

### **SAFEGUARDING / PREVENT POLICY**

#### CSL Group Company (09) & Learning (20)

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Approved by CSL Board	David Kreyling
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#### Introduction

Creative Sport & Leisure Ltd has a statutory and moral duty to ensure that it safeguards and promotes the welfare of those receiving education and training through the provision.

Throughout these policies and procedures, reference is made to "children and young people" or "child protection." These terms are used to mean those under the age of 18 including unborn children. The Company recognises that some adults are also vulnerable to abuse and so the policy and procedures should be applied (with appropriate adaptations) to allegations of abuse against, and the protection of, adults at risk. The Lord Chancellor's Department, in 1997, defined a vulnerable adult or adult at risk as a person 'who is or may be in need of community care services by reason of disability, age or illness; and is or may be unable to take care of, or unable to protect him or herself, against significant harm or exploitation'.

#### **Policy Statement of Intent**

Everyone at Creative Sport & Leisure Ltd is committed to the Safeguarding & Prevent and well-being of all our learners and fully recognises its responsibilities for protecting all vulnerable groups from any form of abuse which includes identifying those that may be at risk of radicalisation and extremism. Our policy applies to staff, learners, contractors, visitors and volunteers working on behalf of or in conjunction with Creative Sport & Leisure Ltd.

There are five main elements to our Policy:

- Ensuring we operate safer recruitment practices in accordance with the legislative document Safer Recruitment, Safeguarding Children in Education (2007) and under the new Prevent Duty Guidance 2015 and 'Keeping Children Safe in Education 2024' DFE publication. See policy "Recruitment and Induction."
- Raising awareness of Safeguarding / Prevent and Online Safety throughout the organisation and ensuring staff are equipped with the appropriate skills and knowledge to support learners effectively and help keep them safe
- Raising awareness of Safeguarding / Prevent and Online Safety to all our learners and ensuring that the learners who are most vulnerable are equipped with the skills and knowledge needed to keep them safe
- Developing and implementing procedures for identifying and reporting cases or suspected cases of abuse and radicalisation
- Establish safe environments in which vulnerable groups can learn and develop

We recognise that because of the regular contact with learners, our staff are well placed to observe the outward signs of abuse and radicalisation. Creative Sport & Leisure Ltd will therefore:

- Create opportunities to embed Safeguarding / Prevent and British Values and Online Safety within all of our curriculum using current news events and curriculum related scenarios
- Establish and maintain an environment where learners feel secure, are encouraged to talk and are listened to
- Ensure learners know that there are designated staff within Creative Sport & Leisure Ltd whom they can approach if they are concerned or worried



- Include opportunities within our ongoing delivery and assessment process for learners to develop their knowledge and skills that they will need to recognise and stay safe from abuse and potential radicalisation
- Ensure that all members of staff understand the factors that make people vulnerable to becoming terrorists or supporting terrorism' and can challenge extremist views along with other actions to respond in a positive way including a referral to the Channel Programme

We recognise and adhere to the statutory requirements within the following important and relevant pieces of safeguarding legislation and guidance:

- Keeping Children Safe in Education September 2024 (incorporating Child-on-Child Abuse Sexual Violence and Sexual Harassment)
- Working Together to Safeguard Children 2023
- Children's Act 1998
- Children's Act 2004
- Safeguarding Vulnerable Groups Act SVGA (2006 amended 2012)
- What to do if you're worried about a child being abused Advice for Practitioners March 2015
- Children Missing Education
- The Care Act 2014 Updates 2016 Under Review 1st July 2023 March 2024 Updates
- Section 5B of the FGM Act 2003 Mandatory reporting of FGM
- Protection of Freedoms Act (2012)
- Human Rights Act 1998 (legislation.gov.uk)
- Disclosure and Barring Service Code of Practice (2012) Revised version November 2017
- Sexual Offences Act (2003) Under Review
- Every Child Matters (2004)
- Equality Act (2010)
- CONTEST JULY 2023
- Section 26 of the Counter Terrorism Act 2015
- Prevent duty guidance: for England and Wales Updated 6 March 2024
- HMG Channel Duty Guidance v14
- Data Protection Act and GDPR 2018
- Education and Training (Welfare of Children) Act 2021

Keeping Children Safe in Education (KCSIE) applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021.

The Children Act 2004 requires agencies to work co-operatively to protect the welfare of children. Although social care services and the police are responsible for investigating child abuse and neglect, all those who come into contact with children and young people have a duty to promote and safeguard them.

Under the Counterterrorism and Security Act 2015 Creative Sport & Leisure Ltd is required to have "due regard to the need to prevent people from being from becoming terrorists or supporting terrorism' violent extremism and non-violent extremism, particularly that which can create an atmosphere conducive to terrorism and can popularise views which terrorists exploit."

Creative Sport & Leisure Ltd will refer concerns that a child or young person might be at risk of significant harm to the appropriate agencies as agreed with the Local Safeguarding Children Partnerships (LSCP) for the areas in which its learners live. Creative Sport & Leisure Ltd works closely with its partner agencies across Essex and beyond, reflecting Creative Sport & Leisure Ltd.'s catchment area. These include the local authorities, police, LSCP, Channel Police Practitioner (CPP) and the local Prevent Coordinators to ensure information is shared and referrals are made as appropriate.



All staff will have training on child protection issues, their responsibilities and Creative Sport & Leisure Ltd policies and procedures, with refresher training at least every 2 years. A member of the Senior Leadership Team will have specific responsibility for child protection. They will be assisted by other staff with responsibility for child protection. The Governing Body will receive from the Designated Safeguarding Lead an annual report which reviews how the duties have been discharged which includes a data 6 summary, emerging themes, online filtering and monitoring, training and sharing good practice.

This Policy is endorsed by the Board of Directors at Creative Sport & Leisure Ltd and will be followed by everyone associated with Creative Sport & Leisure Ltd (Directors, all staff, supply staff, volunteers and visitors), irrespective of site, and includes visitors attending the Creative Sport & Leisure Ltd premises on official Creative Sport & Leisure Ltd business, but excludes persons involved in approved 'letting activities' i.e. external users of Creative Sport & Leisure Ltd accommodation.

