

# SAFEGUARDING POLICY

Street League

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# SAFEGUARDING POLICY

## Contents

<b>1</b>	<b>Policy Overview</b>	<b>4</b>
1.1	Purpose of the policy	4
1.2	Aims of the policy	4
1.3	Scope of the policy	4
<b>2</b>	<b>Roles and responsibilities</b>	<b>5</b>
2.1	Street League's Safeguarding Reporting Structure	5
2.2	The Board of Trustees	5
2.3	Strategic Safeguarding Lead	5
2.4	Operational Safeguarding Lead (England)	6
2.5	Regional Safeguarding Managers	6
2.6	HR Team	7
2.7	Commercial Director	7
2.8	Line Managers	7
2.9	All staff	7
<b>3</b>	<b>Safeguarding at Street League (England)</b>	<b>8</b>
3.2	Criminality	9
3.3	Health and Safety	9
3.4	Recruitment and employment at Street League	9
3.5	Staff training and development	9
3.6	Handling allegations	10
3.7	Information exchange and confidentiality	10
3.8	Data Protection	11
<b>4</b>	<b>Records Retention and Disposal</b>	<b>11</b>
<b>5</b>	<b>Definitions</b>	<b>11</b>
5.1	Child(ren)	11
5.2	Adults who are (at risk) also referred to as Vulnerable	11
5.3	Safeguarding Adults Board (SAB)	11
5.4	Abuse	12
5.5	Forms of Abuse: Children	12
5.6	Forms of Abuse: Adults	13
<b>6</b>	<b>Preventing Radicalisation and Extremism</b>	<b>14</b>
<b>7</b>	<b>Responding to and reporting abuse</b>	<b>14</b>
7.1	Advice for frontline staff	14

7.2	Concerns relating to a child or young person.....	15
<b>8</b>	<b>Reporting Flowchart .....</b>	<b>15</b>
8.1	What happens when an incident is reported .....	15
8.2	Guidelines for dealing with an incident .....	16
8.3	Concerns relating to adults (vulnerable) at risk.....	17
8.4	Internal Reporting Procedure.....	17
8.5	Allegations against Street League employees .....	17
8.6	Allegations against another Street League staff member.....	19
<b>9</b>	<b>Online safety .....</b>	<b>19</b>
9.1	Protecting participants online.....	19
<b>10</b>	<b>Guidelines for photography and filming at Street League’s managed facilities and events .....</b>	<b>20</b>
10.1	Obtaining permission.....	20
10.2	Vigilance by the public.....	20
<b>11</b>	<b>Support for employees .....</b>	<b>21</b>
11.1	Post-incident de-brief.....	21
<b>12</b>	<b>Policy monitoring and review .....</b>	<b>22</b>
12.1	Policy review .....	22
	<b>Appendix A: Safeguarding policy map.....</b>	<b>23</b>
	<b>Appendix B: Glossary of useful terms .....</b>	<b>24</b>
	<b>Appendix C: Further information and guidance to support staff understanding .....</b>	<b>25</b>
	<b>Appendix D: (Incident) Safeguarding and concerns report .....</b>	<b>26</b>
	<b>Appendix E: Contact details.....</b>	<b>29</b>

**Quick Reference - England Safeguarding contact details**

Contact name	E-mail	Mobile
Dougie Stevenson	Douglas.Stevenson@streetleague.co.uk	07736908748
David Doyle	David.Doyle@streetleague.co.uk	07717295992

# 1 Policy Overview

## 1.1 Purpose of the policy

- 1.1.1 This policy applies to England only. For Street League's Scottish safeguarding policy and procedures, please refer to the [Child and Adult Protection Policy](#).
- 1.1.2 Street League has a duty under section 11 of the Children Act 2004 to ensure that their activities and services provided on their behalf, are discharged with regard to the need to safeguard and promote the welfare of children.
- 1.1.3 Street League is committed to ensuring that all children and adults at risk are protected and kept safe from harm. We have a responsibility to safeguard and promote the well-being of children and adults so that they enjoy a safe and positive environment free from harassment and bullying, however, we recognise that not all children and adults have positive experiences in their life

## 1.2 Aims of the policy

- 1.2.1 Guide and support effective implementation of policies and procedures as well as the maintenance of systems to safeguard children and adults during Street League's activities.
- 1.2.2 Provide confidence in Street League's policies and practice in respect of the safe supervision of children and adults at risk.
- 1.2.3 Set out how Street League works with partners to ensure that adults at risk of abuse, receive protection and support.
- 1.2.4 Ensure that concerns about abuse or a child's welfare are reported promptly to the appropriate authorities.
- 1.2.5 Assist all employees, Apprentices, volunteers, trustees, visitors, partners and contractors involved in Street League's activities to recognise and respond to the signs of possible abuse, and to protect themselves against allegations of abuse.
- 1.2.6 Raise awareness of issues and procedures around safeguarding children and adults at risk.

