



Safeguarding and Prevent Policy, Strategy and Procedures

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Policy Statement

Sporting Equals works in partnership with a wide range of individuals and organisations throughout the UK. We recognise that some of the people we encounter, including children, young people, and adults at risk, may be experiencing, or be vulnerable to, abuse, harm, or neglect.

All staff, volunteers and Trustees of Sporting Equals play an important role in promoting the welfare and protection of the children, young people, and adults at risk with whom the Charity works. The Board of Trustees holds the ultimate responsibility for safeguarding in the organisation.

This policy sets out how Sporting Equals prevents, recognises and responds to safeguarding concerns.

Sporting Equals is an organisation focused on race equity and as such, we recognise that racism, racial discrimination and racialised bias are, in and of themselves, safeguarding concerns, and that individuals from Racially and Ethnically Marginalised backgrounds experience additional and specific barriers to being heard and adequately protected. Thus, this policy commits Sporting Equals to safeguarding practices that are anti-racist, anti-discriminatory, and culturally competent.

It provides a framework so that everyone within Sporting Equals' scope has the information and support they require to act.

Going beyond our duties to children, young people and adults at risk, Sporting Equals considers the potential harm to any individual affected by our work and takes proportionate measures to prevent it.

Strategic aims of this policy

This policy contributes to the protection and safeguarding of children, young people and adults at risk by:

- Adopting a whole-charity approach to safeguarding.
- Adopting a person-centred and child-focused approach, consistent with the principles of the Children Acts 1989 and 2004, the Care Act 2014, and other relevant statutory guidance.
- Clarifying standards of behaviour for Trustees, staff and volunteers (and others identified under 'Scope' below)
- Alerting staff and Trustees to the signs and indicators of possible harm, abuse, neglect, and radicalisation, including how racial bias can affect whether those signs are recognised and acted on
- Setting out clear procedures for reporting concerns

- Developing the awareness of Trustees and staff of the causes of abuse and the risks people may face
- Equipping staff and Trustees to identify and challenge racism and discrimination, not simply to be aware of it
- Addressing concerns at the earliest possible stage
- Reducing the risk of people being exposed to multiple harms, including violence, extremism, exploitation, discrimination or victimisation
- Recognising risk and supporting online safety for people, including in the home

This means that we will:

- Identify and protect all people, with particular attention to those at heightened or compounded risk
- Identify needs as early as possible, seek and act on the voice and lived experience of vulnerable people, and design plans to meet those needs

Values

Sporting Equals is committed to promoting an inclusive, respectful and safe environment where everyone is treated with dignity, fairness and respect. Our organisational values underpin the culture and behaviours expected across all areas of our work. These values are:

- **Creativity:** Finding creative ways to challenge and drive the sport and physical activity sector, and ourselves, to be better.
- **Energy:** To be relentless and unwavering in our enthusiasm to drive positive change.
- **Honesty:** To speak candidly and transparently so that we can be the best we can be.
- **Inclusion:** Ensuring that all are proactively welcome and have a genuine sense of belonging.
- **Leadership:** Being accountable and responsible in our everyday actions.

We expect all staff, trustees, volunteers, associates and partners to uphold these values in the delivery of their roles and interactions with others.

Scope

This policy, strategy and procedures will always apply when Sporting Equals is delivering its work, including services, activities, events and programme, whether delivered directly or through partners. It applies to:

- The Board of Trustees
- Staff
- Partners in delivery
- Associate workforce (i.e. tutors, mentors)
- Volunteers
- Contractors
- Course organisers
- Associates who provide a service to the Charity
- Committees, sub-committees and working groups coordinated by Sporting Equals
- All Sporting Equals activities and events

In this document, we will refer to **children, young people and adults at risk** collectively as **people**, except where the distinction matters. We recognise that children and adults are protected under different legislation, that reporting routes may differ, and that the policy applies the correct framework in each case. Paid employees of Sporting Equals are referred to as “staff”. We also engage with an associate workforce from time to time; for the purpose of this document, they are also referred to as “staff”.

As the charity is overseen by a board of trustees, they hold the ultimate legal responsibility for safeguarding. For ease of reading, the Trustees are included within the term “staff” where safeguarding procedures are the same. However, where the policy specifies a distinct role or process for Trustees (for example, Board responsibilities, the Trustee safeguarding lead, or allegations involving Trustees or a member of the senior management team), those specific procedures take priority.

Statutory and legal Framework

To safeguard and promote the welfare of children, young people and adults, Sporting Equals acts in accordance with the following legislation, statutory guidance and regulations:

- Keeping Children Safe in Education – September 2025
- Working Together to Safeguard Children March 2026
- The Children Act 1989 and 2004
- The Children and Social Work Act 2017
- The Care Act 2014
- Safeguarding Vulnerable Groups Act 2006
- The Counter Terrorism and Security Act 2015 (which created Prevent Duty)
- Prevent Duty Guidance for England and Wales
- The Equality Act 2010

Other policies that support safeguarding

This document should be used in conjunction with the following Charity policies/procedures where necessary:

- Safe Recruitment
- Code of ethics
- Health and Safety
- Equality, Diversity and inclusion
- Complaints
- Appeals
- Whistleblowing
- Online safety
- Privacy Policy
- Any other policies the Trustees deem relevant

Glossary of Terms:

- **A child:** the United Nations Convention on the Rights of a Child defines a child as any person under the age of 18 years.
- **Adults at risk:** an individual aged 18 years or over and who (a) has needs requiring care and support, whether or not the local authority is currently meeting those needs or not; (b) is experiencing or is at risk of abuse or neglect; and (c) as a result of their care or support needs are unable to protect themselves from risk, or from experiencing abuse or neglect (Care Act 2014, section 42). Sporting Equals uses the term “adults at risk” to reflect the risks that rise from various circumstances and relationships, and not specifically from a person’s inherent characteristic.
- **Disclosure:** is the process by which a child or adult lets someone know that abuse is taking place. This may not happen all at once and can be a gradual process that takes place over a long period.
- **Regulated Activity:** a legal term defining the type of activity that people barred by the Disclosure & Barring Service (DBS) are prohibited from undertaking, which is defined in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, as amended by the Protection of Freedoms Act 2012. Regulated activity with children includes teaching, training, instructing, caring for or supervising children, and providing guidance or advice on their wellbeing. Where Sporting Equals staff, associates or volunteers must undertake regulated activities, we ensure that the appropriate level of DBS checks, including a barred-list check is in place. Full definitions are available at gov.uk
- **Special Educational Needs and Disabilities (SEND):** All staff and individuals associated with Sporting Equals must be aware that additional barriers can exist when recognising abuse and neglect in people with Special Educational Needs (SEN) and disabilities. These include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the person's disability without further exploration.
- The risk that people with SEND are disproportionately impacted by issues such as bullying without the presentation of outward signs.
- Communication barriers and difficulties in overcoming them.
- **Looked After Children:** all staff must be aware of issues around safeguarding looked-after children. The most common reason for a child becoming looked after is because of abuse and/or neglect.
- **Harm:** ill-treatment or the impairment of health or development, including that suffered from seeing or hearing the ill-treatment of another (Children Act 1989, section 31(9), as amended by the Adoption and Children Act 2002).
- **Significant Harm:** this is the threshold that justifies the compulsory intervention in a child's interest under the Children Act 1989. A single traumatic event may constitute significant harm e.g. a violent assault, suffocation or poisoning. But more often, significant harm is a compilation of events, both acute and longstanding, that interrupt, change or damage a child's physical or psychological development.
- **Child Protection:** the procedures undertaken to respond effectively to concerns about a child.
- **Multi-Agency Safeguarding Hub (MASH):** a hub that identifies risks to children and is usually a link between schools, GPs, the police, ambulance service and social care.
- **Safeguarding:** the action taken to promote the welfare of children and adults at risk to protect them from harm. For children, safeguarding means:
 - protection from abuse and maltreatment
 - preventing harm to their health or development
 - ensuring children grow up with the provision of safe and effective care
 - taking action to enable all children and young people to have the best outcomes (Working Together to Safeguard Children, 2026).

