



KiCK Safeguarding Policy for working with Children & Young People

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1. A policy statement on safeguarding the welfare of children

Definitions

A child in this policy is defined as anyone under the age of 18.

A Young Person in this policy is defined as anyone under the age of 18.

Safeguarding: There is no legal definition of safeguarding, however in this policy, any references to safeguarding are in relation to the Government report, "Making Safeguarding Everyone's Business". The emphasis is to keep a child safe from harm by preventing abuse in the first instance. Therefore, safeguarding is defined as both safeguarding and promoting welfare .

Policy and guidelines for work with young people under 18

The Department for Education published an updated version of the statutory safeguarding and child protection guidance for schools in England, Keeping Children Safe in Education (KCSIE) in September 2024.

The guidance sets out what schools in England that KICK work in must do to safeguard and promote the welfare of children and young people under the age of 18.

The main updates to the document are listed below.

- Additional information around when children may require early help, in accordance with the guidance in Working Together.
- A recommendation for school staff, governors and trustees to use the DfE Data Protection guidance for schools to understand data protection
- Clarification that schools continue to be responsible for the safeguarding of pupils they place with an alternative provision provider.

The link to the policy is [Keeping children safe in education 2025](#). It is essential that everybody working in a school, college or place of education understands their safeguarding responsibilities. All KICK staff must read the relevant section of the document annually, in compliance with this using the Bright HR (KICK's HR system). Bright HR provides the option to confirm they have read this and so this can be tracked by the Safeguarding Office to ensure this is complete.

Below is the policy statement for KICK. This statement should be read in conjunction with KICK's Ethos, Values and Behaviours for working with young people.

KICK is committed to our mission to transform young people's lives, with God's love, through sport and support in all the settings and roles we have within schools and other settings. As an organisation with a Christian ethos, we affirm our belief in the God-given-value of each young person with whom we work or have contact. In recognition of God's wholehearted commitment to them, we will treat each individual with value and dignity whatever their belief.

KICK is committed to good practice through our core values which ensure our organisation places the young person at the heart of our work and that we have high professional standards. These values include the following, as we aim to transform young people's lives.

KICK POLICY STATEMENT -

We therefore make the following statements in response to Government guidelines based on our ACEII Values:

- *Aspirational Safeguarding*: As an organisation with a Christian ethos we affirm our belief in the God given value of each young person with whom we work or have contact.
- *Compassionate Safeguarding*: In recognition of God's wholehearted commitment to them, we will also treat each individual with value and dignity and aim that none suffers neglect, physical, sexual, emotional or spiritual abuse of any kind.
- *Excellent Safeguarding*: It is the responsibility of each one of us to safeguard the young people we come into contact with against neglect, physical, sexual, spiritual¹ and emotional abuse and to report any abuse discovered or suspected in accordance with this policy.
- *Intentional Safeguarding*: KICK is dedicated to quality supervision supporting resourcing and training those who work with young people.
- *Integral Safeguarding*: Each staff worker and volunteer shall be given a copy of this statement and KICK's agreed procedures for working with young people.

This statement will be reviewed on a regular basis and applies at any event undertaken in the name of KICK.

To achieve this Policy Statement KICK has;

- Appointed a Designated Safeguarding Officer, Safeguarding Deputies and two Lead Safeguarding Trustees and formed a Safeguarding Committee. Currently John Wright is the DSL and Becci Lee and Randy Ashie are the deputies. The board members are Penny Cox and Mike Wakeham. Gavin Stone (COO) and Andrew Martin (Director of BD) also sit on the committee.
- Senior leads and Managers have all been placed on a Level 3 Safeguarding course, one level below the DSO and deputies.
- Clear lines of accountability for safeguarding throughout the organisation.
- Termly safeguarding training for all delivery staff.
- Any Trustee on the Safeguarding Committee will do accredited training.
- Monthly safeguarding updates via the All-Staff bulletin, the *KICK Information Cascade*.
- A Safeguarding Policy that is formally updated annually to ensure all new legislation and guidance is regularly reviewed and included.
- Procedures to ensure that all new staff members are guided through the policy at point of induction which will include familiarising themselves with child protection responsibilities and procedures.
- All staff to complete a Level 2 Safeguarding course before starting within a school.
- Procedures to ensure that KICK have effective complaints and whistleblowing procedures in place.
- All staff will aimed to be visited/ meet physically before starting in a school. All staff will be meet physically within their first six weeks of employment.
- Talent Acquisition team to all complete Safer Recruitment online training.
- Staff must complete an electronic signature to confirm reading and understanding of any relevant compulsory policies to ensure they are up to date.

