as Facebook, Twitter and Instagram, they share information about themselves. If things such as their name, photographs, social activities or hobbies and interests are publicly available, they can be used by strangers to identify individual children.

Additional risks include:

- cyberbullying or berating by peers and people they consider 'friends' – in sport this can include negative comments or reactions to their performance or achievement
- being encouraged to create or share inappropriate or harmful material of themselves or others, including sexting (sexual images or video)
- making themselves identifiable by posting personal details on social media such as they school they attend or their home address
- encouragement to take part in violent behaviour or harmful trends
- communicating with people they don't know, including potentially dangerous individuals
- communicating directly with staff or other adults in an inappropriate way
- risks of online grooming

What social media means for sport:

Social media provides unique opportunities for sports organisations to engage and develop relationships with people in a creative and dynamic forum where users are active participants. It's widely used to promote sports activities, campaigns and events. Groups, clubs and other sports organisations also use it to communicate with coaches, officials and participants (including young people) regarding club news. Just like other online platforms, experiencing negative behaviour on social media can have an impact on a young person's performance and desire to participate in sport. If not used appropriately, it's easy for sports organisations to open young people's identities up to the wrong people and make them vulnerable online.

The aims of our online safety policy are:

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

Understanding the online world:

As part of using the internet and social media, our organisation will:

- understand the safety aspects – including what is acceptable and unacceptable behaviour for staff and children – when using websites, social media, apps and other forms of digital communication
- be aware that it doesn't matter what device for digital interaction, but that the same safety aspects apply whether it is a computer, mobile phone or game console
- when using social media platforms (including Facebook, Twitter and Instagram) ensure that we adhere to relevant legislation and good practise guidelines
- regularly review existing safeguarding policies and procedures to ensure that online safeguarding issues are fully integrated, including:
 - making sure concerns of abuse or disclosures that take place online are written into reporting procedures
 - incorporating online bullying (cyberbullying) in our anti-bullying policy
- provide training for the person responsible for managing our organisation's online presence

Managing our online presence:

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

- all social media accounts will be password-protected, and at least 3 members of staff will have access to each account and password
- the account will be monitored by a designated person, who will have been appointed by the club committee

- the designated person managing our online presence will seek advice from our designated safeguarding lead to advise on safeguarding requirements
- a designated supervisor will remove inappropriate posts by children or staff, explaining why, and informing anyone who may be affected (as well as the parents of any children involved)
- account, page and event settings will be set to 'private' so that only invited club members can see their content
- identifying details such as a child's home address, school name or telephone number shouldn't be posted on social media platforms
- any posts or correspondence will be consistent with our aims
- we'll make sure children and young people are aware of who manages our social media accounts and who to contact if they have any concerns about the running of the account
- parents will be asked to give their approval for us to communicate with their children through social media, or by any other means of communication
- parents will need to give permission for photographs or videos of their child to be posted on social media
- all of our accounts and email addresses will be appropriate and fit for purpose

What we expect of staff and visitors:

- staff should be aware of this policy and behave in accordance with it
- staff should seek the advice of the designated safeguarding lead if they have any concerns about the use of the internet or social media
- staff should communicate any messages they wish to send out to children and young people to the designated person responsible for the organisation's online presence
- staff should not 'friend' or 'follow' children or young people from personal accounts on social media
- staff should make sure any content posted is accurate and appropriate, as young people may 'follow' them on social media
- staff should not communicate with young people via personal accounts or private messages
- rather than communicating with parents through personal social media accounts, staff should choose a more formal means of communication, such as face-to-face, in an email or in writing, or use an organisational account, profile or website
- at least one other member of staff should be copied into any emails sent to children or young people
- staff should avoid communicating with children or young people via email outside of normal office hours
- emails should be signed off in a professional manner avoiding the use of emojis or symbols such as 'kisses' (X's)
- any disclosure of abuse reported through social media should be dealt with in the same way as a face-to-face disclosure, according to our reporting procedures
- smartphone users should respect the private lives of others and not take or distribute pictures of other people if it could invade their privacy
- staff and young people must not engage in 'sexting' or send pictures to anyone that are obscene, indecent or menacing

What we expect of children and young people:

- children should be aware of this online safety policy and agree to its terms
- we expect children and young people's behaviour online to be consistent with the guidelines within this policy with regard to use of all digital devices, including smartphones, tablets and consoles

Using mobile phones or other digital technology:

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

- staff will avoid having children's or young people's personal mobile numbers and will instead seek contact through a parent or guardian
- we'll seek parental permission on each occasion we need to contact children or young people directly; the purpose for each contact will be clearly identified and agreed upon
- a method of accountability will be arranged, such as copies of texts also being sent to the club's lead welfare officer or to parents
- staff should have a separate phone from their personal one for any contact with parents or young people
- texts will be used for communication information – such as reminding children or young people about upcoming events, which kit to bring or practise timings -and not to engage in conversation
- if a young person misinterprets such communication and tries to engage a staff member in conversation, the member of staff will take the following steps:
 - end the conversation or stop replying
 - suggest discussing the subject further at the next practise or event
 - if concerned about the child or young person, provide contact details for the club's lead welfare officer or appropriate agencies

Using mobile phones during sports activities:

So that all children can enjoy and actively take part in sports activities, we discourage the use of mobile phones during such activities. As part of this policy we will:

- make children aware of how and who to contact if there is an emergency or a change to previously agreed arrangements with the organisation.
- Inform parents of appropriate times they can contact children who are away at camps, trips or events and discourage them from attempting to contact outside of these times
- Advise parents that it may not be possible to contact children during activities and provide a contact within the club or organisation who will be reachable should there be an emergency
- Explain to young people how using mobile phones during activities has an impact on their safe awareness of their environment, and their level of participation and achievement

Use of other digital devices and programmes:

The principles in this policy apply no matter which current or future technology is used – including computers, laptops, tablets, web-enabled games consoles and smart TVs - and whether an app, programme or website is used.

If any digital devices are used as part of activities within the organisation:

- We expect children and young people to adhere to the guidelines surrounding online use and behaviour set out in this policy
- We'll establish appropriate restrictions, more commonly known as 'parental controls', on any device provided to prevent misuse or harm

As an organisation, we commit to implementing this policy and addressing any concerns within a timely manner and within these guidelines.

Appendix 3

Data Protection Policy

Our Data Protection Policy sets out the obligations of First Kicks Sports Ltd, a company registered in United Kingdom under number [7750930](#), whose registered office is at [Vision 25 Electric Avenue Enfield EN3 7DG](#) (“the Company”) regarding data protection and the rights of our Staff (“data subjects”) in respect of their personal data under Data Protection Law (all legislation and regulations in force from time to time regulating the use of personal data and the privacy of electronic communications including, but not limited to, EU Regulation 2016/679 General Data Protection Regulation (“GDPR”), the Data Protection Act 2018, and any successor legislation or other directly applicable EU regulation relating to data protection and privacy for as long as, and to the extent that, EU law has legal effect in the UK).

Our Policy sets the Company’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.

The Company’s Data Protection Officer is *Samuel Okikiolu (m) 07903 686 922* The Data Protection Officer is responsible for administering this Policy and for developing and implementing any applicable related policies, procedures, and/or guidelines.

All staff are responsible for ensuring that all employees, agents, contractors, or other parties working on behalf of the Company comply with this Policy and, where applicable, must implement such practices, processes, controls, and training as are reasonably necessary to ensure such compliance.

Any questions relating to our Data Protection Policy or to Data Protection Law should be referred to the Data Protection Officer: *Samuel Okikiolu (m) 07903 686 922 (email) samuel@firstkickssports.co.uk*

The full Data Protection Policy is as follows:

Definitions

“consent”

means the consent of the data subject which must be a freely given, specific, informed, and unambiguous indication of the data subject’s wishes by which they, by a statement or by a clear affirmative action, signify their agreement to the processing of personal data relating to them;

“data controller”

means the natural or legal person or organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data. For the purposes of this Policy, the Company

“data processor”	is the data controller of all personal data used in our business for our commercial purposes;
“data subject”	means a natural or legal person or organisation which processes personal data on behalf of a data controller;
“EEA”	means a living, identified, or identifiable natural person about whom the Company holds personal data;
“personal data”	means the European Economic Area, consisting of all EU Member States, Iceland, Liechtenstein, and Norway;
“personal data breach”	means any information relating to a data subject who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data, an online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural, or social identity of that data subject;
“processing”	means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored, or otherwise processed;
“pseudonymisation”	means any operation or set of operations performed on personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
“special category personal data”	means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data is not attributed to an identified or identifiable natural person; and means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sexual life, sexual orientation, biometric, or genetic data.

1. **Scope**

- The Company is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and trust of all individuals with whom it deals.
- The Company’s Data Protection Officer is Samuel Okikiolu. The Data Protection Officer is responsible for administering this Policy and for developing and implementing any applicable related policies, procedures, and/or guidelines.
- All Directors and the Office Manager are responsible for ensuring that all employees, agents, contractors, or other parties working on behalf of the Company comply with this

Policy and, where applicable, must implement such practices, processes, controls, and training as are reasonably necessary to ensure such compliance.

- Any questions relating to this Policy or to Data Protection Law should be referred to the Data Protection Officer. In particular, the Data Protection Officer should always be consulted in the following cases:
 - a) if there is any uncertainty relating to the lawful basis on which personal data is to be collected, held, and/or processed;
 - b) if consent is being relied upon in order to collect, hold, and/or process personal data;
 - c) if there is any uncertainty relating to the retention period for any particular type(s) of personal data;
 - d) if any new or amended privacy notices or similar privacy-related documentation are required;
 - e) if any assistance is required in dealing with the exercise of a data subject's rights (including, but not limited to, the handling of subject access requests);
 - f) if a personal data breach (suspected or actual) has occurred;
 - g) if there is any uncertainty relating to security measures (whether technical or organisational) required to protect personal data;
 - h) if personal data is to be shared with third parties (whether such third parties are acting as data controllers or data processors);
 - i) if personal data is to be transferred outside of the EEA and there are questions relating to the legal basis on which to do so;
 - j) when any significant new processing activity is to be carried out, or significant changes are to be made to existing processing activities, which will require a Data Protection Impact Assessment;
 - k) when personal data is to be used for purposes different to those for which it was originally collected;
 - l) if any automated processing, including profiling or automated decision-making, is to be carried out; or
 - m) if any assistance is required in complying with the law applicable to direct marketing.

2. **The Data Protection Principles**

This Policy aims to ensure compliance with Data Protection Law. The GDPR sets out the following principles with which any party handling personal data must comply. Data controllers are responsible for, and must be able to demonstrate, such compliance. All personal data must be:

- processed lawfully, fairly, and in a transparent manner in relation to the data subject;
- collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed;
- accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of the data subject;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss,

destruction, or damage, using appropriate technical or organisational measures.

3. **The Rights of Data Subjects**

The GDPR sets out the following key rights applicable to data subjects:

- The right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure (also known as the 'right to be forgotten');
- the right to restrict processing;
- the right to data portability;
- the right to object; and
- rights with respect to automated decision-making and profiling.

4. **Lawful, Fair, and Transparent Data Processing**

- Data Protection Law seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. Specifically, the GDPR states that processing of personal data shall be lawful if at least one of the following applies:
 - a) the data subject has given consent to the processing of their personal data for one or more specific purposes;
 - b) the processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract;
 - c) the processing is necessary for compliance with a legal obligation to which the data controller is subject;
 - d) the processing is necessary to protect the vital interests of the data subject or of another natural person;
 - e) the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller; or
 - f) the processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.
- [If the personal data in question is special category personal data (also known as "sensitive personal data"), at least one of the following conditions must be met:
 - a) the data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless EU or EU Member State law prohibits them from doing so);
 - b) the processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law (insofar as it is authorised by EU or EU Member State law or a collective agreement pursuant to EU Member State law which provides for appropriate safeguards for the fundamental rights and interests of the data subject);
 - c) the processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;
 - d) the data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects;

- e) the processing relates to personal data which is manifestly made public by the data subject;
- f) the processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity;
- g) the processing is necessary for substantial public interest reasons, on the basis of EU or EU Member State law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject;
- h) the processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the GDPR;
- i) the processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of EU or EU Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy); or
- j) the processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.]