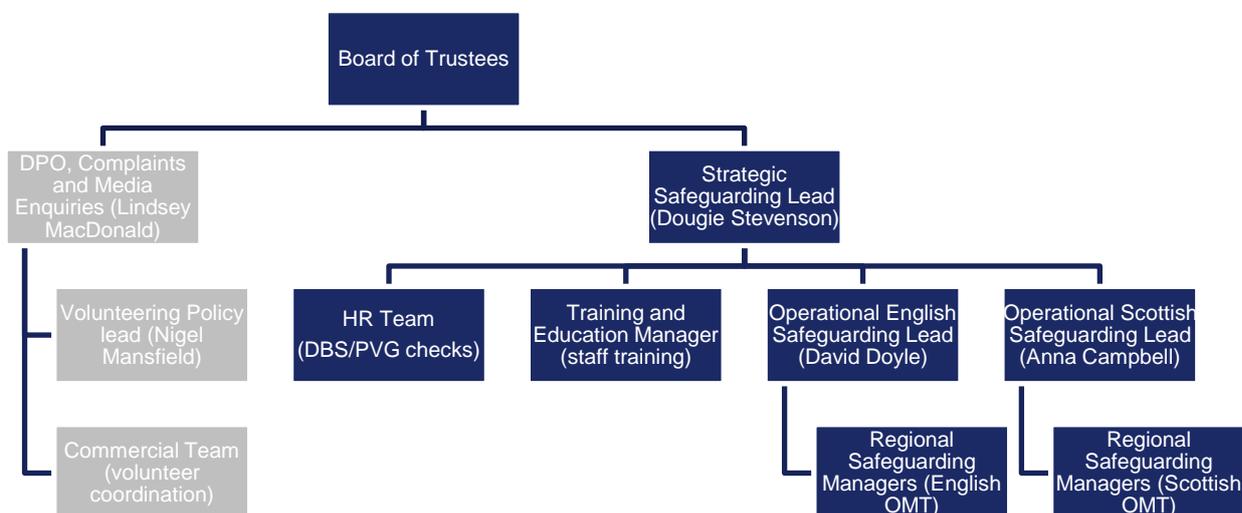
## 1.3 Scope of the policy

- 1.3.1 This policy covers all employees, volunteers, trustees, partners, contractors and voluntary organisations involved in Street League's activities (in England). It should be readily available to all these individuals and can be found on our [Management System](#) and website.
- 1.3.2 Street League recognises that the LSCB's [Local Safeguarding and Children's Board] Children's Social Care, Safeguarding Adult Board and the Police are the lead agencies in each region regarding child and adult protection. Street League

also recognises that everyone has a responsibility for child protection and protecting adults at risk, including all employees, volunteers, and stakeholders.

## 2 Roles and responsibilities

### 2.1 Street League's Safeguarding Reporting Structure



### 2.2 The Board of Trustees

2.2.1 Charity trustees are responsible for approving the Safeguarding Policy, for reviewing it and understanding their obligations, and for ensuring that the policy is reviewed regularly.

2.2.2 Safeguarding is a standing item at each Board meeting, which occur quarterly. Trustees will receive updates on incidents, analysis of trends, training needs, and actions taken to mitigate risks associated with safeguarding.

2.2.3 Trustees are responsible for ensuring that those benefiting from, or working with, their charity, are not harmed in any way through contact with it. The Charity Commission for England and Wales provides guidance on charity compliance which should be followed. Further information on the Charity Commission's role in safeguarding can be found on [The Charity Commission's page](#).

### 2.3 Strategic Safeguarding Lead

2.3.1 Douglas Stevenson, as the Strategic Safeguarding Lead, has overall responsibility for Safeguarding and Child and Adult Protection across Street League. Duties of this role include:

- Provide oversight and leadership of safeguarding matters across Street League
- Provide updates to the trustees and ensure they are informed of and understand their obligations regarding safeguarding

- Ensure compliance with Street League’s policies in the context of safeguarding
- Chair quarterly Steering Group meetings
- Ensure resource is in place to provide training and support to staff as required
- Review and update the Safeguarding Policy and ensure an aligned approach across England and Scotland
- Undertake duties of the Operational Safeguarding Lead when cover is required.

## 2.4 Operational Safeguarding Lead (England)

2.4.1 Street League’s Operational Safeguarding Lead for England is David Doyle. He will note who is covering this role when he is out of the office. If you are unsure, please refer to the Strategic Safeguarding Lead.

<b>All incidents must be reported via the appropriate form on SharePoint which will go to the Operational Safeguarding Leads (England and Scotland).</b>		
David Doyle	David.doyle@streetleague.co.uk	07717 295 992

2.4.2 The Operational Safeguarding Lead supports the Strategic Safeguarding Lead, deputises as required and is responsible for coordinating action within Street League and liaising with other agencies.

2.4.3 All safeguarding incidents and concerns must be reported to the Operational Safeguarding Lead (England) using the appropriate [form](#) on SharePoint. Reports submitted will be logged along with the report and any associated documents and follow ups on a secure site within SharePoint for monitoring and record retention purposes. See page 18 for the reporting process.

2.4.4 The Operational Safeguarding Lead will ensure incidents are classified as either active or closed depending on the status and levels of support provided. They are responsible for monitoring incidents.

2.4.5 The Operational Safeguarding Lead will source appropriate and relevant training for all staff with support from the Training and Education Manager.

## 2.5 Regional Safeguarding Managers

2.5.1 Street League has a qualified Safeguarding Manager in each region where we operate. The Safeguarding Manager should be your first point of contact regarding an incident, or to discuss a concern or a child at risk.

2.5.2 Safeguarding Managers should inform their team of who the point of contact is when they are not available. If you are unsure of who to speak with, notify the Operational Safeguarding Lead.

2.5.3 Operations Managers and local Safeguarding lead are responsible for ensuring their local contact lists are kept up to date and made available to staff and kept up to date to reflect the local context and needs. Annually the contacts lists will

be recorded as an appendix to the annual safeguarding report that is reported at Board level, this is the responsibility of the Strategic Safeguarding Lead.

## 2.6 HR Team

2.6.1 In line with Street League's HR policies ([Recruitment and Selection Policy](#), [Disclosures Policy](#), [Induction Policy](#), [Probation Review Policy](#)). the HR team will complete criminal background checks (DBS/PVG) for all incoming staff and retain these records in line with Street League's [Data Protection Policy](#) and [Records Retention and Disposal Policy](#).

## 2.7 Commercial Director

2.7.1 Most of Street League's volunteers and visitors are our corporate partners' employees. Their visits are arranged by members of the Commercial Team or the Regional Operations Manager.

2.7.2 The Commercial Director will ensure that all visitors and volunteers will read and sign Street League's Volunteers (Visitors) Code of Conduct and that these are saved on Street League's contact relationship manager (CRM) Dynamics 365.

## 2.8 Line Managers

2.8.1 Must ensure that the Safeguarding Policy is explained to new staff as part of their induction, is understood, and implemented as required.

2.8.2 Must ensure that staff submit reports in line with the policy and consult with the Regional Safeguarding Manager or Operational Safeguarding Lead if there are concerns regarding a participant.

2.8.3 Must implement and uphold relevant HR Policies should concerns be raised regarding a member of staff ([Resolution and Grievance Policy](#), [Complaints Policy](#), [Whistleblowing Policy](#)).

