

SAFEGUARDING CHILDREN AND VULNERABLE ADULTS POLICY

Season 22/23

1. Introduction

- 1.1. Saracens (“the Club”) and Saracens Sport Foundation (SSF) are committed to safeguarding and protecting children and young people and fully accepts responsibility for the wellbeing and safety of all children and young people who are under the Club’s care or utilising the Club’s facilities.
- 1.2. All children have the right to protection from all forms of abuse and exploitation and it is the duty of all staff and volunteers, paid or unpaid, including Trustees working at the Foundation to safeguard the welfare of children and young people by creating an environment that protects them from harm.
- 1.3. The wellbeing of children and young people is paramount for all staff and accordingly, they must make themselves aware of the Club’s Safeguarding Children and Vulnerable Adults Policy. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance. All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.

2. Rules, Regulations & Legislation

- 2.1. This policy and procedure document is in accordance with LSCB (London Safeguarding Children Board) guidelines and is compliant with regulations set out in the 1989 and 2004 Children Act, Working Together to Safeguard Children (2015), the London Child Protection Procedures (2017, 5th edition), Rugby Football Union (RFU), Safeguarding Children Rules and Premiership Rugby League Rules and Minimum Standards criteria. In addition, the following principles, legislation, rules, regulations and guidance underpin the Safeguarding Policy:
 - What to do if you’re worried a child is being abused: Advice for Practitioners (2015)
 - Safeguarding Vulnerable Groups Act 2006
 - Protection of Freedoms Act (POFA) 2012
 - Keeping Children Safe in Education (KCSIE) 2022
 - Female Genital Mutilation Act (2013)
 - Sexual Offences Act (2003)
 - UN Convention on the Rights of the Child (1989)
 - The Equality Act (2010)
 - Data Protection Act (1998)
 - London Child Protection Procedures and Practice Guidance 2017
- 2.2. The Club is fully committed to ensuring that the best practice recommended by these bodies is employed throughout the Club. The Club also has a responsibility to maintain regular dialogue with the Local Safeguarding Children Board. Due to their contact with children, staff at the Club are well placed to observe changes in a child’s behaviour and outward signs of abuse and/or neglect.

3. Scope

- 3.1. This policy is for use across the Club, Saracens Sport Foundation and Stone X Stadium and has been adopted by Senior Executives and Management of the Club and the Saracens Foundation, including Directors. The Club and Foundation are committed to prioritising safeguarding at a strategic level to ensure best practice in safeguarding is promoted and adhered to.
- 3.2. Activities undertaken at the following locations/departments are under the remit of this policy including:

- Saracens Sport Foundation
- Saracens Men and Academy training ground (Old Albanians);
- Saracens Women’s Rugby Club;
- Saracens Mavericks Netball Club
- Saracens Rugby Camps;
- Stone X Stadium;
- Saracens Academy Scholars;
- Saracens Retail Store;
- Stadium Tours, My First Match Day, Stewarding, Pioneering and all other activities on match days and roles that come in to contact with children, young people and vulnerable adults;
- Travel, Events and Support Liaison;
- Youth Development;
- Other club related entities/activities undertaken outside of the UK.

4. Definitions

- 4.1. A ‘child’ is defined as anyone who has not yet reached their 18th birthday. ‘Children’ therefore means ‘children and young people’ throughout.¹
- 4.2. A ‘vulnerable adult’ is an adult who is or may be for any reason unable to take care of themselves, or be unable to protect themselves from harm or exploitation
- 4.3. Safeguarding and promoting the welfare of children is defined² for the purposes of this policy as:
- protecting children from maltreatment;
 - preventing impairment of children's health or development;
 - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
 - acting to enable all children to have the best outcomes
- 4.4. An “**Activity**” means any activity or series of activities arranged for children by or in the name of the Club. These are deemed to be regulated and therefore activate the required levels of DBS³ checks.

5. Aims & Key principles

- 5.1. **The aims of Saracens Rugby Club’s Safeguarding Children Policy are:**
- To safeguard all children who interact with us.
 - To demonstrate best practice in the area of safeguarding children.
 - To positively reflect and promote the Club Values (**Work-rate, Discipline, Honesty and Humility**) regarding safeguarding children.
 - To ensure children feel safe in our activities.
 - To commit to working in partnership across the organisation and with external organisations including statutory bodies to safeguard and protect children and young people.
 - To develop a positive and pro-active welfare programme to enable all children to participate in an enjoyable and safe environment.

¹ Working Together to Safeguard Children, 2015

² Working Together to Safeguard Children, 2015

³ Disclosure and Barring Service

- To encourage parents and other members of a child's family to be involved in a relationship with Saracens and Saracens Foundation.
- To ensure that coaches, parents and other adults who come in contact with children are good role models of behaviour.
- To promote high ethical standards throughout Saracens.

