

Child Protection and Safeguarding Policy

St Helen's Enterprises Limited

September 2021

I. Policy statement

- I.1 This policy has regard for the Amateur Swimming Association's (ASA) guidance on child protection. It is published on the St Helen's Learn to Swim School website and made available to all hirers. This policy can be made available in large print or other accessible format if required. This policy and its procedures apply wherever staff or hirers work with children.
- I.2 Hirers who bring children onto the School premises under a Licence Agreement with St Helen's Enterprises (the Organisation) are responsible for the safety of those children. Hirers working with children must have their own Child Protection Policy and Procedures which will be available for inspection by the Organisation upon request.
- I.3 Every St Helen's Swim School pupil should feel safe and protected from any form of abuse. The Organisation is committed to safeguarding and promoting the welfare of children and young people and expects all staff and hirers to share this commitment. The Organisation will take all reasonable measures to:
 - I.3.1 ensure that, in line with the Organisation's published Staff Selection and Recruitment Policy, it practises safer recruitment in checking the suitability of staff, staff of contractors, (including members of the Board of Directors Body) to work with children and young people in accordance with the guidance given in by the ASA.
 - I.3.2 ensure that all staff are aware of the need to refer any concerns immediately to the Designated Safeguarding Officer (DSO). Contact details for the DSO and children's social care are provided in Appendix 1 of this Policy.
 - I.3.3 Identify children who may be suffering, or are likely to suffer significant harm, abuse or neglect.
 - I.3.4 deal appropriately with every suspicion or complaint of abuse and to support children who have been abused in accordance with any agreed child protection plan.
 - I.3.5 design and operate procedures which, so far as possible, ensure that staff and others who are innocent are not prejudiced by false allegations.
 - I.3.6 operate robust and sensible health and safety procedures
- I.4 This policy is supported by Appendices 1-6 as follows:
 - I.4.1 Appendix 1 - Reporting Safeguarding Concerns to External Organisations;
 - I.4.2 Appendix 2 - Role of the Designated Safeguarding Officer;
 - I.4.3 Appendix 3 – Swim Teacher Code of Conduct;
 - I.4.4 Appendix 4 - Types and signs of abuse;
 - I.4.5 Appendix 5 - Guidance for staff on suspecting or hearing a complaint of abuse;
 - I.4.6 Appendix 6 - Dealing with allegations against members of staff;
- I.5 Further guidance on safeguarding arrangements where children are engaged in close one-to-one teaching is contained within the Staff Code of Conduct.

2. The Designated Safeguarding Officer (DSO)

2.1 The Organisation has appointed the Sports Centre Manager to be responsible for matters relating to child protection and welfare. The Sports Centre Manager can refer concerns to the relevant external body.

2.2 Contact details for the DSO are as follows:-

Designated Safeguarding Officer (St Helen's Enterprises)	Nikki Watmore	Sports Centre Manager	01923 843273 or 07957764233
Assistant Designated Safeguarding officer (St Helen's Enterprises)	Micky Giogoli	Assistant Sports Centre Manager	01923 843282

2.3 Parents are welcome to approach the DSO if they have any concerns about the welfare of any child in the swim school.

2.4 The DSO & Assistant DSO have undertaken Level 3 Child Protection training and training in inter-agency working and attend refresher training at regular intervals.

2.5 If, at any point, there is a risk of immediate harm to a child, a referral should be made to children's social care immediately. Anyone may make a referral. Contact details are listed in Appendix I of this document.

3. Duty of employees and Directors

3.1 Every employee and Board Director is under a general legal duty:

3.1.1 to protect children from abuse;

3.1.2 to be aware of the Organisation's child protection procedures and to follow them;

3.1.3 to keep a sufficient record of any significant complaint, conversation or event in accordance with this policy;

3.1.4 to report any matters of concern to the DSO, and

3.1.5 to make an immediate referral to children's social care if there is a risk of immediate serious harm to a child.

3.2 The Board of Directors has nominated one of its members to manage child protection incidents and allegations against staff on behalf of the Board and to liaise with external agencies where this is required.