Creative Sport & Leisure Ltd will investigate serious concerns and allegations of abuse and respond to these promptly and appropriately, with possible referral to appropriate external agencies such as Social Services, Local Safeguarding Children Partnerships (LSCP) the Police and The Local Authority Designated Officer (LADO).

#### Responsibilities

To support our commitment to the Safeguarding and the Wellbeing of all our learners in relation to the above legislation we will:

- Ensure that we have Designated Persons for Safeguarding / Prevent who have received appropriate training and support for this role. The Designated Safeguarding Lead for Safeguarding / Prevent is David Kreyling CEO and the Deputy Designated Safeguarding Lead is Sheena Attwater Learner Services Manager alongside members of the Safeguarding & Prevent Team in the above's absence
- Ensure that the Safeguarding line and email box are monitored continuously. Please note: All emails referring to Safeguarding please send to: <a href="mailto:safeguarding@creativesportleisure.co.uk">safeguarding@creativesportleisure.co.uk</a> or call the Safeguarding Line on: Freephone 24/7 08004101212
- Convene a Safeguarding / Prevent Panel every 10/12 weeks (as needed if urgent), to review status / progress / resolution of all cases reported. The panel will consist of the Deputy Designated Safeguarding Lead, DDSL for HR and DDSLs for learners and DDSL SLT representatives. Each member of the panel will ensure that all cases reported to the DDSL Lead are actioned appropriately and that all records are clear, concise, factual, and up to date. All cases to be closed will be signed off by the panel. All records to be kept securely on SharePoint with access restricted and documents password protected. All of the Safeguarding & Prevent Team will ensure that they have completed their Level 3 training
- Ensure that all staff and learners are aware of our Designated Safeguarding & Prevent Team. This will be communicated via our staff and learner induction process, tutorial themes, internal training, meetings and awareness sessions.
- Ensure all staff are aware and understand their responsibilities in relation to Safeguarding & Prevent and Online Safety (please refer to CSL Online Safety Policy in being alert to the vulnerability signs and indicators of abuse, neglect, exploitation and or radicalisation and understand the actions they can apply in response before referring any concerns to the Designated Safeguarding & Prevent Team. This includes identifying when to make a referral to the Channel Programme
- Ensure that effective Safeguarding & Prevent procedures are developed, implemented, and monitored to ensure effectiveness



- Ensure the Safeguarding procedures are based on the 5R's approach of
- > Recognition
- > Response
- > Record
- > Report
- > Refer
- The Prevent procedure will adopt the ethos of:
- Notice
- > Check
- > Share

Where there are concerns that an individual may be vulnerable

- Ensure we develop effective links with relevant external agencies, local Safeguarding and Prevent Channel boards and co-operate with any requirements with any Safeguarding referral matters
- Ensure that we keep written records of Safeguarding / Prevent concerns, even when there is no need to refer the matter to the relevant parties
- Ensure all records are stored securely and in accordance with Data Protection Act and GDPR regulations

### **Individual Responsibilities**

**The CEO for Creative Sport & Leisure Ltd**, David Kreyling and the Governor responsible for Safeguarding are responsible for ensuring that the organisation complies proactively with its responsibilities for implementing a robust Safeguarding and Prevent Policy and work with other agencies to protect vulnerable people.

**Designated Person for Safeguarding / Prevent,** David Kreyling is responsible for:

- Managing the Safeguarding and Prevent strategy and policy documents on behalf of Creative Sport & Leisure Ltd
- Acting as lead advisor on Safeguarding and Prevent strategy and implementation
- Acting as an advisor to the Safeguarding and Prevent trainers (either internal or external)
- Identifying a process within the HR department to consider confidential referrals in relation to members of staff where there is a concern in respect of radicalisation
- Providing support and advice on Safeguarding and Prevent concerns raised by staff
- Assisting managers to take concerns to the appropriate authority
- Implement and monitor the Filtering and Monitoring Policy to safeguard learners and staff
- Liaising with the Head of Training and Development to plan and implement a Safeguarding and Prevent training and awareness programme

#### The Director of Learning and Development

- Assisting with recruitment of new staff following safer recruitment process (refer to Creative Sport & Leisure Ltd Recruitment Policy)
- Deciding a suitable number of training places and events to be delivered to staff identified by line managers as needing to access Safeguarding and Prevent training
- Ensuring that a training plan is in place for Safeguarding and Prevent training at Levels 1, 2 or 3 (as appropriate)
- Providing training reports to the Board as required



#### Deputy Designated Safeguarding Leads (Safeguarding & Prevent Team)

- First point of call for all Safeguarding / Prevent concerns
- Responsible for day-to-day implementation / coordination of the Safeguarding and Prevent strategies
- Deputising for Designated Safeguarding & Prevent Lead when required
- Providing advice to all staff in relation to potential referrals
- Raising awareness of Safeguarding & Prevent to learners
- Maintaining an awareness of Safeguarding & Prevent as a national concern
- Leading and managing the appropriate escalation of Safeguarding & Prevent concerns
- Liaising with DDSL in the People Department, if the concern raised is about a member of staff
- Responsible for convening and facilitating Safeguarding Panel meetings to review status / progress /resolution of all cases reported

#### Safeguarding panel

- Meet every 10/12 weeks or within 24 hours if an emergency arises
- Identify trends
- Ensure all case paperwork is up to date and correct
- Escalate concerns to external partners: LADOS, GOV Regional Prevent Coordinators and or Police where needed
- Agree actions
- Sign off/close cases

#### The Senior Leadership Team is responsible for:

- Ensuring that CSL Safeguarding& Prevent Policy and Training information is disseminated to all staff
- Providing advice to managers in relation to potential referrals
- Maintaining an awareness of Safeguarding & Prevent within their area
- Identifying the staff needing to attend Safeguarding & Prevent training according to the staff qualification log/matrix
- Supporting staff with the processes to escalate a Safeguarding or Prevent concern
- Facilitating the appropriate escalation of Safeguarding & Prevent concerns
- Consulting with the People Department if the concern raised is about a member of staff

#### All Staff are responsible for:

- Attending the required Safeguarding & Prevent Training relevant to their role, this will be determined by legislation and could change as legislation is updated
- Reporting all Safeguarding & Prevent related concerns to the Safeguarding & Prevent Team
- Assisting in appropriate escalation of the referral or concern

Creative Sport & Leisure Ltd recognises its responsibilities regarding the Safeguarding of young and vulnerable learners from abuse, neglect and exploitation, and from inappropriate and inadequate care, and is committed to responding in all cases where there is concern. It also recognises its responsibilities for identifying signs of young people being groomed and radicalised and the risk of becoming terrorists or supporting terrorism' or extremist activity and is committed to responding in all cases including referrals to the Channel Programme when additional support is needed.