2.8.4 Must ensure that they and the staff they manage are familiar with the following additional policies and procedures on the [Management System](#) that complement and underpin Street League's Safeguarding environment and systems:

- Professional Boundaries at Work (and Code of Conduct)
- Disciplinary Procedure
- Equal Opportunities, Equality and Diversity Policy
- Data Protection Policy
- Records Retention and Disposal Policy
- Health and Safety Policy
- Whistleblowing Policy

## 2.9 All staff

2.9.1 Must provide a safe environment in which young people can learn.

- 2.9.2 Must be aware of the systems within Street League that support safeguarding.
- 2.9.3 Identify concerns early and provide help for children and adults at risk, to prevent concerns from escalating. Street League and their staff form part of the wider safeguarding system for children and adults at risk. This system is described in statutory guidance [Working together to Keep Children Safe 2018](#).
- 2.9.4 Street League will work with social care, the police, health services and other services to promote the welfare of children and adults at risk to protect them from harm.
- 2.9.5 Must be aware of their local early help process and understand their role in it; see [Working together to Keep Children Safe 2018](#).
- 2.9.6 All staff should be aware of the process for making referrals to Children social care and for statutory assessments under the Children Act 1989's section 17 (Children in need) and Section 47 (Child at risk of significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- 2.9.7 Provide detailed and accurate reports of all incidents which must be submitted via the online [form](#).

### **3 Safeguarding at Street League (England)**

- 3.1.1 The Safeguarding Policy (England) sits within Street League's policy framework, which ensure the safe, effective and professional delivery of Street League's activities, enabling it to achieve its mission (see Appendix A).
- 3.1.2 Street League is a charity committed to using the power of sport to end youth unemployment in the UK. Our activities include:
  - Classroom-based group activities and workshops, including discussions, mock interviews, individual work (e.g. preparing CVs, cover letters).
  - Sport and physical activity in group settings, including team sports (e.g. football, rugby), fitness, dance, individual sports (e.g. table tennis) and group exercise (e.g. yoga).
  - One-to-one support to help young people prepare and review action plans, set goals and measure their individual progress.
  - In-work activities such as work placements, world of work visits, job trials, and employment (with and without training).
  - Schools programmes in a sport and classroom environment that seeks to develop their employability skills and improves their overall wellbeing.
  - Remote (online) support through group and 1-to-1 sessions, facilitated through Zoom, WhatsApp and Skype.
- 3.1.3 Street League supports a diverse range of young people (aged 14 to 30 years) from disadvantaged communities who face a range of complex socio-economic

barriers. Experiences and circumstances that might make our young people particularly vulnerable include:

- Experience of abuse, living in care, the criminal justice system or homelessness
- Having learning difficulties, poor mental or physical health
- Being refugees/asylum seekers or fleeing violence (e.g. domestic, gang-related)

3.1.4 As detailed in Street League's Equal Opportunities, Equality and Diversity Policy we recognise and value diversity.

3.1.5 We also recognise and seek to redress inequality and disadvantage – as an employer, service provider to young people and in partnership with third parties.

3.1.6 We aim to provide the services and support needed by each young person, with their Initial Assessment and Individual Learning Plan (ILP) offering formats in which these needs might be identified and addressed.

### 3.2 Criminology

3.2.1 Information about criminality should be passed onto the Police. Thereafter the Police would contact Social Work (Social Services) by the way of a police concern report.

### 3.3 Health and Safety

3.3.1 Under health and safety law, Street League has the same legal responsibilities for the health, safety and welfare of young people and/ or adults, as its employees. See [Management System/Health & Safety Policies](#) for further guidance.

### 3.4 Recruitment and employment at Street League

3.4.1 Street League will take all reasonable steps to prevent unsuitable people from working with children and adults in accordance with the [Recruitment and Selection Policy](#).

3.4.2 Street League will ensure that all staff with responsibility for recruitment and selection are trained in Safer Recruitment in line with Keeping Children Safe in Education (KCSIE) 2020.

3.4.3 Street League will ensure that all employees who encounter children and adults will be DBS checked on a 3-yearly basis. This is to ensure that employees' records are current and up-to-date.

3.4.4 Street League maintains a [Working with Offenders Policy](#) made available upon request.

### 3.5 Staff training and development

- 3.5.1 Street League has a responsibility to ensure all new employees undertake an induction programme. As part of this induction programme, Street League will ensure employees are made aware of and understand their responsibilities in respect of its Safeguarding and Prevent Policies.
- 3.5.2 Street League will provide regular updates to training annually and when there are changes to external policies and or guidance that will require a change to practice.
- 3.6 Handling allegations
- 3.6.1 When collecting and recording details relating to concerns or an allegation, it is important for staff to distinguish between fact, hearsay and opinion.
- 3.6.2 Opinions expressed should only be those relevant to the situation being reported and remain respectful and appropriate in tone.
- 3.7 Information exchange and confidentiality
- 3.7.1 Street League regards confidentiality as an essential responsibility of all its employees, trustees, partners and volunteers. This is set out in their respective codes of conduct and contracts.
- 3.7.2 When sharing information, Street League does so with due consideration of relevant legislation and its Data Protection Policy. Decisions pertaining to information sharing (relevant to safeguarding) should prioritise the safety and wellbeing of the individual and be underpinned by the following principles:
- Data sharing is necessary
  - Data sharing is proportionate
  - Data sharing is relevant to the situation
  - Data sharing is adequate
  - Data sharing is accurate
  - Data sharing is timely
  - Data sharing is secure
- 3.7.3 The individual's consent should always be sought prior to reporting abuse. However, a lack of consent should never compromise the safety or welfare of a child or vulnerable adult. Consideration should be given as to why consent is being withheld in line with their human rights. Written consent should be sought when possible and submitted as part of the paperwork to [safeguarding@streetleague.co.uk](mailto:safeguarding@streetleague.co.uk) alongside the incident report form.
- 3.7.4 The decision to share confidential information without the individual's consent should be agreed with the Operational Safeguarding Lead, in advance when time allows. These decisions should be recorded, signed by the relevant parties and saved on Street League's secure Safeguarding Site on SharePoint by the Operational Safeguarding Lead.

3.7.5 We treat all of our young people with respect and equality, therefore their privacy and confidentiality on personal matters is paramount. Street League staff will engage with parents and carers on a need only basis, and only when we can be sure of the safety and confidentiality of the young person. We aim to be pragmatic on a case by case basis with a high level of privacy.