5. Consent

If consent is relied upon as the lawful basis for collecting, holding, and/or processing personal data, the following shall apply:

- Consent is a clear indication by the data subject that they agree to the processing of their personal data. Such a clear indication may take the form of a statement or a positive action. Silence, pre-ticked boxes, or inactivity are unlikely to amount to consent.
- Where consent is given in a document which includes other matters, the section dealing with consent must be kept clearly separate from such other matters.
- Data subjects are free to withdraw consent at any time and it must be made easy for them to do so. If a data subject withdraws consent, their request must be honoured promptly.
- If personal data is to be processed for a different purpose that is incompatible with the purpose or purposes for which that personal data was originally collected that was not disclosed to the data subject when they first provided their consent, consent to the new purpose or purposes may need to be obtained from the data subject.
- [If special category personal data is processed, the Company shall normally rely on a lawful basis other than explicit consent. If explicit consent is relied upon, the data subject in question must be issued with a suitable privacy notice in order to capture their consent.]
- In all cases where consent is relied upon as the lawful basis for collecting, holding, and/or processing personal data, records must be kept of all consents obtained in order to ensure that the Company can demonstrate its compliance with consent requirements.

6. Specified, Explicit, and Legitimate Purposes

- The Company collects and processes the personal data set out in Part 24 of this Policy. This includes:
 - a) personal data collected directly from data subjects[.] **OR** [; and]

b) [personal data obtained from third parties.]

- The Company only collects, processes, and holds personal data for the specific purposes set out in Part 24 of this Policy (or for other purposes expressly permitted by the GDPR).
- Data subjects must be kept informed at all times of the purpose or purposes for which the Company uses their personal data. Please refer to Part 15 for more information on keeping data subjects informed.

7. **Adequate, Relevant, and Limited Data Processing**

- The Company will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed) as under Part 8, above, and as set out in Part 24, below.
- Employees, agents, contractors, or other parties working on behalf of the Company may collect personal data only to the extent required for the performance of their job duties and only in accordance with this Policy. Excessive personal data must not be collected.
- Employees, agents, contractors, or other parties working on behalf of the Company may process personal data only when the performance of their job duties requires it. Personal data held by the Company cannot be processed for any unrelated reasons.

8. **Accuracy of Data and Keeping Data Up-to-Date**

- The Company shall ensure that all personal data collected, processed, and held by it is kept accurate and up-to-date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 17, below.
- The accuracy of personal data shall be checked when it is collected and at [regular] OR 2-year intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

9. **Data Retention**

- The Company shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.
- When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.
- For full details of the Company's approach to data retention, including retention periods for specific personal data types held by the Company, please refer to our Data Retention Policy.

10. **Secure Processing**

- The Company shall ensure that all personal data collected, held, and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in Parts 25 to 30 of this Policy.
- All technical and organisational measures taken to protect personal data shall be regularly reviewed and evaluated to ensure their ongoing effectiveness and the continued security of personal data.
- Data security must be maintained at all times by protecting the confidentiality, integrity, and availability of all personal data as follows:
 - a) only those with a genuine need to access and use personal data and who are authorised to do so may access and use it;
 - b) personal data must be accurate and suitable for the purpose or purposes for which it is collected, held, and processed; and
 - c) authorised users must always be able to access the personal data as required for the authorised purpose or purposes.

11. **Accountability and Record-Keeping**

- The Data Protection Officer is responsible for administering this Policy and for developing and implementing any applicable related policies, procedures, and/or guidelines.
- The Company shall follow a privacy by design approach at all times when collecting, holding, and processing personal data. Data Protection Impact Assessments shall be conducted if any processing presents a significant risk to the rights and freedoms of data subjects (please refer to Part 14 for further information).
- All employees, agents, contractors, or other parties working on behalf of the Company shall be given appropriate training in data protection and privacy, addressing the relevant aspects of Data Protection Law, this Policy, and all other applicable Company policies.
- The Company's data protection compliance shall be regularly reviewed and evaluated by means of Data Protection Audits.
- The Company shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:
 - 11..1 the name and details of the Company, its Data Protection Officer, and any applicable third-party data transfers (including data processors and other data controllers with whom personal data is shared);
 - 11..2 the purposes for which the Company collects, holds, and processes personal data;
 - 11..3 the Company's legal basis or bases (including, but not limited to, consent, the mechanism(s) for obtaining such consent, and records of such consent) for collecting, holding, and processing personal data;
 - 11..4 details of the categories of personal data collected, held, and processed by the Company, and the categories of data subject to which that personal data relates;
 - 11..5 details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards;
 - 11..6 details of how long personal data will be retained by the Company (please refer to the Company's Data Retention Policy);
 - 11..7 details of personal data storage, including location(s);
 - 11..8 detailed descriptions of all technical and organisational measures taken by the Company to ensure the security of personal data.

12. **Data Protection Impact Assessments and Privacy by Design**

- In accordance with the privacy by design principles, the Company shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data which involve the use of new technologies and where the processing involved is likely to result in a high risk to the rights and freedoms of data subjects.
- The principles of privacy by design should be followed at all times when collecting, holding, and processing personal data. The following factors should be taken into consideration:
 - a) the nature, scope, context, and purpose or purposes of the collection, holding, and processing;
 - b) the state of the art of all relevant technical and organisational measures to be taken;
 - c) the cost of implementing such measures; and
 - d) the risks posed to data subjects and to the Company, including their likelihood and severity.
- Data Protection Impact Assessments shall be overseen by the Data Protection Officer and shall address the following:
 - a) the type(s) of personal data that will be collected, held, and processed;
 - b) the purpose(s) for which personal data is to be used;
 - c) the Company's objectives;
 - d) how personal data is to be used;
 - e) the parties (internal and/or external) who are to be consulted;

- f) the necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed;
- g) risks posed to data subjects;
- h) risks posed both within and to the Company; and
- i) proposed measures to minimise and handle identified risks.

13. **Keeping Data Subjects Informed**

- The Company shall provide the information set out in Part 15.2 to every data subject:
 - a) where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and
 - b) where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:
 - i) if the personal data is used to communicate with the data subject, when the first communication is made; or
 - ii) if the personal data is to be transferred to another party, before that transfer is made; or
 - iii) as soon as reasonably possible and in any event not more than one month after the personal data is obtained.
- The following information shall be provided in the form of a privacy notice:
 - a) details of the Company including, but not limited to, contact details, and the names and contact details of any applicable representatives and its Data Protection Officer;
 - b) the purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 24 of this Policy) and the lawful basis justifying that collection and processing;
 - c) where applicable, the legitimate interests upon which the Company is justifying its collection and processing of the personal data;
 - d) where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed;
 - e) where the personal data is to be transferred to one or more third parties, details of those parties;
 - f) where the personal data is to be transferred to a third party that is located outside of the EEA, details of that transfer, including but not limited to the safeguards in place (see Part 31 of this Policy for further details);
 - g) details of applicable data retention periods;
 - h) details of the data subject's rights under the GDPR;
 - i) details of the data subject's right to withdraw their consent to the Company's processing of their personal data at any time;
 - j) details of the data subject's right to complain to the Information Commissioner's Office (the "supervisory authority" under the GDPR);
 - k) where the personal data is not obtained directly from the data subject, details about the source of that personal data;
 - l) where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it; and
 - m) details of any automated decision-making or profiling that will take place using the personal data, including information on how decisions will be made, the significance of those decisions, and any consequences.

14. **Data Subject Access**

- Data subjects may make subject access requests ("SARs") at any time to find out more about the personal data which the Company holds about them, what it is doing with that personal data, and why.
- Employees wishing to make a SAR should do using a Subject Access Request Form, sending

the form to the Company's Data Protection Officer First Kicks Sports Ltd.

- Responses to SARs must normally be made within one month of receipt, however, this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.
- All SARs received shall be handled by the Company's Data Protection Officer.
- The Company does not charge a fee for the handling of normal SARs. The Company reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

15. **Rectification of Personal Data**

- Data subjects have the right to require the Company to rectify any of their personal data that is inaccurate or incomplete.
- The Company shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Company of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.
- In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

16. **Erasure of Personal Data**

- Data subjects have the right to request that the Company erases the personal data it holds about them in the following circumstances:
 - a) it is no longer necessary for the Company to hold that personal data with respect to the purpose(s) for which it was originally collected or processed;
 - b) the data subject wishes to withdraw their consent to the Company holding and processing their personal data;
 - c) the data subject objects to the Company holding and processing their personal data (and there is no overriding legitimate interest to allow the Company to continue doing so) (see Part 21 of this Policy for further details concerning the right to object);
 - d) the personal data has been processed unlawfully;
 - e) the personal data needs to be erased in order for the Company to comply with a particular legal obligation[;] **OR** [.]
 - f) [the personal data is being held and processed for the purpose of providing information society services to a child.]
- Unless the Company has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.
- In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

17. **Restriction of Personal Data Processing**

- Data subjects may request that the Company ceases processing the personal data it holds about them. If a data subject makes such a request, the Company shall retain only the amount of personal data concerning that data subject (if any) that is necessary to ensure that the personal data in question is not processed further.
- In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

18. **[Data Portability**

- The Company processes personal data using automated means.
- Where data subjects have given their consent to the Company to process their personal data in such a manner, or the processing is otherwise required for the performance of a contract between the Company and the data subject, data subjects have the right, under the GDPR, to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers).
- To facilitate the right of data portability, the Company shall make available all applicable personal data to data subjects in the following format[s]:
 - a) Emails
 - b) Databases on Excel
- Where technically feasible, if requested by a data subject, personal data shall be sent directly to the required data controller.
- All requests for copies of personal data shall be complied with within one month of the data subject's request. The period can be extended by up to two months in the case of complex or numerous requests. If such additional time is required, the data subject shall be informed.]

19. **Objections to Personal Data Processing**

- Data subjects have the right to object to the Company processing their personal data based on legitimate interests, for direct marketing (including profiling), [and processing for scientific and/or historical research and statistics purposes].
- Where a data subject objects to the Company processing their personal data based on its legitimate interests, the Company shall cease such processing immediately, unless it can be demonstrated that the Company's legitimate grounds for such processing override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.
- Where a data subject objects to the Company processing their personal data for direct marketing purposes, the Company shall cease such processing promptly.
- [Where a data subject objects to the Company processing their personal data for scientific and/or historical research and statistics purposes, the data subject must, under the GDPR, "demonstrate grounds relating to his or her particular situation". The Company is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.]

20. **[Automated Processing, Automated Decision-Making, and Profiling**

- [The Company uses personal data in automated decision-making processes as follows:
 - a) DBS Checks
- [The Company uses personal data for profiling purposes as follows:
 - a) DBS Checks
- The activities described in this Part 22 are generally prohibited under Data Protection Law where the resulting decisions have a legal or similarly significant effect on data subjects unless one of the following applies:
 - a) the data subject has given their explicit consent;
 - b) the processing is authorised by law; or
 - c) the processing is necessary for the entry into, or performance of, a contract between the Company and the data subject.
- If special category personal data is to be processed in this manner, such processing can only be carried out if one of the following applies:
 - a) the data subject has given their explicit consent; or
 - b) the processing is necessary for reasons of substantial public interest.