For adults, safeguarding means protecting an adult's right to live in safety, free from abuse and neglect (Care Act 2014)

Safeguarding is everyone's responsibility and should be carried out in a way that is anti-racist, anti-discriminatory and culturally competent. Safeguarding actions may be needed to protect people from a range of harms including:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

- Bullying including cyberbullying
- Child abduction
- Child missing from education
- Child missing from home or care
- Child criminal exploitation
- Child sexual exploitation (CSE)
- Child-on-child abuse
- Cybercrime
- Domestic abuse
- Discriminatory abuse
- Substance misuse
- Fabricated or induced illness.
- So-called 'honour' based abuse
- Faith abuse
- Female genital mutilation (FGM)
- Forced marriage
- Financial or material abuse
- Harmful sexual behaviour
- Gangs and youth violence
- Gender-based violence / violence against women and girls (VAWG)
- Organisational abuse
- Modern slavery
- Homophobic, biphobic and transphobic abuse
- Psychological abuse
- Radicalisation and Violent Extremism
- Relationship abuse
- Self-neglect
- Serious violence
- Sexual violence and sexual abuse
- Sexual harassment
- Youth produced sexual imagery
- Trafficking
- County lines
- Coercive behaviour

A more comprehensive list can be found in appendix 1.

- **Concerns that cause harm (the harm threshold):** The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child or adult. Harm may be indicated where an adult has: behaved in a way that has harmed or may have harmed a child or adult; Possibly committed a criminal offence against, or related to, a child or adult; Behaved towards a child or an adult in a way that indicates that they may pose a risk of harm to children or adults; or behaved in a way that indicates they may be unsuitable to work with children or adults.

- **Low level concerns or poor practice:** any concern about an adult's behaviour towards, or concerning, a child or another adult that does not meet the harms threshold above or is not serious enough to consider a referral externally at the time of reporting.
- **Concerns not meeting the harm threshold (originated from a low-level concern):** concerns more serious than low-level but not meeting statutory thresholds.
- **Allegation:** a concern that meets the harm threshold and requires external referral.
- **Extremism:** the Government's 2011 Prevent strategy defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. It also includes calls for the death of members of our armed forces, whether in this country or overseas.
- **Non-violent extremism:** extremism, as defined above, which is not accompanied by violence.
- **Prevent:** actions to safeguard people from becoming terrorists or supporting terrorism, and to protect those who are being targeted by terrorist recruiters. Prevent concerns all forms of terrorism and does not focus on any one community.
- **Radicalisation:** the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism:** action that endangers or causes serious violence to a person or people; causes serious damage to property; or seriously interferes or disrupts an electronic system, where the use or threat of that action is designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause (Terrorism Act 2000, section 1).

Guiding Principles of Safeguarding

Sporting Equals' approach to safeguarding is underpinned by the following principles:

- Safeguarding is everyone's responsibility. Every Trustee, member of staff, associate, volunteer and partner has a role in keeping children, young people, and adults at risk safe.
- The welfare of the child is paramount. In all decisions affecting a child, the child's welfare is the paramount consideration (Children Act 1989).
- A person-centred approach. We work with people, not simply do things to them. As such, we seek and act on the voice, wishes and lived experience of those affected.

- The six principles of adult safeguarding set out in the Care Act 2014 guide our work with adults at risk: empowerment, prevention, proportionality, protection, partnership and accountability.
- Anti-racist and anti-discriminatory practice. We recognise that racism, bias and discrimination affect who is seen, heard and protected. We actively identify and challenge them, and ensure our safeguarding practice is culturally competent and accessible to all communities.
- Early action. Concerns are addressed at the earliest possible stage to prevent harm escalating.

This policy is organised around the following areas:

- Prevention and responsibilities - the delivery and pastoral support offered to people and the creation of and maintenance of a whole-Charity proactive ethos that keep people safe.
- Procedures for identifying and reporting cases, or suspected cases of abuse or radicalisation.
- Supporting children and adults at risk those who may have been abused or who have witnessed violence towards others.
- Preventing unsuitable people working with children, and adults at risk
- Reporting.

Prevention and responsibilities

We recognise that high self-esteem, confidence, supportive relationships and good lines of communication help to protect people. The Charity will therefore:

- Establish and maintain an environment in both the real and virtual world, where people feel safe and are encouraged to speak up, and are listened to.
- Ensure people know that there are adults in the Charity they can approach if they are worried or in difficulty, and that their concerns will be taken seriously and acted upon promptly.
- Support staff who make disclosures or report concerns, including under the Whistleblowing policy.

Further information with regards to the government's Prevent Strategy is available at: <https://www.gov.uk/government/publications/prevent-strategy-2011>

Responsibilities

All staff and Trustees will:

- Read and understand this document, along with the associated policies that support safeguarding.
- Know who the Charity's Designated Safeguarding Lead (DSL) and Director/Trustee responsible for safeguarding are and be able to approach them for advice and support.
- Follow the principles identified in the policy statement and guiding principles.

- Identify concerns early and be prepared to identify children or adults at risk who may benefit from early help or support.
- Receive appropriate safeguarding and Prevent training.
- Be kept regularly updated with safeguarding and Prevent updates (at least annually) to provide them with the relevant skills and knowledge required to safeguard and protect people.
- Know what to do if a child or adult tells them they are being abused, exploited or neglected, and how to maintain confidentiality unless required otherwise.
- Be able to re-assure those affected that they are being taken seriously and will be supported and that everything will be done to promote safety.
- Be aware of the process for making referrals - to local authority children's social care and for statutory assessments under the Children Act 1989, and to local authority adult social care and Safeguarding Adults Board under section 42 of the Care Act 2014 and be aware of the role they may play in such assessments.
- Be aware of the types of abuse, neglect, exploitation and radicalisation (Appendix 1), understanding that children and adults can be at risk of harm both inside and outside of work, and inside and outside of the home and online.
- Have the confidence and knowledge to identify children or adults at risk of being drawn to terrorism.
- Be aware that people may not always be ready or able to talk about their experiences, recognise that they are being abused, exploited, neglected or recognise that what they experienced was harmful.
- Be aware that abuse, neglect, safeguarding and Prevent issues are rarely standalone events and cannot be covered by one definition. In most cases, multiple issues overlap.
- Be aware that bias and discrimination can affect whether a concern is recognised and acted upon and actively guard against this in their own work and practice.

The Sporting Equals Board will:

- Appoint a safeguarding Director/Trustee lead who will oversee this policy, be suitably trained and report to the Board; and work with the DSL to ensure Sporting Equals are high performing in relation to safeguarding and Prevent.
- Ensure that an effective Safeguarding Policy and associated policies are in place which are updated at least annually and that the Charity contributes to inter-agency working in line with statutory guidance.
- Ensure that the Charity's Safeguarding arrangements consider the procedures and practice local authorities as part of the inter-agency safeguarding procedures set up by the Local Safeguarding Children's Partnerships and Adult Safeguarding Boards.
- Ensure that the policies and procedures in place enable appropriate action to be taken in a timely manner to safeguard and promote welfare.
- Ensure that a Designated Safeguarding Lead (DSL) is appointed within the staff team to lead on safeguarding, advise/support staff and liaise with the Local

Authority and other agencies. They will have status and authority to carry out the role e.g. commit resources to safeguarding and direct staff as appropriate.

- Scrutinise regular reports detailing the numbers and types of safeguarding incidents and concerns, along with updates from the DSL, the Director/Trustee responsible for safeguarding and the Chief Executive Officer.
- Ensure that training is updated yearly in accordance with government guidance or training policy.
- Hold a safeguarding central record where the DSL, CEO and Director/Trustee responsible for safeguarding have access.
- Hold a staffing and Trustee central record where the DSL Director/Trustee responsible for safeguarding has access to DBS, right to work in the UK and references for all staff.
- Ensure staff and Trustee DBS checks are maintained via the DBS update service.
- Ensure every member of staff, paid and unpaid can execute their responsibilities, identified within this policy.

Board Reporting and Assurance

The Board of Trustees will receive regular safeguarding assurance reports at least quarterly via the People and Remuneration Committee, or more frequently where required.

Reports will include, where appropriate:

- the number and nature of safeguarding concerns raised;
- themes, trends and learning identified;
- actions taken and outcomes;
- safeguarding training compliance;
- DBS and safer-recruitment compliance;
- safeguarding risks relating to partner organisations;
- policy breaches or significant concerns;
- updates on safeguarding action plans;
- analysis of safeguarding data for any disproportionality, including ethnicity in the concerns raised, the referrals made, and the outcomes reached

Serious safeguarding incidents will be escalated promptly to the Chair, the safeguarding lead Director/trustee and Chief Executive. Where required, Sporting Equals will comply with Charity Commission Serious Incident Reporting requirements and any other regulatory obligations.