All staff and volunteers will be expected to sign a declaration stating whether or not they have ever accepted an official caution from the police, been convicted or are currently the subject of criminal

¹ "Spiritual abuse happens when a leader with spiritual authority uses that authority to coerce, control or exploit a follower, thus causing spiritual wounds."
Ken Blue: Healing Spiritual Abuse. IVP 1993.

charges (disclosing such information may not bar an individual from being appointed).

2. The Roles and Appointment of Staff and Volunteers

The appointment of staff and volunteers will follow the relevant KICK recruitment and probationary procedures. These are available from the Director of HR and include what to do in relation to the application process, interviews, references and proof of identity etc. We will be guided by the Safer Recruitment in Education Government guidelines. All staff and volunteers will have a written job description, work objectives and agreement.

In all cases, KICK will conduct an enhanced DBS check on all staff and volunteers which will be led by the DBS Coordinator. Where staff and volunteers are involved in any form of 'regulated activity' (anyone working closely with children or vulnerable adults, either paid or unpaid, not part of a family or personal arrangement, on a frequent or intensive basis. Frequent meaning once a week) cannot start any unsupervised activity within a school until the DBS enhanced disclosure has been received and is considered satisfactory. However, if written permission has been given by the school, satisfactory references are received and the DBS check is at the stage of process, then these coaches will be able to work in schools.

If recruiting staff or volunteers from overseas the guidance on the Disclosure Services should be followed. Where the country of origin is not listed KICK will contact that country's representative in this country, see the list on the FCO website: <http://www.fco.gov.uk/resources/en/pdf/london-diplomatic-list-june>. Volunteers from overseas that come to work with KICK must register with the local Police.

DBS disclosures will be stored electronically on the Bright HR System. This system is secure and can only be seen by the Safeguarding Officers and therefore remains confidential.

The KICK 'Use of Disclosure and Barring Service Policy' should also be referred to and complied with. This can be obtained from the Director of HR.

Any new staff or volunteer, who has a conviction on a DBS, will automatically be assessed against a risk register and then if needed, referred to the KICK Safeguarding Panel for decision on employment.

3. KICK Camps and Festivals

All staff delivering at a KICK Camp or Festival would be expected to receive further Safeguarding training specific to a Camp or Festival and expected staff behaviour. KICK Camps will always have a senior lead coach onsite and a member of the Safeguarding management team available to call. Each KICK Camp must have a risk assessment prior to starting and have a record book on site. The Camp Lead or Camp Manager will be responsible for the risk assessment and record book. The lead coach will be expected to share the risk assessment as well as the list of children attending the KICK Camp with any needs of safeguarding concerns attached with the staff working at the camp.

Festival staffing will be expected to adhere to the “Out of Hours Policy” and conduct themselves in accordance with the Code of Conduct for staff. Each Festival will have the minimum of one manager who has a Level 3 of higher safeguarding qualification and DSL training prior to the festival. This will be delivered by our Director of Business and lead on Festivals Andrew Martin, this training will be compulsory for any manager leading at a festival.

4. Guidelines for working with young people

All activities should avoid any situation where abuse could happen. All young people should be treated with respect and dignity. More detailed guidelines are contained within KICK’s Code of Conduct for working with young people.

