

Safeguarding Policy

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Adopted by: Superstars Holiday Club Ltd, Unit 8 Craven Court, Winwick Quay, Warrington WA2 8QU

Related policies and publications

- **Working together to safeguard children (Government Website)**
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf
- **Keeping children safe in education (Government Website)**
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741314/Keeping_Children_Safe_in_Education__3_September_2018_14.09.18.pdf
- **Prevent (Government Website)** – <https://www.gov.uk/government/publications/prevent-duty-guidance>
- **Prevent Guidance for Further Education Institutions (Government Website)** -
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/445915/Prevent_Duty_Guidance_For_Further_Education__England__Wales_-_Interactive.pdf
- **Equality & Diversity Policy**
- **Data Protection Policy**
- **DBS & Update Service Policy**

The Designated Safeguarding Officers for Superstars is Louise Nicholson. A Deputy Safeguarding Lead has been put in place of Rachel Davies when the Lead cannot be contacted for any reason (annual leave or sickness)

Superstars Safeguarding Policy

Every young person that takes part in a Superstars programme should do so in an environment where they are safe and protected from harm. Child protection is of paramount importance to us.

Superstars' Child Protection Statement

This Safeguarding Policy applies to all Superstars owners, staff whether paid or volunteers who come into contact with children and young people at any event organised by or held under the authority of and/or any other body affiliated, or representative of Superstars. As part of Superstars' commitment to best practice in the care of children, Superstars expects all staff to comply with the Policy and the regulations contained within it. For the purposes of this Safeguarding Policy, a child or young person or vulnerable adult is any individual under the age of 18 OR anyone over 18 who is attending a Superstars course, provision or training programme as a participant.

Superstars believes:

- That the safety and welfare of children, young people and vulnerable adults should always be of paramount importance, whatever the circumstances.
- That everyone with a role in working with children, young people and vulnerable adults has a moral and arguably a legal responsibility to safeguard and promote an individual's welfare particularly when it comes to protecting children or young people from abuse.
- That special care is needed in dealing with children, young people and vulnerable adults whose age, inexperience or physical state makes them particularly vulnerable to abuse.

Superstars has therefore adopted this Safeguarding Policy to ensure that the welfare and safety of children, young people and vulnerable adults in Superstars care or custody is always the primary consideration. Superstars are committed to providing an environment where children and young people can learn about, participate in and enjoy sports, education and activities free from harassment or abuse.

The Policy is predicated on the following three principles:

1. An individual's welfare is the paramount consideration.
2. An individual regardless of age, ability, gender, racial origin, religious belief and sexual orientation has a right to be protected from abuse in accordance with the Equality Act.
3. The rights, dignity and worth of an individual should always be respected.

The Children Act 1989 (as amended by The Children Act 2004) states that anyone who is involved in the care of children should "do what is reasonable in the circumstances for the purpose of safeguarding or promoting the child's welfare".

Introduction

Superstars priority is to ensure the safety and protection of all its learners and tutors taking part in direct provision or by contractors. All staff has a duty to safeguard learners, to be alert to signs of abuse and take action where abuse is reported. Superstars has developed its own policy which follows all most up to date government guidance in the **Working together to safeguarding children** and **Keeping children safe in education** documents (see above links to these documents).

Statement of Intent – Zero Tolerance

Superstars will provide guidance to all staff, contractors and volunteers and ensure robust procedures are in place to cover the points outlined below. Superstars will closely monitor compliance in these areas.

- ➤ Promote the Health, Safety and Welfare of children, young people and vulnerable adults by providing opportunities for them to undertake their training safely.
- ➤ Respect and promote the rights, wishes and feelings of children, young people and vulnerable adults.
- ➤ Promote and implement appropriate procedures to safeguard the well-being of children, young people and vulnerable adults.
- ➤ Protect children, young people and vulnerable adults from abuse.

