



## **Manchester City Sports Business School Safeguarding Policy**

### **Introduction**

Manchester City Sports Business School (the School) is committed to ensuring the safety and well-being of all members of its community including its staff, guests, faculty, and students (including children, young people, and adults at risk of abuse or neglect because of their needs for care and support). The School recognises that all our staff have an active part to play when protecting our students from harm, and that their welfare is our paramount concern.

The purpose of this policy is to describe the School's expectations of staff and other adults involved in its programmes when interacting with children, young people, or adults at risk, and to inform parents and guardians how we will safeguard their children when they are in our care.

### **Policy Statement: Commitment to Safeguarding**

The School acknowledges its responsibility to protect and promote the wellbeing and safety of children, young people and adults at risk involved in any School activities. The School is committed to providing a safe environment for all students, staff, and visitors and adopting practices that reflect statutory responsibilities, government guidance, and compliance with best practice. This policy aims to ensure that all students are protected from abuse, and have a positive and enjoyable experience in a safe and student-centered environment.

The School will give equal priority to keeping all children, young people, and adults at risk safe, regardless of their gender, gender identity, race, national origin, ethnicity, age, religion or belief, sexual orientation, or disability. The School acknowledges that some individuals may be particularly vulnerable to abuse because of their particular needs or the impact of discrimination, and the School will take appropriate steps to ensure their welfare.

The safeguarding policy and procedures herein apply to all staff, students, and volunteers who may be working with children, young people or adults at risk of harm through the School's programmes. Failure to comply with this policy will result in disciplinary action and may result in dismissal and/or referral to statutory or regulatory bodies.

The School has established and will maintain links with relevant agencies and co-operate as required with enquiries of a child protection nature.

The School will:

- Designate a safeguarding lead who will be involved and available during each programme offered.
- Ensure that all programme staff are aware of their roles and responsibilities with respect to safeguarding, and have received appropriate training to enable them to recognise and respond to signs of abuse, neglect, or other concerns.
- Ensure that all programme staff are suitable for their role and have cleared required background checks.
- Ensure that procedures are in place to escalate and/or respond to incidents or concerns, and to provide support for those who raise or disclose the concern.
- Record, store, and use information in line with data protection legislation and guidance.
- Ensure that students and their families are aware of the School's safeguarding policies, know with whom they can raise concerns, and feel comfortable sharing their concerns.

## Definitions

*Child/children:* a person/people under the age of 18.

*Young people:* children who are 16 or 17 years old.

*Adult at risk:* a person aged 18 years old or older deemed at risk and therefore, entitled to be safeguarded because they are unable to protect themselves against harm or exploitation. An adult at risk may be a person who:

- is elderly and frail due to ill health, physical disability or cognitive impairment
- has a learning disability
- has a physical disability and/or a sensory impairment
- has mental health needs such that their capacity is reduced
- has a long-term illness/condition
- misuses substances or alcohol
- is a carer, such as, a family member or friend who provides personal assistance and care to adults and is subject to abuse
- is unable to demonstrate the capacity to make a decision and is in need of care and support

*Age of consent in the UK:* a person can legally consent to sexual activity if they are 16 years old or over. However, it is illegal under the Sexual Offences Act 2003 for an adult in a position of trust to engage in sexual activity with a person under the age of 18. Staff employed by the School are in a position of trust when working with children and young people.

*Safeguarding:* taking all reasonable steps to prevent harm, particularly sexual exploitation, abuse, and harassment from occurring; to protect people, especially adults at risk and children, from that harm; and to respond appropriately when harm does occur. Safeguarding applies consistently and without exception across all activities associated with the School. It requires proactively identifying, preventing, and guarding against all risks of harm, exploitation and abuse and having mature, accountable, and transparent systems for response, reporting, and learning when risks materialise. Those systems must be survivor-centred and also protect those accused until a decision is made.