- Where decisions are to be based solely on automated processing (including profiling), data subjects have the right to object, to challenge such decisions, request human intervention, to express their own point of view, and to obtain an explanation of the decision from the Company. Data subjects must be explicitly informed of this right at the first point of contact.
- In addition to the above, clear information must be provided to data subjects explaining the logic involved in the decision-making or profiling, and the significance and envisaged consequences of the decision or decisions.
- When personal data is used for any form of automated processing, automated decision-making, or profiling, the following shall apply:
 - a) appropriate mathematical or statistical procedures shall be used;
 - b) technical and organisational measures shall be implemented to minimise the risk of errors. If errors occur, such measures must enable them to be easily corrected; and
 - c) all personal data to be processed in this manner shall be secured in order to prevent discriminatory effects arising (see Parts 25 to 30 of this Policy for more details on data security and organisational measures).]

21. **[Direct Marketing**

- The Company is subject to certain rules and regulations when marketing its **[products] AND/OR [services]**.
- The prior consent of data subjects is required for electronic direct marketing including email, text messaging, and automated telephone calls subject to the following limited exception:
 - a) The Company may send marketing text messages or emails to a customer provided that that customer's contact details have been obtained in the course of a sale, the marketing relates to similar products or services, and the customer in question has been given the opportunity to opt-out of marketing when their details were first collected and in every subsequent communication from the Company.
- The right to object to direct marketing shall be explicitly offered to data subjects in a clear and intelligible manner and must be kept separate from other information in order to preserve its clarity.
- If a data subject objects to direct marketing, their request must be complied with promptly. A limited amount of personal data may be retained in such circumstances to the extent required to ensure that the data subject's marketing preferences continue to be complied with.]

22. **Personal Data Collected, Held, and Processed**

Employees personal data is collected, held, and processed by the Company (for details of data retention.)

23. **Data Security - Transferring Personal Data and Communications**

The Company shall ensure that the following measures are taken with respect to all communications and other transfers involving personal data:

- All emails containing personal data must be encrypted.
- All emails containing personal data must be marked "confidential";
- Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances;
- Personal data may not be transmitted over a wireless network if there is a wired alternative that is reasonably practicable;
- Personal data contained in the body of an email, whether sent or received, should be copied from the body of that email and stored securely. The email itself should be deleted. All temporary files associated therewith should also be deleted.
- Where personal data is to be sent by facsimile transmission the recipient should be

informed in advance of the transmission and should be waiting by the fax machine to receive the data;

- Where personal data is to be transferred in hardcopy form it should be passed directly to the recipient.
- All personal data to be transferred physically, whether in hardcopy form or on removable electronic media shall be transferred in a suitable container marked “confidential”;

24. **Data Security - Storage**

The Company shall ensure that the following measures are taken with respect to the storage of personal data:

- All electronic copies of personal data should be stored securely using passwords and data encryption;
- All hardcopies of personal data, along with any electronic copies stored on physical, removable media should be stored securely in a locked box, drawer, cabinet, or similar;
- All personal data stored electronically should be backed up monthly with backups stored [onsite] **AND/OR** [offsite]. All backups should be encrypted.
- No personal data should be stored on any mobile device (including, but not limited to, laptops, tablets, and smartphones), whether such device belongs to the Company or otherwise [without the formal written approval of the Data Protection Officer and, in the event of such approval, strictly in accordance with all instructions and limitations described at the time the approval is given, and for no longer than is absolutely necessary];
- No personal data should be transferred to any device personally belonging to an employee, agent, contractor, or other party working on behalf of the Company and personal data may only be transferred to devices belonging to agents, contractors, or other parties working on behalf of the Company where the party in question has agreed to comply fully with the letter and spirit of this Policy and of the GDPR (which may include demonstrating to the Company that all suitable technical and organisational measures have been taken);

25. **Data Security - Disposal**

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please refer to the Company’s Data Retention Policy.

26. **Data Security - Use of Personal Data**

The Company shall ensure that the following measures are taken with respect to the use of personal data:

- No personal data may be shared informally and if an employee, agent, contractor, or other party working on behalf of the Company requires access to any personal data that they do not already have access to, such access should be formally requested the Data Protection Officer
- No personal data may be transferred to any employee, agent, contractor, or other party, whether such parties are working on behalf of the Company or not, without the authorisation of the Data Protection Officer
- Personal data must be handled with care at all times and should not be left unattended or on view to unauthorised employees, agents, contractors, or other parties at any time;
- If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it;
- Where personal data held by the Company is used for marketing purposes, it shall be the responsibility of the Data Protection Officer to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS;

27. **Data Security - IT Security**

The Company shall ensure that the following measures are taken with respect to IT and information security:

- All passwords used to protect personal data should be changed regularly and should not use words or phrases that can be easily guessed or otherwise compromised. All passwords must contain a combination of uppercase and lowercase letters, numbers, and symbols. [All software used by the Company is designed to require such passwords.];
- Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Company, irrespective of seniority or department. If a password is forgotten, it must be reset using the applicable method. IT staff do not have access to passwords;
- All software (including, but not limited to, applications and operating systems) shall be kept up-to-date. The Company's IT staff shall be responsible for installing any and all security-related update. After the updates are made available by the publisher or manufacturer] **OR** [as soon as reasonably and practically possible] [, unless there are valid technical reasons not to do so];
- No software may be installed on any Company-owned computer or device without the prior approval of the Data Protection Officer.

28. **Organisational Measures**

The Company shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data:

- All employees, agents, contractors, or other parties working on behalf of the Company shall be made fully aware of both their individual responsibilities and the Company's responsibilities under Data Protection Law and under this Policy, and shall be provided with a copy of this Policy;
- Only employees, agents, contractors, or other parties working on behalf of the Company that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Company;
- All sharing of personal data shall comply with the information provided to the relevant data subjects and, if required, the consent of such data subjects shall be obtained prior to the sharing of their personal data;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately trained to do so;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be appropriately supervised;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise;
- Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed;
- All personal data held by the Company shall be reviewed periodically, as set out in the Company's Data Retention Policy;
- The performance of those employees, agents, contractors, or other parties working on behalf of the Company handling personal data shall be regularly evaluated and reviewed;
- All employees, agents, contractors, or other parties working on behalf of the Company handling personal data will be bound to do so in accordance with the principles of Data Protection Law and this Policy by contract;
- All agents, contractors, or other parties working on behalf of the Company handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of

the Company arising out of this Policy and Data Protection Law;

- Where any agent, contractor or other party working on behalf of the Company handling personal data fails in their obligations under this Policy that party shall indemnify and hold harmless the Company against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure;

29. **Transferring Personal Data to a Country Outside the EEA**

- The Company may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.
- The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:
 - 29..1 the transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data;
 - 29..2 the transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the GDPR); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;
 - 29..3 the transfer is made with the informed and explicit consent of the relevant data subject(s);
 - 29..4 the transfer is necessary for the performance of a contract between the data subject and the Company (or for pre-contractual steps taken at the request of the data subject);
 - 29..5 the transfer is necessary for important public interest reasons;
 - 29..6 the transfer is necessary for the conduct of legal claims;
 - 29..7 the transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or
 - 29..8 the transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

30. **Data Breach Notification**

- All personal data breaches must be reported immediately to the Company's Data Protection Officer.
- If an employee, agent, contractor, or other party working on behalf of the Company becomes aware of or suspects that a personal data breach has occurred, they must not attempt to investigate it themselves. Any and all evidence relating to the personal data breach in question should be carefully retained.
- If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection Officer must ensure that the Information Commissioner's Office is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.
- In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 32.3) to the rights and freedoms of data subjects, the Data

Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

- Data breach notifications shall include the following information:
 - 30..1 The categories and approximate number of data subjects concerned;
 - 30..2 The categories and approximate number of personal data records concerned;
 - 30..3 The name and contact details of the Company's data protection officer (or other contact point where more information can be obtained);
 - 30..4 The likely consequences of the breach;
 - 30..5 Details of the measures taken, or proposed to be taken, by the Company to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

31. **Implementation of Policy**

This Policy shall be deemed effective as of 01/05/2022. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

Appendix 4

Anti-Bullying Policy

Our anti-bullying policy sets out how we feel about bullying as an organisation, what we'll do to tackle it and how we'll support children and young people who experience or display bullying behaviour.

Bullying:

- all forms of bullying will be acted upon
- everybody in the organisation, club or session has a responsibility to work together to stop bullying
- bullying can include online as well as offline behaviour
- bullying behaviour can include: -
- physically pushing, kicking, hitting, pinching etc.
- name calling, spreading rumours, persistent teasing and humiliation or the continual ignoring of others
- posting of derogatory or abusive comments, videos or images on social media
- racial, homophobic, transphobic or sexist comments, taunts or gestures
- sexual comments, suggestions or behaviour
- unwanted physical contact

Our organisation will:

- recognise its duty of care and responsibility to safeguard all players from harm
- promote and implement this anti-bullying policy in addition to our safeguarding policy and procedures
- ensure that bullying behaviour is not tolerated or condoned
- require all members of the club/organisation to sign up this policy
- take action to investigate and respond to any reports of bullying from children and young people
- encourage and facilitate children and young people to play an active part in developing and adopting a code of conduct for behaviour
- ensure that coaches are given access to information, guidance and training on bullying

Each participant, coach, volunteer or official will:

- encourage individuals to speak out about bullying behaviour
- respect every child's need for, and right to, a play environment where safety, security, praise, recognition and opportunity for taking responsibility are available
- respect the feelings and views of others
- recognise that everyone is important and equal, and that our differences make each of us special and worthy of being valued
- show appreciation of others by acknowledging individual qualities, contributions and progress
- ensure safety by having rules and practices carefully explained and displayed for all to see
- report incidents of bullying behaviour they see – by doing nothing you are condoning the behaviour

Supporting children:

- we'll let children know who will listen to and support them
- we'll create an "open door" ethos where children feel confident to talk to an adult about bullying behaviour or any other issue that affects them
 - potential barriers to talking (including those associated with a child's disability or impairment) will be acknowledged and addressed at the outset to enable children to speak out
 - we'll make sure children are aware of helpline numbers
 - anyone who reports an incident of bullying will be listened to carefully and reports will be taken seriously
 - any reported experience of bullying behaviour will be investigated and will involve listening carefully to all those involved
 - children experiencing bullying behaviour will be supported and helped to uphold their right to play and live in a safe environment
 - those who display bullying behaviour will be supported and encouraged to develop better relationships
 - we'll make sure that sanctions are proportionate and fair

Support to the parents/guardians:

- parents or guardians will be advised on the club or organisation's bullying policy and practice
- any experience of bullying behaviour will be discussed with the child's parents or guardians
- parents will be consulted on action to be taken (for both victim and bully) and we'll agree on these actions together
- information and advice on coping with bullying will be made available
- support will be offered to parents, including information from other agencies or support lines

All incidents of bullying behaviour should be dealt with appropriately, following the guidelines in our policy where possible and be reported in a timely manner to our DSL.

Appendix 5

Health & Safety Policy

Policy Statement

First Kicks Sports Ltd is strongly committed to encouraging our members to take part, but the health, well-being and safety of each individual is always our paramount concern. We recommend levels of training dependent on age and ability, and expect our junior athletes to participate within these boundaries.

Policy in Brief:

To support our Health & Safety policy statement we are committed to the following duties:

- Undertake regular, recorded risk assessment of the club premises and all activities undertaken by the club
- Create a safe environment by putting health & safety measures in place as identified by the assessment
- Ensure that all members are given the appropriate level of training and competition by regularly assessing individual ability dependant on age, maturity and development
- Ensure that all members are aware of, understand and follow the club's health & safety policy
- Appoint a competent club member to assist with health and safety responsibilities
- Ensure that normal operating procedures and emergency operating procedures are in place and known by all members
- Provide access to adequate first aid facilities, telephone and qualified first aider at all times
- Report any injuries or accidents sustained during any club activity or whilst on the club premises
- Ensure that the implementation of the policy is reviewed regularly and monitored for effectiveness.