3.3 **Training.** All staff, including temporary staff are provided with safeguarding induction training that includes:

3.3.1 this policy;

3.3.2 the Staff Code of Conduct

3.3.3 the identity of the DSO

- 3.4 The DSO undertakes regular Safer Recruitment Training aimed at preventing people who pose a risk of harm from working with children. All staff are interviewed and vetted by the Human Resources Manager who has received specific safer recruitment training.

4. Complaints of abuse

- 4.1 Every complaint or suspicion of abuse from within or outside the Organisation is taken seriously and action taken in accordance with this policy.
- 4.2 The child protection training provided to staff considers the types and signs of abuse staff should be aware of and reminds staff of the action they should take if they are concerned about a child. Further details are set out the Appendices.

5. Action by the Designated Safeguarding Officer

- 5.1 If a member of staff is concerned that a swim school pupil or any child who on the premises may be suffering harm, the matter should be referred to the DSO as soon as possible. If at any point there is a risk of immediate serious harm a referral should be made to children's social care immediately.

On being notified of a complaint or suspicion of abuse, the action to be taken by the DSO will take into account:

- 5.1.1 the local inter-agency procedures of the Hillingdon Local Safeguarding Children Partnership;
- 5.1.2 the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to children's social care or the police;
- 5.1.3 the child's wishes or feelings, and
- 5.1.4 duties of confidentiality, so far as applicable.
- 5.2 If there is room for doubt as to whether a referral should be made, the DSO will consult with children's social care on a "no names" basis without identifying the family. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral to children's social care will be made without delay (and in any event within 24 hours).
- 5.3 If the initial referral is made by telephone, the DSO will confirm the referral in writing to children's social care within 24 hours. If no response or acknowledgment is received within three working days, the DSO will contact the children's social care again.
- 5.4 The DSO will inform the Business Director of all referrals as soon as practically possible and the Business Director will inform the Director responsible for safeguarding.

6. Dealing with allegations against staff

- 6.1 The Organisation aims to strike a balance between the need to protect children from abuse and the need to protect staff from false or unfounded allegations. The procedures for dealing with allegations against staff are set out in Appendix 6.

7. Informing Parents

- 7.1 Parents will normally be kept informed as appropriate of any action to be taken under these procedures. However, there may be circumstances when the DSO will need to consult children's social care and/or the police before discussing details with parents.

8. Confidentiality and information sharing

- 8.1 The Organisation will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children in accordance with the Data Protection Policy for staff. The Organisation will co-operate with police and children's social care to ensure that all relevant information is shared for the purposes of child protection investigations under section 47 of the Children Act 1989 in accordance with the requirements of Working Together To Safeguard Children (July 2018).

9. Monitoring

- 9.1 Any child protection incidents at the Organisation will be followed by a review of the safeguarding procedures within the organisation and a prompt report to the Board of Directors.
- 9.2 In addition, the DSO will ensure that this policy is reviewed annually and its procedures and implementation are updated and reviewed regularly, working with the Board of Directors as necessary.

Authorised by	Resolution of the Board of Directors
Signed by	
	Chairman of Board of Directors
Date	September 2021
Effective date of the policy	September 2021
Date of Next Review	September 2022

Appendix I - Reporting Safeguarding Concerns to External Organisations

Hillingdon MASH (Multi- agency safeguarding Hub) team : 01895 556633

Local Authority Designated officer for Hillingdon **Rob Wratten** can be contacted on

- Tel: 01895 250975
- Fax: 01895 277179
- Email: rwratten@hillington.gov.uk

Hillingdon Local Safeguarding Children Partnership (LSCP)

Safeguarding Lead for concerns about children: Suzi Gladdish

- Address: Civic Centre
High Street
Uxbridge
Middlesex
UB8 1UW
- Telephone: 01895 277463 (Monday-Friday: 0900-1730)
- Telephone: 01895 250111 (out of hours and weekends)
- Email: sgladdish@hillington.gov.uk
- Web: <https://www.hillingdonsafeguardingpartnership.org.uk>