Operational Management of Safeguarding:

Sporting Equals will manage safeguarding operationally through the following groups:

Internal safeguarding and Prevent group:

- Membership: Director/Trustee responsible for safeguarding, the Designated Safeguarding Lead, the CEO and where appropriate the Head of Human Resources
- The internal safeguarding group will meet quarterly and review policies relevant to safeguarding in line with the annual review schedule.
- Propose changes and updates to policies, and recommendation to the board for approval by the People and Remuneration Committee
- Presents a quarterly report to the People and Remuneration Committee as identified above, to be progressed to the board

Case management group:

- Deal with safeguarding concerns that require formal investigation outside of statutory agency referral processes.
- Membership: appropriate qualified independent investigators (internal or external), and other individuals with relevant safeguarding expertise where appropriate. The group will be supported by the Lead Director/Trustee and Designated Safeguarding Lead. However, they will have no influence over investigations or outcomes. They are in a coordinating role.

The case management group will:

- Carry out safeguarding investigations and ensure investigations are conducted fairly, proportionately and independently. Review findings and recommendations and ensure appropriate safeguarding actions are implemented.
- Where allegations involve senior staff, Trustees or potential conflicts of interest, Sporting Equals may appoint an external independent investigator to ensure impartiality and maintain confidence in the process.
- Decisions by this group must be independent from any Trustee or staff member and its recommendations should be acted upon by the Internal Safeguarding and Prevent group.
- The group's work feeds into the quarterly reporting to the Board

The Director/Trustee Safeguarding Lead will:

- Oversee the monitoring and annual review of this policy and its procedures, reporting to the People and Remuneration Committee of proposed changes and any other policies that need developing or modifying
- Report to the Board of Trustees on cases identifying issues and learning whilst respecting confidentiality
- Inform the board of issues related to Race equity and safeguarding
- Oversee, with the DSL the Sporting Equals safeguarding action plan
- Ensure suitable training is provided for Board of trustees and staff

- Chair the internal safeguarding group and case management group
- Provide an Annual Safeguarding report for the Sporting Equals Board, detailing any changes to the policy and procedures; training undertaken by self, Trustees, staff with specific responsibility and all other staff and number and type of incidents/cases.

The Designated Safeguarding Lead will:

- Undertake required training (both trained to the same level) and access continual professional development opportunities regularly (refresher training annually)
- Manage referrals (Local Children's Services, MASH, Channel, Police and the Safeguarding Adults Board for adults at risk)
- Act as a point of contact with safeguarding partners (i.e. LADO, Adult Safeguarding Board)
- Provide support, advice and guidance for any staff member, person and employer with a safeguarding or child protection concern
- Work with the CEO to strategically oversee online safety responsibilities, ensuring risk assessments, filtering systems addresses these areas appropriately.
- Take responsibility for case management
- Keep detailed, accurate, confidential and secure written records of concerns, disclosures and referrals. Ensure all such records are kept confidentially and securely.
- Ensure staff are aware and have access to the Safeguarding and Prevent Policy, which is reviewed annually.
- Communicate regularly to staff about safeguarding and Prevent updates.
- Ensure as a Charity, we are meeting legal and statutory requirements
- Ensure that the Safeguarding and Prevent statement and Policy is available publicly
- Ensure the quality assurance of the provision of safeguarding information, advice and guidance and procedures
- Obtain access to resources
- Deal with allegations against staff
- Liaise with the internal safeguarding and prevent group any other relevant staff to inform of any issues/ongoing investigations
- Encourage a culture of listening to children and adults, considering their wishes and feelings to best support and protect them.
- Liaise with the Sporting Equals Board through the Director/Trustee responsible for safeguarding and People and Remuneration committee to inform them of issues.

Details of the Designated Safeguarding Leads can be found below:

- Designated Safeguarding Lead: Ianthe Mumford
- Deputy Designated Safeguarding Lead: Tim Masih
- Director /Trustee responsible for Safeguarding: Richard Grainger

If you wish to contact someone from the Sporting Equals Safeguarding team, please email safeguarding@sportingequals.org.uk or call on 0121 777 1375.

With regards to Sporting Equals' liaison with other agencies, we will endeavour to:

- Develop effective links with relevant services to promote the safety and welfare of all people.
- Co-operate pro-actively, in line with Working Together to Safeguard Children (2026), with key agencies in their enquiries regarding child protection or Prevent matters.
- Establish and maintain links with regional Prevent Leads and the Police Channel Coordinator
- Work closely with Sport England and its delivery and systems partners, particularly in relation to issues related to race equity and safeguarding.

Record Keeping:

Sporting Equals will:

- Keep clear, detailed, accurate, written records of any safeguarding concerns (noting the date, event and action taken), even where there is no need to refer the matter to an external agency
- Ensure all records are kept securely in an area only available to the DSL and Director responsible for safeguarding

Confidentiality and information sharing

Sporting Equals will:

- Store and handle child and adult-at-risk protection information in line with the UK GDPR and the Data Protection Act 2018. Data protection law does not prevent staff from sharing information with relevant agencies where doing so may help to protect a child or adult at risk. Child or adult at risk protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children/adult at risk and parents do not have an automatic right to see them. If any member of staff receives a request from a person or parent to see child/adult at risk protection requests, they will refer to the DSL or Director/Trustee responsible for safeguarding.

- Share information on a "need to know" basis and seek advice from the DSL or Director/Trustee responsible for safeguarding in any case of doubt.
- Make staff aware of their professional responsibility to share information with other agencies to safeguard children and adults at risk where required.
- Be clear with children and adults at risk who want to make a disclosure that staff cannot promise to keep secrets.

Communication with parents and carers:

Sporting Equals will:

- Inform parents and carers, via the Charity's website, of the responsibilities placed on the Charity and staff in relation to safeguarding.
- Undertake appropriate discussion with parents and carers before involving another agency, unless doing so could increase the risk to the child or adult at risk or exacerbate the situation; in which case advice will be sought from social care first, in line with the Local Safeguarding Children Partnership inter-agency procedures.

Procedures for Handling Concerns

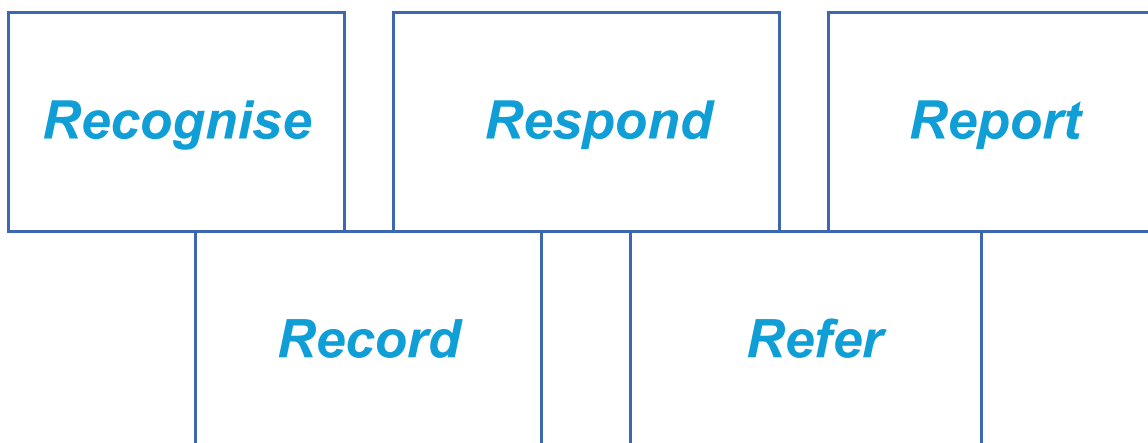
Our procedures account for the Local Safeguarding Children Partnership, the Adult Safeguarding Board procedure and Channel guidance. Concerns, disclosures and allegations are taken seriously and dealt with as soon as possible.

The wishes of the person affected, and their protection are central when considering immediate actions.

The Designated Safeguarding Leads (DSL) should be the first point of contact. A DSL is responsible for conducting any investigation.

Dealing with a safeguarding issue:

If there are concerns that a child or adult at risk may be in danger, appropriate action must be taken to prevent further risk. We use 5 guiding actions when dealing with safeguarding issues known as the 5Rs:



- **Recognise:** Be aware and understand the indicators and signs of potential abuse, neglect, exploitation, harm and radicalisation. Be aware too that bias and discrimination can affect whether signs are recognised, for example the adultification of Black children, and guard against this. Relevant training can support you to recognise these.
- **Respond:** If you do have a safeguarding concern, it is essential that you respond appropriately; do not ignore the situation.
- **Report:** Safeguarding concerns must be reported without delay. Confidentiality is important so only share information with those who are part of the safeguarding process. Ensure you speak to a DSL.
- **Record:** Note the who, where, what, why and when of safeguarding. Take notes that detail everything about your concern, doing this as soon as possible.
- **Refer:** It is for the DSLs to review the concern and decide whether the disclosure must be escalated onto the relevant authorities. However, if an individual is under immediate or severe threat or danger, contact the relevant local authority or police directly.

