SARACENS
FOUNDATION

SARACENS FOUNDATION SAFEGUARDING POLICY FOR CHILDREN AND ADULTS AT RISK

1 Introduction

The Saracens Foundation (SF) is committed to safeguarding and protecting children and all adults who are under SF care or utilising the SF facilities. The welfare of these groups is paramount for all staff and accordingly, they must make themselves aware of the SF Safeguarding Policy. Where appropriate, the following policy will be supplemented by training and additional guidance. All concerns and allegations of abuse will be taken seriously and responded to swiftly and appropriately. SF is committed to prioritising safeguarding at a Board and Executive level to ensure that best practice in safeguarding is promoted and adhered to.

1.1 Scope

Activities undertaken at the following locations/departments are under the remit of this policy including:

- Saracens Foundation (SF)

1.2 Roles & Responsibilities

SF has a comprehensive safeguarding structure which assures the safety and welfare of all that engage with the group. For the purpose of this policy the safeguarding structure consists of the Foundation Safeguarding Lead (FSL) who has overall responsibility for the safeguarding of children at the Foundation and departmental Designated Safeguarding Officers (DSO) who work within various areas of the group. These DSOs have special responsibilities and are the focal point for safeguarding children and vulnerable adults in their nominated area.

The FSL is responsible for implementation of the safeguarding operations, processes, and policies across the Saracens Foundation. The FSL is also responsible for the induction and training of safeguarding across the charity, as well as the organisation and management of quarterly meetings to review and report on safeguarding operations and incidents.

- DSOs are appointed to provide a lead for safeguarding within the SF departments. The DSOs are responsible for embedding safeguarding within their own departments as well as being the point of contact should a concern arise within their own departments.

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Key people include:

Richard Symonds, Saracens Foundation, Head of Foundation

FSL – Ben Lawrence, Saracens Foundation, Head of Operations
- Saracens Foundation DSO – Mike Dobson
- Saracens Foundation DSO – Jessica Hammond
- Saracens Foundation DSO – Gill Thayne

BSR – Vic Luck, Saracens Group Board Member

Employees, workers, agency staff, consultants and volunteers working within SF are responsible for familiarising themselves with the SF safeguarding policy, ensuring the safety and welfare of all children as well as promoting best practice and creating a safe and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect. This expectation is set on recruitment, during induction and in regular communications.

Anybody with a concern about an individual's welfare should contact the FSL or a DSO for advice in the first instance – details can be found in Section 3 of this policy.

1.3 Rules, Regulations & Legislation

This policy is in accordance with national guidelines and is compliant with regulations set out in the 1989 and 2004 Children Act, Working Together to Safeguard Children (2023), the London Child Protection Procedures, Rugby Football Union (RFU), Safeguarding Children Rules and Premiership Rugby League Rules. This is further underpinned by the Adults at Risk Policy and the Adult Care Act 2014.

SG is fully committed to ensuring that the best practice recommended by these bodies is employed throughout the group. SF also has a responsibility to maintain regular dialogue with the Local Safeguarding Children Board. Due to their contact with children and all adults, staff in the SF are well placed to observe signs of abuse and/or neglect.

1.4 Definitions

A 'child' is defined as anyone who has not yet reached their 18th birthday.

Under the Care Act 2014, someone who is over 18 years of age, and has care and support needs is therefore defined as an 'adult at risk'. They can be experiencing or be at risk of abuse and or neglect as a result of care and support needs. They could therefore be unable to protect themselves against abuse or neglect.

Throughout this document, when referring to children, we are also referring to both children and adults at risk.

'Safeguarding' is defined for the purposes of this policy as:

- Protection from maltreatment.
- Preventing impairment of mental as well as physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

'Activity' means any activity or series of activities arranged for children by or in the name of SF. These are deemed to be regulated and therefore activate the required levels of DBS checks.

1.5 Aims & Key Principles

The aims of this policy are:

- To safeguard all children and adults who interact with SF.
- To ensure children and adults feel safe in SF activities.
- To demonstrate best practice in the area of safeguarding.
- To promote high ethical standards throughout SF.
- To promote the SF values in our safeguarding.
- To commit to working in partnership across the SF and with external organisations including statutory bodies to safeguard and protect those in our care.

The key principles underpinning this policy are:

- A child's welfare is, and must always be, the paramount consideration.
- An individual child or adult's right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs, gender or sexual identity.
- All allegations of abuse or poor practice will be taken seriously and responded to swiftly and appropriately.