5.2. The key principles underpinning this policy are:

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

5.3. This policy applies to all staff and is consistent with procedures of the Safeguarding Children Board for Barnet and Hertfordshire.

6. Roles & responsibilities

6.1. The Club has a comprehensive safeguarding structure which ensures the safety and welfare of all children that engage with Saracens. For the purpose of this policy and procedure the safeguarding structure consists of; the Saracens Group Safeguarding Lead (SL) who has overall responsibility for the safeguarding of children at the club, The Foundation Safeguarding Lead 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 business. These DSO's have special responsibilities and are the focal point for safeguarding children and vulnerable adults in their nominated area.

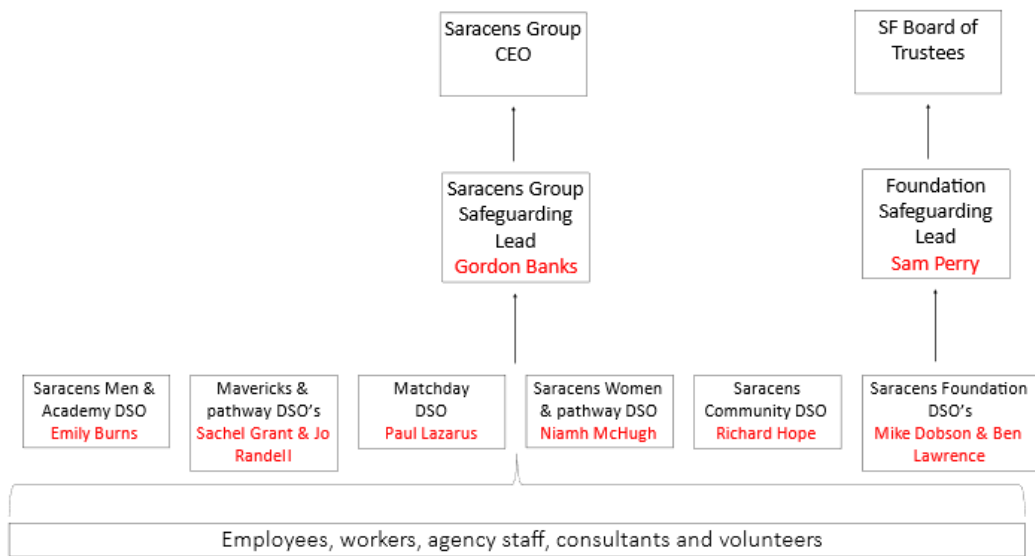
6.2. The Saracens Group Safeguarding Lead is responsible for Implementation of the safeguarding operations, processes, and policies across the Saracens Group. The Safeguarding Lead (SL) is also responsible for the induction and training of safeguarding across the group, as well as the organisation and management of quarterly meetings to review and report on safeguarding operations and incidents.

6.3. The SL forms an important part of the incident management and reporting process should incidents need to be escalated above Designated Safeguarding Officer (DSO) level.

6.4. The Saracens Foundation Safeguarding Lead is responsible for implementation of the safeguarding operations, processes, and policies across the Saracens Foundation. The Safeguarding Lead (SL) 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.

6.5. The SL forms an important part of the incident management and reporting process should incidents need to be escalated above Designated Safeguarding Officer (DSO) level.

6.6. Designated Safeguarding Officers (DSO's) are appointed to provide a lead for safeguarding within the Club and Foundation. The DSO's 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.



6.7. DSO's will meet on a quarterly basis to review incidents and share information in accordance with Working Together (2015). The minutes of such meetings will be recorded and stored appropriately and in line with the Data Protection Act (1998) and should be shared with the SSM.

6.8. Employees, workers, agency staff, consultants and volunteers are responsible for familiarising themselves with the Club's policy and procedures, ensuring the safety and welfare of all children and young people 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.

6.9. Anybody with a concern about a child's welfare should contact the SL or a Designated Safeguarding Officer for advice in the first instance – details can be found at the end of this policy.

7. Human Resources & Safer Recruitment

7.1. As part of Saracens recruitment and selection process, offers of work for positions which involve working with children are subject to a satisfactory Disclosure & Barring Service (DBS) at the level deemed suitable for the position offered and subject to appropriate references.

7.2. Saracens 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 or vulnerable adults. Please contact the Safeguarding Lead if you have an exceptional circumstances case.

7.3. The SL holds a specific Safer Working Practice induction with all new employees, casuals and volunteers within their first month of work. During which key elements of Saracens Safeguarding Children and Vulnerable Adults Policy are discussed in more detail, including any specific safeguarding updates, signs and indicators of abuse and how to report a concern.

