

Active Kent & Medway

Safeguarding and Protecting Children and Young People Policy and Procedures

January 2026

Amendments

Any amendments made to this policy prior to the next full review due in 2028 will be listed here.

Date/Page	Amendments
05.03.26/ Page 2	Inclusion of new Sport Welfare Officer contact details

Key People in Active Kent & Medway

Lead Safeguarding Officer: Natalie Harris, Events and Safeguarding Manager

Tel: [03000 412044](tel:03000412044)

Email: natalie.harris@kent.gov.uk

Deputy Safeguarding Officer: Louise Milne, Strategic Lead - Children and Young People

Tel: [03000 410696](tel:03000410696)

Email: louise.milne@kent.gov.uk

Senior Management Lead: Liz Davidson, Active Partnership Director

Tel: [03000 423044](tel:03000423044)

Email: liz.davidson@kent.gov.uk

Board Safeguarding Champion: Chris Morgan, Board Member

Sport Welfare Officers: Jimmy McCormack

Tel: [03000 411836](tel:03000411836)

Email: jimmy.mccormack@kent.gov.uk

Rachel Daly

Tel: [03000 410964](tel:03000410964)

Email: rachel.daly@kent.gov.uk

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have accessed and read this policy. This is recorded on the AKM Safeguarding and Equalities Training Record.

This policy will be promoted to all staff and volunteers, partners and customers, and will be available on the Active Kent & Medway website and in additional formats as required.

Date of policy: January 2026

Date of next review: September 2028

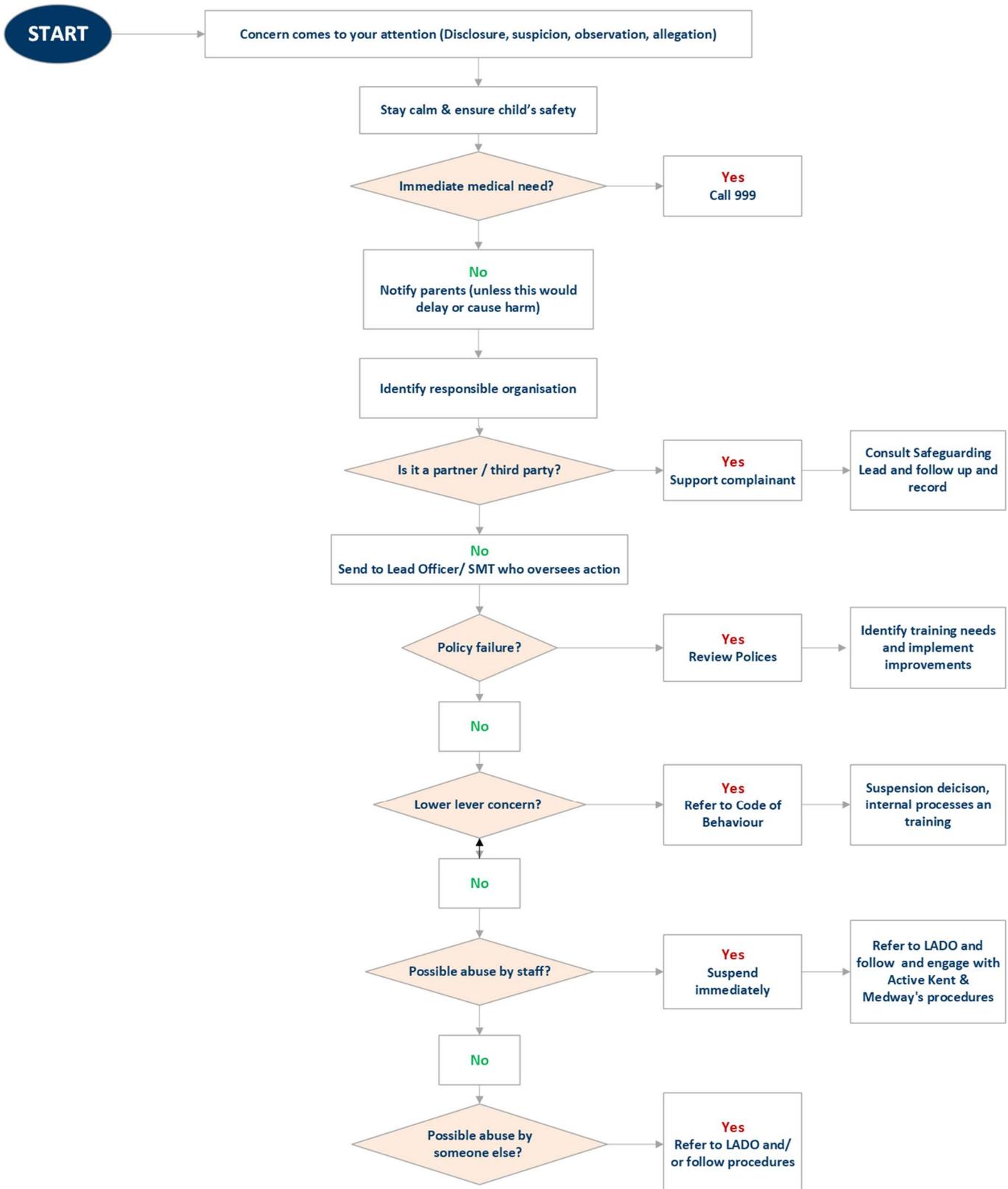
Safeguarding Concerns Reporting Flow Chart

This flowchart outlines the safeguarding reporting procedure to follow in the event of a concern arising about children or young people.

