Policy and Procedures for Safeguarding Children

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Policy Statement

Northamptonshire Sport acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice. The policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all children have a positive and enjoyable experience of sport in a safe and child centred environment are protected from abuse whilst participating in sport.

To respond to any concerns relating to children that may be identified whilst participating in sport Northamptonshire Sport acknowledges that some children, including disabled children and children or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

As part of our safeguarding policy Northamptonshire Sport will:

- Maintain a culture of safeguarding, equality and protection, promoting and prioritising the safety and wellbeing of children
- ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children
- ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- prevent the employment/deployment of unsuitable individuals
- ensure robust safeguarding arrangements and procedures are in operation.

The policy and procedures will be widely promoted and are mandatory for everyone involved in Northamptonshire Sport including paid staff, volunteers, partners and stakeholders, contractors and other funded organisations. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

1.1. Policy aims

- To ensure that the welfare and needs of children are of primary importance in the work of Northamptonshire Sport at all levels (strategic planning, advocacy and delivery)
- To ensure good practice is promoted and implemented at ALL times to ensure the safety of children
- To raise awareness of safeguarding issues and implement preventative measures
- To ensure all staff (paid / voluntary) are supported and trained to make informed and confident responses to specific safeguarding issues
- To ensure effective communication to staff (paid / voluntary), parents / carers and participants on safeguarding issues
- To ensure clear procedures are in place, promoted and implemented in line with Northamptonshire Multi-Agency procedures for Child Protection, Working Together to Safeguard Children (2018) and Keeping Children Safe in Education statutory guidance

1.2. Definitions of Terms

Child/Children - A child is a person under the age of 18 years (The Children’s Act 1989). The term children / child will be used throughout this document and encompasses ‘older’ children who otherwise may be referred to as children.

Designated Safeguarding Officer - The designated person within an organisation responsible for Safeguarding (specific responsibilities are outlined in section 3.8 and Appendix D of this policy).

Northamptonshire Sport - the Active Partnership for Northamptonshire. Northamptonshire Sport is partnership of local and national organisations working together to get people in Northamptonshire More Active, More Often. The partnership is led by a core team of staff whose role is to provide leadership and co-ordination of the network.
National Governing Bodies (NGB) - independent, self-appointed organisations that govern their sports through the common consent of their sport.
Partner - organisations or individuals working on behalf of Northamptonshire Sport including those receiving funding from Northamptonshire Sport to deliver agreed outcomes.
Coaches – Anyone who delivers to children including coaches, teachers and instructors.

1.3. The Role of Northamptonshire Sport
Northamptonshire Sport is committed to ensuring that sport, physical activity and recreation across Northamptonshire is both safe and inclusive. It aims to contribute to safeguarding children by:

- Meeting the requirements of the Standards for Safeguarding and Protecting Children in Sport (CPSU 2002)
- Implementing and demonstrating best safeguarding practice when core staff, volunteers or others are providing services, activities and programmes
- Working with partners to establish and implement agreed, consistent minimum safeguarding standards for sport and physical activity locally
- Requiring those individuals or organisations that are funded to provide any service for children to effectively address safeguarding requirements
- Maximising its influence to promote safeguarding practice and principles within its wider partnership role and relationships.

1.4. Using this policy
This policy has been written to work for Northamptonshire Sport taking into account the views and procedures of the wider network to create a single policy that can be adopted by all partners and stakeholders if required.
2. Understanding and Identifying Concerns about Children

Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people (whether in a paid or voluntary capacity) are not experts at such recognition. However, they do have a responsibility to act if they have any concerns about the behaviour of someone (an adult or another child) towards a child. Northamptonshire Sport will therefore encourage and expect core team, and those acting on behalf of the core team, to discuss any concerns they may have about the welfare of a child immediately with the designated welfare officer (contact details can be found in Appendix A). It is not the responsibility of sports staff/volunteers to determine if abuse is occurring. It is however their responsibility to follow the appropriate procedure within this policy. Following the correct procedure will ensure the correct people / agencies are informed and the appropriate action taken.

It is the responsibility of sports staff/volunteers to recognise that some group’s children can be regarded as more vulnerable than others, for example their ethnic background, race, religion, socio-economic position or physical and mental ability. These factors must be considered when recognising signs of abuse and neglect.

2.1. What Constitutes Child Abuse?

2.1.1. Abuse & Poor Practice

The term ‘child abuse’ is used to describe all the ways children are harmed, by adults or peers and often by those they know and trust. It refers to the damage that has been, or may be, done to a child’s physical or mental health or development. This may occur at home, at school or in the community which includes a sport environment.

Poor practice refers to behaviour, generally by staff and volunteers, that contravenes the guidelines identified within this policy and the Northamptonshire Sport Code of Conduct.

2.1.2. Child Abuse

Some adults and children who are motivated to harm children deliberately seek out opportunities to work or volunteer in environments that offer access to children. This may include education and social care settings or other community settings eg. sports clubs.

It is therefore important that any organisation or group that provide services for children have effective recruitment and deployment systems in place which include seeking and following up references and undertake criminal records checks where eligible. This process is designed to limit access to children by those known or believed to represent a risk to them.

2.2. Types of Child Abuse

Neglect

The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs. Neglect in a sport situation could include a coach failing to ensure a pitch is suitable to train on or exposing children to extreme temperatures during a coaching session.

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
Physical abuse in a sport situation may be deemed to occur if the nature and intensity of training and competition exceed the capacity of the child’s development stage. This includes instances where prohibited substances are used to delay puberty, control diet or enhance performance. Another example of physical abuse in sport is a coach physically punishing a child for a performance.

**Sexual Abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children 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). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. There are situations within all sports where the potential for this form of abuse exists. Some individuals have deliberately targeted sports activities in order to gain access to, and abuse, children. There is evidence that individuals have sometimes ignored codes of practice and used physical contact within a coaching role to mask their inappropriate touching of children eg. supporting an athlete on a piece of equipment. Some people have used sporting events as an opportunity to take inappropriate photographs or videos of sportspeople in vulnerable positions. Some people have used involvement in sports clubs as a method of ‘grooming’ children. The term ‘grooming’ refers to the way in which sexual abusers (or potential abusers) manipulate targeted victims, professional carers, colleagues and their environment. They do this to make it easier to abuse children and reduce the likelihood of the child either telling/disclosing or being believed, should they share what is happening.

**Emotional Abuse**

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone. Emotional abuse may occur in sport if children are subjected to constant criticism, name calling, sarcasm, bullying, racism or unrealistic pressure to consistently perform to high expectations. In some circumstances this may come from parents and coaches. As a result of emotional abuse, children may feel nervous, lack confidence and self-worth, and learn to dislike any form of activity. It is up to the coach to lead by example and ensure concerning incidents are handled with care and sensitivity.

**Bullying**

Bullying is deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those being bullied to defend themselves. It can be verbal, written or physical and can include actions such as:

- physical assaults
- name-calling, sarcasm and racist taunts
- threats and gestures
- unwanted physical contact
- graffiti
- stealing or hiding personal items
- being ostracised or ignored

Bullying can also occur via the internet, through blogging and social networking sites, and by phone through text messaging.

The competitive nature of sport makes it an ideal environment for the bully who could be:

- a parent who pushes their child too hard
- a coach who shouts at, or humiliates, children
• a child who actively seeks to make sport a difficult or unhappy experience for others.

2.3. Identifying Signs of Abuse

Recognising abuse is not easy, even for individuals who are experienced in working in this field. Often personal feelings of shock or anger can interfere with the recognition that abuse is, or may be, taking place, and it is easy to deny that it is happening.