Additional advice:

- Listen carefully and stay calm.
- You cannot promise that the information will remain confidential
- Do not investigate or interrogate the reporter. Use open questions only, to clarify your understanding of what you have been told, and do not put words in their mouth. Reassure the child or adult at risk that, by telling you, they have done the right thing.
- If the child or adult at risk declines to discuss the incident, you must inform the DSL.
- In no circumstances should you investigate the allegation or disclosure yourself. Report it immediately to a DSL or if they are unavailable, please contact one of the members of the Safeguarding and Prevent group. Do not share any information about the allegation or disclosure outside of the Safeguarding and Prevent group.

Procedure For Staff Disclosures

Staff concerns about a person

If staff have any concerns about a person, these must be referred to the DSL as soon as possible, who will then assess the severity of the concern.

Staff should complete the Safeguarding Disclosure Form. Options can include referral to external specialist services, or pastoral support and local monitoring. Providing early help is more effective in promoting the welfare of children and adults at risk than reacting later.

Staff **may** be required to support other agencies and professionals in an early help assessment and share information to support early identification and assessment. The DSLs will take the lead on working with external agencies.

If a person makes a disclosure to a member of staff

If a person makes a disclosure to a member of staff, the person should be acknowledged, taken seriously and listened to. As soon as it becomes clear that the person is talking about a safeguarding issue, you need to gently let them know that if they continue you have a **legal obligation** to pass this information on to the DSL. **You cannot promise confidentiality to the person.** Reassure them but explain that a record will be made. It is important not to ask too many questions as you **must not under any circumstances investigate any accusations.**

Allow the person to freely recall significant events, keeping questions to the absolute minimum necessary to ensure a clear and accurate understanding of what has been said. Record the factual details on the Safeguarding Disclosure Form, contact the DSL immediately and pass on your written notes. The DSL will set out the next steps; take no further action yourself.

If a member of staff receives information about a person from someone else.

If a member of staff receives information about a person, which suggests that there is a safeguarding issue or that this is likely, this must be recorded on the Safeguarding Disclosure Form and reported immediately to the DSL. The DSL will assess the severity of the issue.

If a member of staff suspects a safeguarding concern

If a member of staff suspects that a person is at risk from a safeguarding issue, they must discuss these concerns with one of the DSLs and not take any independent action. The concerns must be recorded on the Safeguarding Disclosure Form.

All contact with external agencies regarding safeguarding concerns should be routed through a Designated Safeguarding Lead (DSL) to ensure a coordinated and supported response.

However, we recognise that in exceptional circumstances, a staff member, volunteer, or Trustee may feel that a concern has not been addressed, or they may wish to raise

a concern independently. In such cases, or in an emergency, individuals have the right to contact external agencies (such as the Local Authority, Police, or the Charity Commission) directly. We encourage anyone who feels their concerns have not been adequately handled to utilise our formal Whistleblowing Policy, which provides a confidential route for reporting issues without fear of detriment.

Furthermore, parents and carers have the right to be informed in respect of concerns or actions taken to safeguard and promote their welfare, provided this does not compromise the person's safety.

Support will be offered to people led by the DSL.

The DSL should keep a log and follow up, where relevant, for updates from recognised referral agencies where appropriate. This is reflective of all three procedures and will be dependent on the level of risk.

Concerns about another Staff Member

There may be concerns about a Sporting Equals member of staff. The Whistleblowing policy identifies grounds for whistleblowing including:

- Criminal offences (e.g. fraud, blackmail, bribery, corruption)
- Endangering someone's health and safety
- Damage to the environment
- A miscarriage of justice
- A failure to comply with legal and regulatory obligation
- A safeguarding concern
- Improper conduct or unethical behaviour including unauthorised disclosure of confidential information
- Attempting to conceal any of the above

Please refer to the Whistleblowing procedure for further information.

Receiving an allegation about a member of staff

- Allegations may arise where a member of Sporting Equals staff has or may have behaved in a way that has harmed, or may have harmed, a child, young person or adult at risk.
- Possibly committed a criminal offence against, or related to, a child, young person or adult at risk.
Behaved towards a child, young person or adult at risk in a way that indicates they may pose a risk of harm; or
- Behaved in a way that indicates they may be unsuitable to work with children, young people or adults at risk.

Sporting Equals recognises that an allegation of child abuse or abuse to adults at risk of harm made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and conduct thorough investigations without delay.

A member of staff who receives an allegation about a colleague from a person at risk of harm will follow the guidelines in the Safeguarding Procedure above. This will ensure the person's needs are met. On some occasions concern may not arise from a direct disclosure. If observations of staff behaviour give rise for concern of inappropriateness, these must be shared directly with a DSL.

The DSL will contact the Local Authority Multi Agency Safeguarding Hub (MASH)) for children under 18 or the Adult Safeguarding Board for adults at risk of harm to discuss referral and action if required. Appropriate internal action will be taken to safeguard the child/adult at risk.

In matters relating to extremism, these should be referred to the local Prevent team.

Sexual violence, abuse, harassment and behaviour procedure

Where there is a report of sexual violence, a DSL is to do an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by case basis. The risk and needs assessment will consider:

- The person affected (especially their protection and support);
- Whether there may have been other victims,
- The alleged perpetrator(s); and
- All the people, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments will be recorded (written or electronic) and kept under review. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. This risk assessment will not replace the Sporting Equals risk assessment. At all times, we will actively consider the risks posed to people and put adequate measures in place to protect them and keep them safe.

Reports will be managed in one of the following ways:

- Internally: we may take the view that the person(s) concerned are not in need of early help or require referrals to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising the behaviour and bullying policies and by providing internal support. All actions related to the case will be recorded.
- Early help: we may decide that where the person is a child, they do not require referral to statutory services but may benefit from early help. Early help means providing support as soon as a problem emerges, at any point in a child's life. We could also:
 - Refer to children's social care
 - Report to the police.

The needs and wishes of the person will be paramount (along with protecting the child/adult) in any response. Support will be tailored on a case-by-case basis.

Wherever possible, the person if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the person's daily experience as normal as possible.

For any scenario or incident relating to sexual abuse, violence, harassment or behaviour, we will review our actions, relevant policies and identify lessons learnt. This could constitute staff training to minimise the risk of further situations.

Initial assessment by the DSL

The DSL will make an initial assessment of any allegation, issue or concern. Where the allegation is potentially a criminal act, or indicates that the person has suffered, is suffering or is likely to suffer significant harm, the matter will be dealt with under the relevant Local Safeguarding Children Board procedures or in the case of adult abuse, the Adult Safeguarding Unit. The police may also be contacted.

The initial assessment will be based on the information received, with a decision being made as to whether the allegation warrants further investigation.

Other potential outcomes may be that:

- the allegation represents inappropriate behaviour or poor practice by the member of staff but is neither potentially a crime nor a cause of significant harm to the child or adult at risk of harm. The matter will be addressed through professional development or mentoring or in some cases more appropriate, the Charity's Disciplinary Policy and Procedure.
- the allegation can be shown to be false because the facts alleged could not possibly be true, in which case the person concerned will be reassured and supported as appropriate.

Enquiries and investigations

Child and Adult protection enquiries by Children's Social Care, Adult Services or the Police are not to be confused with internal, disciplinary enquiries by Sporting Equals. The Charity may be able to use the outcome of external agency enquiries as part of its own procedures. Neither the Child Protection Agencies nor the Police have power to direct the Charity to act in a particular way; however, Sporting Equals will always assist the agencies with their enquiries.

If there is an investigation by an external agency, for example, the Police, the DSL will normally be involved in and contribute to the inter-agency strategy discussions. The DSL is responsible for ensuring that the Charity gives every assistance with the agency's enquiries. They will ensure that the appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made. The DSL shall advise the member of staff that they may seek additional advice and support.

Following discussion with the LADO/Adult Safeguarding Board, the Police or other investigating agency, the DSL shall:

- ensure that the parents/carers of the child or adult at risk making the allegation have been informed that the allegation has been made and what the likely process will involve.
- inform the member of staff against whom the allegation was made of the fact that the allegation was made. Where investigation is taking place, they will be informed of what the likely process will involve and what support may be available

Written records of the action taken in connection with the allegation will be kept.

Suspension of Staff

Suspension occurs only for good reason, for example:

- Where there is a cause to suspect a child or adult is at risk of significant harm.
- Where the allegations warrant investigation by the Police or potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.
- Where necessary for the good and efficient conduct of the investigation.

