

Appendix A

PLACES LEISURE Safeguarding and Child Protection Policy

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Policy/Strategy Control Statement

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4	Author	Olivia Barker
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Policy Applicable To

Business Area: Health & Safety

Applicable to: Places Leisure

Amendment Sheet Record

Revision Date	Description of Changes	Approved By	Date Approved
28/10/2024	Reporting guidance removed from policy and added as appendix to policy.	Keith Evans	28/10/2024
28/10/2024	Section added regarding children with SEN or additional needs and how this is managed at sites.	Keith Evans	28/10/2024
28/10/2024	Date of Working together to safeguarding children amended to the latest version	Keith Evans	28/10/2024

Please summarise the current policy requirements and how this is changed in the new policy.

Annual review no significant changes

Please explain the reason for changes/improvements/new policy.

Annual review no significant change

Please explain any new actions required to put the policy changes into practice.

Annual review no significant change

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SAFEGUARDING AND CHILD PROTECTION POLICY

Introduction

The aim of these Child Safeguarding Policies and Procedures (CSPP) are to safeguard all children in line with current legislation, regulations and guidance and is for use within all Places Leisure settings where children are present. A child is anyone under the age of 18.

The CSPP consistently emphasises that the responsibility for child safeguarding in our organisations belongs with all those involved in our settings and is not the sole responsibility of any one person at local, regional, or national level. Places Leisure believe that all children involved in activity under its organisation have the right to stay safe and have fun.

Safeguarding children in our organisation is an integral part of daily activities and is about creating a culture that provides a safe and happy environment in which children can partake in leisure activities and help develop emotionally and physically to a level appropriate for their ability.

The Children Acts 1989 and 2004 as amended by the Children and Social Work Act 2017 and the Government document “Working Together to Safeguard Children 2023” are clear that safeguarding children is the responsibility of all, including those who are employed or volunteer with children in whatever capacity. It is the organisations’ responsibility, through safe recruitment practice, to ensure that those who are deemed to be unsuitable to work with children are not allowed to do so in our organisation.

The Disclosure and Barring Service (DBS) is an important, but not sole, part of safe recruitment. All staff must follow the guidance in these CSPP to safeguard children from harm, and act appropriately if a child is identified as being at risk of harm.

Working Together to Safeguard Children (23):

Working Together to Safeguard Children 2023 sets out how organisations should work together to safeguard and promote the welfare of children and young people in accordance with the Children Act 1989 and the Children Act 2004. The government document “What to do if you’re worried a child is being abused” (2015) is practice guidance that has been developed to assist anyone working with children and young people to work together to safeguard and promote children’s welfare and underpins the Places Leisure Safeguarding Manual.

1. **Safeguarding is everyone’s responsibility:** for services to be effective each practitioner and organisation should play their full part.

and

2. **A child-centred approach:** for services to be effective they should be based on a clear understanding of the needs and views of children.

No single person can have a full picture of a child's needs and circumstances and, 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.

In order that organisations and practitioners collaborate effectively, it is vital that every individual working with children and families is aware of the role that they have to play and the role of other practitioners. They should be aware of, and comply with, the published local arrangements as set out by the local safeguarding partners.

Effective safeguarding requires clear local arrangements for collaboration between practitioners and agencies, however, these procedures outline the expected route for acting on concerns coming to notice of any Places employee, nationally.

Key principles

- The welfare of the child is, and must always be, paramount.
- It is every child's right to be protected from abuse irrespective of their age, gender, faith or religion, culture, ethnicity, sexual orientation, background, economic position, disability, or level of ability.
- Allegations of abuse or concerns regarding children will be treated seriously and will be responded to swiftly and appropriately.
- Places Leisure recognises the responsibilities of the statutory agencies and is committed to complying with safeguarding partners and the statutory guidance [Working Together to Safeguard Children](#)
- Confidentiality will be maintained appropriately at all times and the child's safety and welfare must be the overriding consideration when making decisions on whether to share information about them.
- Places Leisure Safeguarding Team will support everyone involved in our settings to understand their roles and responsibilities with regards to safeguarding and protecting children from harm.

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Safe Recruitment Policy

The company has a duty of care and is committed to safeguard all children and young people involved in their activities by providing:

- clear safeguarding procedures, accountability, and appropriate training for all staff.
- robust recruitment procedures to ensure there are no known reasons or information available that would prevent staff from working with children and young people.
- a comprehensive induction programme and probationary period for all new employees, including the dissemination of the safeguarding manual.
- a procedure for the reporting of safeguarding concerns through this, and the Whistle Blowing Policy and Procedure.
- awareness of good practice to ensure a safe and healthy environment amongst parents, guardians, and participants.
- monitoring the impact of the safeguarding manual and procedures to ensure compliance with legislation, and local Safeguarding Children Partnerships.
- ongoing support for staff through regular supervision and an annual appraisal programme.
- a process for dealing with allegations of abuse against members of staff.