If you're worried about a child, even if you're unsure, you can contact the free NSPCC helpline service:

by phone: **0808 800 5000**

by email (at any time): help@nspcc.org.uk



Contents

Section 1 – Introduction	5
Introduction & Scope	5
Monitoring & Review.....	5
Relationship of Policy, Procedures and Guidance.....	6
Terminology	6
Section 2 - Policy	7
Policy Statement.....	7
Principles.....	7
Organisational Responsibilities	7
Partnership Responsibilities.....	8
Responsibilities at all Levels of the Organisation	9
Section 3 – Procedures	10
Introduction to Abuse.....	10
Recognising Abuse & Neglect.....	10
Reporting Concerns.....	11
Disclosure by a Child	11
Suspected Abuse.....	11
Sharing Concerns with Parents	11
Early Help and Preventative Services	12
Allegations Against Staff or Volunteers	12
Protecting Children from Abuse by Someone in a Position of Trust	12
Internal Enquiries and Suspension	13
Lower Level Concerns.....	13
Decision-Making and Thresholds.....	14
Case Management.....	14
Support for Staff.....	14
Referrals to the DBS	15
Allegations of Previous Abuse	15
Wider Children’s Workforce.....	15
Escalation of Professional Concerns	15
Welfare Incidents and Concerns	16
Recording and Record-Keeping.....	16
Working Together to Safeguard Children 2023	16
List of Appendices	16

Section 1 – Introduction

Introduction & Scope

1. Active Kent & Medway, hosted and part-funded by Kent County Council, aim to change and improve lives through sport and physical activity across Kent and Medway in partnership with various organisations.
2. We are committed to safeguarding children, ensuring our practices align with statutory duties, government guidance, Kent County Council procedures, and best practice from partners such as Sport England and the NSPCC Child Protection in Sport Unit.
3. This policy prioritises the welfare of children, aiming to ensure all participants—regardless of background—have a safe, enjoyable, and child-centred experience.
4. We recognise that some children, including those with disabilities or from diverse communities, may be more vulnerable to abuse. Reasonable steps will be taken to protect their welfare, and the policy will undergo an Equality Impact Assessment.
5. Our safeguarding commitments include:
 - Promoting children's safety and wellbeing.
 - Ensuring staff understand their roles and receive appropriate training.
 - Responding to concerns and supporting those affected.
 - Maintaining secure, detailed records.
 - Reducing the risk of unsuitable individuals working with children through robust recruitment and safeguarding measures.
 - Operating robust safeguarding procedures.
6. This policy applies to all staff and volunteers aged 18+ involved in activities under Active Kent & Medway's supervision and control.
7. Young people under 18 on work experience or volunteer placements will receive the same safeguarding protections and age-appropriate information.
8. We also ensure that partner organisations have adequate safeguarding measures. While our influence is limited to specific partnerships, we encourage others to adopt this policy as a model.
9. The policy is based on:
 - Relevant legislation and government guidance (e.g. *Working Together to Safeguard Children, 2023*).
 - Advice from Kent & Medway Safeguarding Children Multi-Agency Partnerships.
 - Best practice from the NSPCC Child Protection in Sport Unit.

Monitoring & Review

1. This policy takes effect from September 2025 and will be formally reviewed in September 2027, or sooner if there are major changes in legislation, organisational structure, or following a serious incident. The Events and Safeguarding Manager, acting as Lead Safeguarding Officer, will lead this process.

Section 1 - Introduction

2. If Active Kent & Medway does not meet expected safeguarding standards, please email activekent@kent.gov.uk Complaints will be investigated and responded to promptly. Complaints can also be made via the [KCC website](#).
3. Children and young people involved in Active Kent & Medway activities will be informed of what to expect from staff and encouraged to raise concerns with their teachers or parents, who can support them in following the complaints process.

Relationship of Policy, Procedures and Guidance

1. This document is divided into two key parts:
 - **Policy Statement & Principles** – outlining the values and expectations guiding staff and volunteers in their work with children and young people.
 - **Implementation Procedures** – detailing the actions to take in response to concerns, disclosures, or allegations involving children or members of the local sports workforce.
2. These are supported by additional policies, guidance, and best practice resources that provide context, address specific areas of work, and help shape safeguarding arrangements for Active Kent & Medway-led activities, as well as inform partner organisations.

Terminology

1. A glossary of key terms used throughout this document is provided in Appendix II.

Section 2 - Policy

Policy Statement

1. Active Kent & Medway is committed to safeguarding children, young people, and adults in sport and physical activity. We work with partners to promote best practice, uphold equality and diversity, and expect all staff, volunteers, and stakeholders to share this commitment.

