

Safeguarding Children Policy

1.0 INTRODUCTION

Policy Purpose and Aims:

The aim of the Foundation of Light's Safeguarding Children Policy is to promote good practice and to empower staff to ensure that we:

- Provide participants with appropriate safety and protection whilst in the care of Foundation of Light
- Provide relevant safeguarding guidance and training, with appropriate training providers, for staff, participants, and volunteers
- Enable staff/volunteers to make informed and confident responses to specific safeguarding issues
- Provide education and awareness-raising to participants and parents/carers to understand their role in safeguarding

2.0 POLICY

This policy should be read in conjunction with documents detailed in 3.0, 'Related Documents'. Any reference to 'Foundation of Light', 'FoL' or 'Foundation' includes both the Beacon of Light Ltd and Altruism Ltd.

This policy covers all activities within the Foundation of Light and any external Foundation-managed activities. It applies to all staff, volunteers, participants, stakeholders, contractors, visitors, board members, and Trustees.

Definitions:

Child	A person under the age of 18 (The Children Act 1989)
Staff or Employees	Any member of the workforce either paid or unpaid
DSO	Designated Safeguarding Officer
DDSO	Designated Deputy Safeguarding Officer
LADO / DO	Local Authority Designated Officer / Designated Officer
DBS	Disclosure and Barring Service
MASA	Multi Agency Safeguarding Arrangements (replaced the Local Safeguarding Children Boards or LSCBs)
LSCP	Local Safeguarding Children Partnership

Roles and Responsibilities

The Foundation has a comprehensive safeguarding structure designed to ensure the safety and welfare of all participants who use services or take part in activities (see appendix 1). This also demonstrates the channels of accountability within the Foundation of Light as well as the link between the Foundation and Sunderland AFC.

The Foundation Safeguarding Structure consists of: Trustee, Chief Executive Officer, Safeguarding Lead, Safeguarding Coordinator, Deputy Safeguarding Officers, and Staff/Volunteers.

Categories of Abuse

Abuse is any form of physical, emotional or sexual mistreatment, or lack of care that leads to injury or harm. Child abuse is a generic term encompassing all ill-treatment of children, including cases where the standard of care does not adequately support the child's health or development. In UK Criminal and Family Law there are four specified types of child abuse:

1. Physical abuse:

Is when someone hurts or harms a child or young person on purpose. Physical abuse can include hitting with hands or objects, slapping, punching, kicking, shaking, throwing, poisoning, burning (NSPCC).

2. Sexual abuse:

Is when a child or young person is forced or tricked into sexual activities. They might not understand that what's happening is abuse or that it's wrong, and they might be afraid to tell someone. Sexual abuse can happen anywhere, and it can happen in person or online. It's never a child's fault they were sexually abused and it's important to make sure children know this (NSPCC).

3. Emotional abuse:

Is any type of abuse that involves the continual emotional mistreatment of a child and it is sometimes called psychological abuse. Emotional abuse can involve deliberately trying to scare, humiliate, isolate or ignore a child (NSPCC).

4. Neglect:

Is the ongoing failure to meet a child's basic needs and is the most common form of child abuse. A child might be left hungry or dirty, or without proper clothing, shelter, supervision or health care. This can put children and young people in danger and it can also have long-term effects on their physical and mental wellbeing (NSPCC).

The FA also regards bullying and cyber-bullying as an additional form of abuse and incidents should be given equal importance when reporting concerns regarding an individual's welfare and safety. Bullying is behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere: at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally (NSPCC).

The Department of Education 'Keeping Children Safe in Education' (Sep 2020) is statutory guidance for schools and colleges. In KCSiE, mental health is explicitly included in the definition of safeguarding, which now includes "preventing impairment of children's mental and physical health or development". All Foundation staff that work with children within formal education follow the requirements set out in the KCSiE document.

Safeguarding issues can also manifest themselves via peer on peer abuse which is most likely to include, but may not be limited to, bullying (including cyberbullying), gender-based violence/sexual assaults, and sexting.

The prevention of radicalisation and extremism will also be treated as a safeguarding concern, in accordance with Government guidance relating to 'Contest', the counter-terrorism strategy and its Prevent strand.