All employees must have a clear understanding of their own role and responsibilities with regard to safeguarding children and young people but also the role of others in the organisation. All employees need to be clear on the recording and reporting of safeguarding concerns, how these concerns will be taken forward within a clear sharing information framework and the role of other agencies.

This manual refers primarily to children, but most principles and procedures also apply to the protection of adults at risk of harm. (Refer also to the separate Adults at Risk policy). The company recognises that the needs of vulnerable adults at risk may differ from those of children and young people and will endeavour to consider this where appropriate.

It is important to remember that everyone has a duty of care and all employees who either work directly or come in to contact with children and young people have a part to play in helping to keep children and young people safe and to promote their welfare.

All policies and procedures in the Safeguarding Manual cover Places for People Leisure Management Ltd and all its associated companies

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Recruitment and selection of employees

Places Leisure (the company) will ensure the safety and protection of all children and young people up to the age of 18 years in its care through the Safeguarding Manual. Children and young people have a right to be safe and adults have a responsibility to protect them.

Rigorous procedures for the recruitment of employees is essential to protect children and young people. The company complies fully with the Disclosure and Barring Service (DBS) Code of Practice. A DBS disclosure will *only* be requested where the company is satisfied that it is legal, proportionate, and relevant to the position concerned and the check allows the company to make an informed decision regarding the suitability of the individual for the position they have applied for.

Screening

Staff employed by the company will have a rigorous screening programme. Checks will include:

- Proof of identification (passport, driving licence or similar)
- Verification of qualifications (originals)
- Receipt of two satisfactory written references, one of which should be from the individual's current / most recent employer.
- Completion of a 'Self Disclosure' Form for staff working in Ofsted registered provisions which will be completed annually as part of the appraisal process.
- A probationary period for all new staff and ongoing supervision

Staff will be made aware of the Company Safeguarding Manual in their induction.

Self-Disclosures

For staff working in Ofsted registered childcare provision, an annual self-disclosure form will be completed.

This self-disclosure form must be used to self-disclose incidents, factors, police records or any other information that may be relevant in determining your suitability to work within Places for People Leisure. Applicants should be aware that Places Leisure may also access information from referees, past employers, and police records.

All Self Disclosure Forms will be stored securely by the GM in their personnel files with access strictly limited to those who are entitled to see it. A record will be kept of the names

of people who have completed Self Disclosures, the date they completed the form and the decision made about their suitability for a role (but not details of any convictions etc.)

Information provided on a Self-Disclosure Form will only be disclosed to those who are involved in the assessment of the information. The information will only be used for the specific reason for which it was collected, and not passed on to any other organisations/individuals, except in the case of necessity to share to prevent risk of harm to children or young people.

Failure to adequately disclose relevant information may result in denial or termination of casual engagement, and/or termination of any offer of contract or permanent employment.

Training

The safeguarding process includes training after recruitment to help staff assess their own practice against established good practice, to ensure their practice is not likely to result in allegations being made;

- recognise 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 and effectively with children and young people.

Appropriate training may be arranged to enable individuals to recognise their responsibilities with regard to good practice and reporting of suspected poor practice or concerns of potential abuse.

The company recognises that society is made up of people from very different racial, cultural, religious, and linguistic backgrounds. It is important that our staff understand this through the disability and equality policy and staff training and development.

Promoting Good Practice with Children Code

It is possible to reduce situations in which abuse can occur and help protect colleagues by promoting good practice. We expect all our colleagues and volunteers to follow the behaviours set out in this code. If any colleague or volunteer behaves in a way which contradicts any of the points set out above, we'll address the problem straight away and aim to resolve the issue.

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All colleagues and volunteers must:

- implement our safeguarding policies and procedures.
- always put the welfare of any child first.
- report concerns about or allegations of abuse or poor practice to the designated safeguarding lead.
- listen to any concerns that parents (carers or guardians included) or children / young people may 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 with children.
- understand engaging in certain sexual behaviours with any child under the age of 18 can be 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 adults to participate before the session begins.
- ensure equipment is fit for purpose, safe to use and accessible.
- respect children's trust and rights whilst being open and honest with them.
- build balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- champion everyone's right to take part and celebrate difference by not discriminating against anyone, regardless of gender, race, faith, beliefs, sexual orientation, or ability.
- stop play if an injury happens, administer appropriate minor first aid, and call for help when necessary.
- use constructive and positive methods of developing children's skills, without humiliating or harming them.
- behave appropriately online, including in any social media interaction.
- 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. Be an excellent role model - this includes not smoking or drinking alcohol in the company of children.
- develop positive relationships with parents and catch up with them regularly about their child's development.
- if a child is dependent on an employee in a particular sport on a one-on-one coaching basis, the employee should talk with the child about what they are doing and give choices where possible. This is particularly the case if it involves any dressing or undressing of outer clothing or where there is physical contact, lifting or assisting a child to carry out particular activities, ideally to take place in an open, observed area.
- employees should avoid taking on the responsibility for tasks for which they are not appropriately trained.
- work in an open environment - avoid private or unobserved situations. (e.g., no secrets).