- 7.4. All staff working in direct contact with children are required to complete the RFU's Level 2 and Level 3 Safeguarding Children Awareness 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), at least once every 3 years. Details of those satisfactorily completing this course are retained by the Human Resources Department in the Single Central Record.
- 7.5. A continual programme of Safeguarding Awareness courses is also provided by the SL to develop knowledge which are department specific.

Single Central Record

- 7.6. The HR Lead maintains the Single Central Record which includes all staff, casuals, volunteers and work experience students who are working with children and vulnerable adults. This record includes the coaching qualifications, DBS, Safeguarding Training and First Aid qualifications of delivery staff.

Work Experience

- 7.7. Saracens may from time to time offer work experience placements to young people. The Club has a central work experience scheme which provides (forwardly) planned and structured work experience placements. Whilst undertaking work for the Club, those on work experience will not have unsupervised access to children or vulnerable adults.
- 7.8. For those undertaking work experience who are under the age of 18, more detailed guidelines can be found in the policy regarding the employment / engagement of workers under the age of 18.
- 7.9. The HR Manager and the Safeguarding Lead should be informed of work experience placements for all children of compulsory school age and young people. Saracens has procedures to safeguard children undertaking work experience which are in accordance with "Work Experience: a guide for Employers"⁴
- 7.10. Children employed as staff are subject to certain employment conditions and hours. Under Health and Safety Management Regulations, under 18's should always be under the supervision of a more experienced adult member of staff and should only undertake duties within their age and capability.
- 7.11. A risk assessment must be completed by the Health and Safety Officer for each child and young person. This must be shared with the parent or carer before the placement is agreed.

Volunteers

- 7.12. Volunteers will undergo checks commensurate with their work at Saracens and contact with children or vulnerable adults. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised with children or vulnerable adults.
- 7.13. 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.

⁴ DFES, 2002

Contractors

- 7.14. All external contractors engaged by Saracens undergo a suitability test prior to commencing work. This will include evidencing the contractor's Safety Record, Safety Policy, Liability Insurance, Risk Assessment/Method Statement and details of Competent Person. On arrival at Saracens the contractor will receive a site induction from a member of the Facilities team which covers Safeguarding Children and give details of the Saracens expected code of behaviour.
- 7.15. Contractors are subject to regular inspection from Saracens personnel. In the event of a contractor carrying out work on an area that is usually occupied by children, this work, where possible, will be undertaken when children are not present or with Saracens personnel overseeing the work.
- 7.16. The contractor will be required to avoid contact with children.

Third Party Organisations and Partnerships

- 7.17. The Club's 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.
- 7.18. If other organisations provide services or activities for children for whom the Club is responsible, we will check that they have appropriate procedures in place, including Safer Recruitment procedures.
- 7.19. Saracens will obtain written confirmation from supply agencies or third party organisations that agency staff or other individuals who may work at Saracens with children have been through appropriate safer recruitment procedures.

8. Disclosure & Barring Service

- 8.1. Saracens is registered with the Disclosure Barring Service to carry out Criminal Record Checks. **Enhanced DBS checks, plus barred list check where appropriate**, enable Saracens to undertake more thorough recruitment and selection procedures for positions which involve working with children.

New Appointments

- 8.2. All staff who are offered a position which involves working with children will be required to complete a Self-Declaration Form and also undertake an Enhanced DBS with barred list check where appropriate. Other roles which are also suitable for a DBS check but not enhanced are identified by the Human Resources Director or guidance from the RFU or PRL. All offers of work are subject to the outcome of the screening process and where applicable, this is set out in the initial job advertisement and the applicant's offer of work. Until a satisfactory DBS has been received, the member of staff will not be permitted to work unsupervised with children.
- 8.3. Saracens is committed to providing equal opportunities to staff and therefore a positive CRC will not necessarily result in a bar from work.

Positive Disclosure

- 8.4. Should a positive DBS be received, a risk assessment will be carried out by the Safeguarding Lead, relevant Head of Department, HR Manager and where applicable the department Designated Safeguarding Officer, to 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.

- 8.5. If a new member of staff has been subject to a DBS check by their previous employer the Club will still require a further check.
- 8.6. Saracens 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 Saracens.