- ➤ Staff are aware of how to instruct learners to be safe online.
- ➤ Staff are trained to recognise signs of extremism and radicalisation in learners and how to raise concerns.
- ➤ Recruit, train and support staff to adopt good practice to safeguard and protect children young people and vulnerable adults from abuse and to minimise the risk to themselves.
- ➤ staff should have relevant safeguarding training including extremism and radicalisation and understand how to report concerns.
- ➤ Respond to any allegations of misconduct or abuse of children, young people and vulnerable adults in line with this guidance document and the procedures set within as well as implementing, where appropriate, the relevant disciplinary and appeals procedures.
- ➤ Ensure through recruitment and selection processes, DBS checks and references that refer to candidates' suitability to have substantial access to children, young people and vulnerable adults are taken up for all appropriate posts.
- ➤ Deal with complaints of abuse, harassment and bullying promptly, sensitively and confidentially. And where appropriate to share this information in line with this policy.
- ➤ Provide an environment where staff and learners are safe and confident.
- ➤ Education establishments, contractors and employers' premises comply with health & safety regulations as outlined by the Superstars Health & Safety Team.
- ➤ Ensure learners receive a full induction and understand the safeguarding policy and how to seek help.
- ➤ Review and evaluate this policy annually

. Definition of Terms

Children and Young People:	Anyone under the age of 18 years
Vulnerable Adults:	<p>Anyone over the age of 18 who is</p> <ul style="list-style-type: none"> • In need of community care services • Unable to care for themselves • Unable to protect themselves against significant harm or exploitation
Staff:	Anyone working for, or on behalf of Superstars – whether paid or voluntary.
Substantial Access:	<p>Where an individual is regularly caring for, training or supervising a child, young person or vulnerable adult.</p> <p>Where, an individual has sole charge of a child, young person or vulnerable adult.</p>
Manager:	<p>The term Manager refers to those adults who have a responsibility for managing services including the supervision.</p> <p>The process of protecting children young people and vulnerable adults from abuse or neglect: preventing</p>

Child protection and Safeguarding:	impairment of their health and development, and ensuring they are learning in a safe learning and effective environment.
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How will this Policy be communicated?

This policy will be issued to all staff on commencement of their employment with Superstars. The Designated Safeguarding Leads will also hold a hard copy for reference purposes and there will be one hard copy at every holiday club site.

Responsibilities

The Directors and Heads of Department have overall responsibility for Safeguarding within Superstars. The Role of the Designated Safeguarding Lead (DSL)

- ➤ Actively promote the consistent use of this safeguarding policy and these guidelines across LMP and sub-contractors.
- ➤ Act as a professional advisor for Superstars staff on the protection of children and vulnerable adults.
- ➤ Ensure that any necessary local training is provided.
- ➤ Provide and arrange for support of staff, and others on how to follow these guidelines and procedures.
- ➤ Contribute to the ongoing review of this policy and guidance to procedures, along with the identification of associated training needs.
- ➤ Ensure that all incidents are reported to the Company Director.
- ➤ Retain a central record (Safeguarding log) of all incidents and allegations including records of the actions taken.

Copies of reports and notes will be kept secure at all times, but will be shared in accordance with the Data Protection Act 1998.

Staff Responsibilities

- ➤ Have a responsibility to protect children, young people and vulnerable adults, but are not responsible for deciding whether abuse is taking place.
- ➤ Be aware of this policy and the Superstars Equality & Diversity policy.
- ➤ Attend appropriate safeguarding training every 2 years if their role involves substantial access to children, young people or vulnerable adults. This training will form part of the overall staff training plan managed by the Heads of Department.
- ➤ Should NOT begin any unsupervised activity involving substantial access to children, young people or vulnerable adults prior to Superstars receiving a satisfactory return of a DBS check.
- ➤ Be aware of appropriate and inappropriate behaviour for employees in charge of children, young people or vulnerable adults.

- ➤ Know who the DSLs are. See above at the start of this policy, head office notice boards and the organisation's website.
- ➤ Have a responsibility to inform their departments DSL of any concerns, signs or allegations of abuse.
- ➤ Have a responsibility to highlight any concerns or risks to the safeguarding and child protection of children, young people and vulnerable adults.