Principles

1. Active Kent & Medway believes that:
 - The welfare and safety of children and young people is paramount.
 - All children have the right to be safe, treated with dignity and respect, and protected from abuse—regardless of age, ability, disability, gender identity, race, culture, religion, belief, sexual orientation, or socio-economic background.
 - While child protection professionals determine if abuse has occurred, everyone is responsible for safeguarding and reporting concerns.
 - All suspected lower-level concerns and abuse allegations must be taken seriously and addressed promptly and appropriately.
 - Confidentiality must align with data protection laws but should never hinder efforts to safeguard children’s welfare and safety.

Organisational Responsibilities

1. Section 11 of the Children Act 2004¹ places duties on organisations, to ensure arrangements are in place that reflect the importance of safeguarding and promoting the welfare of children, including: accountability at all levels of the organisation, a child-centred culture, clear whistleblowing procedures, information sharing protocols, a designated lead officer, and safe recruitment processes.
2. Active Kent & Medway is responsible for safeguarding when delivering events, programmes, or activities that;
 - a. Are directly led, overseen, or delivered by Active Kent & Medway.
 - b. Are under its supervision and control.
 - c. Involve individuals employed, commissioned, or deployed by Active Kent & Medway.
 - d. Are funded through its core funding (KCC/Sport England).
 - e. Are commissioned for delivery by Active Kent & Medway
5. These activities may include coaching, taster sessions, competitions, consultations, work experience, workshops, and case study visits. They may occur as one-off events, over a set period, or on a regular basis.
6. In these instances, Active Kent & Medway will:
 - Fulfil its duty of care to safeguard the wellbeing of children and young people.
 - Respect and promote their rights, wishes and feelings.

¹ See [Working Together to Safeguard Children 2023](#)

- Follow safe recruitment practices, including appropriate checks (e.g., DBS, references, self-declaration) in line with KCC procedures.
- Train staff and volunteers in best practice to protect children and reduce risk of abuse or allegations.
- Designate staff responsible for safeguarding and ensure they are informed of concerns.
- Embed safeguarding through risk assessments and welfare plans.
- Ensure staff are qualified, insured, and supported by robust health & safety arrangements (including First Aid).
- Establish clear codes of conduct for staff, volunteers and participants.
- Obtain consent and securely manage personal information (e.g., registration, medical details, photographs).
- Provide training on recognising and responding to abuse, neglect and other concerns.
- Respond to allegations and concerns in line with KCC disciplinary procedures.
- Support individuals who raise, disclose or are subject to concerns.
- Maintain accurate, confidential safeguarding records and share information appropriately with agencies, in line with legislation.
- Inform parents, children, staff and volunteers about this policy and what they can expect.
- Provide clear procedures for raising concerns or complaints.
- Capture and use young people's views to improve activities.
- Ensure everyone understands their safeguarding roles and responsibilities.

Partnership Responsibilities

1. Active Kent & Medway also has a responsibility to ensure that safeguarding arrangements have been considered when working with partner organisations. The Safeguarding Agreement Checklist tool can be used to ensure that Active Kent & Medway fulfils these responsibilities.
2. In respect of its wider responsibilities for safeguarding, *partners* of Active Kent & Medway are defined as those organisations:
 - which are awarded funding from Active Kent & Medway
 - with whom Active Kent & Medway has a Service Level Agreement or other agreement
 - which Active Kent & Medway commission to provide a service
 - to which Active Kent & Medway award any form of accreditation
 - which oversee, lead or deliver activities alongside or on behalf of Active Kent & Medway
3. Partners could include, but are not limited to: Local Authorities, sports clubs, Governing Bodies of Sport, leisure/activity providers, schools, School Sports Partnerships, colleges, universities, media agencies, event management companies, training providers, youth service providers, sports facilities, charities, community interest companies, voluntary and community organisations.
4. In these instances, Active Kent & Medway will:

- seek assurances that partner organisations have adequate and appropriate policies, procedures and training in line with Section 11 of the Children Act, and a commitment to best practice
- expect partners to respond to allegations appropriately and **implement their own procedures**
- ensure that adequate and appropriate safeguarding arrangements is a key element of all commissioning, funding and **partnership agreements**
- **encourage, support and assist** organisations to develop and implement safeguarding policies, procedures and best practice.