### 3.8 Data Protection

3.8.1 In line with General Data Protection Regulation (GDPR) 2018, the Human Rights Act 1998, and the Freedom of Information Act 2000 Street League's [Data Protection Policy](#) sets out all employees' statutory obligation to protect confidentiality of personal information.

3.8.2 Street League will comply with requests made under the Children Act 2004 (guidance on the conditions can be found here [Section 14b](#)). Compliance with such requests must be ensured by the Operational Safeguarding Lead.

3.8.3 Any potential or actual data breach relating to safeguarding data will be handled under the procedures set out by Street League's policy and, as required, guidance from the Information Commissioner's Office (ICO).

## 4 Records Retention and Disposal

4.1.1 As detailed in Street League's [Records Retention and Disposal Policy](#) safeguarding incident records will be retained for 15 years and securely destroyed thereafter.

## 5 Definitions

### 5.1 Child(ren)

5.1.1 Individuals who have not yet reached their 18<sup>th</sup> birthday.

### 5.2 Adults who are (at risk) also referred to as Vulnerable

5.2.1 Any person aged 18 or over who:

- has needs for care and support (whether the local authority is meeting any of those needs)
- is experiencing, or at risk of, abuse or neglect
- as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

### 5.3 Safeguarding Adults Board (SAB)

5.3.1 The overarching purpose of a SAB is to help and safeguard adults with care and support needs. It does this by:

- assuring itself that local safeguarding arrangements are in place as defined by the Care Act 2014 and statutory guidance [Mental Capacity Act 2005](#)

- assuring itself that safeguarding practice is person-centred and outcome-focused
- working collaboratively to prevent abuse and neglect where possible
- ensuring agencies and individuals give timely and proportionate responses when abuse or neglect have occurred
- assuring itself that safeguarding practice is continuously improving and enhancing the quality of life of adults in its area

## 5.4 Abuse

5.4.1 Abuse is a form of maltreatment of a child or adult that is vulnerable/at risk. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm, or by failing to act to prevent harm. For further information on the types of abuse and neglect please refer to the NSPCC Preventing Neglect.

## 5.5 Forms of Abuse: Children

5.5.1 There are four forms of abuse defined for children or adults at risk. These are physical abuse, sexual abuse, neglect and emotional abuse.

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

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

5.5.4 **Sexual abuse:** involves forcing or enticing a child or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child or adult at risk is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving individuals in looking at, or in the production of, sexual images, watching sexual activities, encouraging child or adult at risk to behave in sexually

inappropriate ways, or grooming a child or adult at risk in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

- 5.5.5 **Neglect:** Persistently failing to meet the basic physical and/or psychological needs of a child or adult at risk
- 5.5.6 An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period but can also be a one-off event. Abuse and neglect can have major long-term impacts on all aspects of a child's health, development and well-being.

## 5.6 Forms of Abuse: Adults

- 5.6.1 In adults, there are ten definitions of abuse. These are physical abuse, domestic violence, sexual abuse, psychological abuse, financial or material abuse, modern slavery, discriminatory abuse, organisational abuse, neglect and acts of omission, and self-neglect.
- 5.6.2 For further guidance see: <https://www.england.nhs.uk/wp-content/uploads/2017/02/adult-pocket-guide.pdf>
- 5.6.3 **Physical abuse:** including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- 5.6.4 **Domestic violence:** including psychological, physical, sexual, financial, emotional abuse; so-called 'honour' based violence.
- 5.6.5 **Sexual abuse:** including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- 5.6.6 **Psychological abuse:** including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- 5.6.7 **Financial or material abuse:** including theft, fraud, cybercrime, postal and doorstep crime, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- 5.6.8 **Modern slavery:** encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they

have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

5.6.9 **Discriminatory abuse:** including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.

5.6.10 **Organisational abuse:** including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

5.6.11 **Neglect and acts of omission:** including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating.

5.6.12 **Self-neglect:** this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

## 6 Preventing Radicalisation and Extremism

6.1.1 See Street League's [Prevent Policy](#) on SharePoint. Street League staff receive training to help to identify signs of extremism. Opportunities are provided in the curriculum to enable participants to discuss issues of religion, ethnicity and culture and Street League follows the Home Office guidance [Prevent duty guidance - GOV.UK](#).