As a club member you have a duty to:

- Take reasonable care for your own health & safety and that of others who may be affected by what you do or not do
- Co-operate with the club on health & safety issues
- Correctly use all equipment provided by the club
- Not interfere with or misuse anything provided for your health, safety or welfare.

Purpose of this Policy:

- First Kick Sports Ltd (the **Employer**) takes health & safety issues seriously and is committed to protecting the health and safety of its staff and all those affected by its business activities and attending its premises. This policy is intended to help the Employer achieve this by clarifying who is responsible for health and safety matters and what those responsibilities are.
- This is a statement of policy only and does not form part of your contract of employment. This policy may be amended at any time by the Employer in its absolute discretion. The Employer will review this policy at regular intervals to ensure that it is achieving its aims effectively.

Who is responsible for workplace health and safety?

- Achieving a healthy and safe workplace is a collective task shared between the Employer and staff. This policy and the rules contained in it apply to all staff of the Employer, irrespective of seniority, tenure and working hours, including all employees, directors and officers, consultants and contractors, casual of agency staff, trainees, homeworkers and fixed-term staff and any volunteers. Specific responsibilities of staff are set out in the section headed 'Responsibilities of all staff' below.

Employer Responsibilities:

The Employer is responsible for:

- Taking reasonable steps to safeguard the health and safety of staff, people affected the Employer's business activities and of people visiting its premises (*see Safeguarding Policy*);
- Identifying health and safety risks and finding ways to manage or overcome them (*see Risk Assessments PART 1-9 and Visual Risk Assessment Checklist*);
- Providing a safe and healthy place of work and safe entry and exit arrangements, including during an emergency (*See Visual Risk Assessment Checklist*)
- Providing and maintaining safe working areas , equipment and systems and, where necessary, appropriate clothing
- Providing safe arrangements for the use, handling, storage and transport of articles and substances (*See COSHH Risk Assessment and Manual Handling Procedure*)
- Providing adequate information, instruction, training and supervision to enable all staff to do their work safely; to avoid hazards and to contribute positively to their own health and safety at work. The Employer will give you the opportunity to ask questions and advise who best to contact in respect of those questions, if you are unsure about how to safely carry out your work; (*a copy of this Policy will be included in the 'Coaches Welcome Pack'*)
- Ensuring any health and safety representatives receive appropriate training to carry out their functions effectively;
- Providing a health and safety induction and appropriate safety training to your role, including: Safeguarding (*all employees (coaches) are required to undertake Safeguarding training as a minimum requirement*)
- Promoting effective communication and consultation between the Employer and staff concerning health and safety matters and will consult with staff directly relating to health and safety;
- If an epidemic or pandemic alert is issued, providing instructions, arrangements and advice to staff as to the organisation of business operations and steps to be taken to minimise the risk of infection (*see Coaches Return to School Covid-19 Guidance, Sept 2020*)
- Regularly monitoring and reviewing the management of health and safety at work, making any necessary changes and bringing those to the attention of staff (*All policies are reviewed on a 2-year basis or sooner if any significant changes to organisational structure or government legislation*)
- The board of Directors of the Employer has overall responsibility for health and safety and has appointed *Samuel Okikiolu* as the Principal Health & Safety Officer with day-to-day responsibility for health and safety matters.
- Any concerns about health and safety matters should be notified to the Principal Health and Safety Officer.

Responsibilities of all staff

General staff responsibilities:

All Staff must:

- Take reasonable care for their own health and safety and that of others who may be affected by their acts or omissions;
- Co-operate with the Principal Health and Safety Officer and the Employer generally to enable compliance with health and safety duties and requirements;
- Comply with any health and safety instructions and rules, including instructions on the safe use of equipment;
- Keep health and safety issues in the front of their minds and take personal responsibility for the health and safety implications of their own acts and omissions;
- Keep the workplace tidy and hazard-free;
- Report all health and safety concerns to the Principal Health and Safety Officer promptly; including any potential risk, hazard or malfunction of equipment, however minor or trivial it may seem (*See Reporting Procedure for Incidents, Accident or Emergencies*)
- Co-operate in the Employer's investigation of any incident or accident which has either led to injury or which could have led to injury; in the Employer's opinion.

Staff responsibilities relating to equipment

All staff must:

- use equipment as directed by any instructions given by representatives of management or contained in any written operating manual or instructions for use and any relevant training;
- report any fault with, damage to or concern about any equipment (including health and safety equipment) or its use to the Principal Health and Safety Officer, who is responsible for maintenance and safety of equipment;
- ensure that health and safety equipment is not interfered with; and
- not attempt to repair equipment unless suitably trained and authorised.

Staff responsibilities relating to accidents and first aid

All staff must:

- promptly report any accident at work involving personal injury, however trivial, to the Principal Health and Safety Officer so that details can be recorded in the Accident Book and cooperate in any associated investigation;
- familiarise themselves with the details of first aid facilities and trained first aiders, which are available from the Principal Health and Safety Officer;
- if an accident occurs, dial and ask for the duty first aider, giving name, location and brief details of the problem.
- The Principal Health and Safety Officer is responsible for investigating any injuries or work-related disease, preparing and keeping accident records, and for submitting reports under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR), where required. (*See Reporting Procedure for Incidents, Accident or Emergencies*)

All sessions will have a First Aider present or around the vicinity of our sessions.

Staff responsibilities relating to emergency evacuation and fire

All staff must:

- familiarise themselves with the instructions about what to do if there is a fire which are available from the Principal Health and Safety Officer;
- ensure they are aware of the location of fire extinguishers, fire exits and alternative ways of leaving the building in an emergency; c. comply with the instructions of firewardens if there is a fire, suspected fire or fire alarm (or a practice drill for any of these scenarios);
- co-operate in fire drills and take them seriously (ensuring that any visitors to the building do the same), fire drills will be held at least once every 12 months;
- ensure that fire exits or fire notices or emergency exit signs are not obstructed or hidden at any time;
- notify the Principal Health and Safety Officer immediately of any circumstances (for example, impaired mobility) which might hinder or delay evacuation in a fire. This will allow the Principal Health and Safety Officer to discuss a personal evacuation plan for you, which will be shared with the fire wardens and colleagues working near to you (*The Schools within which we operate will have the main responsibility for their own fire evacuation plans and procedure's however, please see Fire Evacuation Plan Poster and Procedure for Holiday Sports Camps*)

On discovering a fire..

All staff must:


- immediately trigger the nearest fire alarm and, if time permits, call reception and notify the location of the fire; and
- attempt to tackle the fire ONLY if they have been trained or otherwise feel competent to do so.
- Nominated members of staff will be trained in the use of fire extinguishers.

On hearing the fire alarm..


All staff must:

- remain calm and immediately evacuate the building, walking quickly without running, following any instructions of the fire wardens;
- leave without stopping to collect personal belongings;
- stay out of any lifts; and
- remain out of the building until notified by a fire warden that it is safe to re-enter.

The Principal Health and Safety Officer is responsible for ensuring fire risk assessments take place and changes made where required, and for making sure there are regular checks of fire extinguishers, fire alarms, escape routes, signage and emergency lighting.




Fire Evacuation Plan




- If the whistle is blown **STOP** what you are doing
- Listen carefully to the staff's instructions
- Leave the building calmly and quickly – don't run and don't stop to collect anything
- Wait at the assembly point
- Listen to the register
- Stay outside until you are told that it is safe to go back inside

Your fire assembly point is:



In the Event of a Fire



- A member of staff will raise the alarm and call the emergency services.
- The children will immediately be escorted out of the building to the assembly point using the nearest marked exit.
- No attempt will be made to collect personal belongings, or to re-enter the building after evacuation.
- The premises will be checked by the Fire Safety Officer and the register will be collected, providing that it is safe to do so.
- The Fire Safety Officer will close all doors and windows to prevent the spread of fire when they leave the building if it is safe to do so.
- The register will be checked and all children and staff accounted for.
- If anyone is missing from the register, the emergency services will be informed.
- If the register is not available the manager will use the emergency contacts list (which is kept off the premises) to contact parents or carers.
- If the Fire Safety Officer is not present at the time of the incident, the manager will assume responsibility or nominate an alternative member of staff.

Risk assessments, display screen equipment and manual handling



Risk assessments are simply a careful examination of what in the workplace could cause harm to people. The Employer will assess any risks and consider measures to best minimise any risk. The Employer will carry out general workplace risk assessments when required or as reasonably requested by staff. Managers must ensure that any necessary risk assessments take place and the resulting recommendations are

implemented. The Principal Health and Safety Officer is responsible for workplace risk assessments and any measures to control risks.

Staff who use a computer for prolonged periods of time should try, where possible to organise short breaks every few hours away from the computer screen, but may request a workstation assessment and/or an eye test by an optician by contacting the Principal Health and Safety Officer. The Principal Health and Safety Officer will then provide you with more details and make arrangements if you would like to proceed.

Guidance on manual handling (for example, lifting and carrying heavy objects) can be obtained from the Principal Health and Safety Officer and where necessary training will be provided by the Employer, but the Employer will try to minimise or avoid the need for manual handling where there is a risk of injury.

Copy of First Kicks' Manual Handling Procedure:

 **FIRST KICKS SPORTS LTD**
MANUAL HANDLING PROCEDURE 

Statistics show that manual handling is one of the most common causes of absence through injury in the workplace. More than one-third of lost time accidents are caused in this way at an estimated cost of £130 million per annum. These injuries may often have long-term effects, severely affecting earning potential and subsequently lifestyle and leisure activities.

This policy is intended to reduce the risk of manual handling injuries and provide guidance on the measures that should be taken to ensure safe lifting and carrying in the workplace.

Summary of Duties

Under Section 2 of the Health and Safety at Work etc. Act 1974, every employer has the duty to provide a safe place of work, a safe system of work, so far as is reasonably practicable. This duty includes the need to minimise risk arising from manual handling tasks.

Under the Manual Handling Operations Regulations 1992 (MHOR), manual handling is interpreted as the transporting or supporting of any load.

Regulation 4 of MHOR requires the employer to avoid the need for hazardous manual handling activities, so far as is reasonably practicable. Where it is not possible to eliminate hazardous manual handling, an assessment must be undertaken to determine the level of risk. Suitable controls must then be introduced to reduce the risk of injury to the lowest extent reasonably practicable. This may be achieved by the use of automation, mechanical aids or redesigning the system of work or even the workplace itself.

An assessment should take into consideration the tasks, the load, the individual, the equipment and any other factors which may affect its safe lifting and carrying (for example the use of personal protective equipment). Assessments should be reviewed when there is a significant change in:



- (a) the activity or process
- (b) the working environment
- (c) the numbers or abilities of personnel
- (d) the nature of the load(s) to be handled.

Reassessment may also be required where accident/absence statistics show that the original control measures were not sufficiently effective.

Where appropriate the employer is also under a duty to provide employees with information on the weight of the load and the centre of gravity, where this is not positioned centrally. There is no maximum weight that a person can be required to handle. Tasks should be assessed on the basis of an ergonomic approach to manual handling operations in the workplace, i.e. fitting the task to suit personal abilities and limitations.

Section 2 of the Health and Safety at Work etc. Act requires the provision of suitable training, information and instruction. This extends to training in safe methods of lifting and carrying for those employees who undertake manual handling activities (MHOR) also require appropriate steps to be taken to reduce risk, one of which will be the provision of adequate training.