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- recognise the developmental needs and capacity of children.
- ensure that use of photographic and filming equipment is appropriate, and permission of parents has been sought;(see photography standard)
- ensure that high standards are maintained at all times.

All colleagues and volunteers must AVOID:

(Except in emergencies. If cases arise where these situations are unavoidable, they should only occur with the full knowledge and consent of the GM or the child's parent, guardian or carer).

- spend excessive time alone with children away from others.
- take children alone on car journeys, however short.
- take children to your home.

Employees 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.
- Allow allegations made, or concerns raised, by a child to go unacknowledged, unrecorded, or not acted upon.
- Do things of a personal nature for children that they can do for themselves.
- Invite or allow children to stay at their home.
- Constantly shout at and/or taunt a child to 'keep control.'
- Offer any inappropriate or inconsistent rewards to a child
- Develop any inappropriate concealed relationship or communication with a child, including online or via social media
- Take a child into their confidence, including the promise 'not to tell,' or allow the sharing of secrets

If an employee accidentally hurts a child, and the child seems distressed in any manner or appears to be sexually aroused, report any such incident as soon as possible to another colleague and make a written note of it. Parents or carers should be informed of the occurrence.

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Places Leisure Safeguarding Team:

The Designated Safeguarding Lead (DSL)

Each contract has a Designated Safeguarding Lead (DSL) to deal with safeguarding / child protection issues. If the designated person is informed of situations where they are unsure if the allegation is one of abuse or not, they will discuss with their Contract Manager, Area Manager or Senior Safeguarding Team.

The DSL will be required to:

- Be familiar with child protection procedures.
- Ensure there are effective internal procedures to handle concerns.
- Ensure that systems are in place for effective record keeping.
- Be the link with Children's Services on concerns that have been raised.
- Attend local training as appropriate

Duty of care

Section 11 of the Children Act 2004 places duties on a range of organisations and individuals to ensure their function and any services they contract out to others are discharged having regard to the need to safeguard and promote the welfare of children.

Places Leisure staff have a duty to be aware of their responsibilities for safeguarding and promoting the welfare of children, how they should respond to child protection concerns and make a referral to the local authority Children's Social Care, police, Local Authority Designated Officer (LADO) or other agencies if necessary.

Anyone involved in our organisation can contact the Places Leisure Safeguarding Team for advice or guidance. If these services are unavailable for any reason and *failure to act immediately may place a child at risk of harm* then immediate contact should be made with police, Children's Social Care, Multi Agency Safeguarding Hub (MASH), NSPCC Child Protection Helpline or other agencies as appropriate.

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Confidentiality and information sharing

Confidentiality must be maintained at all times when an allegation has been made and is being investigated. Organisations should only tell individuals who '*need to know*' and can help in managing the concerns. If parents/guardians are not implicated in the concern, ensure they are made aware at the earliest opportunity.

Consider the best method of communication to maintain confidentiality and be mindful of the environment.

Information sharing is essential for effective safeguarding and promoting the welfare of children. It is a key factor identified in many serious case reviews, where poor information sharing has resulted in missed opportunities to take action that keeps children safe.

Employees should consider how much information you need to release and consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk. The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child. There will be incidents where to share information with a person (or their parent/guardian) suspected of a criminal offence may compromise an investigation, and longer-term protection of children. Please seek advice from the Safeguarding Team in such cases.

The HM Government document entitled "Advice for practitioners providing safeguarding services to children, young people, parents and carers" July 2018

<https://www.gov.uk/government/publications/safeguarding-practitioners-informationsharing-advice> .

Which provides non-statutory advice to support practitioners in the decisions they take to share information, which reduces the risk of harm to children and young people and promotes their wellbeing. This outlines the seven golden rules to sharing information, which includes the GDPR / Data Protection Act not being a barrier to share to safeguard children, honesty around arrangements for sharing, we can share without consent in some circumstances, consider safety and wellbeing, and the necessity / proportionality of sharing, and recording of such sharing.