Suspension is not automatic; a member of staff may be suspended on full pay whilst an investigation is undertaken (if they are employed through PAYE Sporting Equals – not as an associate). If the member of staff is an associate, work with the staff member will stop until the investigation has been carried out. Suspension can only be carried out by a DSL.

Prior to making the decision to suspend, the DSL will interview the member of staff. This will occur with the approval of the LADO/Adult Safeguarding Board where possible. If the Police are engaged in an investigation, the officer in charge of the case will be consulted. The process will follow Sporting Equals Disciplinary Procedures.

Where suspension is instigated and or something that could result in dismissal for gross misconduct which harmed a child or placed a child at risk, Sporting Equals will refer them to the Disclosure and Barring Service (DBS). Referral to DBS also applies to action taken in relation to adults at risk of harm.

If the staff member is subject to registration by a professional body or regulator, for example, OFSTED, the LADO will advise on whether a referral to that body is appropriate.

If it is decided that a member of staff who has been suspended from work can return, Sporting Equals will facilitate their return to work and consider how the member of staff's contact with the child or children who made the allegation can be best managed. The DBS will be notified that the suspension has been lifted.

Disciplinary Investigation

The disciplinary investigation will be conducted in accordance with Sporting Equals' existing Disciplinary Policy and Procedure. The member of staff will be informed of:

- The disciplinary allegation against them

- Their entitlement to be represented by a work companion
- The Charity's awareness of the personal impact the allegation may have and the support the Charity is able to offer for example, counselling

Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension will be lifted immediately, and arrangements made for the member of staff to return to work.

The child, children or adult at risk of harm, making the allegation, and/or parent will be informed of the outcome of the investigation and proceedings. This will occur prior to the return to work of the member of staff (if suspended).

Allegations without Foundation

False allegations may be indicative of problems of abuse elsewhere. A record will be kept and consideration given to a referral to Local Safeguarding Children's Partnerships / Adult Safeguarding Boards, in order that other agencies may act upon the information.

The Charity (a DSL) shall:

- Inform the member of staff against whom the allegation is made orally and in writing that no further action will be taken.
- Reassure them of the Charity's understanding of the personal impact that false allegations may have and the support that Sporting Equals will continue to offer.
- Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.
- Where the allegation was made by a child/adult at risk of harm other than the alleged victim, consideration to be given to informing the parents/carers of that child/adult at risk of harm.
- Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.
- Remove allegations from member of staff's personal file.

If a staff member has concerns about a partner organisation in delivery

If staff members have any concerns about a partner organisation they are working with, this must be referred to their line manager if it is not related to safeguarding i.e. health and safety. If the issue is a safeguarding concern, please refer to the DSL.

Please note, Sporting Equals has a responsibility to ensure the health, safety and welfare of all people undertaking programmes with partner organisations. Sporting Equals will ensure that partners are aware of this document and their responsibilities for compliance in relation to Safeguarding and the Prevent duty for any person who is placed with them and that arrangements are in place to ensure that a person's wellbeing is safeguarded.

Even if the partner organisation has safeguarding policy and procedures in place this does not stop Sporting Equals applying the procedures in this document.

Concerns About a Partner Organisation

In the event of an allegation of child/adult at risk abuse being committed by a partner organisation, the DSL will report this to the appropriate organisation and support in their procedure to investigate the matter. The case will still be recorded in the Sporting Equals log of incidents.

Should the DSL not be satisfied with the partner organisation outcome the Sporting Equals procedure will be followed.

Concerns about Safeguarding Practices

All staff should feel able to raise concerns about poor or unsafe practice and potential failures in the Charity's safeguarding practices and that such concerns would be taken seriously by the Sporting Equals Board.

If staff members have any concerns about the Sporting Equals' safeguarding regime, they should raise this initially with their Line Manager.

If no immediate action is taken, then appropriate Whistle-blowing Procedures are in place for such concerns to be raised with the Board.

Where a staff member feels unable to raise an issue with Sporting Equals or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

General guidance can be found at - [Advice on whistleblowing](#)

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 - line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: help@nspcc.org.uk.

Alternatively, staff can write to: National Society for the Prevention of Cruelty to Children (NSPCC) Weston House 42 Curtain Road London EC2A 3NH.

Low-level concern procedure

As identified prior in this document, a low-level concern or poor practice is defined as any concern about an adult's behaviour towards, or concerning, a child or another adult that does not meet the harms threshold above or is not serious enough to consider a referral externally at the time of reporting. The concern may not pose an immediate risk.

Low-level concerns are differentiated from concerns that cause harm. The harms threshold is the point at which a concern is no longer low-level and constitutes a threat of harm to a child or adult. Sporting Equals recognises that while low-level concerns are by their nature, less serious than concerns which meet the threshold identified above, serious safeguarding concerns often begin with low-level concerns.

Examples of low-level concerns may include:

- Being over-friendly with a person

- Having favourites
- Engaging with a child or adult at risk one to one in a secluded area

Concerns will be categorised as follows:

- **Low level concern:** behaviour that is inconsistent with the Charity code of ethics but does not meet the harm threshold
- **Concerns not meeting the harm threshold:** More serious than low level but not meeting statutory thresholds. These will be reviewed for patterns
- **Allegations:** Meeting the harm threshold and requiring external referral.

Sharing low level concerns

It is critical that all low-level concerns are shared with the Designated Safeguarding Lead. Having one recipient of all such concerns should allow any potential patterns of concerning, problematic or inappropriate behaviour to be identified, and ensure that no information is potentially lost.

Concerns should be shared as soon as reasonably possible, within 24 hours of becoming aware of the concern where it relates to a specific incident. However, it is never too late to share a concern, and a delay should not be seen as a barrier to sharing.

Low level concerns can be made verbally or by completing an incident form. This can be found in the appendix.

In the event of concerns about the DSL please inform the Director responsible for safeguarding. If there are concerns about both, please inform the Chief Executive of Sporting Equals.

If the staff member who raises the concern does not wish to be named, then the Designated Safeguarding Lead will respect the staff member's wishes as far as possible.

Self-reporting a low-level concern

There may be occasions where a staff member may feel they have acted in a way that:

- could be misinterpreted
- could appear compromising to others
- falls below the standards set out in the Code of Ethics

The DSL will maintain a culture of approachability for all staff members and will be understanding and sensitive towards those who self-report. Staff members who self-report will not be treated more favourably during any investigations than staff members who have been reported by somebody else. Their self-awareness will however be taken into consideration.

Staff training

Sporting Equals will provide Safeguarding and Prevent training for all staff and Trustees, from induction, updated yearly (in accordance with legal/statutory guidance or best practice), covering:

- The Charity's legislative responsibilities
- Their personal responsibilities
- The Charity's policies and procedures
- The need to be alert to the signs and indicators of possible abuse and radicalisation
- The recognition and challenge of bias, discrimination, including adultification and anti-racism practice
- The need to record concerns
- How to support and respond to children and adults at risk who report abuse
- Sporting Equals ensures that all staff and Trustees receive safeguarding induction training upon appointment
- Annual safeguarding updates and refreshers
- Role-appropriate accredited safeguarding training at intervals determined by organisational policy and safeguarding risk

Designated Safeguarding Leads will undertake enhanced safeguarding training and refresher training in line with statutory guidance and best practice"

- Staff have access to relevant resources, relevant to their role
- That all staff, paid and unpaid, recognise their duty and feel able to raise concerns about poor or unsafe practice regarding children and adults at risk and that such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle-blowing policies

Online Safety

We recognise our responsibility to ensure a safe environment to learn and work, including online. Our Designated Safeguarding Lead and Governance lead works with our IT provider to make appropriate decisions on required filtering and monitoring to safeguard staff from harmful and inappropriate content online. This is reviewed annually unless there is a safeguarding incident which involves online activity, which therefore requires a system review. Any alerts will be logged and acted upon in line with safeguarding procedures.

At the point of induction with any new staff, we share our Online Safety policy which provides guidance on operating safely online. During our induction, we also share suggestions on what content can be deemed as unsafe, such as (list not exhaustive):

- Discrimination
- Extremism
- Gambling related harm
- Malware/hacking
- Drugs/substance abuse
- Pornography
- Self-harm
- Violence
- Piracy and copyright theft

We also advise partners to use appropriate filtering and monitoring systems and regularly review their effectiveness.

Cyber-bullying by people, via texts, emails, sexting and sharing indecent images will be treated as seriously as any other type of bullying and will be managed through liaising with the partner and through our disciplinary system.

Social networking sites can also be sources of inappropriate and harmful behaviour. Any inappropriate behaviour will be dealt with as per the process above.