Due to the nature of our work at Creative Sport & Leisure Ltd staff may be in the front line of working with young learners, vulnerable learners, and vulnerable adults. This may mean that we are the first to know that a young or vulnerable learner or adult is being or has been abused, neglected and or exploited or that we are Company Policy 9 / Managing Learning 20 Page 5 of 24



concerned about a person's Wellbeing. We may also be the first to recognises changes in behaviours that are the signs that a vulnerable learner is being drawn into activities that could be considered as extremist and likely to be in opposition to British Values. Everyone has an equal responsibility to ensure that the individual needs and welfare of the person are put first and to safeguard any person with whom we may come into contact. This responsibility not only rests with the Directors, Senior Leadership Team and Designated Persons for Safeguarding & Prevent, but also with every individual member of staff employed or volunteering within our organisation whilst at work, online, at an employer's premises or in the community or at home.

We will ensure that our Safeguarding & Prevent Policy and associated Procedures are reviewed at least annually to ensure that they are still relevant and effective.

#### **Understanding and Identifying Safeguarding Concerns**

### What is Safeguarding?

- Providing help and support to meet the needs of children, young, vulnerable and adult learners, as soon as problems emerge
- Protecting children, young, vulnerable and adult learners from maltreatment, whether that is within or outside the home, including online
- Preventing the impairment of children, young, vulnerable and adult learners mental and physical health or development
- Making sure that children, young, vulnerable and adult learners grow up in circumstances consistent with the provision of safe and effective care
- ❖ Taking action to enable all children, young, vulnerable and adult learners to have the best outcomes
- Safeguarding involves adopting safer recruitment practices to assist in identifying persons who are unsuitable to work with young or vulnerable learners

Different types of abuse and unsafe activities which can occur face to face or online which we recognise, and which have become more prevalent in recent times are:

- · Child on Child Abuse
- Child-on-Child Sexual Violence and Sexual harassment
- Grooming leading to Child Sexual Exploitation (CSE)
- Modern Slavery/Exploitation
- Discriminatory Abuse
- Self-Neglect
- County Lines / Gang affiliations
- Financial Abuse
- Domestic Violence
- Alcohol and Drugs
- Crime
- Bullying

#### Signs and indicators of possible abuse, neglect and exploitation

When considering whether there is enough information and evidence to suggest a young or vulnerable learner has been abused, neglected and or exploited there are many possible indicators. However, there may be a perfectly reasonable explanation, so it is important to remain vigilant, but not be overzealous, nor jump to conclusions. There may also be no signs or indicators of abuse, neglected and or exploited however, this does not necessarily mean a report of abuse, neglected and or exploited is false.



#### **Domestic Abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.'

#### Signs suggesting physical abuse and or experiencing Domestic Violence at home

- Any injuries not consistent with the explanation given for them
- Injuries that have occurred on parts of the body which are unusual and not indicative of a fall or because playing a contact/rough sport etc.
- Injuries that have not received medical attention
- Neglect under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illness', unkempt appearance, dirty clothes, coats in the summer, t-shirts in the winter etc.
- Changes in routine
- Changes to personality such as, emotional all the time, aggressive when put on the spot
- Suddenly being nervousness of joining in any type of sport activity (shying away from contact)

# Signs of sexual abuse

- Any disclosure made by an individual
- Individuals with an excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour
- Sexual activity through words, play or drawing
- Individuals who are sexually provocative or seductive
- Severe sleeping disorders
- Eating disorders

#### Signs suggesting emotional abuse

- Changes or regressions in mood or behaviour
- Nervousness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Attention seeking behaviour
- Persistent tiredness
- Running away

#### **Marriage and Arranged Marriages:**

Please note that as of Feb 2023: Under the Marriage and Civil Partnership (Minimum Age) Act, it becomes illegal for 16 and 17 year olds to be married, or enter into a civil partnership, even with parental consent. It criminalises arranged marriage for children under any circumstances and introduces harsher penalties for those found guilty of up to 7 years in prison.

#### Children potentially at greater risk of harm (gender-questioning-children-proposed-guidance)

At Creative Sport & Leisure we recognise that some children may potentially be at risk of greater harm and require additional help and support. These learners could be those with disabilities 'Children who are absent from education for prolonged periods and/or repeated occasions, home educated learners, Gender Questioning Young Children, Young Carers, those in care or previously in care and or those who already have support from social services for an already identified concern.

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At Creative Sport & Leisure we acknowledge that due to the additional needs of these groups it is important to be aware that additional safeguarding challenges / barriers can exist when abuse and neglect of these groups is happening. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability, without further exploration
- That they may be more prone to peer group isolation than others
- The potential to be disproportionally impacted by things like bullying, without outwardly showing signs
- Communication difficulties in overcoming these barriers
- Scared to engage with another adult for fear of further harm

#### Child on Child abuse - Sexual Violence and Sexual Harassment

Creative Sport & Leisure recognises that some learners experience sexual violence, sexual harassment and or may suffer abuse from their peers in person and online. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Any incidents relating to Child-on-Child abuse and or sexual violence/harassment will be managed in the same way as any other child protection concern and will follow the same procedures. We will seek advice and support from other agencies as appropriate. In all cases, if staff are unsure, they should always speak to the Deputy Designated Safeguarding Leads (DDSL).

#### **Common types of Abuse**

**Sexual Violence** refers to sexual offences under the Sexual Offences Act 2003. Rape, Assault by Penetration, Sexual Assault.

**Sexual Harassment** "Unwanted conduct of a sexual nature" that can occur online or offline. This can include sexual comments, sexual jokes, or taunting. Physical behaviours. Online sexual harassment.