- 2:1 Any form of contact should take place in public if possible. In situations where conversations require more privacy e.g. mentoring, then staff must ensure that there is another adult present and/or proximate in the building and that they are aware that the meeting is taking place. The door should be kept open or there should be a window in the room. Both public and personal conversations are to be within the guidelines laid out in KICK’s Code of Conduct for working with young people.
- 2:2 Taking a young person alone in a vehicle should be avoided, however short the journey. If this cannot be avoided and if only one person is left in a four-door car, that young person should sit in the rear seats. In the case of a staff member giving a young person a lift in the case of an emergency, lifts should only be given where the driver is insured for use of the car for business purposes and written consent has been given by way of either the parent or the school.
- 2:3 KICK Staff should not initiate physical contact with young people unless needed for a demonstration or first aid reasons. If physical abuse is threatened, then workers should seek assistance in the first instance and if physical violence is used against the member of staff, then they may defend themselves using the minimum of force. It should never be necessary to physically restrain a child unless his/her safety and/or that of others is at risk.
- 2:4 For school lessons, after school clubs, lunchtime events or other sessions at a school, an agreement is to be negotiated with the school as to whether or not they wish a staff member to be present (although a member of staff should always be on call). The recommended minimum is that two staff members or volunteers be present during such sessions, one being from the school and one from KICK.
- 2:5 When coaching at KICK Camps or Academies, ensure there are always two staff members or volunteers present. If young people need to be escorted off the premises, this should be done wherever possible through verbal encouragement. If more than verbal encouragement is needed, the recognised supervisor should be aware of this.
- 2:6 Making sexually suggestive comments about or to a young person (even in ‘fun’), scapegoating, ridiculing, rejecting or comments about the attributes or attractiveness of a young person should never occur.
- 2:7 Hugging is to be discouraged among the staff and volunteers when young people are present. If a learner hugs a staff member they should remind that learner they should not do that and make clear boundaries known. Although physical contact should not be initiated by the worker it is important that young people, if they initiate and choose to have any contact,

are responded to appropriately, e.g. a side arm hug. Physical contact should be age-appropriate.

- 2:8 Parental/guardian consent must be obtained for any activity undertaken where the young person is involved in extended time out of their home. Communication of what is happening should always be made available to parents/guardians.
- 2.9 Avoid favouritism and special friendships. Staff must not develop an exclusive relationship with a group member, however small the age gap. Never befriend particular young people.
- 3.0 To ensure that personal social media accounts are placed on private and no young person engaging with KICK is allowed to follow or see KICK staff's media accounts.

5. Procedures for protecting children and young people

All KICK staff shall be given and have explained this policy document.

All KICK staff will receive training according to these guidelines when they join KICK. Training will then occur for the whole team at least every term.

All KICK staff may come into contact with young people in the course of their duties, as a result all staff and volunteers will have an enhanced Disclosure and Barring Service (DBS) check completed. This will be redone every 3 years and will be instigated by the DBS Co-ordinator. Where there is a break in service, the worker must reapply for future work and references must be sought again. KICK will also conduct a DBS check for those workers who are paid on a contract for services or for sessional work (rather than employed or voluntary). Guidance on DBS is contained in KICK's Use of the Disclosure and Barring Service Policy. This Policy can be obtained from the Director of HR

One-off volunteers undertaking tasks for KICK are required to have a KICK DBS when working/volunteering for KICK. One-off volunteers will include those who accompany staff on a speaking engagement, shadow KICK staff members at school or assist at an evening after event, or any other KICK event.

No one who has been barred by the DBS will be allowed to undertake any form of regulated activity on behalf of KICK. No one under the age of 16 can receive a DBS check and cannot therefore take part in any regulated activity for KICK. Children under the age of 16 can still complete work experience with KICK but will under no circumstance be left alone with children and will always be with a KICK Coach when volunteering. Children taking part in work experience with KICK must also provide agreement from their school along with a reference of recommendation.

KICK is not responsible for the selection, approval or appointment of those working with children or young people in any school or affiliated church or group. These groups and churches are responsible for appointing people to work with children and young people according to their own policies for protecting children and young people.

Staff members responsible for the publicity of KICK may only use photos of young people where their face cannot be seen, unless parental permission is given. If KICK would like to use a picture of a child's face, written parental permission must be given beforehand. KICK may also use stock photos of children where their face is shown if purchasing these from a media and marketing company where this is acceptable, legal and safe.

6. Management/Supervision

There is a system of line management within KICK to provide supervision and accountability. This includes monitoring on-going work with young people in accordance with KICK policies and guidelines.