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 **FIRST KICKS SPORTS LTD**
MANUAL HANDLING PROCEDURE 

In nearly every job in the company there are a number of lifting operations carried out by staff and operatives. The office worker may need to lift a computer (not an item that is especially heavy, but one which has an awkward shape and prone to having electrical leads dangling around a person's feet), or there is the lifting of the photocopier paper, access to files kept low down or on high shelves. At the other end of the scale would be the workshop fitters handling a heavy piece of plant or surfacing operatives lifting kerbstones. In between there are a multitude of manual handling operations which could give rise to the risk of injury. A number of practical things can be done to reduce the risks of injury from manual handling operations.

Arrangements for securing the Health and Safety of Employees

The elimination of hazardous manual handling activities:

The company will ensure the operations which involve manual handling are eliminated, so far as is reasonably practicable. The measures to achieve this include an ergonomic design of the workplace and activity and the provision of automated or mechanical aids such as trolleys, conveyors or other lifting equipment.

Assessment of risk:

Where necessary, an assessment of manual handling activities will be carried out by competent persons. Risks which are identified will be reduced to the lowest level reasonably practicable. The following factors should be considered during the assessment.

The task

- Bending and stooping to lift a load significantly increases the risk of a back injury.
- Items should ideally be lifted from no higher than knee-height to no higher than shoulder height.
- Outside this range, lifting capacity is reduced and the risk of injury is increased.
- When items are required to be lifted from above shoulder height, a stand or suitable means of access should be used.
- Items which are pushed or pulled should be as near to waist level as possible. Pushing is preferred, particularly where the back can rest against a fixed object to give leverage.
- Carrying distances should be minimised, especially if the task is regularly repeated.
- Repetitive tasks should be avoided whenever possible.
- Tasks which involve lifting and carrying should be designed in such a way as to allow for significant rest breaks (rotation of tasks) of to avoid fatigue.
- Avoid tasks which require twisting the body where ever possible.

The load

- The Load should be kept as near as possible to the body trunk to reduce strain and should be not of such size as to obscure vision.
- An indication of the weight of the load and the centre of gravity should be provided where appropriate. Unstable loads should be handled with particular care. The change in the centre of gravity is likely to result in over balancing.
- Ensure there is a secure hand hold, using gloves were necessary to protect against sharp edges or splinters.

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The individual

- The consideration must be given to age, body weight and physical fitness.
- Regard must be given to personal limitations, employees must not attempt to handle those which are beyond their individual capability. Assistance must be sought where this is necessary.
- Persons with genuine physical or clinical reasons for avoiding lifting should be made allowance for, as should pregnant women, who should not be required to undertake hazardous lifting or carrying tasks.
- Significant knowledge and understanding of the work is an important factor in reducing the risk of injury.
- Individuals undertaking lifting of carrying will be given suitable instruction, training and information to undertake the task with minimum risk.

The working environment

- There must be adequate space to enable the activity to be conducted in safety and the transportation route must be free from obstruction.
- Lighting, heating and weather conditions must be taken into account.
- Floors another working services must be in a safe condition, and adequate ventilation is required, particularly where there is no natural ventilation

Other factors

- The use of personal protective equipment may be necessary whilst carrying out manual handling activities. If the use of personal protective equipment restricts safe and easy movement, this should be reported.
- Constant interruptions from other employees must be avoided, as this can reduce the concentration of an individual.

Duties of managers and supervisors

Managers or supervisors must ensure that:

- manual handling assessments are carried out where relevant and records are kept
- employees are properly supervised
- adequate information and training is provided to persons carrying out manual handling activities
- any injuries or incidents relating to manual handling are investigated, with remedial action taken
- employees adhere to safe systems of work
- safety arrangements for manual handling operations are regularly monitored and reviewed
- employees undertaking manual handling activities are suitably screen for reasons of health and safety, before undertaking the work
- special arrangements are made, when necessary, for individuals with health conditions who could be adversely affected by manual handling operations

Duties of Employees

Employees must ensure that:

- They report to management (in confidence) any personal conditions which may be detrimentally affected by the manual handling activity
- They comply with instruction and training which has provided in safe manual handling activities



- Their own health and safety is not put at risk when carrying out manual handling activities
- They use equipment which has been provided to minimise the risk from manual handling activities
- Any problems relating to the activities are reported to a responsible person

Information and Training

- Suitable information and training, will be provided to persons who are required to carry out manual handling activities.
- Training needs will be identified and reviewed by the responsible person.
- Refresher training will also be given at reasonable intervals.
- Employees will be informed of the approximate weight of loads which are handled and objects which have eccentric weight distribution.

Safe System of Work

Poor lifting and carrying techniques can result in discomfort and increase the risk of injury. In extreme circumstances, these injuries can have permanent effects. These risks can be reduced by adopting the following simple precautions:

- Ensure that formalized systems of work have been designed for the work activity are complied with.
- Make full and proper use of aids to lifting and carrying, such as trolleys, and lifting equipment.
- Store heavy items between the shoulder and hip height. Where possible only store small, light items above shoulder or below knee height.
- Use the legs and knees to bend and lift – do not stoop or bend the back.
- Avoid tasks which require stretching or twisting.
- Ensure that regular rest breaks are taken where manual handling activities are repetitive to prevent the onset of fatigue.
- Ensure that there are no sharp, hot or cold edges which could cause injury.
- Ensure that walkways are free from obstructions.
- Make full and proper use of personal protective equipment.
- Report any problems or concerns associated with manual handling operations to a responsible person without delay.

On the 'rare' occasion staff may come into contact with any Controlled Substances Hazardous to Health, we have the following Risk Assessment in place 'COSHH Risk Assessment PART-10':



COSHH RISK ASSESSMENT TEMPLATE						
Use our risk assessment template to complete the COSHH risk assessment process for your common hazardous substances.						
Person at Risk:	Staff	Public	Visitors	Contractor	Young People/Workshops	Review Date:
Assessor:	Print name:	Signature:	Supervisor:	Print name:	Signature:	Method of Use:
Description of substance:		Department:		Site and location of substance:		



Hazard Identification and PPE			
Route of Entry:	Personal Protective Equipment (Tick Required Boxes):	Tick here for none	
Inhalation	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Absorption	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ingestion	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Location of PPE:	Head Protection	Protective Clothing	Protective Footwear
	Safety Glasses	Face Shield	Face Mask
	Respirator		
Hazard & Precautionary Statements:	Occupational exposure band(s) (OEB)	Maximum exposure limits (MEL)	Workplace exposure limits (WEL)
Frequency and Duration of Exposure	Exposure Class:	Max. Heavy Work per Day:	Duration:
	• Low (irritating)	• 1-5	• 1-5 minutes
	• Medium (irritant)	• 5-10	• 6-30 minutes
	• Severe (acute or chronic)	• More than 10	• 31-60 minutes
			• 1 hour+



Control Measures			
General Precautions:	First Aid Measures:	Further Controls Required:	Responsibility:



Spillage Procedure		Site and Spillage Prevention
Handling and Storage		Storage Considerations
COSHH Assessment Comments		
Assessor Summary		
1. Has the assessment considered all factors pertinent to the use of the substance? If NO, please give details of further action required.		
2. Has the assessment considered the		



COSHH Assessment		Person Tick
The task is safe to be carried out with current control procedures.		Tick if no further action required.
The task is safe to be carried out subject to action listed.		Tick if use of the substance is not causing significant problems but requires some action to bring it within other guidelines. Action should be prioritised and specific dates set for completion.
This substance is critical, significant non-compliance with health & safety concerns.		Tick if the task or substance has potential to cause significant problems to users, use of substance to be discontinued until problems



New best practice:	
The substance should be re-assessed on a regular basis (other annual), if there are significant changes to the use or process or there is a significant change in personnel who carry out it e.g. young/retiree/return workers, pregnancy, workers with pre-existing conditions such as asthma, dermatitis, etc.	Signature: _____ Date: _____
This Assessment has been discussed with the user and their line manager and action agreed.	Signature: _____ Date: _____
User: _____	Line Manager: _____

Copy of the DSE Display Equipment Workstation Checklist Risk Assessment PART-11:

Copy of the Risk Assessments for Holiday Camps PART-1 to 4:

Holiday Sports Camp
Risk Assessment: Part 1
General Information

Date of Holiday Sports Camp: Time:	
Destination address and contact number:	
Transport to be used:	
Number of children participating: Age 4-7 Age 9-11?	
Adult - Child ratio? <i>(This only applies to additional needs when considering ratios)</i>	
Nature of outing:	
Staff members attending:	Contact details:
Volunteers attending:	Contact details:

Holiday Sports Camp
Risk Assessment: Part 2
Checklist of actions to be taken to minimise risk

Leader will have responsibility for	Action completed
Checking public liability insurance details are correct.	
Ensuring everyone is aware who the named Supervisor/Leader is.	
Ensuring all adults are aware who the Named First Aider is.	
Taking accident record forms to record events promptly, to be filed upon return.	
Ensuring all adults are aware of the procedures that need to be followed in the event of an emergency. (Circulate Missing Child policy any other relevant policy & procedures prior to the outing)	
Ensuring all adults are aware of meeting times and areas.	
Taking register and contact details in a format that ensures their confidentiality.	
Collecting required permissions, taking them on outing and storing them confidentially.	
Taking stocked first aid kit.	
Naming and appropriate storage of any necessary medications.	
Ensuring all adults are aware of any special precautions as identified by the Outing Risk Assessment.	
Taking mobile phone and ensuring that it is charged, with credit available and with emergency contact numbers stored.	
Issuing children with emergency contact details. <i>(eg stickers, bracelets etc)</i>	
Ensuring the appropriate staff:adult ratios are met.	
Coordinating any additional volunteer helpers.	
Ensuring that only adults who have DSE checks will have unsupervised contact with the children.	

Holiday Sports Camp
Risk Assessment: Part 3
Daily Environment Checks
All areas to be checked before each session

Date: _____ Time: _____ Checked by: _____

Area assessed	Yes	No	Comments/Actions
1 Entrance Hall			<ul style="list-style-type: none"> Free of trip hazards Exit routes unobstructed Electrical sockets free from damage Clean and tidy External doors locked and / or alarmed Lights switched on Clearing unauthorised clutter
2 Large Room			<ul style="list-style-type: none"> External doors locked and / or alarmed Layout of equipment allows free movement Electrical wires positioned safely Heating guards appropriately Clean and tidy Toys and play equipment in good order Slips tripped Phone switched on First Aid kit accessible Room temperature suitable Free of trip hazards
3 Small Room			<ul style="list-style-type: none"> Layout of equipment allows free movement Electrical wires positioned safely Heating guards appropriately Clean and tidy Toys and play equipment in good order Room temperature suitable Free of trip hazards
4 Kitchen			<ul style="list-style-type: none"> Clean and tidy Equipment and equipment positioned safely Cleaning products/materials stored securely Food stored appropriately Fridge temperature within safe range Hot/boil water available for handwashing
5 Toilets			<ul style="list-style-type: none"> Clean and tidy Accessible to all Clearance of cleaning products Sufficient toilet roll, juggle and paper towels Hand washing position to be clear
6 All risks			<ul style="list-style-type: none"> Clearance of obstructions In working order Checks identified
7 Outside areas			<ul style="list-style-type: none"> Entrance well clear of obstruction (eg tree) Play area free from (eg glass, animal faeces) Outdoor equipment in good order and safe to use Any workbenches/tables in the play area? Gates closed / locked

Managing Challenging Behaviour Policy

Staff/volunteers who deliver sports activities to children may, on occasions, be required to deal with a child's challenging behaviour.

These guidelines aim to promote good practice and are based on the following principles:

- The welfare of the child is the paramount consideration.
- Children must never be subject to any form of treatment that is harmful, abusive, humiliating or degrading.
- The specific needs a child may have (e.g. communication, behaviour management, comprehension and so on) should be discussed with their parent/carer and where appropriate the child, before activities start. Where appropriate it may be helpful to record the details of any agreed plan or approach and provide copies to all parties.
- Every child should be supported to participate. Consideration to exclude a child from activities should apply only as a last resort and after all efforts to address any challenge have been exhausted, in exceptional circumstances where the safety of that child or of other children cannot be maintained.