**Child on Child abuse** can manifest itself in many ways. This may include:

Bullying (online and offline) Physical abuse Sexual violence

Sexual harassment 'Up-skirting' 'Sexting' Initiation/ hazing type violence and rituals

At Creative Sport & Leisure Ltd we make every effort to keep all learners, visitors, subcontractors, volunteers, and staff safe by constantly keeping abreast of relevant updates and information. All those relevant to learners can be found via Creative Sport & Leisure Ltd learner intranet commonly referred to as "The App" where they can also access a range of materials covering topics such as:

- Consent -Tea and Consent
- Healthy and respectful relationships
- Gender stereotypes
- Online content
- Sexual imagery



#### Zero Tolerance" IT COULD HAPPEN HERE"

Creative Sport & Leisure Ltd does not tolerate any harmful behaviours and will take swift action to intervene were it to occur. All Creative Sport & Leisure Ltd staff will maintain an attitude that "it could happen here" and will make it clear to learners through training and tutorial themes that we have a zero-tolerance approach to sexual violence and sexual harassment, that it is never acceptable, and it will not be tolerated. Creative Sport & Leisure Ltd staff will not accept sexual violence/harassment as "banter", "just having a laugh", "a part of growing up" or "boys being boys" or "girls being girls.

Creative Sport & Leisure Ltd will take swift action were they to be made aware of or witness any challenging physical behaviours (potentially criminal in nature) such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting up skirts and will follow Safeguarding processes to investigate and support all persons involved.

We use group training sessions, Monthly Themes/Tutorial Themes to help learners understand, in an age-appropriate way, what abuse is, and we encourage learners to tell a trusted adult if someone is behaving in a way that makes them feel uncomfortable. Creative Sport & Leisure Ltd understands the different gender issues that can be prevalent when dealing with Child-on-Child abuse. Please click on the following link to read OFSTEDs June 2021 review. Review of sexual abuse in Schools and Colleges.

## See Appendix 2 for more information on Child-on-Child Abuse

#### What to do if you believe someone to be at risk of being abused

Creative Sport & Leisure Ltd will adopt Safeguarding procedures that are based on the 5R's approach of *Recognition, Response, Record, Report, Refer* when there is concern a learner is becoming vulnerable to abuse.

Recognise any behaviour that may indicate abuse

Respond appropriately to any recognised indicators, making sure you are sensitive to the situation and person

Report your findings to the On Duty Designated Persons for Safeguarding and Prevent

**Record** precisely and promptly what has been alleged, ensuring details are accurate and factual. Do not ask questions Do not record your or others' opinions, as your report may be used as legal evidence. Forward completed reporting

form to the Safeguarding & Prevent Team safeguarding@creativesportleisure.co.uk

**Refer** The On Duty Designated Person for Safeguarding and Prevent will decide if a referral is appropriate and to which agency a referral is made.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.



## The Safeguarding & Prevent Team at Creative Sport & Leisure Ltd

The Designated Safeguarding & Prevent Lead (DSL) is David Kreyling david.kreyling@creativesportleisure.co.uk

# Deputy Designated Safeguarding/Deputy Prevent Leads at Creative Sport & Leisure Ltd are:

Sheena Attwater, Learner Services Manager – Primary contact safeguarding@creativesportleisure.co.uk (non-emergency)

Emergency 24/7 Freephone: 0800 410 1212

Please call the number above in an emergency or email (non-emergency) if you have any concerns or need any guidance or advice.

Additional members of the Safeguarding & Prevent Team

Stuart Kendrick, Director of Learning and Development (Learners and Staff)

**Denise Mooney, Head of People (Staff)** 

David O'Donovan, Head of Learning and Development (Learners)

safeguarding@creativesportleisure.co.uk (non-emergency)

Emergency 24/7 Freephone: 0800 410 1212

# **Understanding and Identifying Prevent**

### What is Prevent?

Prevent is part of the Home Office and the Police counter-terrorism strategy and aims to stop people from becoming terrorists or supporting terrorism, by working with individuals and communities to address issues before they become a criminal matter and to stop people moving from extremism into terrorist-related activity.

#### Context

Young people in the UK are potentially vulnerable to engagement with extremist ideologies or being targeted by extremist organisations. Training Providers, and other organisations that interact with young people, should be aware of these risks and be familiar with the support networks and processes in place to protect vulnerable individuals from becoming radicalised or to prevent people from becoming terrorists or supporting terrorism'

#### **Definition of Radicalisation**

The Institute of Strategic Dialogue defines radicalisation as "the process through which an individual changes from passiveness or activism to become more revolutionary, militant or extremist, especially where there is intent towards, or support for, violence." Driving factors behind radicalisation can include lack of integration and/or polarisation, identity crises and/or isolation, political and/or democratic disenfranchisement, discrimination foreign policy and/or international crises, or disputing political movements, Ideologies and or faiths.



#### **Definition of Extremism**

(New Definition of Extremism 2024)

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, which aims to:

- 1. negate or destroy the fundamental rights and freedoms of others; or
- 2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights or
- 3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

#### Who are we Safeguarding under Prevent?

Everyone. There is no stereotype for people who hold extremist views. Vulnerability, isolation, and personal grievances added to strong political, religious or social views, can result in a person searching for a cause. People can become vulnerable for many reasons including:

- Low self-esteem
- Depression
- Guilt
- Loss
- Isolation
- Family breakdown
- Fear
- Lack of purpose
- Anger
- Peer pressure

We are by no means suggesting that singularly one of these characteristics or circumstances will drive someone to terrorism. But they often lead to a sense of injustice – be that on a personal or more far-reaching scale. Their vulnerabilities or susceptibilities are then exploited towards crime or terrorism by people who have their own agenda.

There is no typical gender, age, religion or background that extremists will target, but they will use a sense of "Duty" (belonging to a specific group), "Status" (need for reputation) and or "Spiritual Rewards" (test of faith) as a way of drawing victims in.

This raises the question of what could those signs of radicalisation look like? They could exhibit a notable change in behaviour and appearance as well as but by no means exhaustive; troubling behaviour, emotional changes – angry, mood swings, newfound arrogance, verbal expression of opinions that are at odds with generally shared values, physical appearance (tattoos), change in routine.

# What to do if you think someone is at Risk of Radicalisation

At Creative Sport & Leisure Ltd, we follow the "Notice, Check, Share" approach:

- 1. **Notice**: Be aware of any changes in someone's behaviour or appearance.
- 2. Check: Talk to someone you trust and follow your instincts if you're still concerned.
- 3. **Share**: Report your concerns to the Safeguarding & Prevent Team.