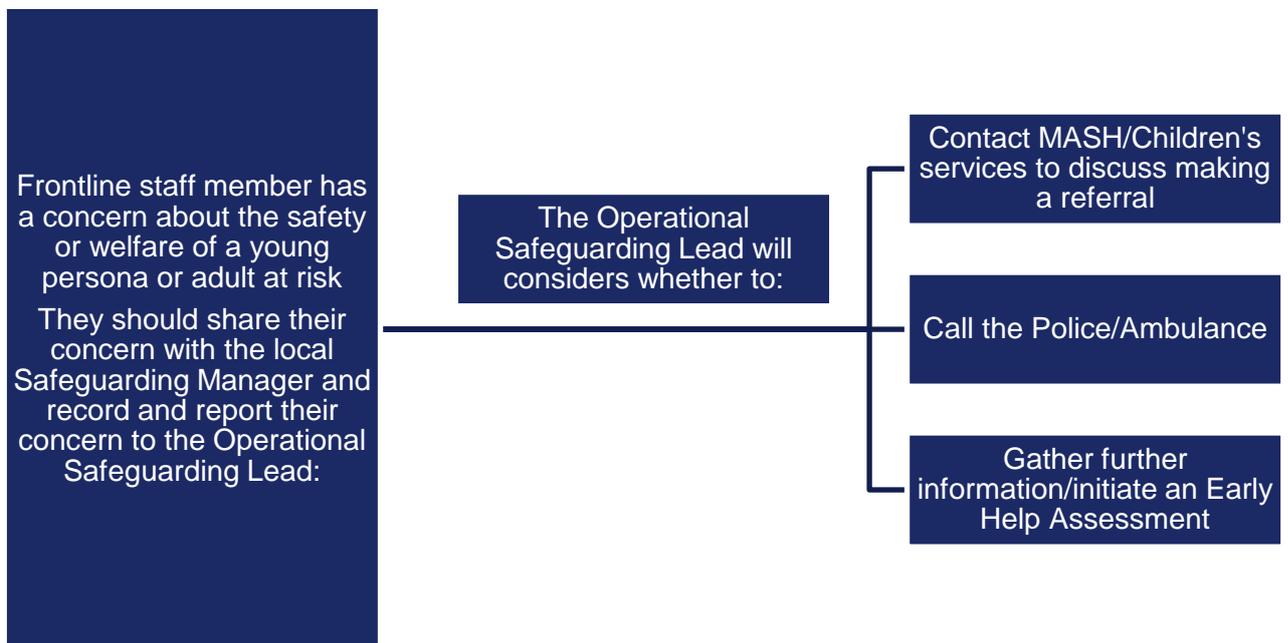
## 7 Responding to and reporting abuse

### 7.1 Advice for frontline staff

- | ✓ Do   | ✗ Don't   |
|--|---|
| ✓ be accessible and receptive                                  | X react strongly e.g. that's terrible!                    |
| ✓ listen carefully   | X jump to conclusions especially about the abuser         |
| ✓ take it seriously  | X speculate or accuse anybody                             |
| ✓ reassure the person they were right to tell                  | X tell them you will keep their secret                    |
| ✓ say what will happen next                                    | X ask leading questions                                   |
| ✓ consult immediately with the designated Safeguarding Officer | X make promises you cannot keep                           |
| ✓ make a careful record of what was said                       | X stop them from speaking freely                          |
|  | X tell them to stop talking so you can fetch someone else |

## 7.2 Concerns relating to a child or young person

7.2.1 If a member of staff has any concerns about a child's welfare, they must act on them immediately, as per the flowchart: Making a child protection decision.



## 8 Reporting Flowchart

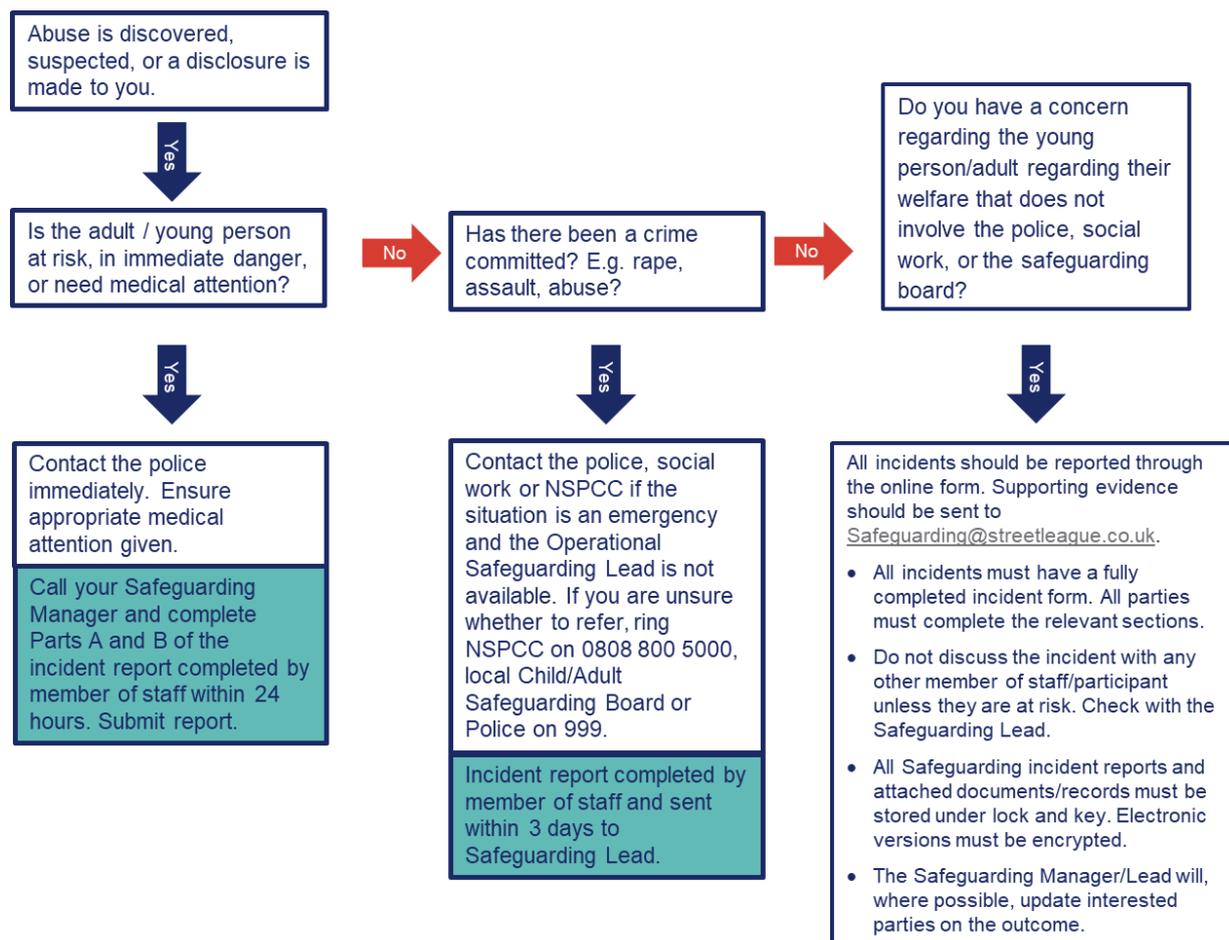
### 8.1 What happens when an incident is reported

All incidents must be reported, using the online [form](#), which triggers the following:



8.1.1 If the staff member does not have access to the online form Street League's Safeguarding and Concerns Report on Appendix D must be completed and submitted to [safeguarding@streetleague.co.uk](mailto:safeguarding@streetleague.co.uk) within 24 hours.