Responsibilities at all Levels of the Organisation

1. All Active Kent & Medway staff and volunteers have a role to play in ensuring that the organisation's safeguarding responsibilities are upheld.
 - Partnership Board (via Safeguarding Board Champion)
 - Senior Management
 - Lead Safeguarding Officer
 - Deputising Officers
 - Staff & Volunteers

Section 3 – Procedures

Introduction to Abuse

1. All staff and volunteers must understand child development, types of abuse and neglect, and know how and when to act. Active Kent & Medway will provide training and support to ensure personnel can respond appropriately to concerns, including lower-level issues.
2. Child abuse occurs when someone harms a child. The four main categories, as defined in *Working Together to Safeguard Children (2023)*, are:
 - Physical abuse
 - Emotional abuse
 - Sexual abuse
 - Neglect
3. Children may experience more than one type of abuse over time. They may be afraid to tell anyone and can feel guilt, shame or confusion—especially if the abuser is a parent, caregiver or someone close.
4. Staff and volunteers should remain alert to signs of abuse and respond promptly in line with safeguarding procedures. In addition to the above, staff should be aware of other safeguarding concerns, including:
 - County Lines (criminal exploitation through drug networks)
 - Forced Marriage
 - Online Abuse
 - Contextual Safeguarding (risks in peer groups, schools, communities)
 - Child Sexual Exploitation (CSE)
 - Honour-Based Violence

Recognising Abuse & Neglect

1. Certain factors may indicate possible significant harm. Their presence does not prove abuse, but they warrant careful assessment, discussion with the Lead Safeguarding Officer, and may require referral to Children’s Services.
2. It is not the role of those in sport to decide if abuse is occurring, but it is their responsibility to act on concerns by following reporting procedures.

Key Indicators of Possible Abuse or Neglect

Signs can overlap across abuse types. Indicators include a child:

- Having unexplained or frequent injuries (e.g., bruising, burns, bite marks) or lack of medical attention.
- Showing abnormal attachment to a parent/carer or behaving aggressively, anxious, or withdrawn.
- Displaying low self-esteem, sudden mood changes, or secrecy.
- Using sexually explicit language or behaviour inappropriate for their age.
- Self-harming, expressing suicidal thoughts, or developing eating disorders.

- Running away, going missing, or showing reluctance to remove clothing for activities.
- Experiencing pain, itching, or bleeding in the genital area.
- Showing poor growth or development.

Additional Indicators of Exploitation or Grooming

- Sudden changes in friends, dress, or behaviour; unexplained money or gifts.
- Use of extremist language or views.
- Increased secrecy around phone or internet use.

Reporting Concerns

1. Abuse or safeguarding concerns can come to light in different ways. In any of the following situations during Active Kent & Medway events, programmes or activities, a Welfare Incident & Concern Record must be completed immediately and the Lead Safeguarding Officer made aware, following reporting procedures:
 - A child discloses a concern or abuse
 - You observe or suspect a concern or abuse
 - A third party alleges a concern or abuse

Disclosure by a Child

1. Children often disclose abuse only to people they trust. Listening and taking them seriously is the first step in protecting them. If a child begins to disclose abuse:
 - **Stay calm** – do not react in a way that could frighten the child
 - **Reassure** – let them know they were right to tell you and they are not to blame
 - **Do not promise confidentiality** – explain you must share information to keep them safe
 - **Take them seriously** – be mindful of language barriers or speech difficulties
 - **Avoid leading questions** – ask only what is necessary (Who? What? When? Where?)
 - **Let them set the pace** – do not press for details; stop if they want to stop
 - **Explain next steps** – ensure they feel secure and know what will happen next
 - **Record accurately** – use the child's own words, note date/time, sign the record

Suspected Abuse

1. Any suspicion that a child is being abused must be reported immediately to the Lead Safeguarding Officer, who will take steps to protect the child and any others at risk. The Lead Safeguarding Officer will seek advice from Children's Services, who may involve the police and follow the Kent and Medway Safeguarding Children Procedures.
2. The parents or carers of the child will be contacted as soon as possible following advice from children's services.

Sharing Concerns with Parents

1. Active Kent & Medway aims to work in partnership with parents where there are concerns about their child. In most cases, it is appropriate to speak with parents to clarify initial concerns (e.g., a child appears

withdrawn due to family changes such as separation or bereavement). If unsure, consult the Lead Safeguarding Officer before speaking to parents.

2. Do not share concerns with parents if doing so could place the child at greater risk (e.g., where a parent/carer may be responsible for the abuse or unable to respond appropriately). In these situations, or where concerns remain, report immediately to the Lead Safeguarding Officer and record the details.

Early Help and Preventative Services

1. Early Help in Kent and Medway provides advice and support for children, young people, or families who need additional help. Families can also self-refer to these services.
2. If you believe a child or family may require Early Help support, discuss the concern with the Lead Safeguarding Officer, who will contact the relevant Early Help team.

Allegations Against Staff or Volunteers

1. Any concern about a child's welfare, including suspected abuse or lower-level concerns involving a member of staff or volunteer, must be reported immediately to the **Lead Safeguarding Officer** and recorded.
2. An allegation may involve someone who:
 - Has harmed, or may have harmed, a child.
 - May have committed a criminal offence against or related to a child.
 - Has behaved in a way that indicates they may pose a risk of harm to children.
 - Has behaved in a way that suggests they may not be suitable to work with children.
3. The child(ren) must be immediately safeguarded, which may include making a request for support from the Front Door. The Lead Officer will inform the Local Authority Designated Officer (LADO) within 24 hours. No further contact should be made with the member of staff prior to speaking with the LADO.