9. Ratios & Supervision of Children

- 9.1. Any activity undertaken by Saracens 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.
- 9.2. 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).
- 9.3. Coaching and staffing arrangements must always meet the needs of all children and ensure their safety. Saracens staff must ensure that children are adequately supervised and decide how to deploy staff to ensure children's needs are met.
- 9.4. The Rugby Football Union recommends that 'as a rule of thumb teams should generally have a minimum of 1 adult to 10 children and young people and a minimum of two adults'.⁵ For children who are 5 years old or under this ratio reduces to 1 adult to 6 children. For children aged 7 and 8 the ratio should be 1 adult to 8 children.
- 9.5. The following ratios apply across the Academy and Saracens Foundation. Advice should be sought from the Safeguarding Lead if unsure.
 - For Academy Activities, the Rugby Football Union Youth Development Rules prescribe a ratio of 1 Coach to 8 Players (over 8s).
 - Where the Foundation are providing programmes/activities/events, the Fit for Purpose Policy should be referenced to ascertain appropriate and safe ratios. This includes Match Day Half Time Activities.
 - Where the Club is taking responsibility for the care of the children, parents/carers should not be included in supervision calculations.

Children at Match Day Events

- 9.6. During Match Day there are often groups of children who are visiting the stadium with parents or other professionals in organised groups. If Saracens are providing an event such as a tour/festival at the stadium, Saracens do not take full responsibility for these children. Instead, Saracens will take responsibility for children and young people during designated activities organised by the Club.

- 9.7. For organised groups where Saracens are primarily responsible for children attending a match day at StoneX Stadium, for any activity, the minimum ratio for children over 5 years of age is 2 responsible adults for every 10 children this is reduced to 7 for children under 5 years of age. Saracens only take responsibility for children whilst undertaking matchday activities.
- 9.8. All children who attend StoneX Stadium for an activity or event including Mascots and Ball Boys/Girls must be accounted for on a register. Parental consent must be taken regarding how the child will be collected at the end of their experience or whether the child or young person is able to walk home alone.
- 9.9. All parents / carers are required to sign the register on collection of their children.

10. Scouts/DPP Coaches

- 10.1. All Scouts and Development Player Programme coaches undertaking work for the Club are registered with the Rugby Football Union. Those scouts/DPP coaches who are engaged in identifying players under the age of 18 also undergo a DBS and are required to undertake the RFU Safeguarding Children Workshop (Level 2 and Level 3). These scouts and DPP coaches should adhere to the safeguarding practices and procedures set out by the RFU within their roles.
- 10.2. References are sought for all Scouts/DPP coaches and, on registration, Scouts /DPP coaches identifying players under the age of 18 are issued with a copy of the RFU rules and regulations, Saracens Code of Conduct and the Safeguarding Children and Vulnerable Adults Policy.
- 10.3. Saracens only permits scouts from other clubs to attend its Academy Games Programme matches in accordance with the provisions of the Premiership Rugby Youth Development Rules.

11. Gifts and Favouritism

- 11.1. 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 Human Resources team.
- 11.2. The Club 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 and they should be dealt with in accordance with the Club’s policy on receiving gifts.
- 11.3. 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.
- 11.4. Any reward given to a child must first be agreed with the staff member’s line manager as part of a structured reward system in line with the departmental policy and not based on favouritism.

12. Use of Images

12.1. Most people who take or view photographs or videos of children 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.

12.2. Saracens takes its guidance on the use of images from guidelines issued by the RFU and PRL. All images are taken by Club 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 Saracens 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 on a newsletter) parental consent is sought in writing at the start of each Rugby season or prior to the event. Parents/Legal Guardians are responsible for informing Saracens 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. The Club will not allow an image to be used for something other than that for which it was initially agreed.
- All children featured in Club 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 Saracens photographers will, where applicable, undertake a DBS and attend a Safeguarding Children 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 Saracens and by the PRL from time to time. Club Identification will be worn at all times.
- All external photographers are subject to contractor requirements and will be escorted at all times whilst on the premises.
- 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 Club document.
- No images of children featured in Club publications will be accompanied by personal details such as their school or home address.
- Recordings of children for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises.
- Any instances of inappropriate images in rugby should be reported to the Safeguarding Lead immediately.
- Saracens does not put young player profiles with images and personal information on its website
- Photography is forbidden in private areas such as changing rooms, toilets, showers, whilst a child is in a state of undress.

13. Travel, Events & Support Liaison

13.1. All off site (outreach) activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where these activities are provided by and managed by Saracens our own safeguarding and child protection procedures apply.

- 13.2. Children have a right to enjoy taking part in sports events planned and provided by those who put their safety and wellbeing first. The Club and Foundation as event organisers have a responsibility to take all reasonable steps to ensure that the activities provide as safe an environment as possible.
- 13.3. When children for whom The Club is 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.
- 13.4. Many things can negatively impact on a child's experience at an event, from boredom and homesickness, to poor coaching practice and abuse. Although incidents of serious poor practice and abuse do arise during events, most incidents are lower-level concerns and are often associated with more general practicalities, e.g. arrangements for refreshments, meals and transport. Nevertheless, they can still have a significant impact on a child's experience at an event.
- 13.5. The Club and Foundation follow both the Child Protection in Sport Unit's⁶ and the RFUs recommended guidance for ensuring the safety and welfare of children whilst travelling⁷.