## 8.2 Guidelines for dealing with an incident



- 8.2.1 Staff must in the first instance follow Street League’s policy and report the incident to their Safeguarding Manager, their nominated deputy (if unavailable), or the Operational Safeguarding Lead.
- 8.2.2 Staff may also share information directly with children’s social care, police or NSPCC if the situation is an emergency and/or they are unable to contact a Safeguarding Manager, Operational Safeguarding Lead or Strategic Safeguarding Lead.
- 8.2.3 See page 17 from: Keeping Children Safe in Education ([KCSIE, September 2020](#)) for a flowchart setting out the process for staff when they have concerns about a child.
- 8.2.4 In all incidents you must take necessary action to protect the child or adult, the relevant action can be discussed with the Safeguarding Manager.
- 8.2.5 Concerns that a young person is in need or at risk of abuse should be recorded in the notes section of their Hanlon profile and marked as confidential (see [Hanlon User Guide](#)). This ensures that these notes are not accessible by the wider team. Secure handling and storage of young people’s files (hard copy, on Hanlon or

Office 365) should be treated as highly confidential and in line with Street League's Data Protection Policy.

### 8.3 Concerns relating to adults (vulnerable) at risk

8.3.1 An adult at risk is any person who is aged 18 years or over and at risk of abuse or neglect because of their needs for care and or support. Where someone is over 18 but still receiving children's services and a safeguarding issue is raised, the matter should be dealt with as a matter of course by the adult safeguarding team.

8.3.2 Contact Street League's Safeguarding Manager or Safeguarding Lead if you are at all unsure if the concern is a welfare issue or a safeguarding adult issue.

8.3.3 You can call Careline on 233 3800 or contact the local police or dial 999 in an emergency.

### 8.4 Internal Reporting Procedure

8.4.1 Employees responding to a suspicion of abuse or poor practice should complete Section A and B of the (Incident) Safeguarding and Concerns report (a link to which can be found on the Management System) with input from their Regional Safeguarding Manager (or appointed cover). The incident report should be submitted via the [form](#) within **24 hours**.

8.4.2 The report will be acknowledged, and a decision made by the Operational Safeguarding Lead about what appropriate action needs to be taken.

8.4.3 If Safeguarding Managers are unsure about whether to refer, they should ring the Local Safeguarding Children's Board Area Office (Monday to Friday 8am to 8pm and Saturday 9.30am to 4pm) and discuss their concerns. Contact numbers can be found online. If outside of these hours contact Social Services emergency duty team. In an emergency, telephone the Police on 999.

### 8.5 Allegations against Street League employees

8.5.1 The flowchart below sets out the procedure to be followed, things to consider and potential outcome(s) when allegations are raised against a Street League employee or volunteer.



8.5.2 Any concerns about the welfare of a child or adult at risk arising from alleged abuse or harassment by an employee of Street League must be raised immediately to the Strategic Safeguarding Lead in the first instance. They will determine the appropriate actions, in line with Street League's [HR Policies](#) and in accordance with its statutory duty (Working Together 2015).

8.5.3 Charity trustees must report serious safeguarding incidents to the Charity Commission in accordance with [Working together to Keep Children Safe 2018](#) where Street League receives an allegation that a volunteer or member of staff who works with children 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 they may pose a risk of harm to children

8.5.4 The Strategic Safeguarding Lead (or their deputy if appointed) must contact the Designated Officer for Local Authority (DOLA) within one working day, using the DOLA Referral Form, giving as much detail as possible.

8.5.5 Where there is an immediate risk to the child or vulnerable adult the police will be contacted immediately.

8.5.6 Street League also has a duty of care to its employees. We will endeavour to provide effective support for anyone facing an allegation and provide the

employee with a named contact if they are suspended in line with our HR policies. It is essential that any allegation 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.

## 8.6 Allegations against another Street League staff member

- 8.6.1 All staff have a responsibility to report if they believe or have a concern that a member of staff is using unacceptable behaviour to an adult with care and support needs or a child/young person.
- 8.6.2 All staff have a duty to identify and report concerns about the conduct and professional performance of other colleagues at the earliest possible stage to safeguard the welfare of children and vulnerable adults.
- 8.6.3 Staff should be alert to the possibilities that individual performance could be the result of a wider system problem, such as staff training, and should escalate their concerns and act quickly.
- 8.6.4 Practice procedures must be consistent with Street League's Safeguarding and Child Protection procedures for responding when allegations are made against people who work with children, young people and adults with care and support needs and comply with [NSPCC guidelines](#).
- 8.6.5 For specific safeguarding issues concerning Street League employees the incident should be immediately referred to the Operational Safeguarding Lead and the appropriate Senior Manager(s). The safeguarding form should be completed as well as a safeguarding risk assessment. The operational safeguarding lead will lead on the treatment of each case, recognising the context and ensuring safety of all involved. Street League's wider policy suite will be used in this case management approach.

## 9 Online safety

### 9.1 Protecting participants online

- 9.1.1 As Street League increasingly works online, it is essential that our participants are safeguarded from potentially harmful and inappropriate online material. We ensure appropriate filters and appropriate monitoring systems are in place through our ICT supplier, as set out in our [ICT Equipment Policy](#).
- 9.1.2 Where Street League uses the ICT facilities of another provider (e.g. library, school, community centre) the [Venue Risk Assessment Form](#) should consider and review that they have appropriate filters and monitoring systems in place.
- 9.1.3 Street League employees ([Professional Boundaries Code of Conduct](#)), visitors and volunteers ([Volunteer Conduct Code](#)) are clearly informed of and must agree to what is appropriate and inappropriate regarding online interaction with Street League's young people.

9.1.4 Procedure for dealing with online concerns (current and past) are in line with section 8.2.

## **10 Guidelines for photography and filming at Street League’s managed facilities and events**

### 10.1 Obtaining permission

10.1.1 Street League’s Data Protection Policy sets out the procedures for obtaining permission and safe storage of images/videos of participants at Street League.

10.1.2 In line with Street League’s [Records Retention and Disposal Policy](#) we date all photography and after three years photos and stop publishing new content containing these images.