Managers Responsibilities

- Are responsible for making sure that their staff are aware of, understand and act in accordance with this policy and related guidance, regardless of the hours they work.
- Make sure that any contractors, agents or other representatives whom they engage with or undertake duties on their behalf, which involves contact with children, young people or vulnerable adults, understand and comply with this policy in full.
- Will in conjunction with Recruitment Team through recruitment and selection processes, ensure DBS checks are taken up for all appropriate posts.
- ➤ Ensure Safeguarding is a primary agenda items at meetings.

Information, Instruction and Training

Appropriate training will be provided to all employees who could potentially come into contact with children, young people and adults. The level of training required will be identified in accordance with the responsibilities of the post.

For new employees training will be provided at Induction and additional training as soon as possible after commencement, in all cases within 2 months. Refresher training will be provided every 3 years; however there will be regular updates provided throughout the term of employment.

Staff will receive training on:

- extremism and radicalisation
- equality and diversity
- safeguarding focused on the learner

Staff who can provide evidence that they have attended an approved training course in safeguarding children, young people and vulnerable adults may be exempt from this training. Self-employed coaches (if applicable) have an obligation to provide similar training in the three areas listed above and provide evidence employees have undertaken training.

Safer Recruitment

To adhere to the Superstars current guidance on safer recruitment for staff working with children and young people and vulnerable adults.

To comply Human Resources will keep a central record which shows the recruitment and DBS check, which are undertaken before employment, relating to staff identity, qualifications and criminal records. The record must include:

- Identity – name, address, DOB
- Qualification checks
- Evidence of permission to work in the UK
- DBS certificate number and date of issue
- In addition, reference checks on previous employment must be carried out.

Superstars will keep a central register of DBS certificate numbers and date of issue and training records for Superstars staff and contractors. All staff must have training in the following: safeguarding, equality and diversity and extremism and radicalisation. Some identified staff such as managers and the Superstars main coaches will have additional training as agreed by the Director.

Superstars request all of its self-employed coaches and placement providers to have carried out a rigorous staff selection and recruitment process and confirm in writing to Superstars that this has been done, (this is to include volunteers where they are required to work with children, young people and vulnerable adults).

DBS Policy Statement

As an organisation using the Disclosure and Barring Service (DBS) checking service to help assess the suitability of applicants for positions of trust, Superstars complies fully with the code of practice regarding the correct handling, use, storage, retention and disposal of certificates and certificate information.

It also complies fully with its obligations under the Data Protection Act 1998 and other relevant legislation pertaining to the safe handling, use, storage, retention and disposal of certificate information and has a written policy on these matters, which is available to those who wish to see it on request.

Storage and access

Certificate information should be kept securely, in lockable, non-portable, storage containers with access strictly controlled and limited to those who are entitled to see it as part of their duties.

Handling

In accordance with section 124 of the Police Act 1997, certificate information is only passed to those who are authorised to receive it in the course of their duties. We maintain a record of all those to whom certificates or certificate information has been revealed and it is a criminal offence to pass this information to anyone who is not entitled to receive it.

Usage

Certificate information is only used for the specific purpose for which it was requested and for which the applicant's full consent has been given.

Retention

Once a recruitment (or other relevant) decision has been made, we do not keep certificate information for any longer than is necessary. This is generally for a period of up to six months, to allow for the consideration and resolution of any disputes or complaints.

If, in very exceptional circumstances, it is considered necessary to keep certificate information for longer than six months, we will consult the DBS about this and will give full consideration to the Data Protection and Human Rights of the individual before doing so.

Throughout this time, the usual conditions regarding the safe storage and strictly controlled access will prevail.

Disposal

Once the retention period has elapsed, we will ensure that any DBS certificate information is immediately destroyed by secure means, for example by shredding, pulping or burning. While awaiting destruction, certificate information will not be kept in any insecure receptacle (e.g. waste bin or confidential waste sack).

We will not keep any photocopy or other image of the certificate or any copy or representation of the contents of a certificate. However, notwithstanding the above, we may keep a record of the date of issue of a certificate, the name of the subject, the type of certificate requested, the position for which the certificate was requested, the unique reference number of the certificates and the details of the recruitment decision taken.