Indications that a child may be being abused include the following:
- unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- an injury for which the explanation seems inconsistent
- the child describes what appears to be an abusive act involving him/her
- someone else (a child or adult) expresses concern about their welfare
- unexplained changes in behaviour (eg. becoming very quiet, withdrawn or displaying sudden outbursts of temper)
- inappropriate sexual awareness
- engaging in sexually explicit behaviour
- distrust of adults, particularly those with whom a close relationship would normally be expected
- has difficulty in making friends
- is prevented from socialising with others
- display variations in eating patterns including overeating or loss of appetite
- loses weight for no apparent reason
- becomes increasingly dirty or unkempt
- failure by parents or carers to meet the basic essential needs eg. adequate food, clothes, warmth, hygiene and medical care

It should be recognised that this not a definitive list and the presence of one or more of the indicators is not proof that abuse is actually taking place. It is not the responsibility of those working in sport to decide if abuse is happening but it is their responsibility to act by reporting their concerns when abuse is suspected. (See Appendix B).
3. Good Practice and Procedures

All personnel are required to demonstrate exemplary behaviour in order to ensure the protection and safety of children. The guidelines detailed below provide good practice examples which must be applied along with specific codes of conduct and behaviour (e.g., NGB codes of conduct) which may apply to specific roles, activities or events.

Poor practice and breaches of a position on trust should be immediately acted upon by parties adopting this policy.

3.1. Adopting Good Practice

To assist in becoming more child-focussed and to ensure good practice, it is useful to consider how the needs of the children you interact with will be met. The following list contains examples of good practice that should be adopted.

- Work in accordance with this safeguarding policy - if in doubt contact the designated safeguarding officer.
- Sports coaches/leaders and volunteers are expected to work within the Sport Coach UK code of practice (for sports coaches) or the relevant National Governing Body code of conduct or behaviour.
- Make sport fun and enjoyable, and promote fair play.
- Give enthusiastic and constructive feedback and support.
- Treat everyone fairly and with respect and dignity.
- Build balanced relationships based on mutual trust.
- Empower children to make their own decisions.
- Be an excellent role model – in your behaviour, attitude and appearance.
- Work in an open environment – avoid closed, unobserved situations.
- Listen to children and, when appropriate, invite their opinion of your coaching.
- Communicate with children and parents using appropriate methods, language and terminology.
- Where relevant keep up to date with technical skills, insurance and qualifications.
- When coaching, observe the relevant governing body of sport’s guidelines on contact/manual support of children and explain them to children and parents.
- Involve parents/carers in the supervision of children.
- Carry out risk assessments and complete appropriate paperwork.
- Keep accurate and up to date records.
- Plan ahead for events, tournaments and competitions.
- Ensure adequate staffing for events in line with Section 3.5 ‘Supervision and Coaching Ratios’ of this document.
- Ensure that, where practicable, mixed sex groups are always accompanied by a male and female member of staff.
- Secure parental/carer consent in writing to act in loco parentis which includes, if the need arises, permission for the administration of emergency first aid and/or other medical treatment.
- Parental / carer consent must be obtained prior to contacting children by phone, text or e-mail.
- Ensuring that use of photographic and filming equipment is appropriate and permission of parent or carer has been sought.
- Keep a written record of any injury that occurs, along with any treatment given.
- Review transport arrangements for staff and performers.
- Check all kit and equipment frequently for signs of wear and tear.
- Practice emergency situations (eg fire, injury).

3.2. Recognising and Correcting Poor Practice

As well as adopting and promoting good practice, it is also important to recognise and respond to poor practice (i.e. actions that fail to comply with the key principles of good practice and child protection). These could include:

- Encouraging or initiating bullying behaviour or acting as a bystander and not challenging bullying behaviour when it is witnessed.
- Failing to respond to allegations made by a child.
- Children using inappropriate language without being challenged.
- Misuse of electronic communication and social media.
- Children being reduced to tears as a form of control.
- The use of sexually suggestive comments, even in jest.
- Favouritism of one child.
It may sometimes be necessary for staff or volunteers to do things of a personal nature for children. These tasks should only be carried out with the full understanding and written consent of parents and the players involved. There is a need to be responsive to a person’s reactions. If a person is fully dependent on a coach/volunteer/member of staff, it is important that the coach/volunteer/member of staff talks with them about what it is they doing; choices should be given where possible. This is particularly so if the coach/volunteer/member of staff is involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Coaches/volunteers/members of staff should avoid taking on the responsibility for tasks for which they have not been appropriately trained.

3.3. Recruitment, employment and deployment of staff and volunteers

Northamptonshire Sport will ensure that all reasonable steps are taken to ensure unsuitable people are prevented from working with children. All recruitment (paid and voluntary) should take place in line with the relevant recruitment procedures. The following steps must be in the recruitment of all personnel (paid or voluntary) who have direct contact with children.

3.3.1. Pre application information

- All posts/roles should have a job or role description which clearly outlines responsibilities in relation to Safeguarding
- Notification should be given if the post requires a Disclosure and Barring Service check.
- All Sports Coaches should meet the Northamptonshire minimum standards of deployment (See Appendix H)

3.3.2. Recruitment selection and screening

An appropriate screening process must be in place and implemented, including:

- An appropriate interview process. Where coaches are being employed it is recommended that their practical coaching skills are assessed
- For individuals working within Regulated Activity, the successful completion an enhanced check with a children’s barred list check through the Disclosure and Barring Service (nb: anyone declining a DBS check should not be allowed to work with children)
- A minimum of two references are taken and checked
- Where necessary, relevant qualifications are seen and checked with the relevant National Governing Body.

3.3.3. Induction

All staff (paid or voluntary) employed/deployed will undertake a clear induction process. This will include health and safety (including risk assessment), equal opportunities and safeguarding. The safeguarding element of the induction will include:

- Roles and responsibilities in relation to safeguarding
- An overview of the safeguarding policy and procedures including the latest version of Keeping children safe in education: for school and college staff (part 1) for Northamptonshire Sport staff or volunteers working in an educational setting
- Key contact details
- Training/Continuous Professional Development needs assessment in relation to safeguarding
- Codes of conduct are signed and agreed

3.4. Continuous Professional Development

It is recognised that providing a system of checks is only part of the process of protecting children from abuse. Northamptonshire Sport is committed to providing appropriate training to individuals on safeguarding and to highlight their responsibilities with regards to their own good practice and reporting of poor practice / concerns of abuse. All individuals working with children must have up to date knowledge and an understanding of safeguarding issues. All staff working in an educational setting must be issued with the latest version of Keeping children safe in education: for school and college staff (part 1) on an annual basis.
It is acknowledged that the training and knowledge required will vary depending on the level of responsibility and degree of contact an individual has with children. The training requirements are as outlined in Appendix D.

3.5. Supervision and Coaching Ratios

It is important to ensure that, in planning and running sports activities for children and young people, consideration is given to providing an appropriate staffing/supervision ratio of adults to participants. Benefits include:

- minimising any risks to participants
- enhancing the benefits children draw from the activity
- reassuring parents/carers
- providing some protection for those responsible for providing, funding or commissioning the activity in the event of concerns or incidents arising.

A risk assessment should be undertaken which informs decision-making about appropriate supervision levels. Key factors to assess include:

- Ages of children
- Additional supervision/support needs of some or all participants (for example due to disability or age)
- Competence/experience of participants for the specific activity
- Nature of activity (for example climbing or swimming sessions may require higher levels of supervision than an aerobics class)
- Nature of the venue - whether closed (e.g. a swimming pool) or open (e.g. parkland); private and exclusive to the group or open and accessible to the public; and what types of equipment children may have access to.
- Sport Specific guidance from National Governing Bodies

A minimum of two adults should be present at the activity venue. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (in the event of a participant requiring the attention of an adult during the activity following an accident for example).

For single sex groups, where practicable, there should be at least one same gender member of staff. For mixed groups, where practicable, there should be at least one male and one female supervising adult.

3.5.1. Sport specific guidance

Many sports governing bodies, facilities and other activity providers have issued guidance on minimum supervision ratios for specific sports or activities. Where relevant to the activity these should be adhered to as minimum standards.

3.5.2. Young people as supervisors

There are many opportunities for under 18’s to coach, officiate or organise events for other children, including achieving qualifications and awards. These positive opportunities allow young people to develop skills, experience and confidence but should not mean that organisations should depend on them to take full responsibility for managing groups of children. Young people under 18 year olds in coaching or other roles should only supplement the adult with overall responsibility for supervising the activity.