**Learners Concerned About Another Learner**: Speak to your tutor first, then report to the Safeguarding & Prevent Team at safeguarding@creativesportleisure.co.uk or call the emergency 24/7 Freephone: 0800 410 1212

Staff Concerned About a Learner: Share your concerns with the Safeguarding & Prevent Team

**Concerns About Staff or External Visitors**: Report directly to the Safeguarding & Prevent Team Company Policy 9 / Managing Learning 20 Page 11 of 24



**Responsibility for Contacting Authorities**: If there are serious concerns about a student, staff member, or external visitor, the following people are responsible for contacting the Channel Programme or Counter Terrorism Team at Essex Police:

- Designated Safeguarding and Prevent Lead: David Kreyling
- Deputy Designated Safeguarding/Prevent Lead: Sheena Attwater
- Safeguarding & Prevent Team Members: If the above are unavailable
- Any Staff Member: If you cannot reach the Safeguarding Team

#### **Contact Details:**

- Designated Safeguarding & Prevent Lead: David Kreyling 07984 155872
- Deputy Safeguarding Leads: Sheena Attwater, Stuart Kendrick, David O'Donovan, Denise Mooney
- Emergency 24/7 Freephone: 0800 410 1212
- Email for Non-Emergencies: safeguarding@creativesportleisure.co.uk

In case of an emergency, please call the number above. For non-urgent concerns, use the email provided.

#### **Safer Recruitment**

Creative Sport & Leisure Ltd will take all possible steps to prevent unsuitable persons working with young or vulnerable learners and in doing so will follow the good practice contained within the legislative document Safeguarding Children and Safer Recruitment in Education (2007), Safer Practice, Safer Learning document produced by NIACE and Prevent Duty Guidance 2015 and Keeping Children Safe in Education (DFE publication 2024).

When interviewing potential staff, we will ensure that:

- There is an open recruitment process
- There is a rigorous interview process with specific questions relating to Safeguarding / Prevent
- Applicants' identity and claims to academic and vocational qualifications will be verified
- We inform shortlisted candidates that online searches may be done as part of pre-recruitment checks and due diligence. Please refer to our Safer Recruitment policy
- References will be taken up by direct contact with referees
- Evidence of the date of birth and address of the applicant will be obtained
- Where appropriate, an Enhanced Disclosure and Barring Service Check will be conducted.

Where a position requires an Enhanced DBS check this will be made clear on the job advert and application form and a statement\* explaining Creative Sport & Leisure Ltd.'s commitment to Safeguarding & Prevent will be documented. All applicants will complete an application form enabling each of them to have the same opportunity to provide information about themselves and assist in identifying any gaps in their employment history.

#### \*Statement of Child Protection- Note to applicants

We are committed to safeguarding and protecting the welfare of our students and expect all staff to share this commitment. An Enhanced Disclosure and Barring Service Certificate will be required for all posts. This post will also be subject to <a href="enhanced checks">enhanced checks</a> as part of our Prevent Duty.

Please note that a conviction may not exclude candidates from appointment but will be considered as part of the recruitment process.

CSL will not share your data with third parties unless your application for employment is successful and we make you an offer of employment. CSL will then share your data with former employers to obtain references for you, and the Disclosure and Barring Service to obtain necessary criminal record checks.

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\*A Disclosure and Barring Service (DBS) check will be required for all posts with access to children or vulnerable adults. Please note that it is an offence to apply, offer or accept to do any work with children (paid or unpaid) if disqualified from working with children.

During Interview, the interviewing team will explore:

- The applicant's attitude and demeanor towards young or vulnerable learners
- The applicant's ability to support our commitment to safeguarding and promoting the welfare of young and vulnerable learners
- Any gaps in the applicant's employment history
- Any concerns or discrepancies arising from the information obtained

A single central register (SCR) will be held for all staff employed by Creative Sport & Leisure Ltd containing details of all DBS checks, and this will be updated on a regular basis by the People Manager.

#### Post appointment

All staff will take part in an induction programme which will vary dependent on the nature of the role. The purpose of this to be:

- Provide awareness and explanations of all relevant policies and procedures
- Provide support for the role in which they have been engaged
- Provide opportunities for a new member of staff to ask questions or discuss concerns relating to their role or responsibilities
- To be introduced to the team and working environment
- To provide log in details for appropriate software
- Issue laptop and phone
- Enable individual line managers and colleagues to recognise any concerns about the person's ability or suitability from the outset and address them if deemed appropriate
- Ensure that individuals are aware of reporting concerns and who the Designated persons for Safeguarding / Prevent
- Ensure that individuals are aware of other relevant policies and procedures, i.e. disciplinary procedure, E & D policy, Health and Safety etc.
- To undertake Safeguarding, Prevent, Internet Safety and Equality and Diversity training amongst other mandatory training required for the role

#### **Probation Periods**

All staff employed by Creative Sport & Leisure will be subject to a Probationary Period of three months before being allocated a permanent appointment/fixed term contract. To provide suitable support for each member of staff and an opportunity to seek support and clarification in their role. A number of action planning /review meetings will take place during this period before final confirmation of employment is given.

If for any reason the member of staff is found not suitable for permanent employment, then the concerns and remedial actions documented at reviews will be used as a basis for dismissal.

#### **Staff Code of Conduct**

The code of conduct should guide all actions taken by staff and anyone else working on behalf of Creative Sport & Leisure Ltd. If it is necessary to act contrary to it (for example visiting a learner in the home) you should only do so after discussion and approval with your line manager.