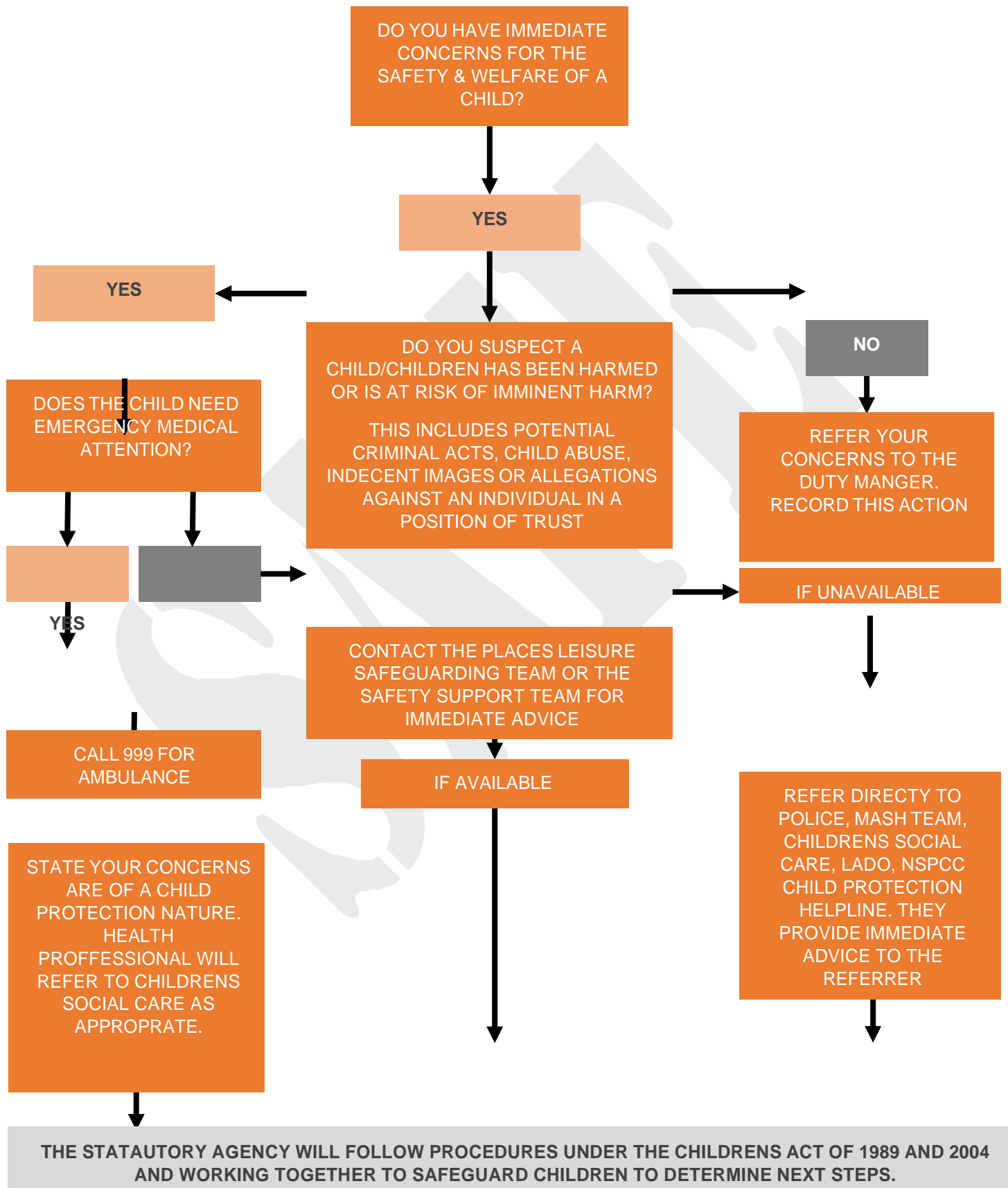
Reporting Guidance

Reporting guidance can be found as an appendix to this policy, all cases should be reported as soon as possible on EcoOnline with all relevant information which has been collected. Any colleague safeguarding or allegations against colleagues should also be reported using EcoOnline.

Where there have been allegations made against a Places Leisure employee this will be reviewed by our Serious Case Management Panel which includes representatives from Places Leisure's Safeguarding Team, People Services Team and an Independent Safeguarding Consultant.