Protecting Children from Abuse by Someone in a Position of Trust

1. Staff and volunteers must maintain professional boundaries at all times. Behaviours that may cause concern include:
 - Giving a child preferential treatment or acting as their confidante.
 - Spending time alone with a child in private or isolated areas, or outside normal duties.
 - Transporting a child alone to or from activities.
 - Developing personal relationships with a child's family or visiting their home.
 - Giving gifts, money, or personal messages (letters, cards).
 - Using texts, calls, emails, or social media to communicate privately with a child.
 - Being overly affectionate, flirting, or making suggestive or sexual comments.
 - Hearing other children make jokes or references about a staff member and a specific child.
2. Active Kent & Medway's Code of Behaviour sets out the standards expected of all staff and volunteers.

3. The Senior Management Team (SMT) and Lead Safeguarding Officer will consult with KCC HR to minimise risk and consider welfare support for all staff. They will also check if the individual holds any other paid or voluntary roles within the children's workforce.
4. The Local Authority Designated Officer (LADO) will decide if a referral is required, consult with Children's Services and/or the Police, and determine who will handle any media enquiries.
5. If the allegation involves the Lead Safeguarding Officer, report it to a Deputy Safeguarding Officer or a member of the Active Kent & Medway Senior Management Team.
6. Allegations may lead to criminal, child protection, or disciplinary investigations. Civil proceedings could also be initiated by the person or family making the allegation.

Internal Enquiries and Suspension

1. Active Kent & Medway will follow KCC disciplinary procedures regarding suspension of any staff member accused of abuse, pending police and Children's Services investigations.
2. Relevant staff and partners will be informed of the suspension and investigation process. This is covered during induction training and through signing the Active Kent & Medway Safeguarding Responsibilities.
3. Staff must not make assumptions or share opinions about the allegation
4. Regardless of external findings, Active Kent & Medway will review each case under misconduct or disciplinary procedures to decide on reinstatement and manage this sensitively with other staff or volunteers.
5. Where evidence is insufficient for police action, decisions will be based on the balance of probability, prioritising the welfare of children.
6. This process continues even if the staff member resigns or leaves before an outcome is reached

Lower Level Concerns

A **lower-level concern** refers to any behaviour by an adult working with children that is inconsistent with the staff code of conduct but does not meet the threshold for harm or formal referral. These concerns may involve inappropriate, thoughtless, or potentially grooming-related behaviour, and can occur inside or outside the workplace.

Examples include:

- Being overly friendly or having favourites.
- Taking photos of children on personal devices.
- Spending time alone with a child in secluded areas.
- Using sexualised, intimidating, or offensive language.

Low-level concerns sit on a **spectrum of behaviour** and must be taken seriously. If a concern is deemed low-level, it should still be reported to the Lead Safeguarding Officer, who may inform the relevant National Governing Body of Sport. If the concern involves the Lead Safeguarding Officer or is not handled appropriately, it must be escalated to Senior Management.

Active Kent & Medway ensures staff are regularly reminded of the Code of Behaviour for Adults Working with Children, and uses concern data to identify training needs and improve safeguarding practice.

For further guidance, see the [CPSU's advice on low-level concerns](#) in sport.

Decision-Making and Thresholds

Active Kent & Medway ensures clarity on who makes decisions at each level:

- Low-Level Concerns: Managed by the Lead Safeguarding Officer, who records and decides actions (e.g., advice, monitoring). Escalate to Senior Management if patterns emerge.
- Suspected Abuse/Significant Harm: Lead Safeguarding Officer decides immediate actions and referrals to Children's Services or Police.
- Allegations Against Staff/Volunteers: Lead Safeguarding Officer informs LADO within 24 hours; suspension decisions made by Senior Management with HR.
- Complex/High-Risk Cases: Case Management Group reviews and agrees actions; unresolved decisions escalate to Senior Management Team.

All decisions must be documented with rationale, actions, and timescales.

Case Management

1. Active Kent & Medway will operate a clear case management process to ensure safeguarding concerns and allegations are handled consistently, fairly, and in line with statutory guidance.
2. A Case Management Group led by the Lead Safeguarding Officer, with representation from Senior Management and other relevant roles will meet to assess risk, make decisions, and coordinate actions when concerns or allegations arise. Responsibilities of this group will include:
 - Review all available information and assess risk to children and others.
 - Agree immediate safeguarding actions and referral pathways (e.g., LADO, Children's Services, Police).
 - Decide on internal measures (e.g., suspension, communication strategy).
 - Monitor progress and outcomes.
 - Decisions will be documented, including rationale, actions taken, and timescales.
 - All discussions and records will be kept secure and shared only on a need-to-know basis, in line with data protection and safeguarding legislation.
 - Cases will be reviewed post-closure to identify lessons learned and improve safeguarding practice.
3. The Case Management Group will be convened for serious or complex cases, including allegations against staff or volunteers, or where multi-agency coordination is required. Where consensus cannot be reached, decisions will be escalated to the Senior Management Team for final determination

Support for Staff

1. Active Kent & Medway recognises the stress and concern that allegations of abuse can cause for staff and volunteers. Adequate support will be provided for children, parents, and staff involved
2. Anyone who reports a concern in good faith will be fully supported and protected under the KCC Whistleblowing Policy.
3. Active Kent & Medway has a duty of care to manage and minimise stress during investigations. Individuals subject to allegations will be informed as soon as possible and consulted before sharing information with other agencies.