3.6. The use of photography and filming equipment

The main concerns addressed by these guidelines relate to:

- The possible identification of children when a photograph is accompanied by personal information
- The inappropriate use, adaptation or copying of images for use on child pornography websites
- The taking of inappropriate photographs or recorded images of children
- The breach of court orders restricting photography of specific children
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There have been concerns about the risks posed directly and indirectly to children through the use of photographs on sport web sites and other publications when they are accompanied by personal information. This information can make a child vulnerable to an individual who may wish to ‘groom’ that child for abuse. Secondly, photographs can be adapted for inappropriate use. There is evidence of adapted material finding its way onto child pornography sites.

3.8.1. Guidelines for Recording Images

- A decision should be made in advance of an activity or event on whether photography is to be permitted
- Participants, staff, volunteers and spectators should be provided with a clear brief as to what is considered appropriate in terms of photography content and usage: Images are for personal use only. Images which may identify children should not be made accessible to others via the internet or published in any other way.
- If professional photographers are commissioned to take photographs or film footage it is important that they are briefed on relevant safeguarding procedures and that they are clear about expectations in relation to safeguarding issues.
- Identification should be issued to professional photographers and the identification should be worn by the photographer at all times.
- Participants and parents should be informed that a photographer will be in attendance at an event and ensure that they consent to both the taking and publication of films or photographs.
- Ensure that unsupervised access to participants, or one to one photo sessions are not allowed.
- No approval is given for photo sessions outside the event or at a participant’s home.
- All children featured in recordings must be appropriately dressed, with outer clothing garments covering their torso from at least the bottom of their neck to their thighs (i.e. a minimum of vest/shirt and shorts).
- The photograph should ideally focus on the activity. Where possible, images of children should be recorded in small groups (the group may comprise any combination of adults and children).
- You should ensure that images of a child are not recorded and published where a court order prohibits this.
- Coaches, teachers and others can use video equipment as a legitimate coaching aid. However, Northamptonshire Sport, the players and their parents/carers should be made aware that this forms part of the coaching programme, and recordings should be used, stored and destroyed with care.
- Concerns regarding inappropriate or intrusive photography should be reported to the event organiser or official and recorded in the same manner as any other safeguarding concern.
- Use of personal equipment to record images by Northamptonshire Sport staff is permitted as long as permission is given in writing by the appropriate line manager. Images must only be downloaded to an approved Northamptonshire Sport server and deleted from the personal device within 10 working days of the event.

3.8.2. Guidelines for using Images and video

- If a photograph is used, give the child’s first name only (no surname), or avoid naming them altogether. Personal details such as email addresses, home addresses and telephone numbers should never be revealed on a website.
- Ask for parental/carer permission to use an image of a child. This ensures that parents or carers understand how the image of their child will be used to represent the activity. A photography and filming consent form is the best way of achieving this. (See example in Appendix E)
- In order to guard against the possibility of a child under a court order appearing on a website, the simultaneous streaming of images onto a website is not recommended. Delayed streaming can limit problems, and provides an opportunity for any necessary editing. It is recommended that you employ appropriate security on web servers, so that material can only be accessed, copied or downloaded by authorised people.
- Make sure that you give adequate thought to the selection of images for use in publicity materials. Give close consideration to the images of children used on websites. Simple techniques such as digital ‘watermarking’ may deter others from misusing images.
- Try to use photographs that represent the broad range of youngsters participating safely in sport. Think about the gender, ethnicity, ability and age of the children you photograph and try to capture the diversity of the children you work with.

3.8.3. Security of images

All photographs and videos should be stored securely (including transparencies, film or hard prints and digital images) and restricted to appropriate staff. Permission must be sought from the Marketing Officer for any member of staff who wishes to use a particular image stored in this section. These arrangements will help to protect potentially inappropriate use of the collection.
3.7. Use of Electronic Communication

Interactive social media technology has revolutionised the way that people connect and interact. Facebook, Twitter, blogs, instant messaging and photo and video exchange sites are increasingly popular, and provide an opportunity for the sporting world to connect with children.

There have also been incidents of young athletes becoming very distressed as a result of bullying by coaches or others who have contacted them without parental knowledge on their mobiles and via social media.

As sports organisations increasingly use social networking and other developing media to communicate with children it is critical that safeguarding protocols and practices keep pace with the raft of communication methods children use. It is important to recognise that this that this medium provides opportunities to effectively engage with a wide range of audiences, especially children.

The following guidelines should be followed at all times:

- Whilst it is important for staff to have access to mobile phones during activity sessions (in case of an emergency), the use of these during activities, training or competitions, for the purpose of making or receiving calls is both unsafe and inappropriate conduct.
- The primary responsibility of staff must be the supervision and safety of children that they coach and the provision of a structured, quality coaching experience. Anything which compromises the coach's ability to maintain a safe environment and give their full attention to the supervision and coaching of children is not permitted.
- Contacting children by phone, text, e-mail or via any other social networking should never be undertaken without parental knowledge or consent. Ideally contact from staff or coaches/volunteers should be primarily on a face to face basis. Additional communication relating to events, training and other information should be directed to the child's parents or legal guardian.
- Staff/coaches/volunteers should not be contacting children directly as individuals via e-mail or social media. However, this may be done so as part of a disclosed list (having received prior permission to disclose in group e-mail) where they are disseminating relevant information. Group e-mails or messages should also give individuals the opportunity to have their contact details removed from the list by including a statement such as: "If you wish to be removed from this e-mail list please contact the administrator".
- It is not considered good practice or appropriate for staff/coaches/volunteers to contact individual children at any time by text, email or social media on any matter without parental consent.

3.8. Designated Safeguarding Lead Officer

Northamptonshire Sport will appoint a Designated Safeguarding Lead Officer and Deputy Safeguarding Lead Officer. These officers will liaise directly with Northamptonshire Safeguarding Partners, local statutory agencies and Child Protection in Sport Unit (CPSU).

The responsibilities of the Designated Safeguarding Officers are:
- Act as the first point of contact for all staff, volunteers and wider local CSP network
- Act as the first point of contact for national organisations (CPSU, NGBs) for safeguarding issues in Northamptonshire
- Ensure that Northamptonshire Sport's safeguarding policy is kept up to date
- Ensure that concerns are logged and stored securely
- Work with Senior Management Team to ensure that the Northamptonshire Sport's safeguarding policy and related policies and procedures are followed
- Develop and work with colleagues to implement Northamptonshire Sport's Safeguarding Action Plan
- Maintain contacts with relevant local statutory agencies eg Local Safeguarding Partners, and the (Local Authority) Designated Officer

Contact details of the designated officers can be found in Appendix A.
3.9. Executive Board Duty of Care Champion

The Executive Board of Northamptonshire Sport will appoint a member of the board as Duty of Care Champion with responsibility:

- To ensure that Safeguarding is included as an agenda item at Board meetings
- To ensure that the Board takes safeguarding issues into consideration when making decisions
- To champion Safeguarding within Northamptonshire Sport and in the wider partnership
- To work with the Lead Safeguarding Officer and/or Deputy Safeguarding Officer on the Annual Safeguarding Action Plan

3.10. Other agencies

Agencies such as Children and Young Peoples Service Referral Teams, the Police and the NSPCC have a statutory duty of care to ensure the welfare of children and work in partnership within the Northamptonshire Safeguarding Children Board (NSCB) guidelines to ensure the safety and welfare of children.

It is the responsibility of the Northamptonshire Sport Safeguarding Lead to maintain and develop links with Local Safeguarding Partners.
4. Taking Appropriate Action

Immediate action should always be taken by reporting concerns if a child says or indicates that they are being abused or if you have reason to suspect that this is the case.

Northamptonshire Sport will encourage and expect staff to discuss any concerns they may have about the welfare of a person immediately with the Designated Safeguarding Lead Officer, or in their absence, or if they are the subject of the concern, the Deputy Designated Safeguarding Lead Officer.