Local Authority Designated Officer for concerns about staff: Rob Wratten

- Telephone : 01895 250975
- Email: rwratten@hillington.gov.uk

The following telephone numbers and points of contact may also be useful:

Neighbouring Local Authority Contacts

• Hertfordshire	0300 123 4043
• Harrow	0208 901 2690
• Buckinghamshire	0845 4600001
• Brent	0208 937 4300
• Ealing	0208 825 8000
Childline	0800 1111
NSPCC	0808 800 5000
NSPCC Child Protection in Sport Unit	0116 234 7278
Email: cpsu@nspcc.org.uk	

St.Helen's Enterprises Board Safeguarding Director

Michelle Weerasekera

email: BusinessDirector@sthelens.london

Appendix 2 - Role of the Designated Safeguarding Officer (DSO)

1 The main responsibilities of the Designated Safeguarding Lead (DSO) are to:

- 1.1 be the first point of contact for parents, pupils, teaching and non-teaching staff and external agencies in all matters of child protection and to provide support, advice and expertise on all matters concerning safeguarding
- 1.2 promote a culture of listening to children
- 1.3 co-ordinate the child protection procedures in the Organisation and to review and update regularly the procedures and implementation of the procedures, reporting as appropriate to the Board of Directors.
- 1.4 ensure that all members of staff and volunteers receive the appropriate training on child protection and safer recruitment procedures and to keep and maintain records of this training.
- 1.5 Hillingdon Local Safeguarding Partnership to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- 1.6 advise and act upon all suspicion, belief and evidence of abuse reported to her
- 1.7 liaise with the designated officer(s) from the local authority, children's social care, the police, health services and other services, to promote the welfare of children and protect them from harm
- 1.8 identify children at risk from radicalisation and enlist the support of other agencies in supporting them
- 1.9 monitor the keeping, confidentiality and storage of records in relation to child protection

2 If the DSO is unavailable, the Deputy DSO will carry out this role.

- 2.1 The Designated Safeguarding Officer is the Sports Centre Manager. In their absence the concerns or abuse must be reported to the Business Director who may in the absence of the Sports Centre Manager take advice from St. Helen's School's Designated Safeguarding Lead, Mrs N Varma and the Board Director for Safeguarding.

3 The role of the Designated Safeguarding Officer is as follows:

3.1 Managing referrals

- To refer all cases of suspected abuse to the local authority children's social care and:
- the designated officer(s) for child protection concerns (or cases which concern a staff member).
- To refer to the Disclosure and Barring Service cases where a person is dismissed or left due to risk/harm to a child; and/or to the Police (cases where a crime may have been committed).

- To act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

3.2 Training

- The designated safeguarding lead receives appropriate training carried out every two years in order to:
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.

3.2 The Designated Safeguarding Officer ensures that:

- each member of staff has access to and understands the Organisation's child protection policy and procedures, especially new staff and those working minimal hours per week;
- all staff are alert to the specific needs of children in need including those with individual needs

3.3 The Designated Safeguarding Officer

- keeps detailed, accurate, secure written records of concerns and referrals; Obtains access to resources and attend any relevant or refresher training courses;
- Encourages a culture of listening to children.

3.4 Raising Awareness

- The designated safeguarding lead ensures that the Organisation's policies are known and used appropriately:
- Ensure the Organisation's child protection policy is reviewed annually and the procedures and implementation are updated and reviewed regularly and works with governing bodies or proprietors regarding this.
- Ensures the child protection policy is available publicly and parents are aware that referrals about suspected abuse or neglect may be made and the role of the Organisation in this.

Appendix 3 – Swim Teacher Code of Conduct

- Children are treated with dignity and respect.
- Promote good practice in swimming teaching in order to reduce the possibility of abusive situations occurring
- Swimming Teachers continually reflect upon their own coaching, supervisory style, philosophy and practices to ensure the safety and wellbeing of children at all times.
- They always work appropriately and openly with children in the Organisation.
- They are an excellent role model, which includes not smoking or drinking alcohol or be under the influence of alcohol when teaching.
- They refer and deal with concerns regarding child safeguarding appropriately.