## **Related Policies**

The School's related policies and procedures can be found in the Staff and Faculty Handbook and [here](#):

- Student Code of Conduct
- Health and Safety Policy
- Equalities and Special Educational Needs Policy
- Student Privacy Notice
- Student Complaints procedure

## **Roles and Responsibilities**

The behaviour of instructors, staff, and other adults associated with the School is expected to align with specific guidelines for safeguarding and interacting with children. Adults must be positive role models for children, and act in a caring, honest, respectful and responsible manner. Everyone at the School shares responsibility for safeguarding, irrespective of their individual roles. Nevertheless, it is important that each individual is aware of and appreciates the role that they play.

- Designated Safeguarding Lead (name and role within the organisation tbc): handle day to day matters, records management, and communication about this policy with students and parents, ensure that all staff undertake appropriate training, and to determine the response to all raised concerns.
- Assistant Safeguarding Leads, Matthew Little (Programme Content Manger) and a second member of the Programme Team (name and role within the organisation tbc) support the Designated Safeguarding Lead in execution of their responsibilities, and serve as Safeguarding Lead if the Designated Safeguarding Lead is unavailable or unable to fulfil their role.
- Director of the School, Jenny Morris: ensure all staff are committed to the importance of safeguarding and promoting children's welfare in the School's provision of services.
- Staff involved in recruitment of School personnel: ensure that the School operates safe recruitment procedures, including appropriate background checks carried out, and implement best practices in the recruitment of new staff.
- Instructional Staff: report any absences to the Designated Safeguarding Lead, who will then follow the attendance procedures.
- All Staff: establish and maintain a culture of listening to and engaging with children, young adults, and adults at risk in age-appropriate ways; know and understand the role of all staff in keeping students safe and responding appropriately to any concerns that may arise; report any problems or issues to the Designated Safeguarding Lead in a timely and appropriate manner, including reporting the conduct of others (whistleblowing). Failure to report safeguarding incidents or concerns may result in disciplinary action.
- Students: behave in a respectful manner toward each other as outlined in the student handbook; students are advised to report any bullying or abusive behaviour that they witness to a staff member they feel most comfortable approaching.

## **Guidelines for Programmes with Children**

Those associated with programmes or activities involving children should observe the following “dos” and “don’ts” in order to maintain a safe and positive experience for programme participants, encourage parent/guardian confidence, and avoid misunderstandings. These guidelines are not meant to inhibit medical (physical or mental) or other professional interactions with children where professional standards apply.

### **DO:**

- Maintain the highest standards of personal behaviour at all times when interacting with children.
- Whenever possible, try to have another adult present when you are working with children in an unsupervised setting.
- Conduct necessary one-on-one interactions with children in a public environment where you can be observed and interrupted.
- Maintain an attitude of “it could happen here” with regard to safeguarding.
- Listen to and interact with children and provide appropriate praise and positive reinforcement.
- Ensure that children know there are staff they can approach if they are worried or in difficulty.
- Treat all children in a group consistently and fairly, and with respect and dignity.
- Be friendly with children within the context of the formal programme or activity while maintaining appropriate boundaries.
- Maintain discipline and discourage inappropriate behaviour by children, consulting with your supervisors if you need help with misbehaving children.
- Follow escalation policies when appropriate.
- Be aware of how your actions and intentions might be perceived and could be misinterpreted.
- Consult with other adult supervisors or colleagues when you feel uncertain about a situation.
- Dress in ways that are appropriate to their role. Clothing should not be revealing, sexually provocative, or give rise to misunderstanding or political/cultural offence.
- Follow appropriate escalation policies if you encounter children with illegal drugs or alcohol.
- Be familiar with the signs and types of abuse, which are set out in Annex A.

### **DON'T:**

- Don't spend significant time alone with one child away from the group or conduct private interactions with children in enclosed spaces or behind closed doors.
- Don't have physical contact with children including efforts to console or comfort students especially in private locations. Where a child is in distress, staff should comfort or reassure a child in an age-appropriate way whilst maintaining clear professional boundaries.