2 SF Procedures

2.1 People & Recruitment

As part of SF recruitment and selection process, offers of work for positions which involve working with children are subject to a satisfactory Disclosure & Barring Service (DBS) check at the level deemed suitable for the position offered and subject to appropriate references. SF also require two satisfactory references and a DBS check to be completed before the commencement of employment. Only in exceptional circumstances where it is deemed business critical, can a risk assessment be completed for an individual to allow them to start work before these checks are completed. In these circumstances there will be no contact with children. Please contact the SL if you have an exceptional circumstances case.

2.1.1 Induction

The SL holds a specific safeguarding induction with all new employees, casuals and volunteers within their first month of work. This includes specific safeguarding updates, signs and indicators of abuse and how to report a concern.

2.1.2 Training & Awareness

All staff working in direct contact with children are required to complete the RFU's 'eLearning Introduction to Safeguarding' workshop before undertaking a role that requires working with children. Individuals must also undertake a refresher course, as advised by the RFU and Premiership Rugby (PRL). Details of those satisfactorily completing this course are retained by the People on Cezanne (our employee records database). A continual programme of Safeguarding awareness communications and additional training options is also provided by the SL to the SF to develop knowledge which are department specific.

We ask that all our coaches have:

- First Aid
- DBS Enhanced Certificate
- RFU Safeguarding Certificates
- Appropriate Coaching Qualification or Equivalent

2.1.3 Single Central Record

The SF SL (Ben Lawrence) maintains the single central record which includes all staff, casuals, volunteers and work experience students who are working with children. This record includes the coaching qualifications, DBS, Safeguarding Training and First Aid qualifications of delivery staff.

2.1.4 Work Experience

SF may from time to time offer work experience placements to children. U18s should always be under the supervision of a more experienced adult member of staff with a current DBS check and should only undertake duties within their age and capability. A risk assessment must be completed by the People Manager prior to or on arrival. This may be shared with the parent or carer before the placement is agreed. Work experience candidates will be talked through the safeguarding reporting procedures on arrival by the SF Safeguarding Lead.

2.1.5 Volunteers

Volunteers will undergo checks commensurate with their work for SF and contact with children. Under no circumstances should a volunteer who has not been appropriately checked be left unsupervised with children. Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, including a DBS check at Enhanced Level but without a barred list check.

2.1.6 Third Party Organisations and Partnerships

SF commitment to Safeguarding should be outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services. If other organisations provide services or activities for children for whom SF is responsible, we will check that they have appropriate procedures in place, including Safer Recruitment procedures. SF will obtain written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work at SF with children have been through appropriate safer recruitment procedures.

2.1.7 Disclosure & Barring Service.

SF works with the RFU to have all the background checks processed for the relevant staff. New staff will provide all their identification documentation to the relevant DSL or who processes the initial application through the GMS portal. SF is committed to providing equal opportunities to staff and therefore a positive CRC will not necessarily result in a bar from work. Should a positive DBS be received, a risk assessment will be carried out by the SL and relevant Head of Department /Head of Operations and where applicable the department DSO can also assess the information contained within the DBS. The member of staff will also be asked to attend an interview prior to a recruitment decision being made. The Rehabilitation of Ex-Offenders Act 1974 and the Protection of Freedoms Act 2012 should be considered in all cases before a final decision is made. If a new member of staff has been subject to a DBS check by their previous employer, SF will still require a further check. SF will ensure that all temporary staff and external consultants identified in roles that are working with children, sign a Self-Declaration Form and in any case, will not have unsupervised access to children during their time with SF. Where there are any persons under the age of 18, a DBS must be processed by a third-party provider as GMS does not allow for applications to be made for those under 18. Once the employee reaches their 18th birthday, a new application can be made through the RFU and all relevant training must be carried out in line with the normal DBS procedures.

2.2 Ratios & Supervision of Children

Any activity undertaken by SF will always give full consideration to the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision.

- Regardless of these ratios a minimum of 2 members of staff or a delivery partner staff member will always be available to supervise an activity. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).

- Coaching and staffing arrangements must always meet the needs of all children and ensure their safety. SF staff must ensure that children are adequately supervised and decide how to deploy staff to ensure children's needs are met.

- The RFU recommends that there should always be at least one DBS checked adult in charge of any group of children. The RFU recommend minimum supervision ratios which must be adhered to by SF staff. Where the SF is taking responsibility for the care of the children, parents/carers should not be included in supervision calculations.

- Where the SF are providing programmes/activities/events, the Risk Assessment should be referenced to ascertain appropriate and safe ratios. This includes Match Day Half Time Activities.