It is not the responsibility of staff or volunteers to decide if abuse is occurring. It is their role to follow procedures and forward any information/concerns to the appropriate contact, who will then deal with the other agencies involved in determining whether abuse has taken place.

4.1. Responding to Observations or Concerns about Children

Due to the nature of sport, there is a unique opportunity to observe children both physically and emotionally. For example in some sports staff carry out fitness assessments prior to the start of a coaching programme, during which personal details may be recorded (e.g. height, weight and body measurements). These may highlight concerns such as rapid changes through diet or weight training. However, it is not the role of staff/coach or volunteers to investigate or assess child protection concerns, but to report them using the procedures in this document.

4.2. Responding to Observations or Concerns about Colleagues

It is important to remember that you not only have to consider the consequences of your own actions but also those of others within the organisation.

From time to time you may be required to observe others sessions and may have concerns or spot risks that have been missed by the person leading the session. In these circumstances you may need to intervene either by stopping the session or by discussing your concerns with the coach in question. This should be viewed as good practice rather than interfering, as a failure to take action could result in a child being injured or a case of negligence being made.

Whilst some incidents are clearly a cause for concern and may prompt action (such as a risk assessment, change to coaching style or review of goals), be aware that some incidents are not so obvious and only surface once damage has occurred.

If an individual suspects abuse/poor practice has taken place, either by observation or by what has been said to that individual, the individual should follow the procedure below:

- Record the information provided as soon as possible and as accurately as possible, using the Safeguarding Disclosure/Incident Report Form (Appendix B). You MUST keep a written record of your concerns noting dates and incidents, as a minimum you should include any discussions which have taken place (with the child, parents and/or coaches and managers or third party). Records must be clearly written, timed, dated and signed.
- Always discuss your concerns with the Designated Safeguarding Officer or Deputy Safeguarding Officer. If the Designated officer, or deputy, is not available talk to a Manager, the Multi-Agency Safeguarding Hub (MASH) or the Police Child Protection Unit.
- If the concerns arise out of hours (after 5.30pm through until 9am weekdays and at any time during weekends and Bank Holidays) then contact the Children and Children Referral Team. These are county wide numbers and they will deal with any enquiry.
- Once the designated Safeguarding Officer has been informed, it is their responsibility to follow the procedure outlined for reporting allegations (fig. 1) to determine if poor practice or abuse has occurred. If necessary the designated officer will refer concerns to the Local Authority Designated Officer, Local Children and Young People Service Referral Team.
- ALL incidents including poor practice must be recorded and kept on file. Information should be stored in accordance with section 4.11 of this policy.
- Northamptonshire Sport will fully support and protect anyone who, in good faith, reports his/her concerns about a colleague’s practice or possibility that a child may be being abused.
- Any telephone referrals must be followed up in writing within 24 hours (one working day) using online multi agency referral form: https://www3.northamptonshire.gov.uk/councilservices/children-families-education/help-and-protection-for-children/protecting-children-information-for-professionals/Pages/contact-early-help-support-MASH.aspx, However:
  - If you think a child is in immediate danger – call the police
  - If you think a child need emergency medical attention – seek medical advice without delay
4.3. Responding to Disclosures and Reports of Abuse

4.3.1. Sources of Concern
Concerns may arise in a number of ways:

- A direct disclosure of abuse to you from a child
- A conversation with an adult (e.g. parent, spectator or colleague) or another child.
- Direct observation of a worrying incident
- Observation of signs or behaviour that suggests possible abuse
- Receipt of an anonymous allegation (e.g. by phone, text, email or letter).
- Information from another agency eg police, LADO etc

4.3.2. Disclosure by a Child
A disclosure is when a child or another person tells you they believe that they or someone else has been the victim of abuse.

Children who are being abused may only tell people they trust and with whom they feel safe. Sports coaches often share a close relationship with their athletes and may therefore be the person in whom they place their trust.

In such instances, it is vital that appropriate and immediate action is taken. The person receiving the information needs to respond in a sensitive manner and:

- Allow the child time to communicate
- React calmly and remain calm throughout
- Really listen to the child and reassure them that they have done the right thing in telling someone and that it is not their fault
- Be honest, and inform the child that you have to talk to someone else who can help
- Keep questions to a minimum (do not ask probing or leading questions to clarify what has been said)
- As soon as practical make a full record of what had been said, heard and seen using the Safeguarding Disclosure / Incident Report Form (see Appendix B).

Remember, this is a confidential matter and you should only discuss this with the appropriate Designated Officer or Multi-Agency Safeguarding Hub (MASH) if the designated officer or deputy is unavailable.

You may be the first person that a child has trusted and it has probably taken a great deal of courage to tell you that something is wrong.

It is important that the person receiving the information does not:

- show any feelings of anger, disgust, disbelief to the child as they may stop talking for fear of upsetting the person further or feel that the negative feelings are being directed towards them
- interrupt or make suggestions to the child
- ask probing or leading questions
- speculate or make assumptions
- make negative comments about the alleged abuser
- approach the alleged abuser
- make promises or agree to keep secrets.
Figure 1: Reporting Concerns, allegations or disclosures about the behaviour of staff or volunteers

1. Staff, coach, volunteer, parent or child has concerns, or an allegation is reported

   - If necessary ensure the immediate safety of the child, (other children) clarify concerns

   - Complete the Safeguarding Disclosure / incident report form immediately and inform the designated officer or deputy of the report

2. Designated Safeguarding Officer (DSO) to contact Local Authority Designated Officer (LADO) and agree an appropriate course of action

   - Is it poor practice/an alleged breach of the code of ethics and conduct?

     - The DSO will establish a Disciplinary Investigation. This will be dealt with in accordance with Northamptonshire Sport disciplinary procedure

     - DSO refers to management for immediate decision re: suspension within Northamptonshire Sport disciplinary procedures. Notification of other bodies e.g. NGB

     - Disciplinary investigation process initiated (may need to be delayed pending outcome of Social Services / Police investigation)

   - Could it be abuse?

     - DSO refers to management for immediate decision re: suspension within Northamptonshire Sport disciplinary procedures.

     - Could it be abuse?

       - DSO will then refer concerns to LADO and follow this up in writing (using interagency referral form within 24 hours)

     - Disciplinary hearing held to determine course of action – takes into consideration Social Service / Police info and any other relevant factors

EMERGENCY CONTACTS
Northamptonshire Police Child Protection Team
Tel: 101
Northamptonshire Multi-Agency Safeguarding Hub (MASH) Tel: 0300 126 1000
Figure 2: Reporting allegations, concerns or disclosures about children or referring a suspected case of abuse

WHAT TO DO IF YOU HAVE A CONCERN ABOUT A CHILD’S WELFARE

Concerns about child’s immediate safety

Discuss with Designated Safeguarding Officer (DSO)

Still have concerns

DSO refer to MASH referral team follow up in writing within 24 hours (one working day) interagency referral form

Social worker and manager acknowledge receipt of referral and following discussions with other agencies and decide on one of three possible outcomes within 1 working day.

Initial assessment required

Concerns about child’s immediate safety

No longer have concerns

No further child protection action although may need to act to ensure that services are provided.

Feedback to referrer on next course of action

To be completed by MASH within seven working days from referral.

Emergency Action may be required. Strategy discussion to take place between MASH, CPU and other agencies as appropriate.

EMERGENCY CONTACTS
Northamptonshire Police Child Protection Team
Tel: 101
Northamptonshire Multi-Agency Safeguarding Hub (MASH) Tel: 0300 126 1000
4.4. Making a Referral

It is the responsibility of the Designated Safeguarding Officer to refer any concerns relating to children to the Northamptonshire Multi Agency Safeguarding Hub (MASH). Where available, the following information should be provided with the referral (absence of information must not delay referral).