4. Staff can access free, confidential counselling via Support Line (03000 411411 or supportline@kent.gov.uk).

Referrals to the DBS

1. Under the Safeguarding Vulnerable Groups Act (2006), employers have a legal duty to refer to the Disclosure and Barring Service (DBS) if a staff member or volunteer has harmed, or poses a risk of harm to, a child. The DBS uses this information to prevent unsuitable individuals from working with children or vulnerable groups.
2. The Senior Management Team must seek advice from the Local Authority Designated Officer (LADO) to determine whether a DBS referral is required

Allegations of Previous Abuse

1. Allegations of abuse may be reported long after the event (e.g., by an adult who was abused as a child or by a staff member still working with children). In such cases, follow the same procedures as for current allegations and **report immediately to the police**, as other children may still be at risk.

Wider Children's Workforce

1. If information is received from, or guidance is requested by, a partner organisation about someone in the wider children's workforce (anyone working with children in a paid or voluntary role), report it immediately to the Lead Safeguarding Officer. They will advise that the organisation's own safeguarding policies and procedures should be followed.
2. The Lead Safeguarding Officer will provide relevant contact details for the sport's National Governing Body and the Local Authority Designated Officer (LADO), and offer additional support as needed.
3. Any information shared or advice given to third parties will be securely recorded and accessible only to the Lead and Deputy Safeguarding Officers.

Escalation of Professional Concerns

1. If you believe the response from Children's Social Care, Police, or another agency is unsatisfactory or does not safeguard the child effectively:
 - Attempt resolution through professional discussion with the agency involved.
 - If unresolved, escalate to the Lead Safeguarding Officer and Senior Management for support.
 - If concerns remain, follow the Kent and Medway Safeguarding Children Partnership (KSCMP) Escalation Policy, which includes:
 - Stage 1: Direct discussion between professionals.
 - Stage 2: Escalation to line managers or safeguarding leads.
 - Stage 3: Referral to the KSCMP Escalation Panel for multi-agency review.
 - Record all actions and decisions taken during escalation.
 - If the child is at immediate risk, contact Children's Services Front Door or Police without delay.

Welfare Incidents and Concerns

1. Any incident or concern during Active Kent & Medway activities that affects a child's welfare—even if it does not indicate abuse or significant harm—must be recorded using the Welfare Incident & Concern Record and forwarded to the Lead Safeguarding Officer.
2. This includes low-level concerns about behaviour inconsistent with the Code of Behaviour.
3. The Lead Safeguarding Officer will use this information to:
 - Identify improvements to systems, processes, and policies.
 - Maintain a record of actions taken by staff.
 - Detect patterns of behaviour or training needs.
4. Accurate recording is essential for responding to future enquiries and ensuring continuous improvement in safeguarding practice.

Recording and Record-Keeping

Active Kent & Medway will maintain accurate, confidential records of all safeguarding concerns, allegations, and decisions:

- **What to record:** Concern details (child's own words where possible), actions taken, decisions made, dates, times, and names.
- **Responsibility:** The person receiving the concern completes the **Welfare Incident & Concern Record** and forwards it to the **Lead Safeguarding Officer**, who documents all subsequent actions.
- **Timescales:** Records must be completed **within 24 hours**.
- **Storage:** Records are kept securely in line with **KCC data protection policies** and shared only on a need-to-know basis.
- **Retention & Review:** Records are retained per statutory requirements and reviewed regularly to identify patterns and improve practice.

Working Together to Safeguard Children 2023

1. Local arrangements in Kent and Medway may be amended to reflect changes to Working Together. Any amendments to procedures that occur as a result of this process will be reflected in a revised version of this policy.

List of Appendices

[Appendix I - Code of behaviour for adults working with children](#)

[Appendix II – Glossary of Terms](#)

[Appendix III – Roles and Responsibilities](#)

[Appendix IV - Taking Disclosures](#)

[Appendix V - Information Sharing](#)

Appendix I

Code of Behaviour For Adults Working With Children

Purpose

This code sets out the conduct expected of all staff, volunteers, students, and others working on behalf of Active Kent & Medway. It aims to protect children and young people from harm and reduce the risk of unfounded allegations. Based on [NSPCC guidance](#), it forms part of staff induction and should be read alongside our Safeguarding Policy and Procedures.

Your Role and Responsibilities

When working with children and young people, you are in a position of trust and must act as a positive role model. You are responsible for:

- Prioritising their welfare and ensuring a safe environment.
- Understanding safeguarding and child protection issues.
- Following our policies and procedures and staying within the law.
- Modelling respectful behaviour and challenging inappropriate conduct.
- Reporting concerns or allegations using our safeguarding procedures.