Working with Self Employed Coaches and Partner Organisations

Any subcontractor, engaged by Superstars in areas where workers are likely to come into contact with children, young people or vulnerable adults should have their own safeguarding policy or failing this will be asked to fully comply with the terms of Superstars' policy.

Recognising Signs of Abuse & Areas of Concern

It needs to be recognised that the term '**abuse**' can be subject to wide interpretation. The starting point for a definition is the following statement:

Abuse is a violation of an individual's human and civil rights by any other person or persons.

Abuse may consist of a single act or repeated acts. It may be physical, verbal or psychological, it may be an act of neglect or an omission to act, or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which he or she has not consented or cannot consent.

Abuse can occur in any relationship and may result in significant harm to, or exploitation of, the person subjected to it.

Below are forms of abuse and areas of concern:

- ➤ **Physical abuse**, including hitting, slapping, pushing, kicking, misuse of medication, restraint, or inappropriate sanctions.
- ➤ **Sexual abuse**, including female genital mutilation, child sexual exploitation and trafficking and impact of new technologies on sexual behaviour, for example sexting.

- ➤ **Psychological abuse**, including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks.
- ➤ **Radicalisation or extremism behaviour.**
- ➤ **Bullying**, including online bullying and prejudice-based bullying.
- ➤ **Gender-based violence / violence against women and girls.**
- ➤ **Forced marriage.**
- ➤ **Racist, disability and homophobic or transphobic abuse.**
- ➤ **Risks of internet abuse** including grooming and abuse.
- ➤ **Substance misuse.**
- ➤ **Teenage relationship abuse.**
- ➤ **Financial abuse**, including theft, fraud, exploitation relating to property, inheritance, benefits, financial transactions, misappropriation of property and possessions
- ➤ **Neglect and acts of omission**, including ignoring medical or physical care needs, failure to provide access to appropriate health, social care or educational services, withholding the necessities of life, such as medication, adequate nutrition and heating.
- ➤ **Domestic violence.**
- ➤ **Fabricated or induced illness.**
- ➤ **Poor parenting**, particularly in relation to babies and young children.
- ➤ **Issues specific to a local area or population, for example gang activity and youth violence.**

Any or all of these types of abuse may be perpetrated as the result of deliberate intent, negligence or ignorance.

How to React to a Disclosure

It is important to listen carefully to the information a child, young person or adult discloses. When listening, the following good practice is required:

- ➤ React calmly so as not to frighten the child, young person or vulnerable adult.
- ➤ Listen to the child, young person or vulnerable adult.
- ➤ Empathise with the child and show that you believe them.
- ➤ Tell the child, young person or vulnerable adult that he/she is not to blame and that he/she was right to tell.
- ➤ Take the information seriously, recognising the difficulties in interpreting what a child, young person or vulnerable adult says.
- ➤ Always avoid projecting your own reactions.
- ➤ Keep questioning to a minimum to ensure clear and accurate understanding of what has been said.
- ➤ Listen but do not probe, speculate or ask for additional information.
- ➤ Use open-ended questions, non-leading questions. Good examples include who, what, why, when and tell me, explain to me, describe to me....
 - Do not introduce personal information from your own experiences.
 - Reassure the child, young person or vulnerable adult.
 - Do not approach an alleged abuser.
 - Do not guarantee confidentiality.

What if a Member of Staff is Accused of Abuse?

When reporting an allegation, the DSL or Company Director should be informed immediately. In the event of the allegation being related to a DSL or company director the staff member should contact the LADO directly.

The DSL will contact the Local Authority Designated Officer **immediately** for advice and if the member of staff should be suspended. Notification of the suspension and reasons will be conveyed in writing to the member of staff in accordance with Superstars disciplinary procedures.

There will be no internal investigation before interaction with the LADO and Superstars will act accordingly on the advice provided.