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Concerns for a child reporting flowchart



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Definitions of Abuse & Neglect

Abuse	Definitions of the different types of abuse and some common indicators are detailed below
Child	A “child” is anyone who has not yet reached their 18th birthday
Child Protection	Child protection is part of safeguarding and promoting welfare. This refers to the activity undertaken to protect specific children who are suffering, or are at risk of suffering, significant harm as a result of maltreatment. Effective child protection is essential as part of the wider work to safeguard and promote the welfare of children. However, all agencies and individuals should be proactive in safeguarding and protecting the welfare of children so that the need for action to protect children from harm is reduced.
Children’s Social Care	This may also be known as Social Services or Children’s Social Care Team (the name may vary around the country)
Designated Officer / LADO	Also known as Local Authority Designated Officer. Supports organisations where concerns have arisen in relation to the behaviour towards children of someone in a position of trust.
Multi Agency Safeguarding Hub (MASH) Team	Usually, a secure co-located information hub of Children’s Social Care, police, health, probation, education, mental health, and other agencies who enable secure information to be shared between agencies to determine best outcomes, following any referral of concerns about a child.
Safeguarding and promoting the welfare of children	Protecting children from maltreatment preventing impairment of children’s health or development ensuring that children grow up in circumstances consistent with the provision of safe and effective care taking action to enable all children to have the best outcomes
Safeguarding partners	The Local Authority The Clinical Commissioning Group for any area which falls within the Local Authority area The Chief Police Officer for an area any part of which falls within the Local Authority area.

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What is abuse and maltreatment of children?

All incidents of abuse and neglect are forms of maltreatment of a child.

Abuse is:

- Any action by another person that causes harm / significant harm to a child.
- When someone fails to prevent harm to a child.

Who could abuse a child?

- The abuser may be a member of the child's family, a stranger, an acquaintance, or an institution.
- An adult or a child.
- Peer on peer abuse.
- A male or female.

Types of abuse

Types of abuse broadly fall into four categories, and in many cases, the circumstances of abuse may include more than one type;

Physical abuse

When a child is deliberately hurt. This can cause injuries such as cuts, bruises, burns and broken bones. It can involve hitting, kicking, shaking, throwing, poisoning, burning, or scalding, drowning or suffocating.

Physical harm may also be caused when a parent/guardian, carer or other adult fabricates the symptoms of, or deliberately induces, illness in a child.

Sexual abuse

Can include forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse.

There are two different types of child sexual abuse. These are called *contact abuse* and *non- contact abuse*.

Contact abuse happens when the abuser makes physical contact with the child and includes:

- Sexual touching of any part of the body whether the child is wearing clothes or not.
- Rape or penetration by putting an object or body part inside a child's mouth, vagina or anus.
- Forcing or encouraging a child to take part in sexual activity.
- Making a child take their clothes off, touch someone else's genitals or masturbate.

Non-contact abuse involves non-touching activities. It can happen online or in person and includes:

- Encouraging a child to watch or hear sexual acts.
- Not taking proper measures to prevent a child being exposed to sexual activities by others.
- Showing pornography to a child.
- Making, viewing, or distributing child abuse images. This can include taking images of a child when they are getting changed in the changing rooms.
- Allowing someone else to make, view or distribute child abuse images
- Meeting a child following face-to-face or online sexual grooming with the intent of abusing them.
- Sexually exploiting a child for money, power, or status (child exploitation).
- Persuading or forcing a child to send or post sexually explicit images of themselves. Sometimes referred to as "sexting".
- Persuading or forcing a child to take part in sexual activities via a webcam or smartphone.
- Having sexual conversations with a child by text or online. This can be a specific offence where an adult communicates with a child under 16 years old if the communication is sexual or intended to obtain from the child a communication which is sexual.

Emotional abuse

Ongoing emotional maltreatment of a child. Emotional abuse is persistent and, over time, can severely damage a child's emotional health and development. It may include:

- Repeatedly conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them, or making fun of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children e.g., interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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Neglect

Persistently failing to meet a child's basic physical and/or psychological needs usually resulting in serious damage to their health and development. Neglect may involve *failure to*:

- Provide adequate food, clothing, and shelter.
- Protect a child from physical and/or emotional harm or danger.
- Ensure adequate supervision (including leaving them with unsuitable carers).
- Make sure the child receives a suitable education.
- Meet or respond to a child's basic emotional needs or preventing appropriate medical treatment.

It is important to recognise that in some cases of abuse, it is not always an adult abusing a young person. It can occur that the abuser may be a young person, for example in the case of bullying.

Bullying can be defined as: "Persistent, offensive or intimidating behaviour arising from the deliberate intent to cause physical or psychological distress to others".

Bullying can include;

- Physical abuse (e.g. pushing, hitting, kicking, pinching,)
- Verbal abuse (e.g. name-calling, spreading rumours, constant teasing and sarcasm, both directly, or online - cyberbullying);
- Emotional abuse (e.g., tormenting, ridiculing, text messaging, humiliating, and ignoring)
- Racist abuse (e.g., taunts, graffiti, and gestures)
- Sexual abuse (e.g., unwanted physical contact or abusive comments).