- Is the information first-hand or did someone tell you about the incident/situation, who else have you spoken to?
- Full names, date of birth and gender of child
- Family address
- Identity of those with parental responsibility
- Names and date of birth of all household members
- Ethnicity, first language and religion of child and parents/carers
- Any need for an interpreter, signer or other communication aid
- Any special needs of child
- Any significant/important recent or historical events/incidents in the children’s or family’s life
- Cause for concern including details of any allegations, their sources, timing and location
- Child current location and emotional and physical condition
- Referrer’s relationship and knowledge of child and parents/carers
- Known current or previous involvement of other agencies/professionals
- Information regarding parental knowledge of, and agreement to, the referral
- Formal referrals from named professionals cannot be treated as anonymous, so the parent will ultimately become aware of the identity of the referrer.

Telephone referrals should be followed up by completing the inter-agency referral form within 24 hours. All sections of the form must be completed in full. The MASH must acknowledge referrals within one working day of receipt. If this does not occur within three working days, the referrer should contact the MASH referral team again.

4.5. Referral to the DBS

The Safeguarding Vulnerable Groups Act (2006) places a legal duty on employers to make a referral to the Disclosure and Barring Service (DBS) if a member of staff or a volunteer is considered to have harmed, or poses a risk of harm to a child. The DBS uses this information to help employers make safer recruitment decisions and prevent unsuitable people from working with children and other vulnerable groups.

4.6. Missing Participants

From the moment children arrive at an activity, staff and volunteers are acting in ‘loco parentis’ and have a duty of care towards them. In the event that a child goes missing the following procedure must be followed:

- Staff member notices or is informed that a participant is missing.
- The Designated Safeguarding Officer is contacted.
- A thorough search for the missing participant is carried out. Other participants remain under supervision.
- If the participant is not found within 20 minutes the police and parents must be contacted.

4.7. Non-collection by parent/career

- Prior to the start of an activity the coach/organiser should ensure communication with parents/carers to ensure they are aware of what is expected from them.
- Parents/carers should have the opportunity to communicate information relating to the dropping off and collection of a child, when completing a consent form. This should detail who is responsible for collecting them following and activity or event, or if they are allowed to make their own way home (this may be the case in more community based activities with or with older children).
- Prior to the start of an activity a risk assessment should be carried out to identify any specific considerations which must be put in place with regards to the drop off or collection of participants, the outcome of which should be communicated to parents / carers prior to the start of the activity or event.
- Emergency contact details of parents/carers must be collected prior to a participant taking part in an activity. This should be made available to the person in charge of the activity.
- In the event of a parent / carer not arriving at the venue in time for collection, when it has been stated that they will be collecting a participant, the following procedure should be followed:
4.8. Complaints

All complaints will be dealt with in line with the Northamptonshire Sport complaints procedure. (Appendix F.) Northamptonshire Sport will ensure that all people involved in the delivery of its programmes and activities are aware of the procedures for complaints.

4.9. Escalating a concern

Where a member of staff or volunteer feels that their child safeguarding concerns are not being they should follow the escalation process:

Stage One
Any employee or volunteer who feels that a decision is not safe or is inappropriate should initially consult the safeguarding lead to clarify their thinking in order to identify the problem, to be specific as to what the disagreement is about and what they aim to achieve. They should also be able to evidence the nature and source of their concerns and should keep a record of all discussions.

Stage Two
Initial attempts should be taken to resolve the problem at the lowest possible level. This would normally be between the people who disagree. It should be recognised that differences in status and/or experience may affect the confidence of some people to pursue this unsupported.

Stage Three
If the problem is not resolved at stage two the concerned person should contact the safeguarding lead who should raise the concerns with the equivalent manager in the other organisation.

Stage Four
If it has not been possible to resolve the concerns the matter should be referred to the Chair of the Northamptonshire Safeguarding Partners.

At all stages of the process actions and decisions must be recorded in writing and shared with relevant personnel, to include the person who raised the initial concern. In particular this must include written confirmation between the parties about an agreed outcome of the disagreement and how any outstanding issues will be pursued.

4.10. Whistleblowing

In certain circumstances, staff or volunteers may feel they are unable to follow Northamptonshire Sport’s standard procedures, for example because they feel their position in the organisation would be in jeopardy, they would be subject to intimidation, or that the person of concern is the designated manager to whom they should report such matters and there is no one senior to refer to. In this instance, they should refer to the Northamptonshire County Council Whistleblowing Policy.

4.11. Recording Concerns

If an organisation has concerns about the welfare or safety of a child, or concerns about the behaviour of an employee or volunteer it is vitally important to record all relevant details, regardless of whether or not the concerns are shared with either the police or Multi-Agency Safeguarding Hub.

An accurate record must be kept of:

- Date and time of incident/disclosure
- Parties who were involved, including any witnesses to an event
- What was said and done and by whom
- Any action taken by the organisation to look into the matter
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Northamptonshire Sport
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- Any further action taken
- Where relevant, the reasons why a decision was taken not to refer those concerns to a statutory agency
- Any interpretation/inference drawn from what was observed, said or alleged should be clearly recorded as such
- Name of person reporting on the concern, name of designation of the person to whom the concern was reported, date and time and their contact details
- The record should be signed.

Records may be used for:

- Evidence for investigations and inquires.
- Court Proceedings.
- Monitoring Quality Assurance.

To service these purposes, records should be:

- Complete.
- Clear and written in straightforward language.
- Concise.
- Accurate not only in fact, but also in differentiating between opinion, judgements and hypothesis.
- Dated and signed.
- Stored securely (see section 4.15).

Records should readily tell the ‘story’ of a case. There should be an updated chronology in the front of the file. It is the responsibility of the referring person to make a written record at the time of the incident/concern.

4.12. Supporting a Child Following an Accusation or Disclosure
It is imperative that the child is treated with dignity and told what is happening, and why. This might be you, or another professional more appropriately placed to provide this support.

4.13. Timescales
It is in everyone’s interest to resolve cases as quickly as possible consistent with a fair and through investigation. Some matters may be resolved very quickly, and this will be determined by the complexity of the issues. In all cases, the matter will be resolved as quickly as possible, and the primary focus will be on ensuring that the safety and welfare of the child concerned is assured.

4.14. Record Retention by Northamptonshire Sport
The Data Protection Act 2018 requires that processing of personal data must:

- be lawful, fair and in a transparent manner in relation to the data subject
- only be collected for specified, explicit and legitimate purposes
- be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- be accurate and, where necessary, kept up to date
- be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed

Northamptonshire Sport will retain personal data for longer than 6 years after the individual’s last contact with Northamptonshire Sport. Exceptions to the 6 year period will occur when records:

- Need to be retained because the information in them is relevant to legal action that has been started
- Are required to be kept longer by law
- Are archived for historical purposes (eg. where the organisation was party to legal proceedings or involved in proceedings brought by a local authority). Where there are legal proceedings it is best to seek legal advice about the retention of records.
- Relate to individuals and providers of services who have, or whose staff, have been judged unsatisfactory.
When records are being kept for more than the 6 year period files need to be clearly marked and the reasons for the extension period clearly identified.

If records related to an employee, they should be kept in the person’s confidential file, including for people who leave the organisation, for a period of 6 years after they have left the organisation. See Appendix G for a full document retention schedule.

4.15. Storing Information

Information relating to an employee will be retained in their personal file. Information relating to non employees (eg. coaches, volunteers, disclosures/allegations) will be stored securely within Northamptonshire Sport. Access to records will by Designated Officers only.

4.16. Information sharing

Safeguarding children is more important than the privacy of another person. Sometimes sharing information is necessary to establish the level of risk to a child. Ask yourself: is it safe for me NOT to share the information? Information should only be shared with the appropriate person (eg. Designated Safeguarding Officer, LADO, Children Services Referral Teams). The Designated Safeguarding Officer will determine how and with whom this information should be shared. Remember the Seven golden rules for information sharing:

- Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.
- Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
- Share with consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.
- Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
- Necessary, proportionate, relevant, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

4.16.1. Sharing Concerns with Parents/Carers

There is always a commitment to work in partnership with parents or carers where there are concerns about their children. Therefore, in most situations, it would be important to talk to parents or carers to help clarify any initial concerns.