LADOS detail in our Holiday Club Areas

Area	Telephone Number	Email Address
Warrington	01925 442079	LADO@warrington.gov.uk
Trafford	0161 9125024	Anita.hopkins@trafford.gov.uk
Manchester	0161 2341214	Quality.assurance@manchester.gov.uk
St Helens	01744 671265	sthelenslado@sthelens.gov.uk
Oldham	0161 7708870	Colette.morris@oldham.gov.uk
Tameside	0161 3424398	Tania.brown@tameside.gov.uk
Stockport	07866 999683	Gill.moore@stockport.gov.uk
Northwich		safeguardinglado@cheshirewestandchester.gov.uk

Reporting & Recording an Incident

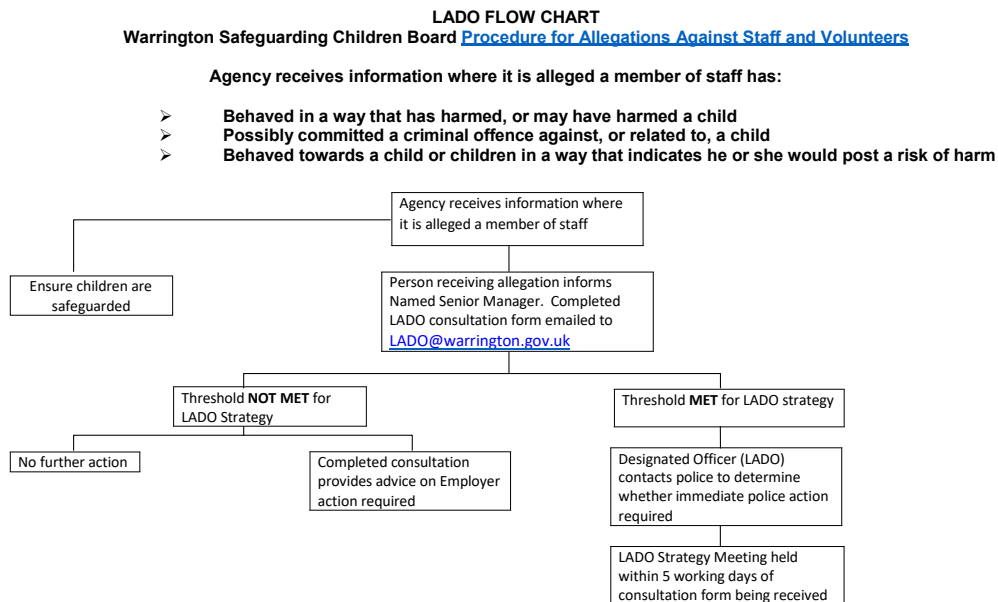
As part of your job role within Superstars, children, young people and adults may disclose information to you about a person that leads to a suspicion or allegation of inappropriate behaviour.

This disclosure may be about an incident that occurred during working hours or outside the workplace:

1. Listen to the child, young person or adult.
2. Acknowledge the information received.
3. You need a reasonable suspicion not definite proof at this stage.
4. Inform the DSL, your manager or Head of SUPERSTARS IMMEDIATELY.
5. If the child or young person is in immediate danger contact the police.
6. Is there a need to protect evidence?
7. Make a full written record of the disclosure on the day you receive it using the individual's own words.
8. Complete an incident referral form, date and sign and pass to the DSL, your manager or Head of Superstars.
9. Self-employed coaches must inform Superstars of any incidences.
10. **All cases of suspected abuse MUST be notified to the DSL and Directors immediately. Please follow the safeguarding report flow chart included in this policy.**

The DSL will clarify the basic facts to establish whether there is a reasonable cause to suspect or believe that misconduct has occurred. If the basic facts support a suspicion of misconduct by a member of staff, the matter will be dealt with in accordance with the disciplinary procedures.

SAFEGUARDING REPORT FLOW CHART (example from Warrington Borough Council)



How Young People Report an Incident

The young person must know how to report an incident and be assured they can talk to a coach or another member of staff with any concerns. This must be covered in the young person's induction and the learners should be given practical examples covering safeguarding and equality and diversity:

- child speaks to the coach
- If the coach is part of the problem;
- Then contact the Head of Superstars

One to One Working

Staff should take all reasonable precautions to ensure their own and others safety is addressed at all times by:

- Avoid working in rooms where you cannot be seen by others.
- Avoid being alone with unknown individuals if possible.
- Make sure all areas in which you need to work are well lit.
- Avoid physical contact at all times.