2.3 Lost Children

A lost child should be treated as a serious incident, and the escalation process should be followed. All sites where the SF deliver from will have a risk assessment that will include any additional measures taken to ensure a child does not go missing whilst in our care. For instance, ensuring that gates are locked. In any incident where a child is unaccounted for during or after a session the incident reporting and escalation procedure should be followed.

2.3.1 Stadium

It is rare for a child to become separated from the adult that they have attended with. Stadium staff, match day stewards and Pioneers are trained to deal with such instances and have a clear protocol to follow. For example - Pioneers are instructed to stay with the child (in pairs) for 15 minutes and wait for the parents, after that they escort the child to security, and an announcement would be made within the stadium. For clarity, Pioneers are volunteer stewards and provide customer facing matchday/event assistance.

2.4 Use of Images

Most people who take or view photographs or videos do so for entirely innocent and legitimate reasons. However, sadly, some people abuse children through taking or distributing images, we must therefore ensure we have safeguards in place. All images are taken by SF officials who have been briefed by the member of staff (and where possible a DSO) responsible for the activity being photographed / filmed. Please refer to SG Data Protection Policy for more information on the use of personal information. In all circumstances where children are being photographed the following will apply in order to protect them:

- Before taking or publishing images of children (for example on our website or in an email) parental consent is sought in writing at the start of each season or prior to the event. Parents/Legal Guardians are responsible for informing SF of any change of circumstances within the season which may affect consent.
- Parents/Legal Guardians will be informed of how the image will be used. SF will not allow an image to be used for something other than that for which it was initially agreed.

- All children featured in SF publications will be appropriately dressed and will have clothing garments covering their torso and from at least the bottom of their neck to their thighs, and feature safety equipment such as shin pads or guards.
- Only use the first name of the child on any publication if consent has been given.
- Encourage children to tell us if they are worried about any photographs that have been taken of them.
- Where possible, the image will focus on the activity taking place and not a specific child.
- Where appropriate, images represent the broad range of people participating safely in the event.
- Designated SF photographers will, where applicable, undertake a DBS and attend a Safeguarding workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the 'Use of Images' policy issued by SG and by the PRL from time to time. Saracens Identification will be worn at all times.
- Children who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any SF document.
- It is our intention that recordings of children for the purposes of legitimate coaching aids are only filmed by SF officials and are stored safely and securely at the SF premises.
- Any instances of inappropriate images should be reported to the SL immediately.
- Photography is forbidden in private areas such as changing rooms, toilets, showers, whilst a child is in a state of undress.

2.5 Gifts & Favouritism

Staff should take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment. Staff members should report any gifts to the Safeguarding Lead. SF recognises that there are occasions when children or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a "thank you", and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others. Staff should report any gifts received to their line manager. Similarly, it is not permitted for staff to give personal gifts to children. This could be misinterpreted as a gesture either to bribe, or to single out the child. It might also be perceived that a "favour" of some kind is expected in return. Any reward given to a child must first be agreed with the staff member's line manager and the Group Head of People as part of a structured reward system and not based on favouritism.

2.6 Online Safeguarding

Staff, volunteers, and coaches should never engage with children through their personal social media accounts, phones, or email addresses to communicate with children. Instead, they should write to the parent, guardian or carer through their official work email or phone.

All communications should be relevant to the work or project. The staff and coaches will provide detailed guidance to parents, guardians, and carers on how to access our online materials or content safely. This will reduce the risk of scams or harmful materials being available to children.

2.6.1 Off-Site Activities

All off site activities are subject to a Risk Assessment and / or will have an Emergency Action Plan sheet (Appendix 1, 2 and 3) to satisfy health and safety and safeguarding requirements. Where these activities are provided by and managed SF, our own safeguarding and child protection procedures apply. SF as event organisers have a responsibility to take all reasonable steps to ensure that the activities provide as safe an environment as possible. When children, for whom SF responsible, attend off-site activities, including residential visits and work-related activities, the DSO or Safeguarding Lead will check that effective risk assessments and safeguarding arrangements are in place such as effective supervision. SF follow both the Child Protection in Sport Unit and the RFUs recommended guidance for ensuring the safety and welfare of children whilst travelling. All parents, children will be informed of safeguarding reporting procedures prior to an off-site activity taking place.

2.6.2 Certificate Expiration

Where a certificate expires but the individual has applied within the recommended timeframe, the individual will be taken off regulatory activity and will be provided with alternative non-regulatory duties, at the Head of Foundation's discretion. Casual coaches will not be offered work until they are able to provide evidence of recertification. If an employee has not applied for recertification within the recommended timeframe, at the SL and Head of Foundation's discretion, the individual may be suspended without pay until re-certification is complete and evidence is provided.