14. Lost Children

- 14.1. A lost child should be treated as a serious incident and the Incident Reporting Policy and Escalation Process should be followed.
- 14.2. All sites where the Club or Foundation 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.
- 14.3. In any incident where a child is unaccounted for during or after a session the incident reporting and escalation procedure should be followed.

Stadium

- 14.4. It is rare for a child to become separated from the adult that they have attended with. Stadium staff are trained to deal with such instances and have a clear protocol to follow. 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.

15. Match Day

- 15.1. Please see matchday protocols and pioneer briefing documents for more details on the processes and procedures followed throughout a matchday.

Unaccompanied Children

- 15.2. A child must be 12 years old or over to be able to attend a match unaccompanied. An under 12 child cannot attend on their own. They must have a responsible person aged 16 or over with them.
- 15.3. Multiple junior tickets can be sold, if all of the group are 12 years and over. Parental permission will need to be given for each junior ticket.

⁶ CPSU Guidance 'Safe sports events, activities and competitions

Mascots & Ball Persons

- 15.4. The Club will only allow children to be match day mascots or ball persons once parental consent has been obtained. A signed image consent form is also required before any images are published in the Club's match day programme.
- 15.5. No photographs of mascots or ball persons featured in Club publications will be accompanied by personal information about the child, such as their school, home address or local sports team.
- 15.6. Whilst at StoneX Stadium, mascots and ball persons are accompanied at all times by at least 2 members of staff who have a valid DBS. Staff who are responsible for mascots and ball persons on a match day are also required to have a good level of understanding and awareness of safeguarding children.

Match Day Photography

- 15.7. Children attend games as spectators. Images of children may appear as part of the crowd on match days and be reproduced in official Saracens promotional material and appear in the public domain. Saracens terms and conditions of ticket purchase and standard ground regulations state that that images can be taken of fans within the crowd and used in promotional material. Ticket holders agree to these conditions when purchasing a ticket. Any queries on promotional material featuring a child should be addressed to Saracens customer care team or Safeguarding Lead.

16. Academy Department

- 16.1. Saracens Academy is committed to the welfare and safety of all children, both within the Academy and at the Club as a whole. The Academy also realises the importance of communication and works closely with parents, carers, schools and local authorities to ensure that the wellbeing of all children is paramount.
- 16.2. Saracens Academy rigorously adheres to the 'Saracens Academy Safeguarding Policy 2022-23' which has been written to provide staff with the processes and procedures to follow to safeguard children. This document complies with Rugby Football Union guidance.
- 16.3. The Club has an Academy Player Manager and Academy Team Manager who is responsible for overseeing Safeguarding across the Academy and first team. This person is the Dedicated Safeguarding Officer (DSO) for the Academy and first team.

Transport

- 16.4. When children are being transported on behalf of the Club they shall, where possible, be accompanied by their manager or coach. Players will be transported by one member of coaching staff. This person will not be left alone with any players, with players travelling in groups of 2 or more. Players will only be transported with prior consent from their parents.

Development Player Programme (DPP)

- 16.5. The Academy use the Rugby Football Unions Development Player Programme in several counties. The coaches on the DDP will be expected to follow all the Academy and RFU policies and guidance in safeguarding children and young people. The Academy will be recording coaches' qualifications and DBS and will issue each coach with the Saracens card to display this information on request.

Medical

- 16.6. The physio and medical department have a separate Code of Conduct for working with children and young people. This will be issued to all full-time, part-time and casual members of staff during their induction on their first day of employment. The Code of Conduct provides the medical and physio staff with the processes and procedures which need to be adhered to when working with children.
- 16.7. There will be occasions where medical treatment is necessary during evening training sessions and weekend fixtures and unfortunately, due to staffing numbers, the Club is unable to guarantee that **two** members of staff are present during treatment sessions.
- 16.8. All members of the medical department have a valid DBS and are required to complete the RFU Safeguarding Children awareness workshop and internal Safer Working Practice training. The Club is fully committed to equal opportunities for all individuals and, as such, the Club employs both male and female staff to work within the medical department.

U18, 21 & First Team Progression

- 16.9. As players progress through the Academy system they may have the opportunity to train and play with the adult provisions of the club. Obviously, this carries several safeguarding concerns as they will be entering an adult provision and be susceptible to adult behaviours and language. The club will support the player(s) during this transition. Parents will be included, and consent sought.