- **Swimming teachers should:**
 - Keep up to date with their technical skills and teacher rescue qualifications by attending termly update refresher sessions and following and verbal or written guidance distributed by the Sports Centre Manager
 - Complete a Safeguarding induction course upon commencement of their role and attend a refresher (Course include both in-house training and online safeguarding training)
 - Know and understand the Safeguarding Policies and Procedures outlined in this document
 - Not exceed the level of their competence and qualifications.
 - Have open and regular communication with parents/carers.
 - Ensure that activities are appropriate for the age, maturity, experience and ability of the pupil.
 - Promote honesty, teamwork and a good working environment.
 - Report any concerns they may have in relation to children or young people following reporting
 - Use the staff changing room
 - Avoid touching swimming pupils as far as possible and only if it is an appropriate aid to teaching.
 - Enforce pool rules as stated in the Normal Operating Procedures for the Pool
 - Be punctual and prepared for start of lessons
 - Help each other set up and any change overs
 - Help clear up at the end of teaching sessions
 - Wear company swimming teacher uniform as allocated to you
 - Respect other teachers' decisions on awarding or stroke practices and to not challenge on poolside

- **Swimming Teachers should not:**
 - Take children to their home or other secluded places where they will be alone.
 - Engage in rough, physical or sexually provocative games.
 - Physically restrain children or young adults
 - Allow or engage in any form of inappropriate touching.
 - Make sexually suggestive remarks to a child or young people.
 - Reduce a child to tears as a form of control.
 - Allow children to use inappropriate language or behaviour unchallenged.
 - Allow allegations made by a child to go unchallenged, unrecorded or not acted upon.
 - Abuse their position of power or trust with children or adults.
 - Resort to bullying tactics or verbal abuse.
 - Leave the pool unattended if children or young people can gain access.
 - Assist with dressing or undressing a child/young adult.

- Give children or young people your home address, home telephone number, mobile telephone number or e-mail address, access to personal social network pages
- Send personal communications (such as birthday cards or faith cards, text messages etc) to children
- Make arrangements to meet children, individually or in groups, outside the Swim School
- contact children at home unless this is strictly necessary
- not give a pupil a lift in your own vehicle
- engage in secretive social contact with pupils or their parents.
- Take video or camera footage of children or young adults
- Take cash for private tuition
- Cause a child to lose self-esteem by
 - embarrassing, humiliating or undermining the individual.
 - Spend excessive amounts of time with one swimmer to the detriment of the class.
 - Do things of a personal nature for children or young people that they can do for themselves.
 - Smoke or consume alcohol while working with children and young people.
 - Engage in a sexual relationship with a swimmer aged 17 or under
 - Use the same changing area as the children/young person

Appendix 4 - Types and signs of abuse

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family, or in an institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

Keeping Children Safe in Education defines the following types of abuse.

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including 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, although it may occur alone.

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. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse can take place online and technology can be used to facilitate offline abuse.

The sexual abuse of children by other children is a specific safeguarding issue in education.

Peer on Peer Abuse: children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiating/hazing type violence rituals.

Sexual Violence and Sexual Harassment between Children: Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”, and
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts which is now covered in The Voyeurism (Offences) Act, commonly known as the Upskirting Act which came into force in April 2019 where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification or cause the victim humiliation distress, or alarm. Dismissing or tolerating such behaviours risks normalising them.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should speak to the designated safeguarding lead (or a deputy).

Neglect: the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Keeping Children Safe in Education (September 2018, updated September 2020) offers guidance to all staff working in schools on types of abuse and on behaviours they should draw to the attention of the Designated Safeguarding Leads. It also offers advice on sources of additional information on key areas. For ease of access this information is replicated below:

Specific Safeguarding Issues

All staff should have an awareness of safeguarding issues – some of which are listed below. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting (also known as youth-produced sexual imagery) put children in danger.