Planning Activities & Club Sessions

Planning for activities and club sessions should include consideration of whether any child involved may need additional support or supervision to participate safely. This should address:

- Assessment of additional risk associated with the child's behaviour
- Appropriate supervision ratios and whether numbers of adults should be increased
- Information sharing for all/volunteers on managing any challenging behaviour to ensure a consistent approach
- Specialist expertise or support that may be needed from carers or outside agencies. This is particularly relevant where it is identified that a child may need a level of physical intervention to participate safely. (see below)

Agreeing Acceptable and Unacceptable Behaviours

Staff, volunteers, children, young people and parents/carers should be involved in developing an agreement about:

- what constitutes acceptable and unacceptable behaviour (code of conduct)
- the range of sanctions which may be applied in response to unacceptable behaviour.

This can be done at the start of a club session or as part of a welcome session at a sports camp. It should involve the views of children and young people to encourage better buy in and understanding. Where challenges are anticipated in light, for example of a child's impairment or other medical condition, a clear plan/agreement should be established and written down. Ensure that parents/carers understand the expectations on their children and ask them to reinforce this ahead of any club session or sports camp.

Managing Challenging Behaviour

In responding to challenging behaviour the response should always be:

- Proportionate to the actions you are managing.
- Imposed as soon as is practicable.
- Fully explained to the child and their parents/carers.
- In dealing with children who display negative or challenging behaviours, staff and volunteers might consider the following options:
 - Time out - from the session, activity, group or individual work.
 - Reparation - the act or process of making amends.
 - Restitution - the act of giving something back.
 - Behavioural reinforcement - rewards for good behaviour, consequences for negative behaviour.
 - De-escalation of the situation - talking with the child and distracting them from challenging behaviour.
 - Increased supervision by staff/volunteers.
 - Use of individual 'contracts' or agreements for the child's future or continued participation.
 - Sanctions or consequences e.g. missing a club, match or session.
 - Seeking additional/specialist support through working in partnership with other agencies.
 - Temporary or permanent exclusion.

The following should never be permitted as a means of managing a child's behaviour:

- Physical punishment or the threat of such.
- Refusal to speak to or interact with the child.
- Being deprived of food, water, access to changing facilities or toilets or other essential facilities.
- Verbal intimidation, ridicule or humiliation.

Physical Intervention

Staff/ volunteers should consider the risks associated with employing physical intervention compared with the risks of not employing physical intervention. The use of physical intervention should always:

- Be avoided - unless it is absolutely necessary to prevent a child injuring themselves or others; or causing serious damage to property.
- Aim to achieve an outcome that is in the best interests of the child whose behaviour is of immediate concern
- Form part of a broader approach to the management of challenging behaviour.
- Be the result of conscious decision-making and not a reaction to an adult's frustration.
- Employ the minimum force needed to avert injury to a person or serious damage to property - applied for the shortest period of time
- Used only after all other strategies have been exhausted
- Be recorded as soon as possible using the appropriate organisational reporting form and procedure. Parents should always be informed following an incident where a coach/volunteer has had to physically intervene with their particular child .

Physical intervention must not:

- Involve contact with buttocks, genitals and breasts.
- Be used as a form of punishment.
- Involve inflicting pain

Views of the child

A timely de-brief for staff/volunteers, the child and parents should always take place in a calm environment following an incident where physical intervention has been used. Even children who haven't directly been involved in the situation may need to talk about what they have witnessed. There should also be a discussion with the child and parents about the child's needs and continued safe participation in the group or activity.

All incidents of challenging behaviour should be dealt with appropriately, following the guidelines in our policy where possible and be reported in a timely manner to our DSL.

Disciplinary Policy

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17.1.0. INTRODUCTION

17.1.1 A high standard of discipline is essential for the efficient and orderly conduct at our Clubs, Camps or matches and for the safety and well-being of its coaches and children. The Directors and Designated Safeguarding Lead (DSL) are responsible for promoting and maintaining that standard.

17.1.2 The intention of this policy is to provide a fair and consistent basis for dealing with conduct or behaviour which is either unsatisfactory or fails to meet the required standards. Its main aim is to bring about permanent change in conduct.

17.1.3 This policy must be applied fairly to all employees irrespective of disability, gender, race, religion, age, sexual orientation or marital/civil partnership status.

17.2.0. SCOPE

17.2.1 This policy and procedure applies to all sports coaches, teaching and support staff within our employment, regardless of length of service, whether full-time, part-time, permanent or fixed term.

17.2.2 An employee who is not achieving the required standard of work because of ill health or capability will be dealt with fairly, in line with this policy and government guidelines.

17.3.0. AIM

17.3.1 First Kicks Sports Ltd believes it is important to have policies and procedures, which assist in setting standards of conduct and ensure order and fairness in the treatment of individuals.

17.4.0. PROCEDURAL GUIDANCE

17.4.1 Responsibility for taking disciplinary action is delegated by the Directors to the Designated Safeguarding Lead (DSL) where necessary. In the case of disciplinary action against the one of the Director's, the responsibility is with the second Director in consultation with the Local Authority.

17.4.2 The following procedure will apply in line with statutory requirements. The procedure will normally apply to all situations in which a potential disciplinary matter arises or where dismissal is a possibility.

17.4.3 Outside of the above procedure, the Director's may issue guidance, advice, positive instruction or prohibition as appropriate

- to ensure that problems are discussed at an early stage
- with the objective of encouraging and helping employees to improve
- to forewarn that if advice, guidance, instruction or prohibition is not observed formal disciplinary action will follow.

17.4.4 Timely and positive discussions with an employee to highlight problems may avoid formal disciplinary action at a later time. The Directors may, where appropriate from time to time, informally advise an employee of matters of concern, or issue advice, guidance, instruction or prohibition designed to help set standards.

17.4.5 Such advice and guidance are not part of the formal disciplinary procedures and the employee should be informed that this is the case. However, employees may wish to seek advice from their Trade Union Representative.

17.4.6 Whenever the Director's give advice, guidance, instruction or prohibition to an employee, it should be carried out in confidence and recorded by letter and placed on the employee's confidential personal file and stored in line with our Data Protection Policy.

17.4.7 Throughout the formal procedure, employees have the right to be accompanied by an appropriate Trade Union representative or a colleague.

17.4.8 It is not intended that the operation of the disciplinary procedure should be adversarial in nature. It is intended to bring about an improvement or to get to the truth of a matter.

17.5.0 THE PROCEDURE

The Directors will, at the earliest opportunity, inform the employee in writing of the nature of the allegations with as much detail as possible and the name of the person who will be conducting the investigation. This should be sent to the employee's home address, or given to the employee in person, prior to the investigation commencing, enclosing a copy of the Disciplinary Policy.

At any stage of this process advice may need to be sought from Human Resources.

17.5.1. Stage 1 : Investigation

17.5.1.1 The Directors will appoint an investigating officer to investigate the matter. This will normally be the Designated Safeguarding Lead (DSL) or a senior member of staff who has had no previous involvement in the case or, in extreme cases, a representative of the Local Authority.

17.5.1.2 No formal disciplinary action will be taken against an employee until any possible case has been investigated as fully as is required in the circumstances. The purpose of the investigation will be to establish the facts promptly and before memories fade, and to take into account statements from any relevant witnesses.

17.5.1.3 The nature of the investigation will vary depending upon the circumstances. It could range from the examination of a record, to a series of interviews.

17.5.1.4 Where it is necessary to hold an investigatory interview(s) with the employee the investigating officer will write to the employee and give the following information:-

- (a) Details of the allegations
- (b) Copies of any appropriate available information
- (c) A copy of the disciplinary procedure
- (d) Time and date of investigation meeting
- (e) Right to representation at any meeting

17.5.1.5 It must be noted, however, that in certain circumstances it may not be appropriate to notify the employee that an investigation is underway. This will normally only be in cases where there is a need for strict confidentiality and/or

where the Police may be involved, for example, child protection issues, fraud or other financial irregularities and theft.

17.5.1.6 In all cases any verbal notification will be followed up in writing as soon as possible.

17.5.1.7 The Investigating Officer will examine relevant documents, records etc. and will interview appropriate people. Interview notes should be confirmed with the interviewees and signed statements taken. Witnesses should be made aware that any discussions are strictly confidential.

17.5.1.8 When the employee has been notified of the nature of the complaint against him/her, he/she should have the opportunity to comment on the matter under investigation. The opportunity for this will be at the formally convened investigatory interview.

17.5.1.9 As soon as the formal investigation is complete, the investigating officer will complete a full report including the findings and will recommend one or more of the following:

- a) no further action
- b) support, training, guidance or information to the employee
- c) that a disciplinary hearing be held to consider the matter further
- d) a review of procedure or process

NB: It may be helpful at this stage for the investigating officer to speak to Human Resources for advice on further stages of this process and timings.

17.5.1.10 The investigating officer should send, confidentially, only the recommendations to the Directors.

17.5.1.11 If support, training, guidance or information to the employee is the recommended outcome this should be confirmed to the employee in writing.

17.5.2. Stage 2 – The Disciplinary Hearing

17.5.2.1 Where a disciplinary hearing is to be convened, whenever possible, it should be arranged at a mutually convenient time and the employee must be given at least **five** working days' notice.

17.5.2.2 The Director will hear the case unless he/she has been directly involved in the case or acted as the investigating officer, in which case the hearing can be delegated to the second Director.

17.5.2.3 The Director must write to the employee, at their home address, inviting them to the hearing and informing them in advance of:

- (a) The statutory right to be accompanied by an appropriate trade union representative or a work colleague of their choice.
- (b) The alleged conduct or circumstances which may lead to dismissal or other disciplinary action being contemplated against the employee.
- (c) The requirement to attend to discuss the matter.
- (d) The date, time and location of the hearing.
- (e) The supporting evidence, including the investigating officer's report, which is to be submitted at the hearing (if available).
- (f) The right to call witnesses and submit relevant information within the agreed timescale.

17.5.2.4 Any documentary evidence, which either party intend to submit, should be made available to the other party at least **three** working days prior to the hearing, or a later date only by agreement. If it is not made available three days in advance then the other party will have the option of requesting a postponement.

If any additional paperwork is to be submitted this must be provided to both parties within an agreed timescale.

17.5.2.5 In any event the hearing must not take place until the employee has been informed of the grounds for calling the hearing and given a reasonable opportunity to consider his/her response to that information.

17.5.2.6 The School expects the employee to attend the hearing.

17.5.2.7 The Directors should be accompanied and advised by Human Resources in all cases.

17.5.2.8 The hearing should proceed in accordance with the procedure for Disciplinary Hearings (Appendix D).

17.5.2.9 The Director may adjourn to enable him/her to consider the facts and reach a decision or to call for additional information.

17.5.2.10 When the hearing is re-convened the employee will be informed of the decision and will be notified of the right to appeal against the decision. This will be followed up in writing.

17.6.0. POSSIBLE OUTCOMES OF THE PROCEDURE

17.6.1. No Further Action

17.6.1.1 This should be confirmed in writing to the employee

17.6.2. Advice, Guidance and/or Training

17.6.2.1 Appropriate for minor breaches of conduct. Timescales and review dates should be set and confirmed to the employee in writing.

17.6.3. Formal Warning

17.6.3.1 A formal warning (as distinct from guidance and advice) may be given only following a disciplinary hearing. Such a warning may be given if the breach of discipline or unsatisfactory conduct is so serious that guidance and advice would not be appropriate in the circumstances or where there has been further unsatisfactory conduct or a breach of discipline following informal guidance and advice.