17. Online Safeguarding

Online Conduct

17.1 Saracens and Saracens Foundation have an Online Safety Policy Statement which should be read to understand our framework and provisions to keep children and vulnerable adults safe online.

17.2 Saracens Foundation have appointed an Online Safety Coordinator; Sam Perry (Safeguarding Lead - Foundation), to risk assess and implement safeguarding processes and procedures for online delivery and communications.

17.3 The RFU have a specific code of conduct for coaches and volunteers which relates to contacting children and vulnerable adults. Coaches, staff, and volunteers should abide by the guidance by the RFU and PRL. Staff, volunteers, and coaches should never communicate with children or vulnerable adults through their personal social media accounts, phones, or email addresses. Instead, they should contact their parent, guardian or carer through their official work email or phone. All communications should be relevant to the work or project.

17.4 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 or vulnerable adults.

Reporting Online Abuse or Risk

17.5 The reporting procedure for online abuse or risk will be the same as for face-to-face delivery, with the 'reporting flowchart' being followed by coaches, staff, and volunteers. However, if appropriate the Safeguarding Lead and Online Safety Coordinator may contact site or social media administrators to raise concerns for children or vulnerable adults.

Streaming Online Delivery

17.6 The safeguarding policies and procedures for face-to-face delivery should be followed for online delivery. In addition, the following procedures have been introduced for 'best in practice online delivery':

- Each online session for children and vulnerable adults will be delivered by two qualified coaches, with a third member of staff (safeguard trained) used as a 'support' member of staff.
- The 'support' member of staff will be the key safeguarding contact for that particular online live stream. They will watch the participants to highlight any risks or safeguarding incidents 'live'.
- Each participant will be given the number of the 'support' member of staff so that they can raise questions or concerns throughout the session.
- The 'support' member of staff will only communicate with participants through their work email, streaming service or work phone, and only about the session or project itself.
- Each online stream session/project will have its own individual risk assessment. However, participants will complete a consent form highlighting that they are attending at their 'own risk' as we will not be able to offer our usual first aid for online streaming delivery.
- The reporting process for streaming online delivery will not change from face-to-face delivery. In addition, the details provided for each person attending will not change. However, we will be required to have the emergency contacts, address that they are participating in and health records in order to safeguard participants from injury or illness during sessions.
- Each online streamed session will be run on a private streaming platform which can only be accessed by invited participants. This means that our participants will be safeguarded from unknown members of the public. Each participant will have to register before the session.
- The platforms used will be either 'Zoom' or 'BookWhen', both of which are highly regarded and have strict privacy and protection policies. We will use these providers as they offer maximum protection to our participants while streaming online.

18. Community Activity – The Saracens Foundation

18.1. The Saracens Foundation ("SF") ensures full compliance with the RFU standards and guidance, it endeavours to adhere to the rules and guidelines issued by the PRL with regard to safeguarding Children.

Fit for Purpose

18.2. All SF activities comply to RFU guidance related to:

- DBS
- Coaching qualifications
- Adult : Child Ratios
- Risk Assessment
- Service Level Agreements & Partnership Agreements
- Registration & Dispersal Procedures
- Accident / Incident Report Forms
- Coach Guidelines & Code of Conduct
- Late Collection Procedures
- First Aid / Administration of Medication
- Transporting Children

18.3. This Policy is written in consultation with the Head of Foundation, Saracens Foundation Designated Safeguarding Officers and the Safeguarding Lead and is under constant review.

Parental Consent

18.4. The SF will obtain parental consent for all activities using a Parental Consent Form. The SF will do everything it can to safeguard children and young people in its care but recognise that in some circumstances, due to the nature of the work carried out, obtaining parental consent for specific activities is not always possible.

Disclosure and Barring Service

18.5. In accordance with the procedures detailed above, SF staff and casual coaches who work with children and young people or vulnerable adults will complete an Enhanced DBS check with barred list every 3 years. For more detailed information on Safer Recruitment refer to the SFC Safer Recruitment Policy.

Re-certification

18.6. It is an expectation of all staff who work with children and young people to keep their certificates up to date. All certificates including DBS, RFU Safeguarding, and First Aid expire after three years.

18.7. All SF staff are required to re-apply for their DBS no later than 3 months before expiry.

18.8. All SF staff and casual coaches are responsible for ensuring they attend an RFU recognised First Aid and RFU Safeguarding Course at least 1 month before the expiration of their previous certificate.

FFP Certificate Expiration

18.9. 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 re-certification.

18.10. If an employee has not applied for recertification within the recommended timeframe, and becomes unfit for purpose, at the Head of Foundation's discretion, the individual may be suspended without pay until re-certification is complete and evidence is provided.