All staff should be aware safeguarding issues can manifest themselves via peer on peer abuse. This is most likely to include, but not limited to: bullying (including cyberbullying), gender based violence/sexual assaults and sexting, initiation and hazing type of violence and rituals. Any form of peer on peer abuse should always be treated as such and is never to be tolerated as 'banter' or 'part of growing up'. Staff should be clear as to the School's policy and procedures with regards to peer on peer abuse. All staff should be aware of the gendered nature of peer on peer abuse, that peer on peer abuse is unacceptable and will be taken seriously.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example information can be found on the TES, MindEd and NSPCC websites. Staff can also access broad government guidance on the issues listed below via the GOV.UK and other government websites:

- bullying including cyberbullying
- child missing from education – and Annex A
- child missing from home or care
- child sexual exploitation (CSE) – and Annex A
- complexed and organised
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM) – and Annex A
- forced marriage – and Annex A
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adult strategy
- private fostering
- preventing radicalisation – and Annex A
- relationship abuse
- sexting
- trafficking

Appendix 5 - Guidance for staff on suspecting or hearing a complaint of abuse

Action staff must take

A member of staff suspecting or hearing a complaint of abuse:

- I.1 must listen carefully to the child and keep an open mind. The member of staff should not take a decision as to whether or not the abuse has taken place
- I.2 must not ask leading questions, i.e. a question which suggests its own answer
- I.3 must reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the DSO who will ensure that the correct action is taken and
- I.4 must keep a sufficient written record of the conversation. The record should include:
 - (a) the date and time
 - (b) the place of the conversation and
 - (c) the essence of what was said and done by whom and in whose presence.

The record should make clear which words were used by the child and also which comments, if any, constitute an interpretation by the staff member of what was said.

- I.5 The record should be signed by the person making it and should use names, not initials. The record should also use roles, such as Senior Leisure Assistant or Swimming Teacher, where appropriate. The record must be kept securely and handed to the DSO as soon as possible.
- I.6 All evidence, for example, scribbled notes, mobile phones containing images messages/images, clothing or computers, must be safeguarded and preserved and passed to the DSO.
- I.7 All suspicions or complaints of abuse must be reported to the DSO as soon as possible, unless it is an allegation against a member of staff in which case the procedures set out in Appendix 6 should be followed. If there is a risk of immediate serious harm to a child and it is not possible to report to the DSO, a referral should be made to children's social care immediately.

Appendix 6 - Dealing with allegations against members of staff.

1. The Organisation's procedures

- 1.1 The procedures for dealing with allegations made against staff will be used where the member of staff has:
 - 1.1.1 behaved in a way that has harmed a child, or may have harmed a child
 - 1.1.2 possibly committed a criminal offence against or related to a child; or
 - 1.1.3 behaved towards a child or children in a way that indicates he or she would pose a risk of harm if he or she work regularly or closely with children.
- 1.2 Any allegations not meeting these criteria will be dealt with in accordance with the Hillingdon Local Safeguarding Children Partnership procedures.
- 1.3 All such allegations must be dealt with as a priority to avoid any delay.

2. Reporting an allegation against staff

- 2.1 Where an allegation or complaint is made against any member of staff or volunteer, the matter should be reported immediately to the DSO, or in his/her absence to the Business Director. Where appropriate, the Business Director will consult with the DSO and the allegation will be discussed immediately with the designated officer(s) from the local authority before further action is taken. The Child Protection Director will be notified.
- 2.2 Where an allegation or complaint is made against the Sports Centre Manager, the matter should be reported immediately to the Business Director, who will notify the Chairman of the Board of Directors and the Safeguarding Director. Again, the allegation will be discussed immediately with the designated officer(s) from the local authority before further action is taken.
- 2.3 The person taking action in accordance with the procedures in this Appendix is known as the "case manager".

3. Disclosure of information

- 3.1 The case manager will inform the accused person of the allegation as soon as possible after the designated officer(s) from the local authority has been consulted.
- 3.2 The Parents or carers of the child[ren] involved will be informed of the allegation as soon as possible if they do not already know of it. They will also be kept informed of the progress of the case, including the outcome of any disciplinary process.
- 3.3 Where the designated officer(s) from the local authority advises that a strategy discussion is needed, or the police or children's social care need to be involved, the case manager will not inform the accused or the parents or carers until these agencies have been consulted and it has been agreed what information can be disclosed.
- 3.4 The reporting restrictions preventing the identification of an employee who is the subject of such an allegation in certain circumstances will be observed.