- Don't use inappropriate language, tell suggestive jokes, or make sexually suggestive comments around children, even if children themselves are doing so.
- Don't wear clothing that is sexually provocative or could give rise to misunderstanding or political/cultural offence.
- Don't give personal gifts to, or do special favours for, a child or do things that may be seen as favouring one child over others.
- Don't share information with children about your private life or have informal or purely social contact with children participating in the programme outside of programme activities.
- Don't drive students in a vehicle unless accompanied by another staff member.
- Don't strike or hit a child or use corporal punishment or other punishment involving physical pain or discomfort.
- Don't relate to children as if they were peers, conduct private correspondence or take on the role of "confidant" (outside of a professional counselling relationship).
- Don't meet with children outside of the parameters of programme activities.
- Don't date or become romantically or sexually involved with a child. Don't show pornography to children or involve children in pornographic activities.
- Don't communicate in any fashion (phone, text, email, social media) with children outside of methods sanctioned and supported by the School. Where communications are used, ensure a second staff member is included in all communications.
- Don't provide illegal drugs or alcohol to children or use them in the presence of children.

## **Safer Recruitment**

All staff who have regular interaction with children will have appropriate background checks completed before they are allowed to begin working with children involved with the School's programming. This includes instructional staff, residential staff, and any other staff who will have more than incidental interaction with children. This includes:

- Enhanced DBS check and Barred List check
- Before employment begins, validated reference and qualification checks specifically indicating the candidate's suitability to work with children.
- Reporting to the Disclosure and Barring Service any person (whether employed, contracted, volunteer or student) the School believes has caused harm or poses a future risk of harm to vulnerable people, including children.
- Employee disciplinary processes to remove individuals from positions working with children due to employee misconduct.

## **Staff Training**

Each staff member will undergo various levels of training to ensure the understanding of this Safeguarding Policy as well as safeguarding all children involved with School programmes.

- The Designated Safeguarding Lead, Assistant Safeguarding Lead, and Director will receive Level 3 safeguarding training.

- All full-time staff members that work with the Next Gen programme will participate in an in-person safeguarding training.
- All Student Life staff members (including residential staff) that work with the Next Gen programmes will participate in an in-person safeguarding training, which will complement the emergency procedure and general safety training to take place as part of their orientation.
- All instructors and other academic staff members will be required to undertake safeguarding online training and submit a sworn statement acknowledging all elements of the School's Safeguarding Policy including behavioural expectations.
- All presenters, guest speakers, and other incidental contractors will be provided with the behavioural guidelines and will be accompanied by another staff member who has completed safeguarding training when interacting with children.

## Responding to Safeguarding Concerns

The safeguarding procedure is to be followed whenever a concern is raised or a disclosure made by a member of staff or the public that a child, young person or adult at risk may be a victim of abuse or exploitation (whether these matters have occurred at the School or relate to an outside matter but are disclosed at the School), and whenever staff fail to uphold the School's high standard of care in carrying out their duties. It should not be used if someone is in immediate danger, in which case the emergency services should be called.

When a member of the public becomes aware of a possible safeguarding concern or receives a disclosure or an allegation related to anyone attending or participating in MCSBS activities or related to MCSBS staff, they may:

- Report it to MCSBS using the ['Report a Safeguarding Concern'](#) online form available in the Safeguarding area on the [MCSBS website](#).

Where any member of the School becomes aware of a possible safeguarding concern or receives a disclosure or an allegation they must:

- Contact the Designated Safeguarding Lead without delay;
- Make a written report of all the relevant details: student/individual name, detail(s) of the person raising the concern, reasons for the cause for concern including any specific incidents, actions, or observations (see Appendix B for a report form); and
- Send the written report to the Designated Safeguarding Lead.

When responding to a person who is reporting abuse or maltreatment, staff must:

- Receive the information. Staff must listen carefully to person reporting abuse or maltreatment and keep an open mind. Staff should not question whether or not the abuse has taken place and be aware of non-verbal messages.
- Follow up. Ask open-ended questions. Staff must not ask leading questions, that is, a question which suggests its own answer. Don't stop an individual who is freely recalling significant events. Keep responses short, simple, quiet, and gentle.
- Reassure. Staff must reassure the individual and let them know that they have done the right thing by telling you.
- Do NOT promise confidentiality. The member of staff should explain that they need to pass the information to the Designated Safeguarding Lead.