There are a number of signs that may indicate that a young person is being bullied:

- Behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotional.
- A drop off in level of performance.
- Physical signs such as stomach aches, headaches, scratching and bruising, damaged clothes, and bingeing on food.
- A shortage of money or frequent loss of possessions.

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Dealing with Suspected Bullying towards a Child

All signs of bullying should be treated seriously. If circumstances lead an employee to suspect that a child is being bullied, the following action should be taken:

- Investigate the circumstances and take action to ensure the victim is safe. Speak with the victim and the alleged bully/ies separately.
- Reassure the victim that you can be trusted and will help, but you cannot promise to tell no one else.
- Keep records of what happened, what was said by whom and when.
- Report concerns to the person in charge of the session.

Dealing with Suspected Bullying by a Child

If circumstances lead an employee to suspect that a child is bullying another child or person, the following action should be taken:

- Investigate the circumstances.
- Talk with the alleged bully, explain the situation, and try to get the alleged bully to understand the consequences of his or her behaviour. Seek an apology to the victim.
- Inform the alleged bully's parents.
- Provide support for victims of bullying.
- Impose appropriate sanctions if necessary.
- Encourage and support the alleged bully to change behaviour.
- Inform the designated person of action taken.
- Keep a written record of action taken.

Homophobic and Transphobic bullying

All bullying has the potential to cause significant harm to young people. Transphobic and homophobic bullying can be hard to spot as it may be happening out of view of adults.

Homophobia is having or showing a dislike or prejudice against homosexual people. Homosexuals are people that are attracted to people of their own sex.

Transphobia is having or showing a range of negative attitudes, feelings, or actions towards transgender or transsexual people or toward transsexuality (people who experience a gender identity that is not consistent with their assigned sex and that they want to permanently transition to the gender with which they identify, usually using some medical intervention).

Transphobia and homophobia are often driven by a lack of understanding which can strengthen stereotypes. It's important that all staff understand gender identity issues, not

only so they can recognise inappropriate language but also ensure that staff themselves don't use homophobic or transphobic language and know how to challenge negative behaviours.

Generally, transphobic, and homophobic bullying can look like other kinds of bullying. It may include:

- Verbal abuse- including spreading rumours that someone is gay, with its implications that this is somehow inferior
- Physical abuse –including hitting, kicking, sexual assault, threatening behaviour, and theft or destruction of property
- Cyberbullying – using online spaces to spread rumours about someone or exclude them; this can also include text messaging, including video and picture messaging
- Exclusion and isolation – for example, always being picked last for the team

Therefore, create an inclusive environment, keep track of any bullying, and escalate as with other safeguarding concerns. Raise awareness, provide support and signpost where appropriate.

Bullying and abuse because of a person's gender identity must be challenged with the same energy as other equality issues.

Self-harming

What is self-harm?

Self-harm, also sometimes referred to as self-injury, is a term used to describe a wide range of behaviours where individuals intentionally hurt themselves; it is often seen as a physical response to an emotional pain. There are lots of different forms of self-harming. Some individuals may use the same method of self-harm all the time, whilst other individuals may use different ways at different times. Ways of self-harming can include but are not limited to:

- cutting
- rubbing/scraping the skin with sharp objects
- scratching, picking, and pinching of skin
- biting yourself
- burning
- interfering with healing
- hair pulling (and then potentially hair eating)
- hitting objects, including punching and head banging
- abusing drugs and alcohol
- poisoning or overdosing
- eating disorders
- exercising excessively

The World Health Organisation state one in five young people will self-harm by the age of 25, and reports indicate girls may be more than twice as likely to self-harm.

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Talking about self-harm

Whether someone tells you directly, or you suspect that an individual is self-harming, it can be extremely difficult to know what to say and how best to approach the situation.

- Try not to panic or overreact. The way you respond will have an impact on how much they open up to you now and in the future.
- Try to be non-judgemental.
- Be supportive of the individual. It maybe they feel more secure while engaging in sport than other environments in their lives.

It can be difficult for sufferers because they may feel scared, ashamed, think they will get in to trouble and may have difficulty in explaining to others how they feel and why they are self-harming. Parents/guardians of sufferers may equally find it difficult to talk about and deal with the emotions of what is happening to their child.

What to do if you suspect someone is self-harming

If an individual has concerns, has noticed marks on an individual's body or has received a disclosure, it is important that these concerns are referred using the processes above, and advise the DSL.

In most cases the parents/guardians of the child would be informed of the concerns so the organisation can establish that the parents/guardians are aware, and the young person is receiving appropriate professional support. Occasionally parents/guardians may be aware but don't know where to turn for help. We can provide appropriate signposting to the professional help available as listed in Useful contacts on Page 22.