17.6.3.2 The warning will be confirmed in writing and will set out the nature of the misconduct, the improvement(s) required, the likely consequences of further misconduct and any time limits imposed and the right of appeal.

17.6.4. Final Warning

17.6.4.1 A final warning may be given only following a disciplinary hearing.

17.6.4.2 Such a warning may be given if the breach of discipline or unsatisfactory conduct is so serious that a formal warning only would not be appropriate in the circumstances or where there has been further unsatisfactory conduct or a breach of discipline following a formal warning.

17.6.4.3 The final warning will be confirmed in writing and will set out the nature of misconduct, the improvement(s) required, any time limits imposed and the right of appeal, and will make it clear that further misconduct could lead to a recommendation that the employee be dismissed.

17.6.5. Dismissal

17.6.5.1 Dismissal may be invoked only following a disciplinary hearing. In conduct cases dismissal may be invoked where it has been found that there has been gross misconduct (see Appendix A for examples) or where the employee has on record a current final warning for the same or similar conduct. Other procedures cover dismissals arising from capability or redundancy. If the employee could not continue to work in the position held without contravention of an enactment then dismissal might be invoked without previous warnings.

17.6.5.2 On occasions, as an alternative to dismissal an employee may be demoted and/or transferred to another School or client location. It should be noted that in these circumstances, unless agreed with the individual this will constitute a dismissal. Should this occur this action should be linked to a final written warning.

17.6.5.3 In accordance with the *School Staffing (England) Regulations 2009*, where the Head Teacher/Governors decide that the appropriate sanction is to cease working at the school, the notice of dismissal will be issued by the School and confirmed by the Council (except in the case of Voluntary Aided and Foundation Schools). This confirmation must be sent within 14 days of the date the notification was issued by the School and must refer to the right of appeal. *This applies only where the School's Headteacher (our Client) is directly involved in the Disciplinary hearing.*

17.6.5.4 Where an employee is dismissed or resigns or leaves as an alternative to dismissal whilst in the formal part of the disciplinary process, it is the statutory responsibility of the employer to refer the case to the *GTCE (depending on the nature of the case and if appropriate)* who will consider the case under its disciplinary functions.

17.6.6. Levels of Discipline

17.6.6.1 The procedure described above will, in the case of minor breaches of discipline, be followed sequentially, commencing with guidance and advice. More serious offences may, even on first offence, result in a formal warning or a final warning. Dismissal will be invoked only in the cases as set out above.

17.7.0. RELATIONSHIP BETWEEN CONDITIONS OF SERVICE AND THIS PROCEDURE

17.7.1 This procedure in its entirety covers all necessary provisions for those staff employed (*by First Kicks Sports Ltd and who are working within Schools*) under the National Joint Council for Local Government Services and Teachers' Conditions. Where the conditions of service provide clear, unambiguous and specific entitlements in respect of disciplinary matters and do not allow local variations in respect of such matters, this procedure shall apply in conjunction with the terms in the individual's conditions of service.

17.7.2 If the conditions of service are silent on any matter(s) contained in this procedure, the relevant part(s) of this procedure shall apply. For the avoidance of doubt, the above procedures set out the minimum standards required in the context of dismissal or action short of dismissal in respect of any employee.

17.8.0. SUSPENSION FROM WORK

17.8.1 The Directors have the authority to suspend a member of staff from duty. Any suspension from work will be on full pay. Suspension should be as short as possible and be reviewed if it continues for a period of one month to assess the reasons for delays. Following this, a review should take place, by the Directors, every two weeks to ensure suspension is kept to a minimum and the employee is kept up to date with progress.

17.8.2 The Directors should ensure the employee is sent a letter identifying the support mechanisms available.

17.8.3 If during the suspension period the employee has any concerns or enquiries then they should contact the Directors.

17.8.4 During the suspension period the employee must be available to attend meetings as required and must not attend the workplace unless invited to do so. Should the employee not be available or acts in breach of the suspension rules then this may affect their pay.

17.8.5 Suspension is not disciplinary action in-itself, but a Neutral Act pending investigation or other measures.

17.8.6 An employee may be suspended if:

(a) it is considered that an act of gross misconduct may have occurred, but it is considered that the employee's continuation at work represents a serious risk to themselves, colleagues, members of the

public or pupils.

(b) the employee is the subject of investigation by the Police which may lead to charges being preferred and this could affect the tenability of his/her employment with First Kicks Sports Ltd or the School/Authority in which they are working.

(c) the employee appears to be incapable of undertaking his/her duties without presenting a serious risk to himself/herself or to others, a further act of misconduct may have taken place, the employee has on record a current final warning and it is considered that he/she should be removed from work because of the risk to the employee, colleagues or other persons, or the work of the School in which they are working.

17.8.7 Suspension will be confirmed in writing as soon as possible, making it clear why suspension has been invoked and what its likely duration will be, if known.

17.8.8 Suspension will be in accordance with the terms of the disciplinary procedure, the employee's contract of employment and conditions of service for the employment groups to which the employee belongs.

17.8.9 Suspension can only be ended by the Directors (or Designated Safeguarding Lead (DSL) may undertake this function on their behalf). In the case of employees working within Community Schools, the Local Authority must also be informed that suspension has ended.

17.8.10 Every effort must be made to minimise the period of time for which an employee is suspended and in deciding to suspend, the Directors should be conscious of the need not to pre-judge any disciplinary decision that will need to be considered later.

17.9.0. APPEALS

17.9.1 There shall be a right of appeal against all warnings and dismissals.

17.9.2 If the employee wishes to appeal, they must do so, within 10 days of the date of the letter informing them of the outcome/decision. This must be in writing to the person who notified them of the decision, stating the grounds upon which they want to appeal. ie:

- The perceived unfairness of the judgement
- The severity of the penalty
- New evidence coming to light
- Procedural irregularities

17.9.3 An Appeals Panel should be formed from the Investigating Team to include an external representative who were not involved in making the original decision. The Appeals Panel should also be advised by a representative of Human Resources but who shall not be entitled to vote in any proceedings of the Panel.

17.9.4 The Chair of the Appeal Panel must write to the employee inviting them to the appeal hearing and the employee must take all reasonable steps to attend.

17.9.5 The appeal hearing will be arranged as soon as practicable and the employee will receive a minimum of 10 working days notice of the date of the appeal hearing. This period may be reduced only by mutual agreement.

17.9.6 The hearing should proceed in accordance with the procedure for appeal hearings (Appendix F).

17.9.7 Following the appeal hearing, within five working days, the employee will be written to and informed of the outcome.

17.10.0. TRADE UNION REPRESENTATIVES

17.10.1 Normal disciplinary standards apply to employees who are trade union representatives.

17.10.2 In normal circumstances no action under the procedure should be taken against a representative of a recognised trade union without taking HR advice nor until an appropriate branch official or full time officer has been notified.

17.11.0. ATTENDANCE AT, AND REPRESENTATION DURING, INVESTIGATION AND/OR DISCIPLINARY PROCEEDINGS/APPEALS

17.11.1 Employees may arrange to be accompanied or, as appropriate, represented, by their trade union representative or a colleague from First Kicks Sports Ltd. This applies to all formal investigatory meetings/interviews, at all formal stages of the procedure.

17.11.2 Where unreasonable delay might be caused by awaiting the availability of the chosen representative and this has been discussed with the appropriate branch official or full time officer, management reserves the right to proceed with the hearing/appeal on the date set and to advise the employee to seek an alternative representative.

17.11.3 Where the employee refuses to attend, or fails to attend without giving an acceptable reason, an investigatory meeting/interview, a disciplinary hearing and/or an appeal, the Investigating Officer/Director/Panel concerned may proceed with the investigation/hearing/appeal and make a decision based on such evidence and information as is available to them at the time.

17.12.0. DISCIPLINARY RECORDS/TIME LIMITS

17.12.1 Except where it is otherwise decided in special circumstances the following time periods will normally apply to warnings given and the Director/Chair of Panel should select an appropriate time period taking into account the type of offence:

(a) Formal Warning - 6 months

(b) Final Warning - 12 months

17.12.2 In the case of all warnings, a longer period of time may be specified by the Director/Chair of Panel, after taking advice from Human Resources.

17.12.3 Records will not be taken into account for disciplinary purposes after the above time periods have been exhausted providing that no further disciplinary action has been taken during the time period.

17.12.4 Where an employee, who has received a warning, which requires an improvement of standards of conduct, is subsequently absent from work by reason of sickness during the currency of the warning, the timescale specified in the warning will be extended to reflect this. This will ensure that the full warning period is applied in the work situation and give the employee the fullest opportunity to demonstrate that he/she is capable of complying with reasonable standards set.

17.13.0. PROBATIONARY PERIODS

17.13.1 During the probationary period of an employee the First Kicks Sports Ltd's or the School's (within which our employee works) probation procedure/Teachers' Induction Procedure, and not the disciplinary procedure, will apply.

17.14.0. AGGRAVATING CIRCUMSTANCES

17.14.1 Where an employee has a current warning on record in respect of the same or related matter, and further disciplinary action is being contemplated against the employee, the current warning may be taken into account in deciding at which stage in the formal procedure disciplinary action is to be taken. In these circumstances advice should be sought from Human Resources.

17.15.0. OFFENCES AGAINST THE LAW

17.15.1 Where it is believed that an employee may have committed an offence against the law within employment this will be considered in the employment context within the disciplinary procedure. The Human Resources Director and the Director of Legal Services (*or external Human Resources or Legal advisors where necessary*) will be consulted in such instances and will advise how the matter should be reported to the Police.

17.15.2 The fact that an employee has been cautioned, charged, remanded in custody or has been convicted of an offence outside employment shall not immediately be regarded as an automatic reason for disciplinary action or dismissal. In such cases consideration must be given as to whether the offence is one which has any connection with, or bearing upon, the employee's work and/or the tenability of his/her continued employment with First Kicks Sports Ltd.

Where appropriate the disciplinary procedure should be followed to consider the matter.

17.15.3 In such cases, where a disciplinary hearing is held, disciplinary action need not necessarily await the outcome of criminal court proceedings since this involves a different standard of proof but the merits of proceeding or delaying should be considered in each individual case.

17.16.0. EQUAL OPPORTUNITIES

17.16.1 First Kicks Sports Ltd has a legal obligation to avoid and eliminate discrimination by ensuring that the principle of equality in employment is observed, both in the way we recruit, promote and develop existing and potential employees and in the way we behave towards each other.

17.16.2 In accordance with equal opportunities legislation and the Council's equality in employment policy, unjustified discrimination, harassment or bullying on any grounds, whether intentional or unintentional, will not be tolerated.

17.16.3 Complaints of discrimination will be investigated fairly and thoroughly and, where upheld, will be dealt with through the disciplinary procedure.

17.17.0. SICKNESS ABSENCE

17.17.1 If an employee is declared medically unfit for work that does not necessarily mean that the employee is unfit to take part in the investigation or disciplinary process. This will depend upon the illness, the general circumstances and the likely duration of the illness. If it is felt that they are well enough to attend and they refuse to do so then they may be referred to an external Occupational Health Consultant for advice on whether the employee is able to take part in the investigation or the disciplinary process. If the employee is not well enough to attend advice should be sought from Human Resources. In these circumstances the employee's Trade Union Representative may attend on their behalf.

17.18.0. WHEN PROCEDURES OVERLAP

17.18.1 Complications can arise when an employee feels that a disciplinary action is unfair or involves unlawful discrimination. However, disciplinary processes cannot be halted without good reason.

17.18.2 If an employee feels that he/she is being unfairly treated the matter should be raised in writing, with their line manager or the appropriate person dealing with the issue; and discussed at the first hearing.