Foundation of Light Commitments

The Foundation of Light recognises its duty of care to safeguard and protect all participants involved in its activities.

The FoL will endeavour to ensure the safety and protection of all children and young people involved in its activities through adherence to a range of policies, procedures and guidelines that should be read in conjunction with this policy. These documents are outlined in section 3.0, 'Related Documents'.

The FoL acknowledges that all children have the right to protection and also recognises that some children may have additional vulnerabilities that must be considered and addressed, such as:

- Learning difficulties and disabilities
- Physical disabilities
- Mental health issues
- Identifying as LGBTQ
- Being from a BME background
- Special Educational Needs (SEN)

- Being a displaced or looked after child

The FoL has a commitment to manage, monitor and investigate allegations of harassment, abuse, discrimination and bullying, and to work in partnership with other statutory agencies to this end, including MASA organisations, the FA and so on.

The FoL endeavours to provide opportunities for its participants whilst also undertaking to create a safe and welcoming culture for all. Where possible, the FoL actively listens to and seeks the views of its participants in order to ensure that opinions and wishes are accurately represented. This is particularly important when making decisions and when developing services.

The FoL is also committed to maintaining a culture of vigilance and transparency. This policy is available on the FoL website and will be made available to participants, stakeholders, and the wider public upon request should the need arise.

The FoL will adhere to safer recruitment procedures, including measures that ensure all staff will receive an appropriate level of criminal records check (DBS) and will be required to maintain the currency of their knowledge and skills, e.g. through training/CPD appropriate to their role.

The FoL is committed to empowering staff to act as role models for all participants.

The FoL are committed to the ongoing support of the survivors of historical abuse in football and promote the work undertaken by affiliated football authorities.

Additional Considerations

Children may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm.

Abuse can occur in a family or in an institutional or community setting. The perpetrator may or may not be known to the child.

Abuse can happen to a child regardless of their age, gender, race or ability.

Abusers can be adults (male or female) and other young people and may be known to and trusted by the child and family.

Special consideration will be given in the following circumstances:

- When making arrangements to work with external service providers
- When taking and storing photographs and/or digital images
- When inviting any visitors into venues
- When sharing information with relevant parties, including situations where FoL is legally obliged to do so

Information Sharing and Data Protection

The General Data Protection Regulations set out the parameters for sharing information appropriately and safely. The basic principles are that any personal information should be shared on the basis that it is necessary for the purpose for which it is being shared; it is shared only with those who need it; it is accurate and up to date; it is shared securely and in a timely fashion; and it is not kept for longer than necessary.

Whenever possible, parents/carers should be informed prior to sharing any information about a child with an outside agency, unless this would increase the potential risk to the child. There is no requirement to inform or obtain consent for a member of staff to report the concern to the DSO.

Duty of care can supercede the need for confidentiality if there is a risk to a child, so in some circumstances it is possible to report a safeguarding issue without the consent of the parent/carer but this will be discussed on a case by case basis.

3.0 RELATED DOCUMENTS

FoL Policies, Procedures and Guidelines located in the Employee Handbook on SharePoint:

- Anti-Bullying Policy – Participants
- Challenging Behaviour Procedure
- Child Safeguarding Report Form
- Complaints Policy and Procedure
- Dignity at Work Policy
- Discipline at Work Policy and Procedure
- Equality, Diversity and Inclusion Policy
- FA Photography Guidelines
- FA Sexting Guidance
- First Aid Policy
- Foundation Risk Assessment Guidance
- Grievance Policy and Procedure
- Health and Safety Handbook
- Lone Working Policy and Procedure documents
- Looked After Children Policy
- Organising Activities with Participants Procedure
- Photography Procedure
- Prevent Policy and Procedure

Recruitment Policy and Procedure
Safeguarding Adults at Risk Policy and Procedure documents
Safeguarding Children Procedure
Social Networking Personal Internet Presence Policy
Staff Behaviour Policy (Code of Conduct)
Transporting People Guidance
Trips Abroad with Young People
Whistle-Blowing Policy and Procedure
Young Persons Policy and Procedure
Youth-Produced Sexual Imagery Policy and Procedure

Legislation - the following legislation and guidance has been used to inform this policy:

Achieving Best Evidence 2011
Criminal Justice Act 1988 (S. 160)
Data Protection Act 2018
FA Grassroots Football Safeguarding Children 2016
FA RESPECT Campaign
FA Safeguarding Rules and Regulations
Human Rights Act 1998
Keeping Children Safe in Education 2019
NSPCC Child Protection in Sport Unit Guidance
Premier League Guidance for Safer Working Practice
Premier League Youth Development Rules
Prevent Duty 2019
Protection of Children Act 1978
Safeguarding Vulnerable Groups Act 2006
Serious Crime Act 2015 (S.67)
Sexual Offences Act 2003
Sunderland MASA Procedures
UN Convention on the Rights of the Child (UNCRC)
Working Together to Safeguard Children
DfE Keeping Children Safe in Education (September 2020)

Government Guidance - Broad government guidance on additional safeguarding issues listed below, can be accessed via the GOV.UK website:

- Bullying including cyberbullying
- Child missing from home or care
- Child sexual exploitation (CSE)
- Children missing education
- Domestic violence
- Drugs
- Fabricated or induced illness
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Gangs and youth violence
- Gender-based violence/violence against women and girls (VAWG)
- Hate
- Mental health
- Missing children and adults
- Preventing radicalisation in:
 - Schools and Childcare
 - Work-based Learning
- Private fostering
- Relationship abuse
- Sexting
- Trafficking

4.0 RESPONSIBILITIES

This policy and its related procedures have been fully endorsed and ratified by the Chief Executive Officer and board of Trustees as well as the Local Safeguarding Children Partnership. The Managing Director has responsibility for this policy. This policy is approved and amended via the following approval route: CEO/ESAC/Trustees.