Photographs and Videos

To protect people, we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in publications). Consent must be obtained via a Sporting Equals consent form.
- Ensure people are appropriately dressed.
- Encourage people to tell us if they are worried about any photographs that are taken of them.
- Ensure that members of staff delete any associated images of people once they have been sent to Sporting Equals

Mobile devices and digital safety

Staff and people are expected to use mobile devices responsibly. The use of personal devices in work environments is discouraged unless explicitly permitted. Incident such as sharing indecent images, sexting, or online harassment using mobile phones will be treated as serious safeguarding concerns.

The Prevent Duty

We are aware of our commitment to protecting staff and people from the risk of harm and adhere to the Prevent Duty, including the updated statutory guidance (2024). The aim of Prevent is to stop people from becoming terrorists or supporting terrorism. It aims to:

- tackle the ideological causes of terrorism.
- intervene early to support people susceptible to radicalisation.
- enable people who have already engaged in terrorism to disengage and rehabilitate.

We understand that Prevent is one of the key pillars of CONTEST (The UK's counter-terrorism strategy). The other pillars are:

- **Pursue:** to stop terrorist attacks
- **Protect:** to strengthen our protection against a terrorist attack
- **Prepare:** to mitigate the impact of a terrorist attack

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

- Critical - an attack is highly likely in the near future.
- Severe - an attack is highly likely.
- Substantial - an attack is likely.
- Moderate - an attack is possible but not likely.
- Low - an attack is unlikely.

In our efforts to comply with the Duty (and the updated Prevent Duty guidance in 2023), we have embedded several actions in our safeguarding and prevent risk assessment, which documents risks and actions we need to take. This risk assessment is owned by the Safeguarding Working Group who update it regularly and communicate relevant updates to staff. We feel that this document helps us to:

1. Ensure that people and staff are aware of their roles and responsibilities in preventing violent extremism and reporting concerns.
2. Promote an inclusive, respectful culture grounded in our values and our obligations under the Equality Act 2010
3. Ensure staff have appropriate training and updates on Prevent
4. Provide support for people who may be at risk by providing appropriate sources of guidance.

Discharging the Prevent duty fairly and without discrimination

Sporting Equals specifically endeavours to discharge its Prevent duty under section 26 of the Counterterrorism and Security Act 2015 in a way that does not stigmatise or disproportionately target any specific community. Prevent concerns all forms of terrorism and is not directed at any one faith or ethnic group. In practice:

- A referral must be based on genuine, evidenced concern about a person's susceptibility to radicalisation. It should never be based on a person's race, religion, nationality, appearance, or political or religious views alone.
- Before any Prevent referral is made, the DSL will consider whether the concern could reflect bias or assumption and will satisfy themselves that the referral threshold is met.
- Sporting Equals will monitor the demographic profile, including ethnicity and religion of Prevent concerns raised and referrals made, and report this to the Board as part of safeguarding assurance, so that any disproportionality can be identified and addressed.
- Prevent training will include awareness of the documented concerns about disproportionality and of the duty to apply the threshold consistently and without discrimination.

External Speakers and Events

Sporting Equals have a policy and procedure for external speakers and events, which all staff comply with so any risks associated with safeguarding or individuals being drawn to terrorism can be mitigated against.

Sporting Equals will assess the risks associated with any planned events and consider carefully whether the views likely to be expressed constitute extremist views that may risk drawing people into terrorism. Only where Sporting Equals is confident that any such risk can be fully mitigated will the event be allowed to proceed.

Sporting Equals will comply with its legal duties in terms of both ensuring freedom of speech and preventing radicalisation. Any potential concerns by staff should be raised following the normal safeguarding reporting procedure so the DSL can assess the appropriateness of the external speaker or event or assess the suitability of any external facilities identified.

Referral Pathway for Prevent - Channel

It is recognised that on occasions people may be identified as requiring support for issues connected to radicalisation and extremism. In these cases, the DSL will review the case and where it is considered appropriate to seek external support a Prevent referral will be made with a view to assessment of the case for the Channel programme. Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. An individual's engagement with the programme is entirely voluntary at all stages. Where a Prevent referral is adopted, we will co-operate with local authority-led Channel panels as required.

Support for referrals or other advice can be obtained from the DfE regional coordinator network or by contacting the police on 101 or asking for the Police and Prevent team.

Reporting

Our Safeguarding Disclosure Form should be used to report any disclosure. For concerns relating to Prevent, a Prevent Disclosure Form should be completed. This can be requested from Sporting Equals at any time. The form must be completed immediately following the awareness of a safeguarding/prevent concern or disclosure and sent directly to a DSL. The form should be completed as accurately and fully as possible, but if all information is not available this should not stop the form being submitted as quickly as possible.

For low level concerns, individuals are required to complete low-level concerns form which can also be found in the appendix. Please note, that low level concerns can also be expressed verbally to a DSL.

Appendix 1-Types of Abuse and Further Information

Staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. The following pages identify types of abuse and further information on safeguarding and prevent issues.

Physical Abuse

Physical abuse causes harm to a child/ adult at risk. It may involve hitting, shaking, throwing, poisoning, scalding, drowning or suffocating. It may be done deliberately or recklessly or be the result of deliberate failure to prevent injury occurring.

Emotional and Psychological Abuse

Emotional and psychological abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the child's or adult at risk's behaviour and emotional development, resulting in low self-worth. Some level of emotional and psychological abuse is present in all forms of abuse.

Sexual Abuse

Involves forcing or enticing a child/adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child/adult aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children/adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Neglect

Neglect is the persistent or severe failure to meet a child or adult at risk's basic physical and/or psychological needs. It will result in serious impairment of the child/adult at risk's health or development. This could involve ignoring medical, emotional or physical care needs and the withholding of the necessities of life, such as medication, adequate nutrition and heating.

Bullying, including cyberbullying

Under the Children Act 1989, a bullying incident should be addressed as a child protection concern when there is 'reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm'. Where this is the case, staff should report their concerns to the DSL. Even where safeguarding is not considered to be an issue, Sporting Equals may need to draw on a range of external services to support the person who is experiencing bullying, or to tackle any underlying issue which has contributed to a person engaging in bullying.

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take

many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences.

Please note, bullying is child to child. An adult cannot bully a child. This would fall under one of the other abuse categories (neglect, sexual, emotional, physical).

Child abduction

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Child Missing from Education

A young person going missing from education is a potential indicator of abuse or neglect. It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, FGM and forced marriage. Any concerns should be referred to the DSL.

Child Missing from Home or Care

- **Young runaway:** a child who has run away from their home or care placement or feels they have been forced or lured to leave.
- **Missing child:** a child reported as missing to the police by their family or carers. If a member of staff suspects that a child is running away, the normal safeguarding procedures apply, and this must be reported to the DSL.
- **Looked after Child:** a child who is looked after by a local authority by reason of a care order or being accommodated under section 20 of the Children Act 1989.
- **Care Leaver:** an eligible, relevant or former relevant child as defined by the Children Act 1989.

Child Criminal Exploitation

This can occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in criminal activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence.

Some specific forms of child criminal exploitation can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or

manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons or begin to carry weapons (such as a knife) for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the indicators for boys and girls may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of sexual abuse and can be a one-off occurrence or might happen over time. All children and young people can experience child sexual exploitation. This includes 16- and 17-year-olds, who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

- Child Sexual Exploitation involves exploitative, contexts and relationships where young people receive something (for example food, drugs, alcohol, gifts or in some cases simply affection) to entice them to engage in sexual activities
- Sexual exploration can take many different forms, from the seemingly “consensual” relationships to serious organised crime involving gangs and groups
- Exploitation is marked out by an imbalance of power in the relationship and involves varying degrees of coercion, intimidation and sexual bullying including cyberbullying and grooming
- It is important to recognise that some people who are being sexually exploited do not show any external signs of this abuse and may not recognise it as abuse
- Young people who go missing can be at increased risk of sexual exploitation and so procedures should be put in place to ensure an appropriate response should any young person go missing, particularly on repeat occasions
- The Charity will refer to the Keeping Children Safe in Education (September 2025) and seek advice from the Social Care Team and/or the LSCB if there is a concern that a young person may be at risk

Children and the court system

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age-appropriate guides to support children 5-11-year-olds and 12–17-year-olds.

Child-on-Child Abuse

All staff should be aware that children can abuse other children. It is important that staff recognise the indicators and signs of child-on-child abuse and know how to identify it and respond to any reports. Child-on-child abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Staff have a responsibility to challenge inappropriate behaviours between peers. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

If a member of staff has any concerns or believe a child is at risk, they must speak to a DSL who will investigate accordingly.