Line management practice involves monthly supervision meetings with staff and volunteers with the appropriate line manager to discuss and review the work of the staff member. Staff and volunteers must make supervisors aware of their working and personal relationships with the young people in their care.

It is expected that a member of the Quality Team will observe every member of staff or volunteer whilst he/she is working with young people at least twice a year. Line Managers will keep a brief written record of each supervision meeting and of anything of note, which are observed.

Any safeguarding concerns should be raised with a safeguarding officer within 24 hours of the concern and reported to their direct line manager when in supervision. Where needed the Designated Safeguarding Lead will advise a line manager on how to support their staff during a safeguarding incident.

7. Training

When a new member of staff is employed by KICK they will receive safeguarding training and a full review of the KICK Safeguarding Policy as part of their induction. It is compulsory for all to complete an online accredited Level 2 Safeguarding Course. This will be sent to them during their induction and must be completed before entering a school. Existing staff are to complete the course every 2 years as assigned by the DSL. Staff must electronically sign to confirm they have read the relevant compulsory policies, to ensure they are up to date with safeguarding.

KICK will run training courses for staff and volunteers, which will endorse the guidelines and equip staff and volunteers to use the guidelines, and associated documents. Such courses will take place at least once a term through specific safeguarding training. Safeguarding updates will also be shared with staff throughout the academic year via the Staff Information Cascade.

The Lead Safeguarding Trustee will work in conjunction with the Designated Safeguarding Lead in keeping them up to date with any changes made to these guidelines.

8. Procedures if abuse is suspected, discovered, or disclosed

If abuse is suspected, discovered or disclosed, the most important thing to remember is that when a young person discloses abuse of any nature is taking (or has taken) place, they are divulging a secret. It is not the place for this document to provide guidance for counselling in this scenario, but please make sure that the young person is made to feel safe and listened to and their concern raised will be taken seriously.

If a young person wants to talk to you about some form of abuse, follow the guidelines below as much as is possible and appropriate to your situation. General points are:

- accept what the person says,
- keep a writing record/ statement of what the young person says
- keep calm,
- be honest,
- look directly at the young person,
- do not appear shocked,
- let them know you may need to tell someone else,
- assure them that they are not to blame for abuse,
- never ask leading questions,
- never push for information,
- do not fill in words, finish their sentences or make assumptions,
- be aware that the child may have been threatened,
- ensure your body language is reassuring,
- where possible do not use physical contact with the young person

In the work of KICK, it is our duty to work to prevent abuse from taking place. There are several forms of abuse and their definitions are as follows:

'Physical' Physical abuse may or may not cause injury and includes physical ill treatment, causing unjustifiable physical discomfort, for example injury, pain or impairment.

'Emotional' is the persistent ill treatment of an individual causing negative effects on the person's emotional wellbeing and could impact their emotional development.

'Sexual' is where a sexual act is carried out without the informed consent of the other individual(s). Contact abuse could include using others to satisfy sexual desires; touching a young person's private parts in a way that makes the individual feel worried or unhappy; showing the young person rude pictures or videos; sexual abuse can be anywhere in the range from visual contact to sexual penetration. Non-contact abuse may include sexual remarks and suggestions and introducing a child to indecent material or exposure.

The age of consent for sex in England is 16. Sexual activity with a child under the age of 13 is classed as rape under the Sexual Offences Act 2003. A child under the age of 13 is not legally capable of giving their consent.

It is illegal and a serious offence for any person under the age of 18 to send sexual photographs or content. It is considered a paedophilic image in the eyes of the law and should be taken seriously.

'Neglect' is the failure for an adult to provide the necessary care, guidance and attention for an individual which seriously impairs their health and development.

'Spiritual' is when a leader with spiritual authority uses that authority to coerce, control or exploit a follower causing spiritual wounds. Young people may be particularly at risk of this in the context of a church, Faith based schools, church-related activities or any place of worship..

Recognising signs of abuse

The following signs may or may not indicate abuse, however if one or more of these signs are present, the possibility of abuse should be considered. Remember there may be other signs or

symptoms which are not listed below which could be indicators of abuse. Similarly, some of these signs and symptoms will not always be indicators of abuse and the presence of one or more of these signs or symptoms does not necessarily confirm abuse.