For example, if a child seems withdrawn, there may be a reasonable explanation. He/she may have experienced an upset in the family, such as a parental separation, divorce or bereavement.

4.16.2. When it is Not Appropriate to Share Concerns with Parents

There are circumstances in which a child might be placed at even greater risk if concerns are shared (eg. where a parent/carer may be responsible for the abuse or not able to respond to the situation appropriately). In these situations or where concerns still exist, any suspicion, allegation or incident of abuse must be reported to the Designated Safeguarding Officer as soon as possible and recorded. If you need guidance or advice on this, discuss this immediately with the Designated Safeguarding Officer.
5. Implementation and Monitoring

5.1. Monitoring
The Northamptonshire Sport Safeguarding Lead and Safeguarding Deputy are responsible for leading the implementation and monitoring of this policy with the Northamptonshire Sport core team through an annual self-assessment and Safeguarding Action Plan. The annual Safeguarding Action Plan clearly outlines actions to be taken by Northamptonshire Sport core team, and those acting on their behalf to ensure the full implementation of this policy. This action plan is managed by the Designated Safeguarding Lead Officer supported by the Safeguarding Deputy Lead Officer.

5.2. Policy Review
The policy will be reviewed every three years by the Northamptonshire Sport Safeguarding Lead, or in the following circumstances:
- Changes in legislation and/or government guidance
- As required by local safeguarding partners UK Sport and/or Home Country Sports Councils.
- As a result of any other significant change, event or incident.

5.3. Communication
In order for this policy to be successfully implemented it is essential that it is effectively communicated to all staff, volunteers, parents/carers and children. It is the responsibility of designated Safeguarding Officers to ensure that all staff are familiar with the policy and procedures and the responsibility for all staff to ensure that the policy is advocated and promoted to partner organisations and parents.

5.3.1. Communication to staff directly employed/deployed
This will take place through initial induction to the employing/deploying organisation and the training.

5.3.2. Communication to Partner organisations
This will take place thorough the Northamptonshire Sport networks. All staff should advocate the principles of this policy and encourage other organisations to adopt this policy or use its framework to check or develop their own. Sports clubs should be encouraged to adopt the Sport’s National Governing Body Child Protection Policy. The Safer Sports (A Guide for Sports Clubs/Organisations) leaflet should be used to promote good practice. Adherence to the county’s Safeguarding framework should be included within all Service Level Agreements or as a condition of grant aid or partnership funding.

5.3.3. Communication to parents/carers
All parents/carers or children involved in activities should be made aware of this Safeguarding Policy, in particular who to contact should they have a concern or wish to make a complaint. The Safer Sport (A guide for parents/carers) leaflet should be used, where possible parents/carers should also be invited to attend a specific briefing (this will be more relevant prior to a big event).

5.3.4. Communication to Children
All Children should be made aware of their right to protection and to enjoy sport, physical activity or recreation in a safe, enjoyable environment. They should also be made aware of who they can contact should they have a concern or feel uncomfortable. The Safer Sport guide for children should be distributed prior to an activity or event and where possible they should attend a briefing.
Appendices

Appendix A : Key Contacts

Northamptonshire Sport
Designated Safeguarding Officer: Martin Barnwell  
Tel: 07834 495842
Deputy Safeguarding Officer: Steve Jackson  
Tel: 07734 459915

Sports National Governing Body Designated Officers
Contact details for NGB designated Officers can be found at :
https://thecpsu.org.uk/help-advice/deal-with-a-concern/#contact-your-national-governing-body

Northamptonshire Multi-Agency Safeguarding Hub (MASH)
Tel: 0300 126 1000
Multi-Agency Safeguarding Hub (MASH) and Child Protection Team
Children, Families and Education
Criminal Justice Centre
700 Pavilion Drive
Brackmills
Northampton
NN4 7YL MASH@northamptonshire.gcsx.gov.uk

NSPCC (for adults)
Tel: 0808 800 5000

Childline for children
Tel: 0800 1111

Northamptonshire Police Child Protection Team
Tel: 101
Safeguarding Disclosure / Incident Report Form

This form should be used by staff, coaches, volunteers to record any concerns they may have or if a disclosure is made. All information must be treated as confidential and reported to the relevant designated Officer (or deputy) within 1 working day. If the Designated Officer (or deputy) cannot be contacted please contact your manager, the Children and Children Services (MASH) referral team or the Police Child Protection Unit. If referred to MASH please forward a copy of this form to the designated officer as soon as possible detailing who has been contacted in relation to this incident.

- Take all complaints, allegations or suspicions seriously
- Ensure the immediate safety of the person affected
- Stay calm, and offer support and reassurance to the person making the disclosure
- Do not make any promises regarding confidentiality
- Listen, keep questions to a minimum, make brief but careful notes and check the person affected agrees with them (where applicable);
- Explain what you will do.

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<td>Contact details</td>
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### What happened?


### Additional notes or observations


### Who have you discussed this incident with?

- Name
- Contact details

Pass this information securely to the Northamptonshire Sport Safeguarding Lead
Appendix C: Definition of Regulated Activity

Activity of a specified nature
- teaching, training, instruction, care for or supervision of children (except if the person undertaking the activities is under regular supervision) if carried out by the same person frequently or overnight
- advice or guidance (except legal advice) provided wholly or mainly for children which relates to their physical, emotional or educational well-being if carried out by the same person frequently or overnight.

Activity within specified establishment
- any activity that is for or on behalf of the establishment with the opportunity for contact with children if carried out frequently:
  - excepted is work by volunteers under regular supervision or occasional or temporary contract work that is not an activity of a specified nature listed above.
- specified establishments are schools, pupil referral units, academies, nursery schools, Further Education (FE) establishments mostly for children, institutions for the detention of children, children’s homes, children’s centres (in England), children’s hospitals (in Northern Ireland) and childcare premises including nurseries.

Healthcare of a child (any frequency)
- healthcare provided to a child by a health care professional or by a person acting under the direction or supervision of a healthcare professional.
- a health care professional who is a person regulated by a professional healthcare regulator (i.e. a body mentioned in section 25(3) of the National Health Service Reform and Health Care Professions Act 2002).
- health care includes: all forms of health care provided for children and includes physical, mental and palliative health care; diagnostic tests and investigative procedures and procedures similar to surgical or medical care, but not provided in connection with a medical condition.

Personal Care of a child (any frequency)
- physical help with eating or drinking for reasons of illness or disability.
- physical help with toileting (including menstruation), washing, bathing or dressing for reasons of age, illness or disability.
- prompting together with supervision when a child is otherwise unable to decide for themselves in relation to any of the above personal care activities.
- training or advice given to a child in relation to any of the above personal care activities.

Moderating an online forum for children
Moderating a public electronic interactive communication service likely to be used wholly or mainly by children and carried out by the same person frequently. Except activity by a person who does not have access to the content of the matter or with users of the service.

Driving a vehicle used for conveying children
Driving a vehicle being used only for conveying children and their carers or supervisors under a contract or similar arrangement when carried out by the same person frequently.

Early years or later years childminding (any frequency)
Early or later years childminding where there is a requirement to register or for voluntary registration under the Childcare Act 2006 and where the activity takes place on domestic premises for reward.

Fostering a child (any frequency)

Day to day management of regulated activity (any frequency)
Day to day management on a regular basis, of a person who is providing a regulated activity in relation to children. This includes the supervisor of a person who would be in regulated activity if not under regular supervision.
Other key exceptions to regulated activity relating to children

Family and Personal Relationships
Excepted from regulated activity relating to children is any activity conducted in the course of a family relationship, or a personal relationship between friends for no commercial consideration. Family relationships involve close family (e.g. parents, siblings, grandparents) and relationships between two people who live in the same household and treat each other as family. Personal, non-commercial relationships are arrangements where either no money changes hands, or any money that does change hands is not part of a commercial relationship (for example, gifting a friend money for petrol after they have driven you to the hospital), and the arrangement is made between friends or family friends.