Sessional Workers

18.11. All sessional workers (casual coaches) are expected to attend regular Safeguarding updates delivered by the Safeguarding Lead. Work will not be offered if the sessional worker cannot attend.

18.12. 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.

18.13. If any of the above certificates have expired these will be required to be renewed before work can be offered.

Departmental Risk Assessments

- 18.14. The SF undertakes a Risk Assessment for each Activity they operate on a bi-annual basis and these are completed in consultation with the SF Department Manager and, where necessary, the Safeguarding Lead and Health and Safety Manager.
- 18.15. All children and young people 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.

Activities for Disabled Persons & Adults at Risk

- 18.16. 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 Club's Disability Policy and Safeguarding Adults at Risk Policy.

HMP Activities and Programmes

- 18.17. Where individuals are required to work within Her Majesty's Prisons (HMP) appropriate DBS and additional police vetting checks will be required.
- 18.18. 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.

Employability

- 18.19. Saracens 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.

Code of Conduct

- 18.20. Each session delivered by SF applies a code of conduct which defines the behaviour expectations of both participants and staff. For more detail, please refer to the Fit for Purpose Policy.

19.Guidelines in the event of concern

Highlighting Concern

- 19.1. Although the Club is committed to doing the utmost to safeguard Children from harm there may be occasions when concern is raised over the treatment of a Child.
- 19.2. If you work or intend to work with young people, 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 rugby or sport generally to do a lot of harm by bullying, harassing, neglecting or abusing children and young people; or by failing to respond to concerns they may have.
- 19.3. 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. Please refer to section 14 for more information on how to respond to a concern or suspicion.

19.4. Child abuse is any action by another person – adult or child – that causes significant harm to a child. It can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. We know that neglect, whatever form it takes, can be just as damaging to a child as physical abuse.

19.5. “Child abuse” and “neglect” are generic terms encompassing all ill treatment of Children as well as cases where the standard of care does not adequately support the Child’s health or development. Children may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the Child and may be of the same or opposite sex. There is often a common misconception that only a certain type of person can abuse Children but this is simply not the case – abuse can take place in any setting, by someone of either sex, of any sexual orientation and of any age.

Recognising signs of abuse

19.6. There are many different forms of abuse that fall into the categories identified by the NSPCC as follows, should you have any concern that abuse is occurring you should contact the SL or a Designated Safeguarding Officer immediately.

Physical Abuse

19.7. Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts.

19.8. 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 (FI).

19.9. 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

19.10. A child 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.

19.11. Honour based violence cuts across all cultures and communities, and cases encountered in the UK have involved families from Turkish, Kurdish, Afghani, South Asian, African, Middle Eastern, South and Eastern European communities. This is not an exhaustive list.

Sexual Abuse

19.12. 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.

Harmful Sexual Behaviour

19.13. Children and young people who develop harmful sexual behaviour harm themselves and others. 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

19.14. 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.

19.15. Children or young people 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.

19.16. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.⁸

Neglect

19.17. 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); 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

19.18. Emotional abuse is 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 children 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 the 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 cyberbullying), 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.

Bullying

19.19. Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

19.20. It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally.

⁸ www.nspcc.org.uk

- 19.21. 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.
- 19.22. The Club has a zero-tolerance approach to bullying and any reported incidents of bullying by a staff member to a child, child to staff member or child to child will be taken seriously and investigated by the Safeguarding Manager. The Academy has a separate Anti-Bullying policy which is issued to parents, players and coaches.
- 19.23. All staff members who undergo the RFU's Safeguarding Children Workshop receive bullying awareness training as part of the workshop as well as attending a Safer Working Practice workshop facilitated by the Safeguarding Manager.
- 19.24. For more detailed information on the categories of abuse, reference should be made to the RFU's Safeguarding Children Policy and Procedures.

Radicalisation & Extremism

- 19.25. 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.

- 19.26. 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.
- 19.27. A range of private and voluntary agencies and organisations provide services or, in some cases, exercise functions in relation to children. The duty applies to those bodies, which include, for example, children's homes and independent fostering agencies and bodies exercising local authority functions whether under voluntary delegation arrangements or via the use of statutory intervention powers. These bodies should ensure they are part of their local authorities' safeguarding arrangements and that staff are aware of and know how to contribute to Prevent-related activity in their area where appropriate.⁹
- 19.28. Saracen's recognises that some children and young 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. Children who attend sports activities are not immune from this risk and therefore Saracens ensure that all staff who work with children and young people are equipped at identifying potential indicators of abuse in regards to radicalisation and extremism.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

FGM Mandatory Reporting Duty

19.29. 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 child abuse. It's dangerous and a criminal offence.

19.30. 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.

19.31. Saracen's ensure FGM is a mandatory topic discussed in the Safer Working Practice Induction and specific Equality and Diversity workshops for Staff, Participants and Scholars.