Supporting Children with Special Educational Needs (SEN)

At Places Leisure, we are committed to safeguarding all children, including those with Special Educational Needs (SEN), understanding that they may face additional vulnerabilities. Our approach aligns with government guidance to ensure the safety and inclusion of all children in our centres.

Key Safeguarding Considerations for Children with SEN:

- **Individual Needs:** We recognize that children with SEN may have unique needs that require specific adjustments. Our staff are aware of these differences and aim to ensure
- our safeguarding practices are inclusive and responsive. This aligns with guidance from

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the *Department for Education's SEND Code of Practice* to tailor support for children with SEN.

- **Communication Challenges:** Some children with SEN may find it difficult to communicate concerns or distress. Staff are trained to be vigilant for non-verbal cues and other signs of potential safeguarding issues, as recommended by the *Keeping Children Safe in Education* guidance.
- **Partnership with Parents:** We work closely with parents and carers to ensure that the individual needs and safeguarding requirements of children with SEN are understood and supported. This collaboration is crucial in line with *Working Together to Safeguard Children* guidelines, emphasising the importance of a multi-agency approach.
- **Inclusive and Safe Environment:** We are committed to fostering an environment free from bullying, discrimination, or exclusion, ensuring that children with SEN feel safe and valued. Our practices reflect the principles in the *Equality Act 2010*, which protects children from unfair treatment.

By following these key practices and government guidance, we aim to provide a safe, supportive environment where children with SEN can thrive and enjoy our services.

SAFEGUARDING AND CHILD PROTECTION POLICY

Contextual Safeguarding

Contextual Safeguarding has been integrated into Working Together to Safeguard Children 2023 and Keeping Children Safe in Education. It also recognises situations involving 'Harm outside the home'.

It is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships children form in their neighbourhoods, schools and online can feature violence and abuse.

It requires all who work with children to have consideration for their needs in the wider non-family context and an understanding that environmental factors around children and their activities including sporting and communication are highly relevant to ensuring children are kept safe.

Within our facilities we recognise there are certain environments or contexts where children may be vulnerable, and a need to ensure all staff and volunteers take action to prevent risk. In this context, specific risks are in changing rooms and villages, often around the use of cameras, phones, and devices capable of taking/sending images, and from unmonitored direct communication with children, be it from their peers or those in a position of trust.

SAFEGUARDING AND CHILD PROTECTION POLICY **Places Leisure** Part of Places for People

Other specific areas of concern;

Child sexual exploitation – the request/demand/performing of any sexual act of an under 18- year-old, in exchange for any type of reward including a threat not to carry out an action (sending pictures of the child to others).

“Faith” or “Belief” abuse – carried out on a child as a result, often, of a belief that it is a necessary act to perform on a child e.g., Witchcraft or Kindoki (predominant in central African countries) where a child might be physically harmed by cutting/beating/water treatments, to “release” the child from spirits.

Female genital mutilation – the mutilation of a child through a belief the harm is appropriate. www.gov.uk/government/publications/multiagency-statutory-guidance-on-female-genital-mutilation

Forced marriage – more common within Asian cultures, often involving children, subsequently being forced into non-consensual acts.

www.gov.uk/guidance/forced-marriage

Radicalisation – there is increasing evidence of children being swayed by others to follow a variety of radical beliefs and communities, often leading to the forced taking, or by their own instigation, of the children leaving the UK, to be recruited in terrorist organisations, potentially with extremist behaviour.

www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty

Gang/youth violence – the recruitment of children into organised gangs usually based in a street culture, involving serious violence/drugs and higher-level criminality.

www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/

Racist or homophobic abuse – commonly verbal, and ominous in its use.

Online contact and communication with children - When an adult communicates with children, they must do so in an appropriate and safe manner whether that is in person, by phone or text, online or via a social networking/messaging website. See Section 29 Young Persons at Work in Safety QMS.

SAFEGUARDING AND CHILD PROTECTION POLICY

Policies, Procedures and Guidance

Changing Rooms

Establish a site-specific Changing Room standard – around engaging with hirers, clubs, and engage in systems / processes which would help make use of natural barriers, to help segregate children (not within the same family unit) aged 11 to 16 (who statistically are the most at risk of being subjected to sexual assaults or the taking of child abuse images) while changing, particularly in 'wet change' areas.

Joint supervision with clubs using facilities could be considered. A shared ownership of keeping children safe alongside hirers, clubs or users can be the most effective way of keeping children safe in more vulnerable areas.

Photography Guidance

Guidance on indecent/child abuse images of children

Many children and adults have tried and succeeded in taking images (video and still photographs) of children in the process of changing, in changing villages or under/over changing cubicles. Many have shared these indecent images with others and can be used to exploit them and in serious cases make demands of children to carry out acts against their wishes. Any use of these child abuse images, or indeed the threat of such, can have devastating consequences for any child.