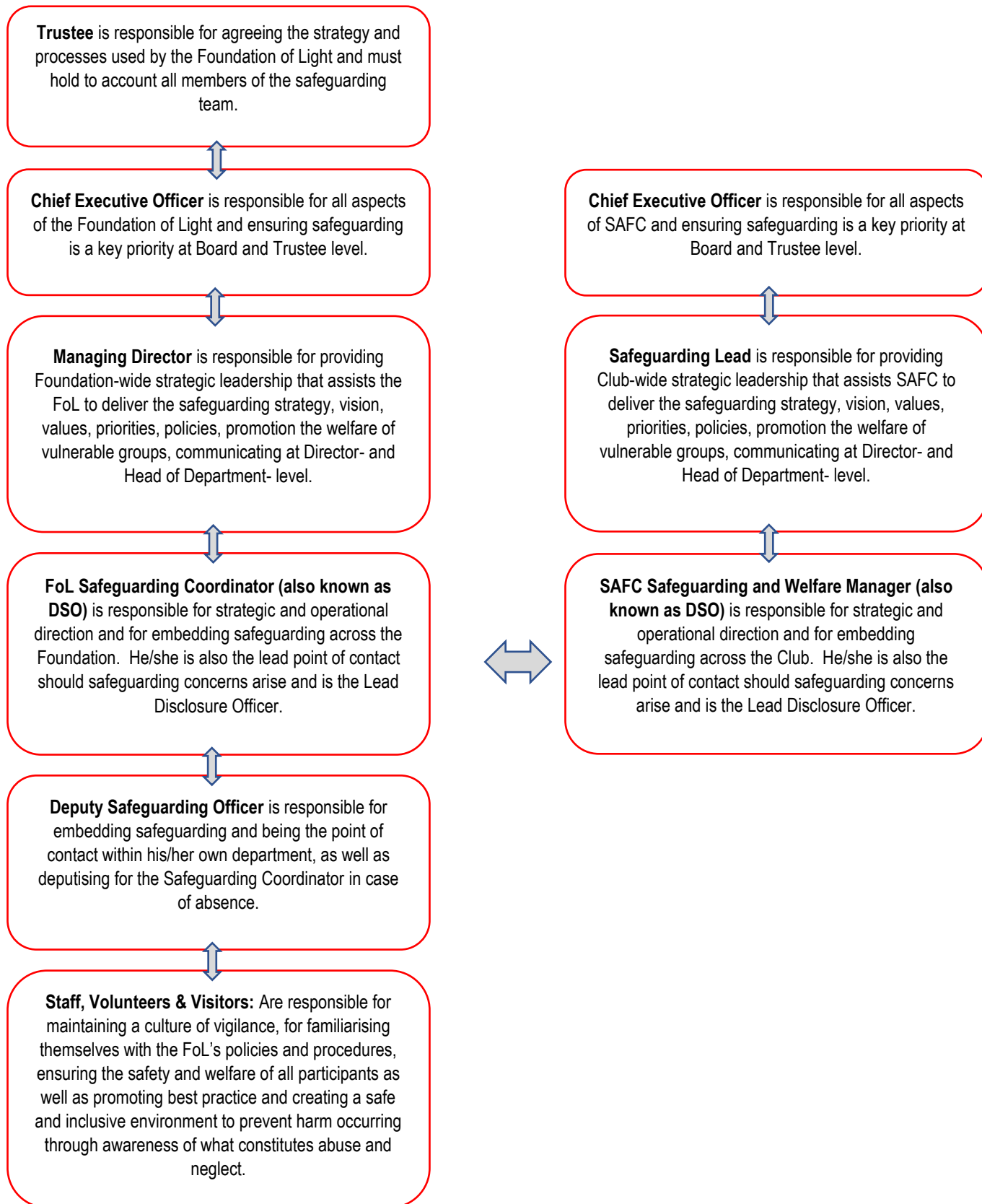
5.0 REVIEW

This policy is reviewed every year or in the light of any changes in organisation, legislation or guidance, implementation of a new service, or following any learning from incidents, concerns or allegations.

6.0 EQUALITY, DIVERSITY AND INCLUSION STATEMENT

All individuals will be treated equally and fairly in the application of this policy. All reasonable requests to accommodate requirements in terms of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation will be made.

Appendix 1: Safeguarding Team Flow-Chart



Addendum to Child Protection Policy due to the circumstances of COVID-19

Due to the current unprecedented circumstances of the COVID-19 virus it is necessary that all organisations are prepared and have appropriate arrangements in place in relation to the management of any safeguarding or child protection concerns both on and off site during this time.

The DfE website page relating to safeguarding arrangements in schools during the Coronavirus (COVID-19) pandemic says, "Whilst acknowledging the pressure that schools and colleges are under, it remains essential that as far as possible they continue to be safe places for children."

Therefore, we have produced this cover note/addendum to our existing Child Protection Policy Template to ensure all staff, Trustees and participants understand our protocols for managing child protection concerns during this time.

Overview and purpose of guidance

The document seeks to ensure that the responsibilities of senior leaders of the Foundation of Light towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour.

The current pandemic with its associated closures is an example of a circumstance which had not been foreseen and where Government, local authorities, school and Community leaders and staff are having to review and amend guidance rapidly.

Now more than ever before, professional judgements may need to be made in situations not covered by existing guidance, or which directly contravene the guidance given by the organisation. In such circumstances, staff will always advise the SLT of the justification for any such action they are proposing to take. Action should not be taken by staff without a conversation with SLT first.

All staff have a responsibility to be aware of systems within the organisation which support safeguarding and any temporary amendment to these will be circulated via email by senior managers with the opportunity for staff to seek clarification around anything they feel unclear or unsure about. This includes the organisations child protection policy, staff behaviour policy (sometimes called the code of conduct) and online e-safety / acceptable use policy.

The principles of Keeping Children Safe in Education 2019 continue to determine the expectations of schools and settings in keeping children safe in school at this time and include:

- the best interests of children must always continue to come first
- if anyone in a school, college or organisation has a safeguarding concern about any child they should continue to act and act immediately
- a DSL or deputy should be available
- it is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children
- children should continue to be protected when they are online

Staff should be aware of and understand the organisations child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and the procedures of the relevant Multi-agency Partnerships (MAPs)

<https://www.safeguardingchildrensunderland.com/>

<https://www.durham-scp.org.uk/>

<https://www.gatesheadsafeguarding.org.uk/article/9175/Gateshead-Safeguarding-Children-Partnership>

Roles and Responsibilities for all staff

All staff are accountable for the way in which they: exercise authority; manage risk; use resources; and safeguard children.