Cyber Crime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Children and adults with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child or adult in this area, the DSL should consider referring into the Cyber Choices programme.

Coercive Behaviour

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim. Serious Crime Act 2015.

It is considered a form of domestic abuse when:

- It occurs repeatedly or continuously, and the perpetrator and victim are personally connected (e.g. intimate partners or family members), and the behaviour has a serious effect on the victim, such as:
 - Causing them to fear, on at least two occasions, that violence will be used against them, or
 - Causing them serious alarm or distress that has a substantial adverse effect on their usual day-to-day activities.

Examples of Coercive Behaviour:

- Isolating a person from friends and family
- Monitoring their time or movements
- Controlling finances
- Repeatedly putting them down
- Threatening to harm them, their children or pets

Discriminatory and racist abuse

Discriminatory abuse is one of the ten categories of abuse set out in the Care and support statutory guidance which is issued under the Care Act 2014 (in Chapter 14, paragraph 14.17). It is abuse motivated by, or targeting, a person's actual or perceived protected characteristic under the Equality Act 2010, which includes race, religion or belief, disability, sex, gender reassignment, sexual orientation and age. Racialised discriminatory abuse includes:

- racist abuse,
- harassment,
- slurs,

- "jokes" and exclusion;
- the use of racist or discriminatory language, imagery or online content; unequal or unfair treatment connected to a protected characteristic;
- and victimisation of a person for raising a discrimination concern.

Racism may be interpersonal (experienced between individual), institutional or structural. Sporting Equals treats racism in any of these forms as a safeguarding concern in its own right and does not solely view such circumstances as an equality, equity or HR matter.

Staff should be alert to the ways discrimination can compound other harms and act as a barrier to disclosure.

Adultification bias which is where Black children in particular are perceived as older, less innocent or less vulnerable than they are, can lead to their safeguarding needs being overlooked. People from ethnically minoritised communities may also face barriers including distrust of statutory services, fear of a racialised response when they access the support services, immigration-status concerns, or language barriers. Staff must guard against these dynamics in how they recognise, report and respond to concerns. Concerns are reported to a DSL in the usual way and recorded so that patterns and disproportionality can be identified.

Domestic Abuse

The Domestic Abuse Act came into force in 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. Types of domestic abuse include:

- intimate partner violence
- abuse by family members
- teenage relationship abuse
- child to parent abuse

Staff should be aware that all children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

The DSL should be notified of Domestic Abuse incidents where the police have been called and that involve young people under their jurisdiction, and they will take appropriate action to ensure children/adults at risk are kept safe.

Substance misuse and Child or adults at risk protection

The discovery that a child/adult at risk is misusing legal or illegal substances or reported evidence of their substance misuse is not necessarily sufficient to initiate child/adult at risk protection proceedings, but the Charity will consider such actions in the following situations, where there is evidence or reasonable cause:

- To believe the child or adult at risk substance misuse may cause him or her to be vulnerable to other abuse such as sexual abuse
- To believe the child's substance related behaviour is a result of abuse or because of pressure or incentives from others, particularly adults
- Where the misuse is suspected of being linked to parent/carer substance misuse

Children/Adults at risk of Substance Misusing Parents/Carers;

- Misuse of drugs and /or alcohol is strongly associated with Significant Harm to children/adults at risk, especially when combined with other features such as domestic violence
- When the Charity receives information about drug and alcohol abuse by a child/adult at risk's parents/carers they will follow appropriate procedures

This is particularly important if the following factors are present:

- Use of the family resources to finance the parent's dependency, characterised by inadequate food, heat and clothing for the children/adult at risk
- Children/adult at risks exposed to unsuitable caregivers or visitors e.g. customers or drug dealers
- The effects of alcohol leading to an inappropriate display of sexual and/or aggressive behaviours
- Chaotic drug and alcohol use leading to emotional unavailability, irrational behaviour and reduced parental vigilance
- Disturbed moods because of withdrawal symptoms or dependency
- Unsafe storage of drugs and/or alcohol or injecting equipment
- Drugs and/or alcohol having an adverse impact on the growth and development of an unborn child

Fabricated or Induced Illness

There are three main ways of a parent/carer fabricating or inducing illness in a child. These are not mutually exclusive and include:

- Fabrication of signs and symptoms which may include fabrication of past medical history.

- Fabrication of signs and symptoms and falsification of hospital charts and records, and specimens of bodily fluids. This may include falsification of letters and documents.
- Induction of illness by a variety of means.

So-called 'honour' based abuse

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL.

Faith Abuse

Faith abuse is child abuse linked to faith or belief. This includes: belief in concepts of witchcraft and spirit possession which involves demons or the devil acting through children or leading them astray (traditionally seen in some Christian beliefs), the evil eye or djinns (traditionally known in some Islamic faith contexts) and dakini (in the Hindu context); ritual or muti murders where the killing of children is believed to bring supernatural benefits or the use of their body parts is believed to produce potent magical remedies; and use of belief in magic or witchcraft to create fear in children to make them more compliant when they are being trafficked for domestic slavery or sexual exploitation. This is not an exhaustive list.

Female Genital Mutilation (FGM)

Female Genital Mutilation includes procedures that intentionally alter or injure the female genital organs for non-medical reasons.

FGM is carried out on children between the ages of 0-15, depending on the community in which they live. It has a short- and long-term effects on physical and psychological health. FGM is internationally recognised as a violation of the human rights of girls and women, and is illegal in most countries, including the UK.

The Charity takes these concerns seriously and staff will be made aware of the possible signs and indicators that may alert them to the possibility of FGM. Any indication that FGM is a risk, is imminent, or has already taken place will be dealt with under the child protection procedures outlined in this document. Particular regard

should be given to a child, who has returned from an extended holiday, and this should always be followed up and any concerns reported to a DSL. This however needs to be done with care and sensitivity, without the automatic assumption that an extended stay in a home country warrants investigation. Where the Charity believes there is a specific risk due to the community it serves further guidance can be found under Part 1 of the Keeping Children Safe in Education (September 2025).

The DSL will make appropriate and timely referrals to Social Care if FGM is suspected. In these cases, parents will not be informed before seeking advice. The case will still be referred to Social Care if it is against the person's wishes.

Forced Marriage

A forced marriage is a marriage without the consent of both parties and where pressure or threats are a factor. This is very different to an arranged marriage, which both parties agree to. It is a criminal offence to force someone to marry another. Signs of concern could include poor punctuality or absences from Charity, low motivation, self-harm, depression, isolation, attempted suicide, eating disorders, other family members forced to marry, family disputes, domestic violence, substance misuse or the person being reported missing from home.

Harmful Sexual Behaviour

Children's sexual behaviour exists on a wide continuum, from normal and developmentally expected, to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). HSB can occur online and/or face to face and can also occur simultaneously between the two.

When considering HSB, ages and the stages of development of the children are critical factors. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. Confidential, specialist support and advice on HSB is available from the specialist sexual violence sector. Examples can be found below:

- Stepanov - [Preventing harmful sexual behaviour in children - Stop It Now](#) provides a guide for parents, carers and professionals to help everyone do their part in keeping children safe, they also run a free confidential helpline.
- The NSPCC provides free and independent advice about HSB: [NSPCC Learning: Protecting children from harmful sexual behaviour](#) and NSPCC - Harmful sexual behaviour framework.

- The Lucy Faithfull Foundation has developed a HSB toolkit, which amongst other things, provides support, advice and information on how to prevent it, links to organisations and helplines, resources about HSB by children, internet safety, sexual development and preventing child sexual abuse.

Gangs and Youth Violence

Gang Activity: Groups of children and young people often gather in public places to socialise, and peer association is an essential feature of most children's transition to adulthood. Groups of children and young people can be disorderly and/or antisocial without engaging in criminal activity. Young people on the periphery of becoming involved with street gangs and those young people already involved in some way can be described as 'A relatively durable, predominantly street-based group of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to the group's identity'.

Youth Violence: Youth violence, serious or otherwise, may be a function of gang activity. However, it could equally represent the behaviour of a child acting individually in response to their particular history and circumstances. 'Serious youth violence' is defined as 'any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19', i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. 'Youth violence' is defined in the same way but also includes assault with injury offences. Most children and young people do not become violent overnight. Their behaviour represents many years of (increasingly) anti-social and aggressive acts.