Respecting Rights and Relationships

You should:

- Treat children fairly and without discrimination.
- Respect individual differences and promote inclusion.
- Encourage children to speak up about behaviour that makes them uncomfortable.
- Build relationships based on trust, honesty, and respect.
- Avoid favouritism and be patient and sensitive when discussing personal issues.
- Ensure appropriate contact and visibility during activities.

Listening and Involving Children

You should:

- Listen to children and take their views seriously.
- Involve them in planning activities where appropriate.
- Respect their privacy, while explaining when information may need to be shared for safeguarding reasons.

Unacceptable Behaviour

You must not:

- Ignore or fail to report concerns.
- Take unnecessary risks or act unlawfully.
- Smoke, vape, drink alcohol, or use illegal substances while working.

- Develop inappropriate relationships or make inappropriate promises.
- Engage in abusive behaviour or sexual contact with anyone under 18.
- Share personal contact details or use personal social media accounts to communicate with children.
- Take photos, videos, or quotes without consent or using personal devices.
- Transport children alone or act in a threatening, patronising, or derogatory manner.

Upholding the Code

Always follow this code—your reputation or role does not exempt you. Breaches may lead to disciplinary action and referral to statutory agencies. Report any concerns, including your own, to the Lead Safeguarding Officer using the Welfare Incident and Concern Record, or follow the whistle-blowing procedure and safeguarding procedures.

Appendix II

Glossary of Terms

Abuse	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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or another child or children.	Working Together to Safeguard Children (2023)
Bullying	Bullying is defined as 'behaviour by an individual or group, usually repeated over time, which intentionally hurts another individual or group either physically or emotionally' (DfE definition).	Kent and Medway Safeguarding Children Partnership Procedures
Child	Anyone who has not yet reached their 18 th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.	Working Together to Safeguard Children (2023)
Child Protection	Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.	Working Together to Safeguard Children (2023)
Code of Conduct/ Behaviour	An important tool for defining and communicating acceptable standards of behaviour. Ideally the code of conduct must apply to everyone in your club. This should include: <ul style="list-style-type: none"> ▪ Adult members ▪ Junior Members ▪ Club Officials and volunteers ▪ Parents and Carers 	Buddle See Appendix IV for staff Code of Behaviour
Deputy Safeguarding Officer	Member of staff trained to deal with concerns about the protection of children. In Active Kent & Medway, this role is undertaken by the	See the Active Kent & Medway Safeguarding Contacts page

	Strategic Lead - Children and Young People.	
Duty of Care	A legal obligation on an individual requiring adherence to a standard of reasonable care while performing any acts that could foreseeably harm others.	
Early Help	Services that can be accessed at a time and place that suits families to help them to do well, stay safe and resolve problems at the earliest possible opportunity, before they become more serious.	KCC Early Help
Emotional abuse	Emotional abuse is a form of Significant Harm which involves the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.	See Abuse
Lead Safeguarding Officer	Member of staff with responsibility for overseeing the organisation's approach to safeguarding children, including dealing with concerns about the protection of children. In Active Kent & Medway, this is undertaken by the Events and Safeguarding Manager.	See the Active Kent & Medway Safeguarding Contacts page
Low-level concern	The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult working with children may have acted in a way that: <ul style="list-style-type: none"> • is inconsistent with an organisation's staff code of conduct, including inappropriate conduct outside of work; and • does not meet the harm threshold; or is otherwise not serious enough to merit a referral to the LADO. 	Farrer & Co
Neglect	Neglect is a form of Significant Harm which involves 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.	See Abuse
Parent	The term 'parents' also refers to carers or	

	guardians, or people with parental responsibilities.	
Physical abuse	Physical Abuse is a form of Significant Harm which may involve including hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.	<i>See Abuse</i>
Poor practice	Poor practice includes any behaviour that contravenes a body's Code of Conduct.	<i>See Code of Conduct</i>
Position of Trust	'Position of trust' is a legal term that refers to certain roles and settings where an adult has regular and direct contact with children. Examples of positions of trust include teachers, care workers, social workers and doctors. In England, Wales and Northern Ireland changes to the law made in 2022 extend the definition to include faith group leaders and sports coaches.	NSPCC Learning
Safeguarding adults	"Adult safeguarding" is working with adults with care and support needs to keep them safe from abuse or neglect.	Safeguarding Adults at Risk Definitions & Terminology - ACT
Safeguarding children	Safeguarding children is the process of protecting them from abuse and neglect, preventing harm to their health or development, and ensuring they grow up in safe, supportive environments that enable them to thrive and reach their full potential.	Working Together to Safeguard Children (2023)
Sexual abuse	Sexual abuse is a form of Significant Harm which involves forcing or enticing a child or young person to take part in sexual activities.	<i>See Abuse</i>
Significant Harm	The Children Act 1989 introduced the concept of significant harm as the threshold, which justifies compulsory intervention in family life in the best interests of children.	Kent and Medway Safeguarding Children Partnership Procedures
Working Together to Safeguard Children 2023	Statutory guidance from the Department for Education outlining how organisations should collaborate to safeguard children. It sets national standards for child protection, promotes multi-agency working, and emphasises a child-centred, whole-family approach to improving outcomes.	Working Together to Safeguard Children (2023)

Appendix III

Roles and Responsibilities

Partnership Board (via Safeguarding Champion)

- Ensure safeguarding requirements are understood and resources allocated.
- Scrutinise and approve policies, procedures, and plans.
- Provide strategic leadership and embed safeguarding in all organisational planning.
- Promote a culture of listening to children.
- Monitor progress through regular reports and updates.
- Represent and communicate the organisation's safeguarding approach externally.