Prevent Strategy

Prevent is a strand of the Government counter terrorism strategy. The UK faces a range of terrorist threats. All the terrorist groups who pose a threat to us seek to radicalise and recruit people to their cause. **The Prevent strategy seeks to:**

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat we face from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

A system of threat level has been created which represents the likelihood of an attack in the near future. **The five levels are:**

1. Critical- an attack is expected imminently
2. Severe – an attack is highly likely
3. Substantial – an attack is a strong possibility
4. Moderate – an attack is possible but not likely
5. Low – an attack is unlikely

The current threat level from international terrorism in the UK and in the London is substantial which means that a terrorist attack is likely.

This strategy has five key objectives:

1. To promote and reinforce shared values; to create space for free and open debate; and to listen and support the learner voice.
2. To break down segregation among different student communities including by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all students in playing a full and active role in wider engagement in society.
3. To ensure children safety and that Superstars is free from bullying, harassment and discrimination
4. To provide support for students who may be at risk and appropriate sources of advice and guidance
5. To ensure that students and staff are aware of their roles and responsibilities in preventing violent extremism.

In order to achieve these objectives, the strategy will concentrate on four areas; Leadership and Values

To provide an ethos which upholds core values of shared responsibility and wellbeing for all children, staff and visitors and promotes respect, equality and diversity and understanding. This will be achieved through:

- Promoting core values of respect, equality and diversity, democratic society, child's voice and participation
- Building staff and children understanding of the issues and confidence to deal with them
- Deepening engagement with local communities
- Actively working with local schools, local authorities, police and other agencies

Teaching and Learning

To provide a curriculum which promotes knowledge, skills and understanding to build the resilience of children, by undermining extremist ideology and supporting the learner voice. This will be achieved through:

- Embedding equality, diversity and inclusion, wellbeing and community cohesion
- Promoting wider skill development such as social and emotional aspects of learning
- A curriculum adapted to recognise local needs, challenge extremist narratives and promote universal rights
- Teaching and learning strategies which explore controversial issues in a way which promotes critical analysis and pro social values

Child Support

To ensure that staff are confident to take preventative and responsive steps working with partner professionals, families and communities. This will be achieved through:

- Establishing strong and effective student support services
- Listening to what is happening within Superstars and the community
- Implementing anti-bullying strategies and challenging discriminatory behaviour
- Helping children and staff know how to access support in Superstars and or through community partners
- Supporting problem solving and repair of harm
- Supporting at risk children through safeguarding and crime prevention processes
- Focussing on narrowing the attainment gap for all children

Managing Risks and Responding to Events

To ensure that the Superstars monitors risks and is ready to deal appropriately with issues which arise. It will do this through:

- Understanding the nature of the threat from violent extremism and how this may impact directly or indirectly on Superstars.
- Understanding and managing potential risks within Superstars and from external influences.
- Responding appropriately to events in local, national or international news that may impact on children and communities.
- Ensuring measures are in place to minimise the potential for acts of violent extremist within Superstars.
- Ensuring plans are in place to respond appropriately to a threat or incident within Superstars.

- Developing effective ICT security and responsible user policies.

If you have the slightest suspicion that one of our children or anyone that is associated with one of our children is at risk from any sort of influence from a terrorist group or ideology, this must be

immediately reported to the Superstars Designated Safeguarding Officers as above of the Company Director immediately.

What to do if you have a concern

- **Contact a Designated Safeguarding Lead** - if a member of staff has a concern about a particular person, they should follow our usual safeguarding procedures, including discussing with the Designated Safeguarding Lead, and where deemed necessary, with children's social care.
- **Contact the Prevent Lead from the Local Authority** - in Prevent priority areas, the local authority will have a Prevent lead who can also provide support. You can also contact your local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice.
- **Contact the Department for Education's Dedicated Helpline: 020 7340 7264** – this will enable staff to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

More information here about the Prevent Duty and advice for schools and childcare providers:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf (Department for Education, June 2015).