10.1.3 Videos and images that are being taken to share with the press/partners should have additional consent for this use. This can be obtained using the [Filming and Photography Consent Form](#)

10.1.4 The following guidelines apply to photographers:

- The photographer should be sensitive to other users/participants and as far as reasonably possible restrict the images taken to those of the subjects(s)
- If at any time another user in the area where the photographs are being taken complains about the activity, then the photography or filming must stop immediately

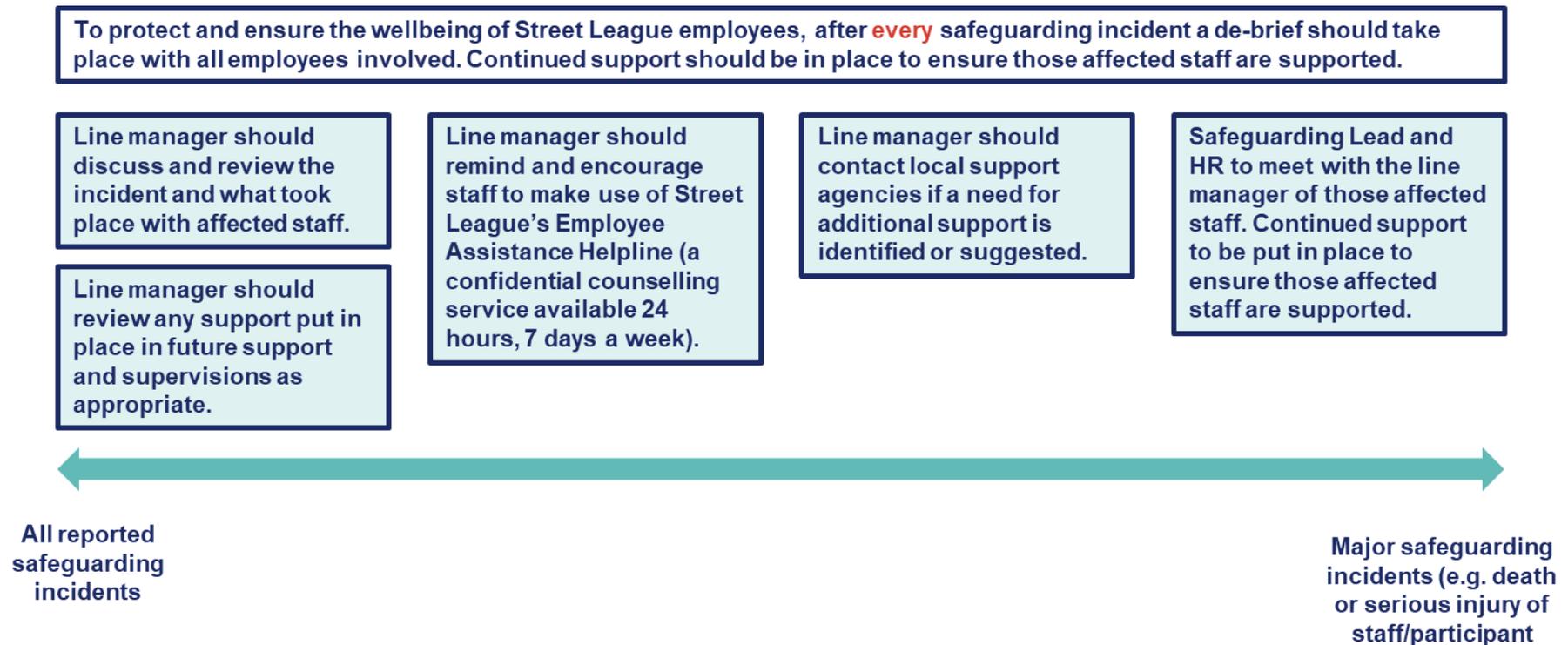
### 10.2 Vigilance by the public

10.2.1 No matter what arrangements are put in place to prevent the misuse of cameras, videos or mobile phones with digital image recording, the nature of “peeping tom” type activity or “Up-skirting” make it very difficult to police. In recognition of this, Street League asks users of their facilities to be alert to any suspicious activity, particularly where children and adults may be involved and encourages them to report any such incidents or concerns at the earliest opportunity to a Street League employee.

## 11 Support for employees

### 11.1 Post-incident de-brief

11.1.1 After every safeguarding incident, line managers should ensure a debrief takes place and actions follow that are informed by the severity of the incident and employee's support needs/requests as per the spectrum of guidance set out in the figure below.



## **12 Policy monitoring and review**

### **12.1 Policy review**

12.1.1 The Safeguarding Policy will be reviewed annually with input and advice from managers as well as the Safeguarding and Health & Safety working group or when legislation changes.

12.1.2 The Safeguarding and Health & Safety working group will regularly monitor safeguarding incidents and where necessary recommend new safeguarding measures and standards or revise existing ones.

## Appendix A: Safeguarding policy map

### Prevent SG issues

#### Recruitment policies

- Safer recruitment policy
- Working with offenders policy
- Recruitment and Selection Policy

#### Disclosures Policy

#### Induction policy

#### Data Protection Policy

### Equip staff for SG issues

Safeguarding Policy and Procedure - England  
Child + Adult Protection Policy and Procedure -  
Scotland

#### Training Plan

#### Professional Boundaries Policy

#### Behaviour Code of Conduct

#### Personal Safety and Lone Working Policy

#### Work Placement Policy (England)

#### PREVENT Policy

### Respond to SG issues

#### Crisis and Issue Management Procedure

#### Whistleblowing Policy

#### Disciplinary and Capability Policies

## STREET LEAGUE POLICY

Safeguarding Policy- England

ISSUE DATE: Sept 2020

REVIEW DATE: Sept 2021

## **Appendix B: Glossary of useful terms**

This glossary defines some of the key terms in the Policy.

### ***Employees***

Those employed by Street League, its sub-contractors, as well as volunteers involved in the delivery of learning activities or in its premises or facilities. Contractors should also meet these guidelines or have their own arrangements, which meet the requirements of this policy.

### ***Local authority***

County, city, district and borough councils. [Find your local council - GOV.UK](#)

### ***Multi Agency Safeguarding Hub [MASH]***

Combined services

### ***Parent***

Generic term to include birth parents, step-parents and carers. The term will specify parental responsibility where necessary.

### ***Safeguard and promote the welfare of children is defined as:***

- protecting children from maltreatment;
- preventing impairment of their health and development;
- ensuring they are growing up in circumstances consistent with the provision of safe and effective care and;
- taking action to enable all children to have the best outcomes.

### ***Education***

Means all schools, whether maintained, non-maintained or independent, including academies and free schools, alternative provision academies and pupil referral units. 'School' includes maintained nursery schools. 'College' means further education colleges and sixth form colleges as established under the Further and Higher Education Act 1992 and relates to their responsibilities to children under the age of 18 and training providers. The statutory guidance that relates to the duties carried out by Street League is the Keeping Children Safe in Education (KCSIE, September 2020).