All staff have a responsibility to keep participants safe and to protect them from abuse (sexual, physical and emotional), neglect and contextual safeguarding concerns. Participants have a right to be safe and to be treated with respect and dignity. It follows that trusted adults are expected to take reasonable steps to ensure their safety and well-being. Failure to do so may be regarded as professional misconduct.

The safeguarding culture of the Foundation of Light is, in part, exercised through the development of respectful, caring and professional relationships between adults and learners and behaviour by the adult that demonstrates integrity, maturity and good judgement.

The public, local authorities, employers and parents/carers will have expectations about the nature of professional involvement in the lives of children. When individuals accept a role working in an education / community setting, they should understand and acknowledge the responsibilities and trust involved in that role.

Employers have duties towards their employees and others under Health and Safety legislation which requires them to take steps to provide a safe working environment for staff. During current circumstances, employees are working from home. It is therefore the responsibility of the employee to ensure their home environment is safe and suitable to work from. Employees unable to secure such an environment must report this to their line manager immediately.

Legislation also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings. An employer's Health and Safety duties and the adults' responsibilities towards children should not conflict.

Designated Safeguarding Leads and Deputies

Off Site: While our facility is closed or partially closed during these unprecedented circumstances, the **Designated Safeguarding Leads Keith Brazier and Jamie Wright** continue to be our Designated Safeguarding Leads due to their level of training and skill. **The Baroness Estelle Morris of Yardley remains the named Trustee with responsibility for safeguarding.**

All staff will continue to follow child protection and safeguarding policies during Beacon closure and ensure concerns are passed on immediately to either the DSL named above.

However, if there is an IMMEDIATE safeguarding concern and the Designated Safeguarding Leads are unavailable please seek immediate support via the Integrated Contact and Referral Team (0191 520 5560) or 561 7007.

On Site:

All staff will continue to follow child protection and safeguarding policies during the phased reopening and ensure concerns are passed on immediately to either DSL in line with Foundation of light procedure

Designated Safeguarding Lead/Deputy should remain the first point of contact for safeguarding concern.

In the event that children or families need support immediately please contact our front door services immediately (as per the information within the Child Protection Policy) or contact the Police.

Expectations for Online meetings

As the Covid-19 pandemic continues to be managed with Government restrictions still in place, ways of working for all have had to move to a more digital, remote but live management system. To ensure the safety of all involved we have provided some expectations which can be used as joining instructions or protocols for online meetings or events to support a clear and effective safeguarding message.

Meeting invitation – meetings will vary and therefore the invitation to join should state the meeting type and its nature (confidential) and any caveats so that all attending are clear of purpose, content and potential outcome. The use of which platform for the meeting and its safety mechanisms should be explained prior to the meeting e.g. Teams, Skype, Zoom etc, use of passwords, waiting rooms to be let in.

Agenda for meetings – Agendas are important for meetings to allow participants to have an agreed expectation of what will be discussed or expected of participants. It is important that it is adhered too and that if notes are being made this is transparent and all participants are informed, including if the note taker will be off camera. Participants should be informed of how the meeting will be recorded (we would suggest that at all meetings it is declared that no official recordings are allowed to be taken and shared on any other platform)

Access and attendance at live session – Participants/delegates/members are asked to be logged into software at least 10 mins before the start time of the session with their camera's active. There will be a 'waiting room' available on Zoom/Teams (others may not have this) where the host will then proceed to allow delegates into the meeting.

If access is being shared by delegates in the same setting/building this should be declared at the beginning of the session/event/meeting for everyone to know and for the host to record on the attendance register.

All participants should be declared through their log in that they are present for the training/attendance register.

All participants by joining the meeting agree to the parameters of the session, this includes remaining logged on at all times, keeping their camera turned on (unless it's an agreed break) and participating in the tasks/chat using the agreed functions and if they have a contribution to make. By joining the meeting, participants are agreeing to a live session through the software and should connectivity fail, the handout will provide support but attempts to reconnect must be exhausted.

NO recording of this session can be allowed, and participants must ensure that they agree to this requirement.

If you do not have a camera or wish to be 'off-camera' you must discuss this with the host beforehand (with training the host would not be able to confirm that you were present).