- Place the safety and well-being of learners first before any organisation or personal goals and before any loyalty to colleagues or friends
- Help and assist in developing a culture in which any member of staff can feel comfortable about pointing out to another member of staff that his/her behaviour is, or may have been inappropriate
- Be committed to actively preventing the exploitation, abuse, and radicalisation of young or vulnerable learners
- Respect all individual learners regardless of any protected characteristic (as defined within the Equality Act 2010), or ability and treat each individual learner with respect and dignity
- Respect each learner's boundaries and help them to develop their own sense of rights, as well as helping them to know what they can do if they feel there is a problem

The focus of your relationship with any learner you have through the course of your work should always remain professional and you should always act in a professional manner. You should never develop a personal relationship, and you should avoid socialising with learners online or in person on occasions where it does not constitute part of your normal duties and avoid establishing relationships through the use of social media such as Twitter, Instagram, Chat forums or Facebook. Additionally:

- Do not take illegal drugs whilst at work, do not drink alcohol prior to or during contact with learners, use a tobacco product or any form of drug or medication. You should not assist learners in anyway in obtaining these items
- Do not engage in or tolerate the bullying or harassment of any person
- Do not engage with any learners outside of work in any private conversations in person or online
- Never engage in or tolerate inappropriate physical activity such as "horse play"
- Ensure lone working with young or vulnerable learners is undertaken with caution and awareness in mind
- Maintain a safe and appropriate emotional and physical distance from young or vulnerable learners
- DO NOT make sexual or discriminatory comments of any kind
- DO NOT engage in rough or sexually provocative games
- DO NOT make sexual comments/innuendos
- DO NOT lend or borrow money or property
- DO NOT forge exclusive or secretive relationships
- DO NOT invite young or vulnerable learners into your home
- DO NOT supply inappropriate reading materials or facilitate inappropriate internet use
- DO NOT use unacceptable forms of restraint

It is essential to have guidelines to follow to minimise the possibility for abuse, misunderstanding and misinterpretation. All employees should be aware of the potential for misunderstanding when touching or coming into contact with young or vulnerable learners. If it is an accepted part of a course, touching should be appropriate to the situation and if applicable all relevant guidelines should be followed. Consoling a young or vulnerable learner who is upset and administering first aid are examples of necessary and acceptable behaviour. Employees should, however, endeavour to minimise any possible misunderstanding of their actions.

## **Safeguarding Staff**

All learner applications are checked to raise any disclosures which may flag up a Safeguarding risk. If previous concerns about a learner are disclosed a risk assessment must be undertaken. Relevant risk assessments will then take place. All files will then be held centrally in the Safeguarding file on SharePoint (restricted access) If paper copies are forwarded on from previous education providers, then these will be held at Head Office in a securely locked cabinet.

All files of learners disclosing information which is deemed to be a concern MUST BE PASSED onto the Deputy Designated Safeguarding Lead following GDPR protocols (password protected attachments). If a learner is deemed a significant risk to other students or staff this must be raised immediately.



During the enrolment of new learners, if staff are made aware of additional information which is considered to be a safeguarding risk this information must also be passed on immediately to the Deputy Designated Safeguarding Lead and enrollment paused to ensure a risk assessment can be put in place to support the learner, employer and CSL staff

#### Work Experience, External Speakers, and Events Policy

Creative Sport & Leisure Ltd recognises that there will be times when staff and learners will be exposed to the views of external speakers either invited into deliver training or through external events. Through the Prevent Risk Assessment, Work Experience Checklist and the External Speakers and Events Policy it aims to eradicate or minimise the risk of learners being exposed to extremist ideas to protect the welfare of staff and learners.

Any decision to invite an external speaker into Creative Sport & Leisure Ltd to deliver a guest presentation or to host/attend an event will be officially proposed through - using our External Speakers and Events Policy *form"* and will consider the following:

- The speaker or event being organised is necessary to expose the learner to new experiences and challenges and is totally necessary to the delivery of the learner's programme of study
- The speaker / organisation and event does not provide support or a platform for the encouragement of extremist ideas that could lead to a learner being radicalised and terrorist's activity
- The views of the speakers are not considered to constitute extremist views likely to draw people into terrorism but at the same time do allow the speaker and learners to express their views within the boundaries of freedom of speech
- If it is not clear following thorough checks that the views of speakers are likely to be extremist, then the event will not be allowed to proceed

If during a presentation or event the visitor or speaker presents with extremist views these will be challenged with opposing views during the event, and if required the event will be ended should this be deemed necessary. Creative Sport & Leisure Ltd has most of its learners in the workplace involved in offsite activities. These fall broadly into two areas:

#### Trips/Visits off Campus - Work Based Learning and Work Experience

Trips / visits must be carefully planned, and staff must have parental consent forms for all young people (18 and under) and vulnerable adults. They must be risk assessed and students' vulnerabilities considered.

We ensure that all learners who are placed with employers and are working or learning off site are in appropriate settings and that a comprehensive Pre-Employment check is carried out.

#### Online - Computer Safety - Online Safety and Filtering and Monitoring Policy

Vulnerable individuals may suffer abuse or be exploited in many ways by abusers and radicalisers. This could be through direct face to face contact, or indirectly Online, through the internet, social networking, or other media.

Access to extremist material is often through leaflets and local contacts. However, the internet plays an important role in the communication of extremist views. It provides a platform for extremists to promote their cause and encourage debate through websites, internet forums and social networking. It is a swift and effective mechanism for disseminating propaganda material and is not always possible to regulate.

Likewise airing one's views and ideas on social media or even just posting a picture can lead to abusive replies, attempts to groom individuals to post other images etc. These are all forms of abuse and staff need to look out for signs that a learner may be being abused.

Staff at Creative Sport & Leisure should be aware of anyone making frequent visits to websites showing images Company Policy 9 / Managing Learning 20 Page 15 of 24



such as armed conflict around the world and providing speeches and access to material from those involved in the radicalising process.

It is the responsibility of all staff to ensure that they are aware of their responsibility to report anything they see that contravenes CSL's Filtering and Monitoring Policy and have a responsibility to report all findings to the Safeguarding & Prevent Team. A dedicated website to report online content that may be illegal is available at <a href="https://www.direct.gov.uk/en/CrimeJusticeAndTheLaw/Counterterrorism/DG">www.direct.gov.uk/en/CrimeJusticeAndTheLaw/Counterterrorism/DG</a> 183993

#### Reporting Procedure abuse, neglect and exploitation and or radicalisation

Reporting procedure to undertake following a young or vulnerable learner confiding about or suspecting a case of abuse, neglect, exploitation and or radicalisation

Where a young or vulnerable learner seeks out a member of staff to confide in and shares information about abuse, neglect, exploitation and or radicalisation or talks spontaneously individually or in groups, our staff will:

- Listen carefully to them, and do not directly question them
- Give them time and attention
- Allow the person to give a spontaneous account: do not stop the person who is freely recalling significant events
- Make an accurate record of the information given taking care to record timing, setting and people present, the person's presentation as well as what was said. Do not discard that as it may be later needed as evidence.
- Use the persons own words where possible
- Explain they cannot promise not to speak to others about the information they have shared

#### Reassure the person that:

- You are glad that they have told them
- That he/she has not done anything wrong
- What you are going to do next
- Explain that help will need to be sought to keep them safe

The person should NOT be asked to repeat his/her accounts to anyone.