Gender-based Violence / Violence against Women and Girls

This can include:

- Physical, sexual and psychological violence occurring in the family, within the general community or in institutions, including domestic abuse, rape, incest and child sexual abuse.
- Sexual harassment and intimidation at work and in the public sphere; commercial sexual exploitation, including prostitution, pornography and trafficking.
- Dowry related violence.
- Female genital mutilation.
- Forced and child marriages.
- 'Honour' crimes.
- Commercial sexual exploitation including activities such as pornography, prostitution, stripping, lap dancing, pole dancing and table dancing.

- Sexual harassment and stalking

Mental Health

Mental health includes our emotional, psychological, and social well-being. It affects how we think, feel, and act. Issues may include:

- Relationship problems.
- Family break-up/divorce.
- Depression.
- Study problems.
- Anger Management.
- Self-harming behaviours.
- Feeling dissatisfied with life or self.
- Domestic Violence/Abuse (past/present).
- Stress/Anxiety.
- Bereavement.
- Low self-confidence / self-esteem.
- Issues with drugs or alcohol.
- Suicidal thoughts.

Homophobia, biphobia and transphobia

The fact that a child or adult may be part of the LGBTQIA+ community is not in itself an inherent risk factor for harm. However, children or adults who are LGBTQIA+ can be targeted by others. In some cases, a child or adult who is perceived by others to be LGBTQIA+ (whether they are or not) can be just as vulnerable as children and adults who identify as LGBTQIA+. Staff should be mindful of the barriers these individuals might face and provide support and a safe space for them to share their concerns, if required.

Radicalisation and Violent Extremism

Radicalisation is the process by which a person comes to support terrorism and forms of extremism leading to terrorism. A radicaliser is an individual who encourages others to develop or adopt beliefs and views supportive of terrorism and forms of extremism leading to terrorism. It is recognised that radicalisation pathways can be very different for everyone and that the objective is to identify those people who are most at risk of

radicalisation so that they can be offered support as may be most appropriate in their individual case. Possible signs of radicalisation include:

- The individual's views become increasingly extreme regarding another section of society or government policy
- They are observed downloading, viewing or sharing extremist propaganda from the web
- They become withdrawn and focused on one ideology that can lead to harm
- The individual becomes increasingly intolerant of more moderate views
- The individual may change appearance, their health may suffer (including mental health), and they may become isolated from family, friends, peers or social groups
- The individual expresses a desire/intent to take part in or support extremist activity

Relationship abuse

- **Emotional abuse:** can include constant insults and name calling, isolation from friends and family, controlling what someone wears/where they go, checking up on someone all the time (checking emails, texts, social networking sites etc) and making someone feel responsible for the abuse they are experiencing.
- **Physical abuse:** can include hitting, punching, choking, pushing, biting, kicking, using weapons etc.
- **Sexual abuse:** can include unwanted kissing or touching, forcing someone to have sex, being made to watch pornography against their will and pressure not to use contraception.
- **Financial abuse:** can include the taking and controlling of money, forcing someone to buy things for someone, forcing someone to work or not to work.

Serious Violence

Children might become at risk from or can become involved with serious violent crime. Indicators may include:

- Increased absence for activity or school
- A change in friendships or development of relationships with older individuals or groups
- A significant decline in performance both academic and otherwise
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries

- Unexplained gifts or new possessions (this could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

There are a range of risk factors which increase the likelihood of involvement in serious violence such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Further advice can be found in the Preventing Youth Violence and Gang Involvement and Criminal Exploitation of Children and Vulnerable Adults: County Lines.

Sexual violence and sexual abuse

Sexual violence and sexual abuse can happen anywhere, and all staff working with children and adults at risk through our training provision are advised to maintain an attitude of 'it could happen here'. Staff should be aware of, and respond appropriately to all reports and concerns, including those outside of our training provision, and or online. Any risks or concerns must be reported immediately to the DSL.

When referring to sexual violence, we do so in the context of child-on-child sexual violence. For the purpose of this advice, when referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003, as described below:

- **Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus, or mouth of another person (B) with his penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if: they intentionally penetrates the vagina or anus of another person (B) with a part of their body or anything else, the penetration is sexual, B does not consent to the penetration, and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if: they intentionally touch another person (B), the touching is sexual, B does not consent to the touching, and A does not reasonably believe that B consents. (Note that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)
- **Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: they intentionally cause another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity, and each time activity occurs. Someone consents to vaginal, anal, or oral penetration only if they agree by choice to that penetration and has the freedom and capacity to make that choice.

- A child under the age of 13 can never consent to any form of sexual activity.
- The age of consent is 16 in the UK.
- Sexual intercourse without consent is rape.

Sexual Harassment

When referring to sexual harassment, this is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of a training environment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include:

- Sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual "jokes" or taunting;
- Physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
 - Consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of anyone under the age of 18 is a criminal offence;
 - Sharing of unwanted explicit content;
 - Upskirting (a criminal offence);
 - Sexualised online bullying;
 - Unwanted sexual comments and messages, including, on social media;
 - Sexual exploitation; coercion and threats;

Staff have a responsibility to challenge inappropriate behaviours and prevent an environment that could lead to sexual violence.

Youth Produced Sexual Imagery (Sexting)

Making, possessing and distributing an imagery of someone under 18 which is indecent is illegal. This includes imagery created by under 18s themselves.

The type of incidents covered by this guidance are:

- A person under the age of 18 creates and shares sexual images of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

The sharing of sexual imagery of people under 18 by adults constitutes child sexual abuse and this should be reported to the DSL who will report it to the police.

Trafficking

Trafficking is defined as the recruitment, transportation, transfer, harbouring or receipt of children by means of threat, force or coercion for the purpose of sexual or commercial sexual exploitation or domestic servitude.

The Palermo Protocol establishes children as a special case for whom there are only two components - movement and exploitation. Any child transported for exploitative reasons is a trafficking victim - whether they have been deceived, as it is not considered possible for children to give informed consent.

- A child may be trafficked without crossing any national borders, e.g. can be trafficked within the UK.
- A child may be trafficked between a number of countries prior to being trafficked into/within the UK. The child may have entered the UK illegally or legally (i.e. with immigration documents). The intention to exploit the child underpins the entire process.

The Modern Slavery Act 2015 consolidates current offences of trafficking and slavery and details the different forms of exploitation that a victim of trafficking may be forced into. The exploitation can take place in several ways including:

- Sexual Exploitation
- Labour Exploitation
- Criminal Exploitation
- Domestic Servitude
- Organ Harvesting

Distinction between human trafficking and smuggling:

Human trafficking does not include people smuggling, which requires the consent of the person being moved. A *smuggled person* is; however, a potential victim who may be vulnerable to being trafficked at any point in their journey, and the distinction can be blurred. Perpetrators may smuggle people with the intention of exploiting them, or with the intention of facilitating exploitation. Alternatively, the smuggled can become vulnerable to traffickers upon arrival at their destination and subsequently be exploited and/or harmed

County Lines

The 2018 Home Office Serious Crime Strategy states the NPCC definition of a County Line is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas (within the UK), using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and adult at risks to move (and store) the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement. In some cases, the dealers will take over a local property, normally belonging to a vulnerable person, and use it to operate their criminal activity from. This is known as cuckooing.

People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business.

Children often don't see themselves as victims or realise they have been groomed to get involved in criminality.

The following signs may indicate that a child is being exploited by a county lines gang:

- frequently going missing from school, home or care
- travelling to locations, or being found in areas they have no obvious connections with, including seaside or market towns
- unwillingness to explain their whereabouts
- acquiring money, clothes, accessories or mobile phones which they seem unable to account for
- receiving excessive texts or phone calls at all hours of the day
- having multiple mobile phone handsets or sim cards
- withdrawing or having sudden changes in personality, behaviour or the language they use

- having relationships with controlling or older individuals and groups
- unexplained injuries
- carrying weapons
- significant decline in results or performance
- being isolated from peers or social networks
- associating with or being interested in gang culture
- self-harming or having significant changes in mental health (Ministry of Justice, 2019)

Appendix 2: Safeguarding Disclosure Form

The Sporting Equals Safeguarding Disclosure form can be found [here](#). Please complete this form if you are raising a safeguarding matter or what you believe to be a low-level concern. If possible, please speak with a Designated Safeguarding Lead (DSL) before completing this form. Please complete the form as fully as possible.

If you believe the individual or anyone else is in immediate danger, contact the Police immediately by calling 999.

Appendix 3: Prevent Disclosure Form

The Sporting Equals Prevent Disclosure form can be found [ere](#). Please complete this form if you believe someone is at risk of becoming radicalised and a risk to themselves or others.

If possible, please speak with a Designated Safeguarding Lead (DSL) before completing this form.

If you believe the individual or anyone else is in immediate danger, contact the Police immediately by calling 999.

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