This can lead to feelings of paranoia and isolation at a time when teenagers in particular need to build up their self-esteem during a crucial stage of their development. The evidence is consistent with earlier NSPCC research that girls are more adversely affected by the risks than boys.

Action to be taken;

It is a criminal offence to take, make, distribute (send), upload and/or possess any indecent image of a child (including those taken/possessed by other under 18-year-olds). It is also an offence to request a child to take, make, distribute, or upload such an image, or encourage another to commit an offence. Additionally, an offence of "voyeurism" is committed if a person for the purposes of their sexual gratification observes or films another without their consent.

In all cases where it is suspected a sexual offence on a child has taken place, report to police, MASH Team or Children's Social Care, seek advice from the DSL. Try to secure or obtain any device used. Do not confront the person suspected (or their parent/guardian) unless necessary to avoid immediate risk of harm to children. Do not view/request/share any such image, as to do so may be committing further offences. Do not investigate

SAFEGUARDING AND CHILD PROTECTION POLICY



Prevention of incidents

There are several ways that an organisation can work to reduce the risk of an incident occurring, as detailed above and in the Changing Room Standard and Photography Standard. The basis of this being clubs should try to segregate between children that are most likely to be at risk of offending; statistically teenage squads using village changing facilities, where use of devices cannot be monitored or easily observed. Some sport National Governing Bodies are now barring *any* use of devices in changing areas while engaged in that NGB activity (eg. Swim England) Organisations will find excellent resources from the National Crime Agency's Child Exploitation and Online Protection Command (CEOP) (formerly the Child Exploitation and Online Protection Centre) and the NSPCC Share Aware Campaign. Further advice and presentations can be sought from the Places Leisure Safeguarding Team.

Missing Child Standard (Refer to EAP)

'Whistleblowing' Policy and Procedure (See Places Leisure 'People' QMS)

This procedure is designed to give employees a clear process to follow in order to bring matters of concern to attention if they genuinely believe something is wrong.

Disciplinary Procedure (see HR QMS)

Should an allegation of child abuse be made against an employee, the Disciplinary Procedures will be followed, and appropriate action taken. Failing to adhere to the Promoting Good Practice with Children Code will also be considered for action as appropriate under the Disciplinary Procedures.

Alongside the disciplinary process, the allegations will also be reviewed by the Serious Case Management Panel to ensure a collaborative approach between Places Leisure's People Services Team, Safeguarding Team and Independent Safeguarding Consultant.

It is acknowledged that the feelings generated by the allegation that a member of staff is, or may be, abusing or bullying a child will raise concerns amongst other staff. This includes the inherent difficulties in reporting such matters.

The company assures all staff that it will fully support and protect anyone, confidentially, who (Without malicious intent), reports his or her concerns about a colleague's practice or the possibility that a child may be being abused or bullied.

Equality and Diversity Policy - please refer to in the People QMS

SAFEGUARDING AND CHILD PROTECTION POLICY

Useful contacts

This is not an exhaustive list, families can also speak to their GP and child's school to enquire about local advice and help services that may be available.

YoungMinds - is the UK's leading charity committed to improving the emotional wellbeing and mental health of children and young people.

Parent/guardian helpline: 0808 802 5544

www.youngminds.org.uk

SelfharmUK - is a project dedicated to supporting young people impacted by selfharm, providing a safe space to talk, ask any questions and be honest about what's going on in your life. SelfharmUK is a registered UK charity that's been working to support young people aged 11 to 19. www.selfharm.co.uk

Harmless - established at the beginning of October 2007. It is a national voluntary organisation for people who self-harm, their friends, families and professionals.

www.harmless.org.uk

Childline - a private and confidential service for children and young people up to 19 years of age. Contact can be made with a Childline counsellor about anything.

Calls are free on: 0800 1111

www.childline.org.uk/info-advice/yourfeelings/self-harm

NSPCC - Calls can be made to the NSPCC Helpline on 0808 800 5000.

Trained counsellors are used to dealing with the effects of self-harm and calls can be made anonymously.

www.nspcc.org.uk/keeping-children-safe/childrens-mental-health/self-harm

Kooth.com - Free online support for young people. Kooth is a service from Xenzone, leaders of online counselling.

www.kooth.com

Mind - Provide advice and support to empower anyone experiencing a mental health problem. They campaign to improve services, raise awareness, and promote understanding.

0300 123 3393

www.mind.org.uk

Samaritans - Confidential support for people experiencing feelings of distress or despair. 116 123 (24-hour helpline)

www.samaritans.org.uk

NHS Information on Self-Harm

www.nhs.uk/conditions/self-harm

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