Physical

- Injuries not consistent with the explanation given for them,
- Bites, burns, bruises, fractures etc. that do not have an accidental explanation,
- Repeated urinary infection,
- Unexplained tummy pains,
- Injuries that have to receive medical attention,
- Re-occurring injuries,
- Cowering and flinching,
- Aggressive behaviour/severe temper.

Please note: Most children will have grazes and bruises which they collect as part of everyday life. However, indicators of physical abuse could include inconsistent or unexplainable explanations or visible injuries on soft parts of the body where accidents are unlikely, for example cheeks, abdomen, back and buttocks.

Emotional

- Obsessions or severe phobias,
- Persistent tiredness,
- Running away, stealing or constant lying,
- Extreme attention seeking behaviour,
- Nervousness,
- Changes or regression in mood or behaviour,
- Extreme anxiety, depression or aggression,
- Inappropriate relationships with peers or adults.

Sexual

- Detailed knowledge of adult sexual behaviours,
- Age-inappropriate sexual play,
- Sexual activity through words, play or drawings,
- Inappropriate relationships with peers or adults,
- Vivid dreams or nightmares,
- Evidence of grooming by individuals,
- Eating disorders,
- Pain or itching in the genital area,
- Sexually transmitted disease.

Neglect

- Constant hunger,
- Untreated illness,
- Under-nourishment,
- Stealing or gorging food,
- Inadequate care,
- Poor personal hygiene,
- Loss of weight or constantly under weight.

Additional Forms of Abuse:

Grooming- Grooming is when an emotional connection is built with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Grooming may also include threats or bribes, which persuade the person that it would be impossible to ask for help. It may appear as an unhealthy close friendship which breaks approved boundaries. A child can be groomed online or face-to-face by a stranger or someone that they know. It is important to remember that most children do not realise they have been groomed and that what has happened is abuse.

Sexual Abuse - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party ,consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) .Upskirting which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm, and initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Forced Marriage - Marriage without consent is not valid in UK law and a child under 16 years old is not considered to be competent to consent to marriage. The pressure put on a young person to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family).

It is important to remember that no matter how you have been made aware, it is not the responsibility of any of KICK's employees or volunteers to make the decision as to whether a child is actually being abused, it is simply your responsibility to act on any concerns by contacting the DSL that the correct and necessary action can be taken to protect the young person.

KICK staff members should look to identify children requiring early help. Any child may benefit from early help, and all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- has returned home to their family from care
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child, or
- is persistently absent from education, including persistent absences for part of the school day.

Mental Health

All KICK staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. KICK staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. If a KICK staff member has a mental health concern about a child that is also a safeguarding concern, immediate action should be taken to follow their school policy, and by speaking to the Designated Safeguarding Lead or a lead at KICK.

Online abuse –

Any child or young person can experience online abuse. If you've noticed something worrying, are concerned about something that's happened, or a child or young person has spoken out about abuse, then it's important you respond appropriately and raise this with the schools DSL and KICKS DSL or Deputy ASAP

What is online abuse ? - Online abuse is any type of abuse that happens on the internet, using technology like computers, tablets, mobile phones, games consoles and other internet-enabled devices.

Children and young people may experience several types of abuse online, including:

- bullying or cyberbullying
- emotional abuse (including emotional blackmail)
- harassment, stalking or other threatening behaviour
- pressure or coercion to send sexual images
- sexual abuse
- sexual exploitation.

The 2025 guidance adds disinformation, misinformation and conspiracy theories to the list of content risks under online safety. Disinformation is the deliberate creation and spread of false or misleading content, such as fake news. Misinformation is the unintentional spread of this false or misleading content

What KICK Staff should do:

If you suspect that a young person may be the victim of such abuse the following procedure must be followed:

- If the disclosure of abuse happens at a KICK session, outside of a school setting, then KICK will be responsible for following the reporting procedure. You must inform the KICK DSL or your line manager immediately for guidance on next steps, it is vital this is done at the moment of the disclosure. If any young person or child comes to you and talks about past or present abuse situations, keep a hand-written narrative of the conversation immediately

after you have spoken with that person. When reporting a disclosure of abuse or concern, KICK staff should inform the KICK Safeguarding Lead without delay. If necessary, the issue must be escalated without delay to KICK CEO. A decision will then be taken between the DSL and CEO as to whether to escalate the disclosure to the LADO for advice of next steps. If appropriate the disclosure should be reported to the relevant authorities quickly and the Board of Trustees will be informed via the Lead Safeguarding Trustee. If not deemed necessary to escalate the disclosure a report of the incident will be passed to the KICK DSL will keep a secure record of the report for future reference. All disclosures will be brought to the termly Safeguarding Committee for information and scrutiny.

- If the disclosure of abuse happens at a school (i.e. during a lesson, an after school club, at another time during the school day or at a holiday club run in partnership with the school), then the coach should follow the school's procedure and inform the school's Safeguarding Officer. Staff must familiarise themselves with the school's policy on their first day of work at each school. The KICK DSL should be informed that a disclosure has taken place and the school's procedure is being followed. After this the KICK DSL will make a decision on if KICK needs to take any further action and the KICK DSL will keep a secure record of the report for future reference.
- If the disclosure of abuse happens at a KICK Academy session (hosted and run by a local church or community project) then the coach should follow the church's procedure and inform the church's Safeguarding Officer. Staff and volunteers should familiarise themselves with the policy of the church before their first session takes place. The KICK Safeguarding Academy Lead should be informed that a disclosure has taken place and the church's procedure is being followed. After this the KICK DSL will make a decision on whether KICK needs to take any further action and the KICK DSL will keep a secure record of the report for future reference.
- It is important to keep reporting channels as short as possible and this should not prevent or delay any reporting to relevant authorities. If the person to whom the abuse was disclosed believes that the designated person has not taken appropriate action, they may speak to the authorities themselves.
- The young person must be kept informed at all times of what is being done, what is likely to happen, and should be prepared for such an eventuality before they disclose such information. However, it is also important that the young person is aware that no action is likely to be taken by the authorities without the young person being listened to and all decisions reached will take account of the wishes and feelings of the young person (1989 Children Act).

When the situation is reported to the authorities then it is likely that the following may be included:

- A strategy discussion involving Social Services, Police Child Protection Team, other significant professionals and the person suspecting abuse or to whom the young person has talked. A decision will be taken as to whether an investigation is warranted; if so, it will then be planned. If the Social Services decide to pursue this the investigation is likely to include:
 - An informal talk with the child
 - A formal police (+/- social services) video recorded interview
 - Medical examination
 - Preliminary family assessment.

The authorities are likely to be more proactive in situations where other young people could also be at risk.

If there is sufficient concern, a child protection conference will be held to decide the best course of action to protect the child and help the family. There may be criminal prosecution of the abuser.

9. Accusations of abuse against KICK staff or volunteers

If any member of KICK staff or volunteer is accused of abuse, then KICK will co-operate with all relevant agencies in the enquiry.

During the course of the enquiry, it is recommended that the staff or volunteer concerned is not involved in face to face schools provision and that they take a period of special leave during which salary continues to be paid. If the enquiry is not concluded within a month or two this action may need to be reassessed.

KICK staff, trustees and volunteers must report any allegation made about themselves or others to the KICK DSL or Deputy. Any accusations against staff members, volunteers or trustees which are found to be true, must be reported to the charity commission.

10. Confidentiality

All children, vulnerable adults, and their families, are entitled to their privacy. However, where there are concerns about the safety or the welfare of a child or vulnerable adult, those concerns and the necessary personal information will need to be shared with those who can make decisions about action to safeguard the child, young person or vulnerable adult.

There is nothing in any legislation that prohibits the sharing of confidential and personal information where there are concerns about the safety or welfare of a child, young person or vulnerable adult, or where a criminal act may be, or may have been committed.

Employees should make written notes at the earliest opportunity and these should be passed to the Designated Safeguarding Lead as seen in Appendix One. The Designated Safeguarding Lead must keep all written documents relating to a safeguarding issue in a secure place.