The On Duty Safeguarding & Prevent Team member must be informed immediately, who will investigate the concern and take appropriate action. All records of the investigation will be kept strictly confidential and stored in a secure place. Outside agencies and resources in Child Protection can and will be used to assist the company.

#### **Procedure for Dealing with Allegations Against Staff**

This applies should anyone have concerns regarding inappropriate behaviour by a member of staff where they have:

- Behaved inappropriately in a way that has harmed or may have harmed a learner
- Possibly committed a criminal offence against or related to a learner
- Behaved towards a learner in a way that indicates he/she is unsuitable to work with them

An investigation will take place which:

- Will determine if the police need to be involved immediately to protect the person further
- Will record all details received and secure them safely
- Will ensure the alleged member of staff is fully conversant of the allegation, is supported where relevant and free from victimisation
- Will determine whether suspension is appropriate whist undertaking the investigation



All allegations will be acted upon, however due to the variance in the risk levels. All allegations will be treated individually, and the appropriate actions assigned on a case by case basis.

# **Anonymous Allegations**

Concerns raised anonymously tend to be far less effective, and depending on the levels of information, the matter may not be investigated at all.

The decision taken to investigate the matter further will depend upon:

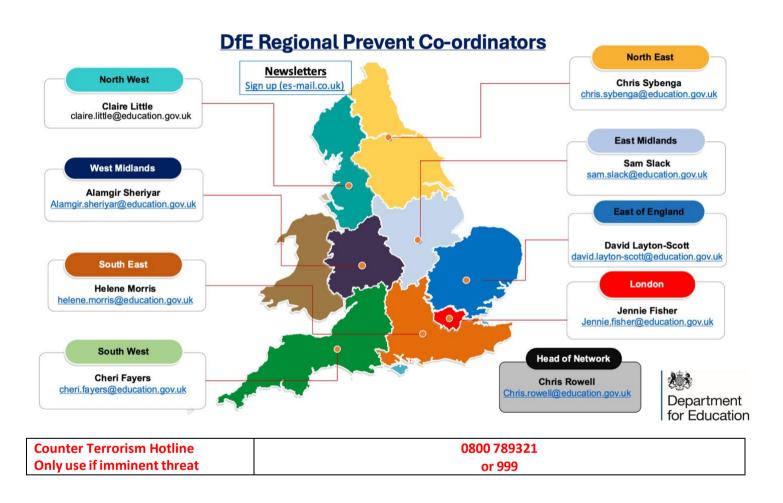
- The seriousness of the matter
- Whether the concern is believable
- Whether an investigation can be carried out on the information provided



# Appendix A

# **Regional Prevent Coordinators**

The refocused Prevent strategy recommended the appointment of regional coordinators to facilitate engagement between different organisations at a local level. Contact details for each regional coordinator can be found below. The coordinators provide information on the Prevent strategy, details of training courses related to Prevent (such as Workshop to Raise Awareness of Prevent - WRAP) and links to relevant stakeholders in each region including the local authority.





# Appendix B

# Child on Child Abuse

Creative Sport & Leisure recognises that some learners experience sexual violence, sexual harassment and or may suffer abuse from their peers in person and online. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

Any incidents relating to Child-on-Child abuse and or sexual violence/harassment will be managed in the same way as any other child protection concern and will follow the same procedures. We will seek advice and support from other agencies as appropriate. In all cases, if staff are unsure, they should always speak to the deputy designated safeguarding lead.

# Child on Child Abuse -formally known as Peer-on-Peer Sexual Abuse

Child on Child sexual abuse occurs between young people who are of a similar age and/or stage of development. It can take place between two peers or amongst a group. It is normal for young people to display certain types of sexual behaviour as part of healthy development, and it is the role of adults who work with young people to identify any sexualised behaviour that is harmful or abusive and respond proportionally.

Abuse can take place in any setting either supervised or unsupervised for example: online, in classroom settings, toilets, outside settings and corridors (NSPCC April 2021). Abusive behaviour can take many forms but may consist of:

- Unwanted touching
- Pressure or coercing others to perform or take part in sexual acts or to share nude or sexualised imagery
- Using sexual language
- Sharing or taking sexual images without consent (for example up-skirting)

Although it is widely known amongst young people that sending sexualised or nude images of an under 18 is illegal, (Ofsted June 2021) research has shown that the sending and receiving of sexualised imagery and content is prevalent amongst young people with some considering it the norm.

Staff must never ask to see, willingly access, view or share any images that have been brought to their attention. It is the responsibility of the police to assess if images sent are from an aggravated or experimental motivation and consider the appropriate intervention with support from education, local safeguarding teams and social care.

Safeguarding staff are to refer to the guidance on .GOV <u>Sharing nudes and semi-nudes: advice for working with children and young people' (December 2020)</u> to support decision making. It is important that all staff work to create a safe environment that provides students with an opportunity to share their experiences and concerns. Staff need to challenge language which is inappropriate or demonstrates societal stereotypes and biases.



# Appendix C

Useful links for Learners - parents - carers, partners and staff

**Early Help** – The government defines Early Help as 'support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse'

To find your local Early Help link go to your local Council website and type in Early Help and you will be guided to the correct process for your area. Contact Safeguarding as they can provide and support you with the right information for each area.