17.18.3 If an employee feels that the process has been incorrectly applied or that the outcome has been influenced by inappropriate considerations, then an appeal should be made and the appeal mechanism will consider this.

17.18.4 If a grievance is raised by the employee after the disciplinary process has started and if the grievance is related to the disciplinary process it can be considered as an appeal at the conclusion of the process. If it does not relate to the disciplinary process it-self it should be considered separately under the grievance procedure.

17.19.0. First Kicks Sports Ltd's Designated Safeguarding Lead (DSL) & Director's Contact Information

First Kicks Sports Ltd's nominated [Designated Safeguarding Lead](#) is also our Director:-

[Ellis Remy](#)

[\(m\) 07984 165 626 Work Mobile](#)

[\(m\) 07415 105 214 Office](#)

[\(email\) ellis@firstkickssports.co.uk](mailto:ellis@firstkickssports.co.uk)

[\(email\) office@firstkickssports.co.uk](mailto:office@firstkickssports.co.uk)

First Kicks Sports Ltd's nominated [Deputy Designated Safeguarding Lead](#) is also our Director:-

Samuel Okikiolu

(m) 07903 686 922 Work Mobile

(m) 07415 105 214 Office

(email) samuel@firstkickssports.co.uk

(email) office@firstkickssports.co.uk

Gross Misconduct

Gross misconduct is conduct of such a serious nature by an employee that First Kicks Sports Ltd could not tolerate the continuation of that employee at work and could not tolerate a repetition of such conduct. Gross misconduct may result in dismissal without notice or without pay in lieu of notice.

The list below contains examples of the type of conduct which will normally be considered to be gross misconduct.

The list is not exhaustive but serves simply as an indication for employees of the types of conduct considered by the School to be so serious as to merit dismissal without prior warnings.

Examples of Gross Misconduct

- Insubordination, e.g. refusing to carry out contractual duties
- Physical violence
- Bullying, victimisation or harassment
- Deliberate damage to School/Council property
- Misuse of the School's/Council's property or name
- Bringing the School/Council into disrepute
- Incapability, whilst on duty, due to alcohol or illegal drugs
- Misuse of School/Council/Client facilities e.g. e-mail, internet, telephones
- Negligence which causes or might cause unacceptable loss, damage or injury
- Deliberate or flagrant infringement of health and safety rules
- Serious breach of confidence (subject to the Public Interest (Disclosure) Act 1998)
- Theft, fraud and/or deliberate falsification of records
- Failure to report any abuse of a child looked after by the Local Authority by a member of staff or other person having contact with the child
- Other conduct judged to be as serious as the above
- There may be occasions in gross misconduct when mitigating factors may need to be taken into consideration.

Role of Human Resources Representative(s) in Disciplinary Matters/Appeals

1. An external Human Resources consultant can provide advice to Directors on the application of the procedure at any stage.
2. An external Human Resources consultant representative will attend all formal stages of the procedure.
3. The role of the external Human Resources consultant will be to assist in ensuring that correct procedural steps are taken and to provide advice based on authority-wide implementation of the procedure so as to promote consistency and fairness. This may involve asking questions for the purpose of clarification on matters which have been raised during the course of the disciplinary proceedings or hearing.
4. Any advice given by the external Human Resources consultant must be considered before a decision is made, but they shall not be entitled to vote in any proceedings.

Administration of Disciplinary Hearings

1. When a disciplinary hearing is to be held under 5.2, the Chair of the hearing must inform the employee in writing, (marked 'Private & Confidential') and give reasonable notice of the date, time and place for the hearing (at least 5 working days' notice to be given).
2. The letter should also contain sufficient details for the employee to understand the allegation or matter of concern, confirmation of the right of the employee to be represented at the hearing by their trade union representative or a colleague from work and the right of the employee to produce appropriate witnesses and/or submit written statements as evidence.
3. The letter should also refer the employee to the Disciplinary Policy, and that an employee cannot refuse or fail to attend the hearing without giving an acceptable reason to the Directors/Chair of Panel.
4. It must be made clear in the letter that the outcome of the Hearing may be disciplinary action.
5. Where further written statements are to be submitted in evidence, the statement(s) should be copied to the Directors/Chair of Panel and the employee as appropriate at least 3 working days before the hearing. This will save time at the hearing and also allow both parties reasonable time to consider the content on the statement(s).
6. Where witnesses are to be called by either party the number of witnesses and names involved should be confirmed to the other party at least 3 working days before the hearing so that administrative arrangements can be made to accommodate the witnesses and to alert each party to the involvement of witnesses.

Procedure for conducting Disciplinary Hearings

1. The procedure and sequence of events will be explained by the Chairperson (Directors/Chair of Panel).
2. The Investigating Officer shall put forward the management case and may call witnesses.
3. Witnesses should be called into the hearing in turn to give their evidence. Having given the evidence and answered any relevant questions they should withdraw. Witnesses may also be called back into the hearing to clarify facts.
4. The appellant or the appellant's representative shall have the opportunity to ask questions of the Investigating Officer and witnesses.
5. The Directors/Chair of Panel hearing the case shall have the opportunity to ask questions of the Investigating Officer and witnesses.
6. The appellant or the appellant's representative shall put forward the case and call such witnesses as the appellant wishes.
7. The Investigating Officer shall have the opportunity to ask questions of the appellant or the appellants representative and witnesses.
8. The Directors/Chair of Panel shall have the opportunity to ask questions of the appellant or the appellants representative or witnesses.
9. The Investigating Officer shall have the opportunity to sum up the case.
10. The appellant or his/her representative shall have the opportunity to sum up the case.
11. The hearing should be adjourned. The Investigating Officer, the appellant, and his/her representative shall withdraw.
12. During the adjournment the Directors/Chair of Panel shall consider the decision, with advice from an external Human Resources consultant.
13. The hearing will re-convene. The decision of the Directors/Chair of Panel will be communicated to both parties.
14. The Directors/Chair of Panel will confirm the outcome in writing, within 5 working days of the hearing.
15. The letter must also, where appropriate, provide the employee with the right to appeal against the decision, advising them how they should appeal and that they should state their reasons for the appeal.

NB At any point during the hearing the Directors/Chair of Panel may adjourn the meeting for a short period of time to seek clarification on relevant points.

Disciplinary Action Letters

1. *Letter confirming hearing* will be sent out by Directors/Chair of Panel giving 5 working days' notice of the hearing and will contain the following information:-

- Details of the allegation(s)
- Time, date and location of the hearing
- The right to be accompanied by a Trade Union Representative or a work colleague
- The outcome of this hearing may result in formal action (list possible outcomes)
- Requirement to attend

2. *Letters confirming disciplinary action* taken will be sent by the Directors/Chair of Panel within 5 working days of the hearing and will contain the following information: -

- Details of the offence or behaviour
- Level of warning
- Confirmation of the period of time for which the warning will remain current
- Details of any action required of the employee
- Details of any assistance or training to be provided by management
- If appropriate, any period of time set for a review
- Confirmation that repetition of this, or related offences/behaviour, are liable to lead to further disciplinary action
- Details of the employee's right of appeal and how that may be exercised

3. *Letters of dismissal* will also be sent within 5 working days of the hearing and include: -

- The effective date of termination and whether notice or payment in lieu of notice is being given
- The reason for dismissal stated as precisely and clearly as possible
- A statement that formal notice of dismissal will be issued by the Directors.
- Details of the employee's right of appeal and how this can be exercised.

Appeals

1. Administration

Appeals against warnings or dismissal should be notified to the person making the decision to be appealed against in writing, within 10 working days of the date of the letter confirming the disciplinary action. The employee concerned should lodge all appeals; other parties or representatives on behalf of the employee cannot lodge appeals. An appeal hearing will then be arranged and the employee will receive at least 10 working days' notice of the hearing of an appeal and may be represented at this by a trade union representative or a work colleague. The notice period of 10 working days may be reduced only by mutual agreement. A fundamental aim of the appeals procedure is for the School not only to be fair but also to be seen to be fair in dealing with its staff. Where the procedure is silent on any point, which may arise during the course of the hearing, it is for the Appeals Panel to decide, in the light of any representations made by management and the employee and/or representative, what course of action should be followed.

2. Appeals Procedure

(A) Representation and Attendance

The normal procedure will be for the employee plus one representative and the manager to attend the hearing and present their cases. The management representative will usually be the Director unless he has acted as investigating officer or had involvement in the case in which circumstances the Chair of the original Disciplinary Panel will take this role. Witnesses will be called, in turn, to give evidence and will then leave the hearing. It is at the discretion of the Panel to permit either party to bring additional representatives/managers and to decide whether they may attend in an observer or participant capacity.

(B) Constitution of Appeals Panel

An Appeals Panel should be formed to include a Director that was not involved in the original Disciplinary Panel. The Appeals Panel should also be advised by an external Human Resources consultant but who shall not be entitled to vote in any proceedings of the Panel.

(C) Written Statements

Both management and the employee will be invited to submit any additional information and/or reports. Where both parties have provided statement's these will be exchanged 3 working days before the hearing.

(D) Procedure for the Appeal Hearing

(a) The management representative shall state the case

(b) Whilst stating the case, if appropriate, the management representative may call witnesses. The procedure for each witness shall be:

- Management representative to question
- Employee and/or representative to question
- The Chair and Panel to ask any questions
- Management representative to re-examine
- Witness to leave the room

- (c) The employee and/or representative may ask questions of the management representative.
- (d) The Chair and Panel may ask questions of the management representative.
- (e) The employee and/or representative to state the case.
- (f) Whilst stating the case, if appropriate, the employee and/or representative may call witnesses. The procedure for each witness shall be: -
- Employee and/or representative to question
 - Management to question
 - The Chair and Panel to ask any questions
 - Employee and/or representative to re-examine
 - Witness to leave the room
- (g) The management representative may ask questions of the employee and/or representative.
- (h) The Chair and Panel may ask questions of the employee and/or representative.
- (i) The management representative to have the opportunity to sum up the case if he/she wishes.
- (j) The employee and/or representative to have the opportunity to sum up the case if he/she wishes.
- (k) The management representative, employee and representative to withdraw.
- (l) The Panel to deliberate recalling management representative, employee and representative only if clarification of evidence already given is required. In such instances both parties should be recalled even though clarification may be required from only one side.
- (m) The Chair shall announce the Panel's decision to both sides unless further time for deliberation is needed, in which case both sides will be advised of this and the decision advised in writing.
- (n) The decision of the Panel will be notified to both sides in writing within 5 working days of the appeal hearing.
- (o) The decision of the Panel is final.

Notes: The provision of summing up at (i) and (j) does not include the right to introduce new evidence at this stage in the procedure. If this becomes necessary, then the other side should be given the right of reply. The hearing is not a court and witnesses should be questioned in a courteous and appropriate manner. They should be allowed to answer questions fully and not be interrupted unless there is a misunderstanding of the question or they stray from the matters under discussion. Where points of clarification, which affect the understanding of the case being advanced, do need to be raised, the Chair may ask questions at any point during the proceedings but otherwise will raise questions at the appropriate stages. Any matters of procedure not covered above will be for the Panel Chair to decide.

(E) Decisions

On the basis of the evidence presented, the Panel may make a decision on the outcome.

Decisions generally will fall into two categories, namely:

- (a) not allowing the appeal in which case the employee's dismissal or warning is confirmed.
- (b) allowing the appeal in which case, if the Panel are of the view that different disciplinary action is necessary, they may consider one or more courses of action such as:
 - (i) formal warning in accordance with the First Kicks Sports Ltd's disciplinary procedure
 - (ii) final warning in accordance with the First Kicks Sports Ltd's disciplinary procedure
 - (iii) redeployment/demotion to another post

NB: The above list is not exhaustive.

The Panel shall give its decision in the presence of both parties and the HR representative, and any party may seek clarification of this decision.