Peer Groups
Excepted from regulated activity relating to children is a person who is part of a peer group and is assisting or under the direction of a person who is engaging in regulated activity. For example, a student helping a teacher.

Supervising a Child in Employment
Excepted from regulated activity relating to children is a person who supervises a child in the course of the child’s employment including work experience. However, it is regulated activity if the child is under 16 and it is carried out by an unsupervised person for whom arrangements exist principally for that purpose.

Definition of a Child
A child is a person aged under 18 years of age.

Statutory supervision guidance
To be supervised in accordance with HM Government statutory guidance, the supervision must be regular and day-to-day, by a person engaging in regulated activity and reasonable in all the circumstances for the protection of children. Further information is provided in the HM Government statutory supervision guidance available from the DBS website.

DBS check
An eligible organisation recruiting to a position (paid or unpaid) that falls within the definition of regulated activity relating to children, must request an applicant to obtain an enhanced DBS Check with barred list check to help determine their suitability for the position, prior to engaging them. Eligible staff in post may also be re-checked to help confirm their ongoing suitability. Further information on eligibility for DBS Checks is available on the DBS website: https://www.gov.uk/government/publications/dbs-guidance-leaflets

Legislation and guidance
Regulated activity relating to children is defined in Schedule 4 to the Safeguarding Vulnerable Groups Act 2006 (as amended). Further information is provided in the HM Government Factual Note on regulated activity relating to children and statutory supervision guidance available from the DBS website.

Any frequency means that doing the activity once or more is regulated activity.

Supervision as defined in statutory guidance on supervision.

Frequently means once a week or more or four or more times in any 30 day period.

Overnight means once or more between 2am and 6am with the opportunity for face to face contact with children

Source: Disclosure and Barring Service DBS referrals guide: summary of regulated activity with children v.2.2
# Appendix D: Safeguarding responsibilities and Training Matrix

<table>
<thead>
<tr>
<th>Position</th>
<th>Role</th>
<th>Training / Qualifications</th>
<th>Update/Refresher Training</th>
</tr>
</thead>
</table>
| **Executive Board Member**   | - Understand Northamptonshire Sport’s role in safeguarding and potential issues in this area  
- Promote Safeguarding best practice within the wider local partnership | - Organisation specific Induction  
- Board Specific Safeguarding Awareness Training (CPSU) | - Safeguarding Awareness updated 3 yearly  
- Briefings provided by Lead Officer/Deputy on changes in practice, policies, procedures, legislative / government guidance |
| **Executive Board Duty of Care Champion** | - Develop a higher level of understanding of Safeguarding in Sport  
- Have oversight of the Safeguarding Action Plan and the work of the Lead Safeguarding Officer | - Organisation specific Induction  
- Board Specific Safeguarding Awareness Training (CPSU) | - Safeguarding Awareness updated 3 yearly  
- Briefings provided by Lead Officer/Deputy on changes in practice, policies, procedures, legislative / government guidance |
| **Director**                 | - Ensure that Northamptonshire Sport has a Safeguarding Lead, Deputy and Executive Board Member with responsibility for Safeguarding  
- Work with the Lead Officer to ensure that Safeguarding is included at a strategic level | - Organisation specific Induction  
- Safeguarding Awareness Training | - Safeguarding Awareness updated 3 yearly  
- Briefings provided by Lead Officer/Deputy on changes in practice, policies, procedures, legislative / government guidance |
| **Senior Management Team**   | - Ensure that the Northamptonshire Sport’s safeguarding policy and related policies and procedures are followed by staff  
- Promote Safeguarding best practice within the core team and the wider local partnership | - Organisation specific Induction  
- Safeguarding Awareness Training | - Safeguarding Awareness updated 3 yearly  
- Briefings provided by Lead Officer/Deputy on changes in practice, policies, procedures, legislative / government guidance |
<table>
<thead>
<tr>
<th>Position</th>
<th>Role</th>
<th>Training / Qualifications</th>
<th>Update/Refresher Training</th>
</tr>
</thead>
</table>
| **Lead Safeguarding Officer** | • Act as the first point of contact for all staff, volunteers and wider local CSP network  
• Act as the first point of contact for national organisations (CPSU, NGBs) for safeguarding issues in Northamptonshire  
• Ensure that Northamptonshire Sport's safeguarding policy is kept up to date  
• Ensure that concerns are logged and stored securely  
• Work with Senior Management Team to ensure that the Northamptonshire Sport’s safeguarding policy and related policies and procedures are followed  
• Develop and work with colleagues to implement Northamptonshire Sport’s Safeguarding Action Plan  
• Maintain contacts with relevant local statutory agencies eg Local Safeguarding Children Board, and the (Local Authority) Designated Officer | • Organisation specific Induction  
• Safeguarding Awareness Training  
• Time to Listen Training  
• Safer Recruitment Training | • Time to Listen Training updated every 3 years  
• Safer Recruitment Training updated every 3 years  
• Attendance at CPSU Safeguarding Lead Meetings (Quarterly) |
| **Deputy Safeguarding Officer** | • Act as the back-up point of contact for all staff and volunteers to go to for advice if they have a concern  
• Work with Safeguarding Lead to develop and implement Northamptonshire Sport’s Safeguarding Action Plan | • Organisation specific Induction  
• Safeguarding Awareness Training  
• Time to Listen Training  
• Safer Recruitment Training | • Time to Listen Training updated every 3 years  
• Safer Recruitment Training updated every 3 years  
• Attendance at CPSU Safeguarding Lead Meetings (Quarterly) |
| **Sport Development Officers** | • Follow Northamptonshire Sport’s safeguarding policy and related policies and procedures  
• Promote Safeguarding best practice to customers within the wider local partnership | • Organisation specific Induction  
• UKC Safeguarding & Protecting Children, or NGB equivalent | • UKC Safeguarding & Protecting Children updated 3 yearly  
• Briefings provided by Lead Officer/Deputy on changes in practice, policies, procedures, legislative / government guidance |
<table>
<thead>
<tr>
<th>Position</th>
<th>Role</th>
<th>Training / Qualifications</th>
<th>Update/Refresher Training</th>
</tr>
</thead>
</table>
| Coaches and Instructors | • Follow Northamptonshire Sport’s safeguarding policy and related policies and procedures  
• Promote Safeguarding best practice to customers within the wider local partnership | • Organisation specific Induction  
• Safeguarding Awareness Training  
• UKC Safeguarding & Protecting Children, or NGB equivalent  
• Hold an up to date nationally recognised qualification which is appropriate to the activity. | • UKC Safeguarding & Protecting Children updated 3 yearly |
Appendix E: Example Participant Registration & Photo Consent

Northamptonshire School Games
Participant Registration Form

<table>
<thead>
<tr>
<th>PARTICIPANT DETAILS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Date of birth</td>
</tr>
<tr>
<td>Male/Female</td>
<td>T-Shirt Size</td>
</tr>
<tr>
<td>Ethnicity</td>
<td>Postcode</td>
</tr>
<tr>
<td>Do you have a Special Educational Need and/or Disability/Sensory Impairment?</td>
<td>Yes/No</td>
</tr>
<tr>
<td>School/College</td>
<td>Year Group</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>EMERGENCY CONTACT DETAILS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Name</td>
<td>Relationship to young person</td>
</tr>
<tr>
<td>Contact Number 1</td>
<td>Contact Number 2</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PARTICIPANT MEDICAL DETAILS</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Please detail any medical conditions / medication taken that we should be aware of</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>DECLARATION OF CONSENT</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>I have received information on the activity that my child is taking part in and confirm that I consider him/her capable of undertaking the activity. I have completed the medical details and consent that, in the event of any illness/accident, any necessary treatment can be administered to my child, which may include the use of anaesthetics. I also understand that while coaches, team personnel &amp; Sport Co-ordinators will take every precaution to ensure that accidents do not happen, they cannot necessarily be held responsible for any loss, damage or injury suffered to my child (please tick box if you agree)</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Signature of Parent/Guardian/Carer of the above Participant</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Please print name:</td>
<td></td>
</tr>
</tbody>
</table>

Please return to your teacher. Schools – please send a copy to your School Sport Manager and bring with you on the day of competition.