These detailed records should be kept until the Designated Safeguarding Lead is confident that the information is held accurately with the agency responsible for taking further action to safeguard the child, young person or vulnerable adult i.e. partner agencies, social services or the police. A chronology of decisions made and actions taken can then be kept on file, once the detailed records are deleted or destroyed. This record should be held for 50 years.

More information can be found in the government document [Working Together to Safeguard Children](#)

Where concerns have been raised about a member of staff or a volunteer and these relate to behaviour that has harmed, or may have harmed a child, young person or vulnerable adult; possibly committed a criminal offence against, or related to a child, young person or vulnerable adult; or behaved in a way that indicates s/he is unsuitable to work with children, young people or vulnerable adults, then:

- The Director of HR must be informed

- A clear and comprehensive summary of any allegations made, details of how the allegations were followed up and resolved, and of any action taken and decisions reached, will be recorded,
- This record will be kept in the person's confidential personnel file and a copy should be given to the individual,
- Such information will be retained on file, including for people who leave the organisation, at least until the person reaches normal retirement age, or for ten years if that is longer.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where a future DBS disclosure reveals information from the police that an allegation was made but did not result in a prosecution or a conviction. It will also prevent unnecessary re-investigation if, as sometimes happens, allegations resurface after a period of time.

(As defined in the [Safeguarding Vulnerable Groups Act 2006](#)).

The Director of HR (or, in their absence, the HR Assistant) is responsible for making this referral to DBS and for informing the Trustee with responsibility for Safeguarding.

Record keeping

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing by the KICK Designated Safeguarding Lead or / and the Director of HR. This will also help if/when responding to any complaints about the way a case has been handled by KICK. The Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each incident.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved, and
- a note of any action taken, decisions reached and the outcome.

Why is all of this important?

It is important for children to receive the right help at the right time to address safeguarding risks, prevent issues escalating and to promote children's welfare. Research and local child safeguarding practice reviews have repeatedly shown the dangers of failing to take effective action.

Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect
- poor record keeping
- failing to listen to the views of the child
- failing to re-assess concerns when situations do not improve
- not sharing information with the right people within and between agencies

- sharing information too slowly, and
- a lack of challenge to those who appear not to be taking action.

11. AI within schools

Using AI safely and effectively - Any use of generative AI by staff, students, and pupils should be carefully considered and assessed, evaluating the benefits and risks of use in its education setting. KICK / and or the school should ensure that safety should not be compromised. Schools and KICK staff should also consider that there may be uses of generative AI by staff or pupils that have not been explicitly approved or adopted in their setting.

Risk assessments should include plans for mitigating against unauthorised use cases. For example, students may use generative AI to create emails from the school to parents/KICK mentors that seem realistic.

Schools and colleges are free to make their own choices about the most suitable use cases for generative AI tools in their settings, as long as they comply with their wider statutory obligations such as keeping children safe in education.

For any use of AI, schools and colleges should follow the below, If for any reason a KICK staff member suspects the below hasn't been followed they should raise this with the KICK DSL.

Guidelines on AI -

- comply with age restrictions set by AI tools and open access LLMs
- consider online safety, including AI, when creating and implementing their school or college approach to safeguarding and related policies and procedures
- consult Keeping children safe in education
- refer to our generative AI product safety expectations
- refer to the filtering and monitoring standards to make sure they have the appropriate systems in place, including filtering and monitoring approaches that cover generative AI

12. Whistle Blowing procedures

KICK is committed to delivering services of the highest possible standard, having a culture of safety and of raising concerns where staff are valued, and reflective practice is promoted. Therefore, we welcome and encourage you (and others) to come forward and voice any concerns that you have

about any aspect of KICK's work, including about poor or unsafe practice and potential failures in the KICK's safeguarding regime, so that they can be dealt with effectively.