2.6.3 Sessional Workers

All sessional workers (casual coaches) are expected to attend regular safeguarding updates delivered by the FSL. Work will not be offered if the sessional worker cannot attend. If a sessional worker has not worked for SF for 6 months, they will be made inactive on the Single Central Record. In order to re-start work and if their DBS is still within its three-year term, the individual will be required to submit a self-declaration form and attend a Safer Working Practice induction, delivered by the Safeguarding Lead. If any of the above certificates have expired these will be required to be renewed before work can be offered.

2.6.4 Departmental Risk Assessments

The SF undertakes a Risk Assessment for each Activity they operate on a bi-annual basis, and these are completed in consultation with the SFL and, where necessary, the SL and Health and Safety Manager. All children are encouraged to wear appropriate shoes and

protective equipment as appropriate to the sports activity. Coaches are required to adapt the sessions should there be participants who are unable to wear the required clothing and equipment.

2.6.5 Activities for Disabled Persons & Adults at Risk

The SF carries out all activities for disabled persons and adults at risk under the guidelines of the Equality Act 2010 and Safeguarding Vulnerable Groups Act 2006, and in accordance with the SG Safeguarding Policy.

2.6.6 HMP Activities and Programmes

Where individuals are required to work within Her Majesty's Prisons (HMP) appropriate DBS and additional police vetting checks will be required. Additional safety training will be provided by the local establishment and governance protocols will be outlined within a Service Level Agreements. For instance, safeguarding referral pathways will be in line with the establishment's protocols.

2.6.7 Employability

SF reserve the right to gather further information on participants should they have any additional concerns about their potential risk to staff, themselves or other participants. Deployment to programmes is therefore at the discretion of the Safeguarding Lead and Head of Foundation, based on satisfactory reference checks and DBS.

2.6.8 Code of Conduct

Each session delivered by SF applies a behaviour code of conduct policy which defines the behaviour expectations of both participants and staff. For more information, please contact FSL – Ben Lawrence, 07460020569.

Guidelines in the Event of Concern

If you work or intend to work with children, you are automatically placed in a position of trust that carries authority, status, power and responsibility. If the adults involved are positive role models displaying high moral and ethical standards, the benefit to young people's development can be significant. Unfortunately, it is also possible for adults in sport to do a lot of harm through direct action or by failing to respond to concerns. It is likely that if you have a concern this will be about poor practice rather than abuse. Both occur in rugby, and other sporting activities and both require a response.

2.7 Recognising signs of abuse

There are many different forms of abuse that fall into the categories identified by the NSPCC as follow. Should you have any concern that abuse is occurring you should contact the SL or a DSO immediately.

- Physical Abuse - Physical abuse is deliberately hurting a child, causing injuries such as bruises, broken bones, burns or cuts. It isn't accidental- children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped, or having objects thrown at them. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell – this is known as fabricated or induced illness. There is no excuse for physically abusing a child. It causes serious, and often long-lasting harm – and in severe cases, death.

- Honour Based Violence - A person who is at risk of honour-based violence is at significant risk of physical harm (including being murdered) and/or neglect and may also suffer significant emotional harm through the threat of violence or witnessing violence directed towards a sibling or other family members. Honour based violence cuts across all cultures and communities.

- Sexual Abuse - Sexual abuse involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence. 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.

- Harmful Sexual Behaviour - Harmful sexual behaviour includes using sexually explicit words and phrases, inappropriate touching, using sexual violence or threats, full penetrative sex with other children or adults.

- Child Sexual Exploitation- Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them. Children may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online. Some children are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

- Neglect- Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); failing to

  protect from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

- Emotional Abuse- Emotional abuse is the persistent emotional maltreatment such as to cause severe and persistent adverse effects on emotional development. It may involve conveying the individual is worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving 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. This may include 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 cyberbullying), causing the individual to frequently to feel frightened or in danger, or the exploitation or corruption of children.

- Bullying - Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt an individual both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night. SF has a zero-tolerance approach to bullying and any reported incidents of bullying will be taken seriously and investigated by the SL.

- Financial abuse and or extortion – This can be the mistreatment of a adult at risk in scenarios where there is financial theft of money or property, being defrauded, being put under pressure in relation t money or other property and having money or property misused.