20. Reporting a disclosure or suspicion of abuse or poor practice

20.1. It can be very hard for children and young 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.

20.2. Children value being believed and, as the adult they have chosen to tell, it's vital that you act on what you've been told.

20.3. A Designated Safeguarding Officer or the Safeguarding Lead should be contacted as early as possible and 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 to the child. 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 the child who may have been keeping the abuse secret
- Tell them it's not their fault. Abuse is never the child's fault and they need to know this
- Say you believe them. A child could keep abuse secret in fear they won't be believed. They've told you because they want help and trust you'll be the person to believe them and help them
- Don't talk to the alleged abuser. Confronting the alleged abuser about what the child's told you could make the situation a lot worse for the child
- Explain what you'll do next. If age appropriate, explain to the child 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 child discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.
- Write down everything said and what was done (handwritten is preferable) and sign and date the notes. An Incident Report Form should be used where possible and, in

any case, a referral must be made to the Club within 24 hours of the incident taking place.

- Seek medical advice if necessary

20.4. Make sure you tell a Designated Safeguarding Officer 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.

21. Recording Allegations or Suspicions of Abuse or Poor Practice

21.1. The DSO will immediately report any allegation to the SL, who will ask for a written factual statement from the person making the report. If an Incident Report Form has been completed a copy should be provided to the SL.

21.2. Any statement made by the child 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. No suggestion of who the perpetrator was or how any concern or incident happened should be suggested.

21.3. The Club will ensure that any child concerned is immediately protected from any possible risk of harm.

21.4. Investigations into possible abuse will require careful management. In these cases, the SL will first seek the advice of the RFU Safeguarding Children Team, Children's Social Care, 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. In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, the Club must provide a report to the RFU Head of Safeguarding Children and the PRL Head of Safeguarding Children. Any external local authority provision will naturally take the lead on any case.

21.5. 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 Safeguarding Lead earliest opportunity.

22. Allegations of abuse against members of Saracens' Staff

22.1. If the report involves an allegation about any member of Saracens or Saracens Foundation staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc.) and the Club believes that the report could demonstrate that the member of staff in question 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; or
- behaved towards a child or children in a way that indicates he or she is unsuitable to work with children,

22.2. The SL or DSO shall immediately 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.

- 22.3. Advice from HR will also be sought 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.
- 22.4. 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 above-mentioned external bodies had been sought and only then in consultation with the SL
- 22.5. Providing it does not contradict with any advice received from the LADO, any internal investigation will be carried out in line with the Club's People Management Policy and either general or department-specific Grievance Procedures, insofar as they are applicable.

Confidentiality

- 22.6. There is always tension and caution around issues of confidentiality. The advice for all staff at Saracens and Saracens Foundation 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).
- 22.7. 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 incident and report form.
- 22.8. 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 Safeguarding Lead or any Safeguarding Officer. The key issue is that the welfare of the Child is protected.

23. Covid-19

- 23.1. All staff and volunteers will follow the up to date covid-19 guidance and procedures set out by Public Health England (PHE) and the National Government. This advice and guidance will be used across our group when planning and delivering all activities and services. We will ensure that we are covid-compliant in everything that we do.

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24. External Contacts

RFU
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T: 0208 831 7832

RFU
Safeguarding Case Manager
Kath Bennett
T: 0208 831 7479
E: kathbennett@rfu.com

Barnet Out of Hours
Children's Emergency Duty Team (24 hour)
Tel: 020 8359 2000

Mutli-agency Safeguarding Hub
Tel: 020 8359 4066

NSPCC HELPLINE: 0808 800 5000 / Textphone: 0800 056 0566

NSPCC SMS: 88858

25. External Resources

- **RFU Safeguarding Children Guidelines:**
https://www.englandrugby.com/mm/document/myrugby/volunteers/01/30/36/55/rfu_safeguarding_policy_guidance_and_procedures_neutral.pdf
- **London Child Protection Procedures (5th Edition 2017)**
http://www.londoncp.co.uk/chapters/A_contents.html
- **Keeping Children Safe in Education (September 2016)**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf
- **Information Sharing Guidance for Managers and Practitioners:**
<http://www.education.gov.uk/publications/standard/publicationdetail/page1/DCSF-00807-2008>
- **Working Together to Safeguard Children 2015:**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419595/Working_Together_to_Safeguard_Children.pdf

26. Date and review

- 26.1. This policy is applicable to Season 2022-2023 and is under constant review. A revised policy will be drafted annually with the next scheduled review due in September 2023 for use in the following season. The policy may also be subject to review following incident learning outcomes, a major incident, organisational or legislative change.