## **Appendix C: Further information and guidance to support staff understanding**

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example, information for Training Providers and colleges can be found on the Foundation Online Learning (website) and NSPCC (website) You can also access broad government guidance on the issues listed below via the GOV.UK website:

KEEPING CHILDREN SAFE IN EDUCATION

WORKING TOGETHER TO SAFEGUARD CHILDREN

**The above 2 documents contain multiple links to other agencies and links for advice and guidance**

CHILD SEXUAL EXPLOITATION (CSE)

FAITH ABUSE

FORCED MARRIAGE

Women's Aid has developed 'The Hideout' website to meet the needs of thousands of children and young people affected by domestic violence [www.thehideout.org.uk](http://www.thehideout.org.uk)

## Appendix D: (Incident) Safeguarding and concerns report

### (INCIDENT) SAFEGUARDING and CONCERNS REPORT

#### SECTION A

Please complete section A of the form to record all concerns, actual incidents or any information that has been reported to you either directly or in directly

About the person the incident relates to:			
Full name			
Address			
Postcode			
Phone Number			
Gender		Age	
Ethnicity		Interpreter Required?	
Academy Programme & location		Date Started	

About the person recording/reporting the incident:	
Full name	
Job title/other (if not SL staff)	
Location	
Witness/was anyone else present? Name/details.	
Activity being undertaken at the time of the incident	
Was the report a self-declaration by YP?	

Section A: Recording concerns/incidents: detail reasons for concern					
Concern		Responding to my own concerns		Responding to concerns raised by someone else	Who?
Date reported		Name of the person			
Activity being undertaken at the time of the incident			Did this take place during SL working hours?	Y/N	
			If No, was this reported out of hours?	Y/N	
If the incident took place at an Employer premises has the employer engagement manager been notified?			Y/N	Date reported:	
Additional Information					
What have you seen and What you did? Use this section to make a detailed record					

Following completion of Section, A, do you have immediate/urgent concerns about the safety of this individual? If yes, please complete section B. If no, please submit a copy to the safeguarding@ inbox, file, monitor and review

Signed:

Date:

Please use this form to document any follow up or support provided or that will be provided

Follow up action:	
Young person/Support	
Who by	when by
External signposting provided	
Who by	When by

**SECTION B - To be completed by the person making the report**

Reportable Concerns		
Has the concern/incident been discussed with the Safeguarding Lead or manager?	YES	NO
To whom? Please detail:	Name: Date and Time	
Is individual aware that you are reporting the incident?	YES	NO
Does individual consent to this sharing of information	YES	NO
Has Parent/Carer been informed?	Yes	NO
Supporting Information		
Are there supporting records/audits/investigations/forms being submitted along with this form	YES	NO
Which agency has the Safeguarding incident/concern been reported to?		
Date and time reported		
Reference/crime Number (If applicable)		
Name and contact details of the person reported to		

Name of the person that made the report to the external agency if different from the person submitting this form	
--	--

**SECTION C- TO BE COMPLETED BY THE SAFEGUARDING LEAD/MANAGER**

**Please use this space to record all action taken and advice given**

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Safeguarding Manager		Date	
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Safeguarding Manager		Date	
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## Appendix E: Contact details

### Local Agencies & Authorities

Each English Local Authority area will have a Local Safeguarding Children Board (LSCB). The lead agency with statutory responsibility for Safeguarding is Social Work Services who usually chair this committee.

Every area has a Children's Trust responsible for the wider planning and delivery of services. The contact details of relevant bodies that may need to be contacted, when reporting concerns or allegations externally, should be held locally and kept up to date.

### National Agencies

National Organisations	Contact details (phone and Email)
NSPCC Helpline	0808 800 5000 <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
ChildLine	0800 1111
Churches Child Protection Advisory Service	0845 120 4550
Disability Rights Commission Helpline (DRC)	08457 622 633 / 08457 622 644
Domestic Violence Helpline	0808 2000 247
The Forced Marriage Unit	020 7008 0151 Emergency Duty Officer (out of hours): 020 7008 1500 <a href="http://www.fco.gov.uk/forcedmarriage">www.fco.gov.uk/forcedmarriage</a>
Muslim Youth Helpline	0808 808 2008
Rape Crisis	0808 802 9999 <a href="http://www.rapecrisis.org">www.rapecrisis.org</a>
Refuge – Domestic Abuse	0808 200 247
<b>Mental Health</b>	
MIND	0845 766 0165 <a href="http://www.mind.org.uk">www.mind.org.uk</a>
Relate	<a href="http://www.relate.org.uk">www.relate.org.uk</a>
Parentline Plus (confidential and anonymous helpline for parents on any parenting issue)	020 7284 5500 0808 800 2222
SANE	0845 767 8000 (12 noon – 2am) <a href="http://www.sane.org.uk">www.sane.org.uk</a>
Samaritans	08457 90 90 90
Bereavement Advice and Support	<a href="http://www.survivingsuicide.com">www.survivingsuicide.com</a> <a href="http://www.crusebereavementcare.org">www.crusebereavementcare.org</a>
<b>Sexually Transmitted Infections</b>	
National Aids/HIV helpline	0800 567 123
Terrence Higgins Trust	0845 1221 200 <a href="http://www.tht.org.uk">www.tht.org.uk</a>
<b>Sexuality</b>	
Bisexual helpline	0181 569 7500
Stonewall	<a href="http://www.stonewall.org.uk">www.stonewall.org.uk</a>
<b>Conception, Pregnancy and Sexual Health</b>	
Brook Advisory Centres	0800 0185 023 <a href="http://www.brook.org.uk">www.brook.org.uk</a>
<b>Drugs and Alcohol</b>	
Al-Anon and Alateen	0171 0 0888
Alcohol and drugs support	<a href="http://www.adfam.org.uk">www.adfam.org.uk</a>
<b>Eating Disorders</b>	
Eating Disorders Association	01603 619 090
<b>Bullying</b>	
Kidscape	08451 205 204 <a href="http://www.kidscape.org.uk">www.kidscape.org.uk</a>
<b>LGBT</b>	
England	0345 330 3030 <a href="mailto:helpline@lgbt.foundation">helpline@lgbt.foundation</a>