4. Action to be taken against the accused

- 4.1 The Organisation has a duty of care towards its employees and as such, it must ensure that effective support is provided for anyone facing an allegation. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless external agencies object to this. A representative will be appointed to keep him or her informed of the progress of the case and to consider what other support is available for the individual, as appropriate.
- 4.2 Where an investigation by the police or children's social care is unnecessary, the designated officer(s) from the local authority will discuss the steps to be taken with the case manager. The appropriate action will depend on the nature and circumstances of the allegation and will range from taking no further action to dismissal or a decision not to use the person's services in the future.
- 4.3 It may be necessary to undertake further enquiries to determine the appropriate action. If so, the designated officer(s) from the local authority will discuss with the case manager how and by whom the investigation will be undertaken. The appropriate person will usually be a senior member of staff, but in some instances it may be appropriate to appoint an independent investigator as advised by the Hillingdon Local Safeguarding Children Partnership.

5. Suspension

- 5.1 Suspension will not be an automatic response to an allegation and will only be considered in a case where:
 - 5.1.1 there is cause to suspect a child or other children are at risk of significant harm or
 - 5.1.2 the allegation is so serious that it might be grounds for dismissal.
- 5.2 Suspension will not be automatic and consideration will be given to whether the result that would be achieved by suspension could be obtained by alternative arrangements.
- 5.3 A member of staff will only be suspended if there is no reasonable alternative. If suspension is deemed appropriate, the reasons and justification will be recorded and the member of staff notified of those reasons in writing within one working day. Appropriate support will be provided for the suspended individual and contact details provided.

6. Criminal proceedings

The Organisation will consult with the designated officer(s) from the local authority following the conclusion of a criminal investigation or prosecution as to whether any further action, including disciplinary action, is appropriate and if so, how to proceed. The options will depend on the circumstances of the case, including the result of the police investigation or trial and the standards of proof applicable.

7. Return to work

If it is decided that the person who has been suspended should return to work, the Organisation will consider how best to facilitate this, for example, arranging a phased return and / or the provision of a mentor to provide assistance and support in the short term. The Organisation will also consider how to manage the contact with the child[ren] who made the allegation.

8. Ceasing to use staff

- 8.1 If the Organisation ceases to use the services of a member of staff because they are unsuitable to work with children, a settlement / compromise agreement will not be used and a referral to the Disclosure and Barring Service will be made as soon as possible if the criteria are met. Any such incidents will be followed by a review of the safeguarding procedures within the Organisation, with a report being presented to the Board of Directors without delay.
- 8.2 If a member of staff tenders his or her resignation, or ceases to provide his or her services, any child protection allegations will still be followed up by the Organisation in accordance with this policy and a referral will be made to the Disclosure and Barring Service as soon as possible if the criteria are met (that is, if the adult has caused harm or posed a risk to a child).

9. Timescales

All allegations must be dealt with as a priority so as to avoid any delay. Where it is clear immediately that the allegation is unsubstantiated or malicious, the case should be resolved within one week. It is expected that most cases of allegations of abuse against staff will be resolved within one month with exceptional cases being completed within 12 months. If the nature of the allegation does not require formal disciplinary action, the DSO should institute appropriate action within three working days.

10. Unsubstantiated or malicious allegations

- 10.1 Where an allegation by a child is shown to have been deliberately invented or malicious, the Sports Centre Manager and Business Director will consider whether the child should be banned from the premises.

11. Record keeping

- 11.1 Details of allegations found to be malicious will be removed from personnel records.
- 11.2 For all other allegations, full details will be recorded on the confidential personnel file of the person accused. The record will be retained at least until the individual has reached normal retirement age or for a period of ten years from the date of the allegation, if this is longer in accordance with the Organisation's relevant Human Resource policies.
- 11.3 An allegation proven to be false, unsubstantiated or malicious will not be referred to in employer references.