We want you to feel able to raise concerns within KICK without fear of reprisals, rather than overlooking a problem. Provision for mediation and conflict resolution will be provided where necessary. KICK promotes a culture of transparency and accountability in relation to how concerns are raised and handled, so you should feel supported in coming forward. Employees must acknowledge their individual responsibilities to bring matters of concern to the attention of senior management and/or relevant agencies. Although this can be difficult, this is particularly important where the welfare of children may be at risk. As an employee you may be the first to realise that there may be something wrong within KICK. However, you may not feel able to express your concerns because you feel that speaking up would be disloyal to your colleagues or to KICK. You may also fear harassment or victimisation. In these circumstances, it may be easier for you to ignore the concern rather than report it. These feelings, however natural, must never result in a child or young person continuing to be unnecessarily at risk. Remember it is often the most vulnerable child or young person who is targeted. These children need someone like you to safeguard their welfare: Do not think what if I'm wrong - think what if I'm right! All concerns must be reported.

Reasons for whistleblowing

- Each individual has a responsibility for raising concerns about unacceptable practice or behaviour,
- To prevent the problem worsening or widening,
- To protect or reduce risks to others,
- To prevent becoming implicated yourself.

What concerns should you raise?

- Is unlawful;
- Is against KICK's policies,
- Falls below established standard or practice,
- Amounts to improper conduct.

Remember: as a KICK employee, you have the right to raise concerns that could be about the actions of other employees.

If you are concerned about something to do with your own terms and conditions of employment, you should raise this under the KICK's Grievance Procedure.

Self-reporting

Any person employed by KICK must report immediately to the Designated Safeguarding Lead any convictions they receive. There may be occasions when an employee has a personal difficulty, maybe a physical or mental problem, which they know to be impinging on their professional competence. Staff have a responsibility to discuss such a situation with their line manager so professional and personal support can be offered to the member of staff concerned. Confidentiality cannot be guaranteed where personal difficulties raise concerns about the welfare or safety of children.

Please note -- before blowing the whistle you should consider the following:

- the responsibility for expressing concerns about unacceptable practice or behaviour rests with all employees,
- you should use staff meetings and other opportunities to raise questions and seek clarification on issues that concern you,

- whilst it can be difficult to raise concerns about the practice or behaviour of a colleague, you must act to prevent the problem from potentially getting worse, to reduce potential risks to the health and safety of others, and to prevent yourself potentially being implicated.

How should you raise a concern?

The earlier a concern is expressed, the easier and sooner it is possible to take action. As a first step, you should normally raise concerns with your:

- Immediate line manager who is likely to seek advice from the Designated Safeguarding Lead depending on what it is;
- For more serious worries go direct to the DSO at KICK
- However, if you have concerns regarding the KICK Safeguarding Team or Executives, you should approach: the Chair of Board.

What happens next?

Once you have raised a concern KICK will:

- give you information on the nature and progress of any enquiries,
- take action to protect you from harassment or victimisation,
- provide mediation and dispute resolution if appropriate,
- do its best to protect your identity if you do not want your name disclosed (although this might not be possible in all cases, especially if a signed statement is needed from you in order to address the concern via another procedure, e.g. the disciplinary procedure),
- take no action against you if you raise a concern in good faith that is later confirmed to be unfounded.

13. Roles of Responsibility

Designated Safeguarding Lead: John Wright (Director of Quality) 07535044033

John Wright is the DSL for KICK and should be consulted on any SG decisions made, his main oversight is around schools and staff work.

Deputy Safeguarding Leads: Becci Lee and Randy Ashie.

Becci Lee (Director of HR) will support the DSL and lead on Safer Recruitment with her team. Randy Ashie (Relationship Manager and Camp Manager) will lead on Camps safeguarding ensuring risk assessments are completed and is available for supporting staff.

Safeguarding Officer Andrew Martin (Director of BD) will be the safeguarding lead for festivals and KICK Academies, ensuring that risk assessments have taken place and volunteers have been vetted according to the safer recruitment guidelines.

Supporting roles:

KICK CEO: Joe Lowther

KICK COO: Gavin Stones

DBS Co-ordinator: Becci Lee (Director of HR) and Louise Corless (HR Assistant)

Designated Safeguarding Board Members: Penny Cox / Mike Wakeham

Board of Trustees: All board members have enhanced DBS checks and Designated safeguarding leads on the board will advise if it is necessary of any of board members to certificated safeguarding training.

Chair of Board: Matthew King

Signed off by KICK Board of Trustees :

Renewal Date: November 2027