# **National reporting and helplines**

- Child Exploitation and Online Protection center report concerns to CEOP using the "Click CEOP" button
- ACT Terrorism Website Action Counters Terrorism Report Suspicious Activity
- <u>Internet Watch Foundation</u> report illegal images/content online Under 18
- NSPCC | The UK children's charity | NSPCC Link to main website Everything we do protects children today and prevents abuse tomorrow, to transform society for every childhood
- Childline NSPCC Childline Service
- NSPCC Online Safety
- Revenge Porn Helpline Support for adult victims of intimate image abuse in the UK (NB if under 18s are involved, report to CEOP or Police)
- Online abuse | NSPCC Support for learners, parents and carers of online abuse
- Protecting children from county lines | NSPCC Learning
- Report Harmful Content Report harmful content online
- Support for victims of modern slavery\_- Leaflets outlining support in different languages

# **Charities and support services**

- Children's Society. Child criminal exploitation and county lines
- <u>Anti-Bullying Alliance</u> The Anti-Bullying Alliance is a coalition of organisations and individuals that are united against bullying
- <u>The Marie Collins Foundation</u> offer a cohesive approach to addressing the needs of children abused via the internet and mobile technologies.
- <u>The Lucy Faithfull Foundation</u> Work to prevent abuse from happening in the first place and to prevent it from happening again if it already has (including child on child abuse)
- Home Women's Aid Working together against domestic abuse. Also link to <u>Online and digital abuse -</u>
  Women's Aid
- The Samaritans: <u>Supporting Schools</u>
- Mind, the mental health charity help for mental health problems
- Papyrus Prevention of young suicide
- Young Minds Mental health support and guidance
- Mosaic Trust LGBTQ+ Support
- Womankind FGM Organisations offering Advice and Support
- Male Victims of Domestic Abuse Mankind Mankind | Directory of Services
- <u>Domestic Abuse Helpline for Men | Men's Advice Line UK</u>
- What Is Forced Marriage? leaflet (publishing.service.gov.uk)
- Forced marriage guidance .GOV
- Ashiana Org Standing Up to Violence Against Women and Girls
- Imkaan Black feminist organisation addressing violence against Black and minoritised women and girls



- 'Honour'-based violence Refuge Charity Domestic Violence Help
- Forced marriage | Childline
- 'Honour'-based violence Refuge Charity Domestic Violence Help
- Coercive control Women's Aid -Support and advice
- Action Fraud report consumer and online fraud
- Homeless England Support for homelessness

# Useful links for parents and carers

- Internet Matters Information from BT, Sky, Talk Talk and Virgin
  - □ Parents pack posters, banners and presentations to use with parents
  - Digital resilience toolkits
  - □ Leaflets
  - What the experts say
- Childnet Information for parents and carers on Internet Safety
  - □ Family agreements and conversation starters
  - □ Supporting Young People Online Leaflets
  - ☐ Keeping under-fives safe online Leaflets
  - ☐ Music, TV, Film and the Internet Leaflets
  - □ Parents resource sheet
  - □ Screen time boundaries
  - □ Digital Wellbeing guidance
  - Critical thinking
  - □ Live Streaming
  - UK Safer Internet Centre parent advice
  - The Parent Zone guidance for parents and professionals working with families
  - Parent Info Excellent resource to include on school/setting websites
  - NSPCC Online Safety NSPCC Online Safety advice
  - O2 and NSPCC
  - Talking to your child Internet Safety
  - Barnardo's Follow me Online Safety Hub
  - Get Safe Online
  - Family Online Safety Institute (FOSI)
  - <u>netlingo</u> common online acronyms and text speak e.g. LOL, POS
  - NSPCC Online Games

### **Links for Foster Carers and Adoptive parents**

- Think U Know: Specific Risks Keeping children in Care safe online
- Think U Know: Placement Plans
- Safer Internet Centre: Advice for foster carers and adoptive parents
- Protecting children from county lines | NSPCC Learning



# **Links to Government Policy papers**

- Keeping Children Safe in Education September 2024 (incorporating Child-on-Child Abuse Sexual Violence and Sexual Harassment) Working Together to Safeguard Children 2024
- Childrens Act 1998
- Children's Act 2004
- Safeguarding Vulnerable Groups Act SVGA (2006 amended 2012)
- What to do if you're worried about a child being abused Advice for Practitioners March 2015
- Children Missing Education
- The Care Act 2014 Updates 2016 Under Review 1st July 2023 March 2024 Updates
- Section 5B of the FGM Act 2003 Mandatory reporting of FGM
- Protection of Freedoms Act (2012)
- Human Rights Act 1998 (legislation.gov.uk)
- Disclosure and Barring Service Code of Practice (2012) Revised version November 2017
- Sexual Offences Act (2003) Under Review
- Every Child Matters (2004)
- Equality Act (2010)
- CONTEST JULY 2023
- Section 26 of the Counter Terrorism Act 2015
- Prevent duty guidance: for England and Wales Updated 6 March 2024
- HMG Channel Duty Guidance v14
- Data Protection Act and GDPR 2018
- Education and Training (Welfare of Children) Act 2021

### **ESSEX** support groups

- Essex Schools Infolink Safeguarding
- Essex County Council Family Operation Hub \_ 03456037627 Out of hours 03456061212
- NELFT provides an extensive range of integrated community and mental health services in Essex
- Essex Children and Young People and Families Directory of Services

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# Other support groups and charities





National Debtline 0808 808 4000; www.nationaldebtline.co.uk



Support for lone parents; 2 0808 802 0925; www.gingerbread.org.uk



BEAMS is a local charity for people with eating disorders and offers mental health support. 2 01268 442059 or 07944 189640;

# PRINK

Frank about drugs; ☎ 0800 776600; 🖳 www.talktofrank.com

NHS choices Community Drug & Alcohol Services (cdas)

Basildon 01268 583154 Sankey House, 81 High Road, Pitsea, SS13 3BB

Grays 01375 375361 Grays Hall, Orsett Road, Grays RM17 5TT

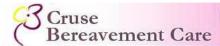
Help, information and advice if you or somebody you know is experiencing problems with drugs and/or alcohol



Sexual health issues for both men and women including information and advice for contraception,

unplanned pregnancy, etc. 2 0845 300 8090 www.mariestopes.org.uk





Daytime Helpline: 0844 477 9400

Email: helpline@cruse.org.uk





www.dialbasildon.co.uk



For expert care and emotional support for cancer patients 2 0808 808 2020; www.macmillan.org.uk



www.citizensadvice.org.uk or enter your postcode online to find your nearest branch



Debt Charity https://www.stepchange.org/



Supporting LGBTQ+ youth across South East Essex (Southend) - www.figuringitout.org.uk