- Radicalisation & Extremism - SF recognises that some people are more vulnerable to radicalisation, including those who may be isolated/marginalised in society (through mental health or disability) and may have no other support. Those who attend sports activities are not immune from this risk and therefore SG ensure that all staff who work with children are equipped at identifying potential indicators of abuse in regard to radicalisation and extremism. The following definitions are taken from the HM Government Prevent Strategy 2011.

    - Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate on terrorist activity.
    - Extremism is 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. We also include in our definition of extremism calls for the death of members of the armed forces.

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This guidance is issued under section 29 of the Act. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty.

- FGM Mandatory Reporting Duty- Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is abuse. It's dangerous and a criminal offence. Section 74 of the Serious Crime Act 2015 amended the Female Genital Mutilation Act 2003 to introduce the legal duty for regulated health and social care professionals and teachers to make a report to the police if:

    - they are informed by a girl under the age of 18 that she has undergone an act of FGM; and/or
    - they observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

3.1 Reporting a disclosure or suspicion of abuse or poor practice

It can be very hard for people to reveal abuse. Often, they fear there may be consequences. Some delay telling someone about abuse for a long time, while others never tell anyone, even if they want to. It is important to that distinguish that if there are concerns relating to adults at risk, then consent will be required from the adult before reporting to a DSO/SL. A DSO or SL should be contacted as early as possible and a report filed **within 24 hours** in any circumstance, however it is recognised that an individual may need to respond to a situation immediately. With this in mind, the following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice:

- Listen carefully. Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the child to 'shut down', retract or stop talking.
- Let them know they've done the right thing. Reassurance can make a big impact to someone who may have been keeping the abuse secret.
- Tell them it's not their fault.
- Say you believe them.
- Don't talk to the alleged abuser. Confronting the alleged abuser about what someone told you could make the situation a lot worse for the individual.
- Explain what you'll do next. If age appropriate, explain that you'll need to report the abuse to someone who will be able to help.
- Don't delay reporting the abuse. The sooner the abuse is reported after the person discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.

- **Write down everything that was said and what was done and report using MyConcern Reporting Tool.**
- Seek medical advice if necessary
- Make sure you tell a DSO immediately; they will know how to follow this up and where to go for further advice.
- DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.

3.2 Recording Allegations or Suspicions of Abuse or Poor Practice

The SL should be contacted immediately if you have concerns about a child or receive a complaint or allegation that a worker/volunteer has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with
  children

The DSO must immediately report any allegation to the SL, who will ask for a written factual statement from the person making the report.

Any statement made by the individual should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, keeping any questions to a minimum and they should be of an open format. Where possible, SF will ensure that any child concerned is immediately protected from any possible risk of harm.

Investigations into possible abuse will require careful management. In these cases, the SL will first seek the advice of the RFU, Children's Social Care, Adult Services, a Local Authority Designated Officer (LADO) or the Police before setting up an internal inquiry and take their advice on informing the Child's parents/carer. In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, SG must provide a report to the RFU Head of Safeguarding Children, PRL Head of Safeguarding Children.

Any external local authority provision will naturally take the lead on any case. Providing it is appropriate to do so the SL will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from the external agency. Escalation to inform board level will take place at the SL earliest opportunity.

3.3 Allegations of abuse made against members of Saracen's Staff

Advice from the People Team must be sought with 24 hours and depending on the nature of the allegation, there may need to be consideration for redeployment or even suspension as a neutral act pending the investigation. This is needed in certain circumstances to protect both the professional from further allegations being made and the children from

being subjected to further risk until there is more proof as to what happened.

Where the allegation is serious, or there is serious risk of harm, the SL or DSO shall immediately (within 24 hours) inform the LADO of the Borough where the alleged incident took place so that he or she can consult with the Police and local authority children's social care colleagues as appropriate. Where the SL or DSO are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.

The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation. This process would only be carried out once the advice of the abovementioned external bodies had been sought and only then in consultation with the SL. Providing it does not contradict any advice received from the LADO, any internal investigation will be carried out in line with the SG disciplinary procedures, insofar as they are applicable.

Where the allegation relates to a member of the SG Safeguarding structure, Chief Executive Officer, Charlie Beall, must be informed immediately.

3.4 Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all SG staff is that no guarantee of confidentiality can be given to a child (although this does not necessarily mean that the parents / carers have to be told). Safeguarding is the priority.

A child should never be pressured to give information or show physical marks unless they do so willingly. If they chose to show markings, two members of staff should be present and any marks raising concern should be recorded on the skin map included within the report form.

There are actions which staff have to and are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need-to-know basis and nobody should have any reservations about referring any issue to the SL. However, the protection of the child is supreme and safeguarding with override confidentially.