For privacy, participants should place themselves on mute and unmute themselves at the request of the host. Participants may wish to wear headphones for privacy, but this would not protect confidentiality when the participant speaks (others in the vicinity would hear these views)

The chat function is a useful way of maintaining connectivity throughout a session/meeting/training.

Participant contribution- Participants are expected to reasonably contribute to the meeting/training as directed by the host. All contributions are welcomed but should be factual and purposeful. Argumentative or antagonistic behaviour towards the host or other participants is unacceptable and the participant may be asked to leave the meeting.

If as a participant you feel your contribution was not accepted, listened to or you disagreed with the content you should raise this independently with the host via the live chat or in a subsequent one to one.

If the disagreement in views concerns the safety and wellbeing of a child during a multi-agency meeting then you must gain assurances that your concerns have been raised and recorded and you must escalate this following the conclusion of the meeting.

Linked to Staff Behaviour Policy

Webcam usage would be expected in most sessions unless agreement reached.

This ensures confidentiality of the meeting to those invited.

Therefore, the following should be considered by all participants:

- Surroundings, (what is on view should be minimal and not personal.)
- Dress code (professional)
- Use of headsets to minimise noise (if interruptions occur then the mute button of the participant should be accessed and then email the host or use the chat function to share that you have left the meeting and why).

For certain meetings which occur virtually due to the coronavirus pandemic such consideration must be given as to whether these meetings can be confidential if they are being accessed virtually from staff members home's and not from official sites. Staff participating in these confidential meetings would need to consider their personal situation whilst working away from site, agree to this and declare their personal situation to the meeting host. While our facility is closed or partially closed during these unprecedented circumstances, staff who require guidance around this must contact the **Designated Safeguarding Lead, Keith Brazier or Jamie Wright**

Use of technology for online / virtual teaching

There has been a sharp increase in the use of technology for remote learning since March 2020 and this addendum provides guidelines for staff.

The Foundation of Light School has reviewed their online safety and acceptable use policies and amended these, ensuring that all staff involved in virtual teaching or the use of technology to contact students are briefed on best practice and any temporary changes to policy / procedures.

When selecting a platform for online / virtual teaching, school has checked that the provider has an appropriate level of security.

If staff need to contact a student or parent by phone and do not have access to a work phone, they should discuss this with a senior member of staff and, if there is no alternative, always use 'caller withheld' (141) to ensure the student / parent is not able to identify the staff member's personal contact details.

Response to safeguarding or child protection concerns

As always our organisations duty of care is to keep children safe and while the arrangements of the physical care of children and physical presence of our Designated Safeguarding Lead/Deputy may be different during this time the Foundation of Light response remains the same and follows the guidelines as set out in our Child Protection Policy.

Staff should recognise their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant external agencies and that to not do so may result in charges of serious neglect on their part where the welfare of children may be at risk.

Upon the return of more participants, staff and volunteers may identify new safeguarding concerns about individual children, for example disclosures of risk of harm, peer on peer abuse or any negative experiences during the time of lockdown and isolation. Staff and volunteers should be clear that they must continue to follow our Child Protection Policy and report concerns immediately regarding any child to the Designated Safeguarding Leads (following the on/off site arrangements in place). Once verbally reported this should be documented following our recording procedures. Every effort to gain accurate information from the parent and child on their return should be taken including, health, mental health, peer on peer abuse and any changes in circumstances.

Response to safeguarding concerns regarding adults in school

As stated in our Child Protection Policy, any concerns that may be raised regarding any adult's behaviour in the Beacon towards a child should be reported immediately to the DSL

Staff should be reminded of the routes for raising concerns during Beacon closure or part closure, including how to escalate their concern if the normal routes for whistleblowing are impeded by the absence / illness of senior managers.

This guidance was written 6th August 2020

This addendum will be reviewed as guidance is updated by safeguarding partners, LAs/Together for Children or DfE, and as a minimum every 4 weeks by Keith Brazier, DSL. At every review it will be directed to the Board of Trustees for approval via the Education and Skills Committee

This addendum links to the following policies and procedures

- Child Protection policy
- Safeguarding policy
- Staff Behaviour policy
- E-safety policy
- Remote Learning Policy
- Health & Safety policy
- Whistleblowing policy
- Home Visit policy
- Preventing radicalisation policy
- Lone working policy

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>