Senior Management Team

- Oversee compliance with the organisation's duty of care.
- Develop, implement, and review safeguarding policies and procedures (including recruitment, complaints, and disciplinary).
- Collaborate with external agencies on serious cases.
- Embed safeguarding in organisational culture and commissioning agreements.
- Communicate safeguarding priorities to partners.

Designated & Deputy Safeguarding Officers

- Lead and maintain safeguarding policies in line with national guidance.
- Act as the main point of contact for concerns and advice.
- Keep accurate, confidential records and share information appropriately.
- Advise on training needs and support staff responding to concerns.
- Provide guidance to partners and signpost support after incidents.

Staff & Volunteers Working with Children

- Understand safeguarding principles and risks to children.
- Recognise and report indicators of abuse or neglect.
- Build positive relationships with children, families, and colleagues.
- Know relevant legislation, organisational policies, and apply them in practice.
- Follow Codes of Conduct and maintain up-to-date safeguarding training.

Staff & Volunteers Not Working with Children

- Understand safeguarding basics and recognise potential risks.
- Report concerns according to organisational procedures.
- Ensure safeguarding is included in commissioning and partnership agreements.
- Represent and communicate the organisation's safeguarding approach externally.

Appendix VI

Taking Disclosures

Guidance for responding to disclosures from children and young people, based on NSPCC and CPSU best practice.

Core Principles

- Let children know you're listening and ready to support them.
- Follow the UP, DOWN, BACK approach: Open UP, Slow DOWN, Reflect BACK.

Open UP

- Give full attention and maintain open, encouraging body language.
- Be compassionate and reassure them their feelings are important.
- Use supportive phrases like 'You've shown such courage today'.

Slow DOWN

- Respect pauses and avoid interrupting – let them set the pace.
- Recognise and respond to body language.
- Understand that disclosure may take several conversations.

Reflect BACK

- Show interest and check understanding by reflecting back.
- Use the child's own words to confirm their experience.

Additional Safeguarding Requirements

- Do NOT promise confidentiality – explain you may need to share information to keep them safe.
- Avoid leading questions; do not press for details beyond what they volunteer.
- Record the disclosure accurately using the child's own words.
- Report promptly following organisational safeguarding procedures.
- Provide reassurance without making unrealistic promises.

Source: NSPCC Learning & CPSU Guidance

Appendix V

Information Sharing

Why Information Sharing Matters

- Timely and appropriate sharing of information is essential to safeguard children and prevent harm
- Data protection laws do NOT prevent sharing information where a child's safety is at risk

Key Principles – Seven Golden Rules

- Data protection is not a barrier – UK GDPR and DPA 2018 enable lawful sharing for safeguarding.
- Be open and honest – explain what, why, and with whom information will be shared unless unsafe.
- Seek advice if unsure – consult safeguarding leads or information governance.
- Share with consent where possible, but lack of consent must not delay sharing if safety is at risk.
- Prioritise safety and well-being – this overrides privacy concerns.
- Ensure sharing is necessary, proportionate, relevant, accurate, timely, and secure.
- Record decisions and reasons – whether you share or not.

Legal Framework

- Working Together to Safeguard Children (2023): Multi-agency information sharing is a statutory expectation
- UK GDPR & Data Protection Act 2018: Provide lawful basis for safeguarding information sharing
- Human Rights Act 1998: Supports proportionality and necessity in sharing

Who to Share With

- Statutory agencies – Police, Children's Services for child protection concerns
- Disclosure & Barring Service – if someone in regulated activity is suspended or expelled
- Other sports organisations/clubs – where necessary to protect children
- Internal staff – only those who need to know to keep children safe

CPSU Guidance for Sport

- Share concerns about a child's welfare (inside or outside sport).
- Share concerns about a person in a position of trust (e.g., coach)
- Share concerns about a member or volunteer who may pose a risk
- Share concerns about the environment (e.g., unsafe venue or hosting arrangements)
- Always act in the child's best interests and follow organisational safeguarding procedures

Recording Requirements

- Date/time of decision
- Summary of information and reason for sharing
- Who requested and who authorised
- Whether consent was obtained or overridden
- How information was shared (secure method)
- Confirmation of receipt if applicable

Source: Working Together to Safeguard Children (2023), UK GDPR, CPSU Guidance.