The information on this form will be stored in accordance with our data protection policy and will only be available to authorised members of Northamptonshire Sport & data collected will be used to submit statistical reports to Sport England. Reports are anonymous & contain no personal information.
Appendix F: Complaints Procedure

STAGE 1
Customer/stakeholder/Staff has a complaint regarding Northamptonshire Sport or a member of Northamptonshire Sport staff

Raise directly with staff involved

Satisfactory Response?

YES

Customer/stakeholder/Staff has a complaint regarding Northamptonshire Sport or a member of Northamptonshire Sport staff

Raise directly with staff involved

Satisfactory Response?

YES

STAGE 2
Contact Senior Management Team Member responsible for work area

Satisfactory Response?

YES

STAGE 3
Submit appeal to Northamptonshire Sport Director

Satisfactory Response?

YES

STAGE 4
Submit appeal to Northamptonshire Sport Executive Board Chair

This is the final Level of Appeal
### Appendix G: Record Retention Schedule

<table>
<thead>
<tr>
<th>Description</th>
<th>Personal Information</th>
<th>Retention Schedule Statutory Provisions</th>
<th>Retention Period</th>
<th>Permanent Preservation in Archives</th>
<th>Indicative Protective Marking</th>
<th>Disposal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Files</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Last action on project + 12 years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Participant Information</td>
<td>Y</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Last Contact + 1 Year</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Customer Email Address data (electronic)</td>
<td>Y</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Permanent</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DELETION</td>
</tr>
<tr>
<td>Safeguarding Concern Documentation</td>
<td>Y</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Permanent</td>
<td>N</td>
<td>SENSITIVE</td>
<td></td>
</tr>
<tr>
<td>Records relating to involvement in the Club Mark Accreditation Scheme</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Date of award of Club Mark + 3 years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Risk Assessment Documentation</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>3 Years</td>
<td>Y</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DISPOSAL</td>
</tr>
<tr>
<td>Photographs (electronic)</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Permanent</td>
<td>Y</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DISPOSAL</td>
</tr>
<tr>
<td>Video recordings (electronic)</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Permanent</td>
<td>Y</td>
<td>SENSITIVE</td>
<td></td>
</tr>
<tr>
<td>GPC Receipts</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Travel Claim Receipts</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Finance Journals</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Petty Cash Receipts</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Description</td>
<td>Personal Information</td>
<td>Retention Schedule Statutory Provisions</td>
<td>Retention Period</td>
<td>Permanent Preservation in Archives</td>
<td>Indicative Protective Marking</td>
<td>Disposal</td>
</tr>
<tr>
<td>---------------------------------------------------------------------------</td>
<td>----------------------</td>
<td>----------------------------------------</td>
<td>------------------------</td>
<td>------------------------------------</td>
<td>-------------------------------</td>
<td>-------------------------------</td>
</tr>
<tr>
<td>Overtime pay claims</td>
<td>Y</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Sickness Absence Forms</td>
<td>Y</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Banking Documentation</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Finance Journals</td>
<td></td>
<td>Limitation Act 1980 (Section 8)</td>
<td>6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DISPOSAL</td>
</tr>
<tr>
<td>Personnel Information</td>
<td>Y</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Last Contact + 6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>SECURE DISPOSAL</td>
</tr>
<tr>
<td>Photographic and Video consents used for promotional purposes taken with the consent of the individuals shown</td>
<td>Y</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Life of the images to which they refer</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DISPOSAL/DELETION</td>
</tr>
<tr>
<td>Annual Report</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>Permanent</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DISPOSAL/DELETION</td>
</tr>
<tr>
<td>Executive Board Quarterly Report</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>3 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DISPOSAL/DELETION</td>
</tr>
<tr>
<td>Sport England Quarterly Report</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>3 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DISPOSAL/DELETION</td>
</tr>
<tr>
<td>Grant award documentation</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>End of Grant award + 3 years</td>
<td>N</td>
<td>SENSITIVE</td>
<td>DISPOSAL/DELETION</td>
</tr>
<tr>
<td>Grant reconciliation and claim documentation</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>End of Grant award + 3 years</td>
<td>N</td>
<td>SENSITIVE</td>
<td>DISPOSAL/DELETION</td>
</tr>
<tr>
<td>Press Releases</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>1 Year</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DISPOSAL/DELETION</td>
</tr>
<tr>
<td>Finance Budget Reporting Documentation</td>
<td>N</td>
<td>Limitation Act 1980 (Section 8)</td>
<td>6 Years</td>
<td>N</td>
<td>NOT PROTECTIVELY MARKED</td>
<td>DISPOSAL/DELETION</td>
</tr>
</tbody>
</table>
Appendix H: Northamptonshire Sport’s minimum standards of deployment for sports coaches

**Fully Qualified**
Sport Specific - All sports coaches should have an appropriate National Governing Body (NGB) coaching qualification, in the sport they are coaching, which enables the coach to deliver a session on their own (usually a level 2). The award must be verified. Sport specific details of which qualification your coach should have for each sport can be found at: [www.northamptonshiresport.org/MinimumQualifications](http://www.northamptonshiresport.org/MinimumQualifications)

Multi-Skills - All coaches delivering multi-skills activities should have a sport specific coaching qualification (as above) in a minimum of one sport AND have attended multi-skills training. E.g. Funs for Everyone, Raising the Bar, 1st4sport Level 2 Award in Multi-Skills Development in Sport (QCF).

**Adequately Insured**
A coach should have up-to-date, appropriate insurance cover including public liability and professional indemnity cover. A coach agency employing coaches should also have Employer’s Liability cover. The employing body is responsible for ensuring insurance is in place and, or if using a coaching provider evidence should be provided that these are in place.

**National Curriculum Aware**
If delivering the physical education curriculum all coaches must demonstrate awareness and application of The National Curriculum. Coaches should follow schemes of work and have lesson plans that have clear learning objectives and assessment opportunities. Delivery should be inclusive and appropriately challenging to enable all children to progress in-line with their own ability. Coaches should have a practical knowledge of The National Curriculum attainment levels.

**Trained in Safeguarding**
Sports coaches should hold a valid, NSPCC recognised, sports related safeguarding certificate. Certificates are valid for 3 years from the date of issue and are issued by Sports Coach UK or a NGB.

**Appropriate to work with Children**
If working without supervision, or if coaching duties include regular or intensive contact with children, sports coaches should have enhanced Disclosure and Baring Service clearance (formally CRB). 2 references should also be taken (one of which should be from a competent person who has witnessed the coach in action). The employing body is responsible for carrying out these checks. If using coaching provider evidence should be provided that these are in place e.g. by obtaining a confirmation letter from the provider.

**Skilled & Competent**
Schools & organisations must determine, through risk assessment, that the coach has the relevant experience, expertise and training. The specific competencies of any sports coach should be established prior to them working in the school. Guidance is available in the publication Safe Practice in Physical Education and Sport 2016 Edition published by The Association for Physical Education.

**Check employment status**
You must ensure you know the employment status of your coaches. This will ensure that if they are employees, the correct amount of tax and National Insurance contributions are being deducted from their payments. Or, if they are deemed to be self-employed, the coaches are paying the relevant National Insurance and tax contributions themselves. If you don’t get it right, you could end up having to pay extra tax, National Insurance, interest and possible penalties. You can check the employment status of your coaches by using the HMRC Employment Status Indicator tool at the following link: [www.northamptonshiresport.org/employmentstatus](http://www.northamptonshiresport.org/employmentstatus)

**Inducted**
All coaches working in your school should receive an induction to the school, this should include: health and safety, first aid, accident and emergency procedures, behaviour management procedures, child protection procedures, pupil and coach dress and any other relevant policies and procedures.