- **Record.** Staff must detail a verbatim record of the conversation using the language that the individual has used. The record should include the date, time, and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials. The record must be kept securely and handed to the Designated Safeguarding Lead as soon as practicable. Advice will be given by the Designated Safeguarding Lead regarding next steps.
- **Report.** Staff should inform the Designated Safeguarding Lead. In all cases, if staff are unsure what to do, they should speak to the Designated Safeguarding Lead. If the Designated Safeguarding Lead is unavailable, the Alternative Safeguarding Lead or Director should be contacted.

Personal information may be disclosed to parents, guardians, sponsors, or agents for any student unless doing so would result in further risk of harm.

If the individual is at risk of significant harm, emergency and/or police services should be notified immediately, as well as the Designated Safeguarding Lead (or the Assistant Safeguarding Lead if the Designated Safeguarding Lead is unavailable). In the event of any police investigation of a reported complaint, the criminal process takes priority. If the matter is being dealt with under criminal processes, any internal disciplinary process may be suspended until the criminal process is at an end (save for taking any necessary precautionary action to safeguard students and staff).

Staff should also report concerns related to poor practice to enable the School to review and respond to staff members' failure to apply the requisite standard of care in carrying out their duties. Staff may report these concerns either verbally or in writing to the Designated Safeguarding Lead (or the Assistant Safeguarding Lead or Director if the Designated Safeguarding Lead is unavailable). The Designated Safeguarding Lead (or other School official) may request a written report if they deem it necessary in their discretion.

## **Allegation Management**

The School takes all allegations that there has been a breach of this safeguarding policy seriously. The process by which an allegation against a member of staff may be managed is addressed in the Employee Handbook. If the allegation is against a student, the student disciplinary policy will apply.

Allegations that a person working with children has behaved in a way that has or may have harmed a child or possibly committed a criminal offence against or related to a child should be reported to the Local Authority Designated Officer (LADO) within one day of such an allegation being made.

Information about allegations may be also shared with the School's programme partner, City Football Group.

## **Record Keeping**

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing, even when referral is not appropriate immediately. Records should be completed as soon as possible, and in any event on the same day the incident/event is reported to the staff member. Information should be kept confidential and stored securely and in accordance with the School's [Student Privacy Notice](#). All child protection records will be kept separately from the main student file.

Records should include:

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

## **Student Information & Parental Consent**

All parent/guardian(s) of enrolled students must complete, sign, and return a parental consent form. School enrolment procedures offer the opportunity for the student and parent/guardian to inform the School of any medical conditions, disabilities or educational needs of the student. This information is confidential and may only be access by staff members on a need-to-know basis. Full next of kin details for all students are required prior to arrival in case of any emergency.

## **Equal Opportunities and Safeguarding**

Some students may be vulnerable to an increased risk of abuse. It is important to understand that this increase may be due to societal attitudes and child protection procedures that fail to acknowledge students' diverse circumstances, rather than the individual student's personality, impairment or circumstances. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues, learning disabilities and reluctance on the part of some adults to accept that abuse can occur. Staff should be aware of these risks and will give special consideration to students who are disabled or have special educational needs; vulnerable to being bullied, or engaging in bullying, vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion or sexuality; or do not have English as a first language.

## **Continuous Monitoring**

The policy will be reviewed annually, following any changes in legislation and/or government guidance, or as a result of any other significant change or event. The review will be undertaken by the safeguarding lead in consultation with key staff members. If the School becomes aware of any safeguarding issues or incidents, this policy may be reviewed and amended as necessary.

*Last reviewed: 21 November 2024*

## Appendix A: Indicators of abuse and neglect

Child abuse is most often used to describe ways in which children are harmed with damage to their physical or mental health. There are four broad categories of abuse as follows:

- **Physical:** Visual - unexplained bruising, burns etc. Dressing to cover injuries, even in hot weather, change in personality, flinching, violent behaviour or talking about physical abuse.
- **Sexual:** through inappropriate physical contact, the taking of indecent images of children, or the encouragement of sexual activity by children for the purpose of adult gratification. A change in character, being over sexual for their age and withdrawing from physical contact.
- **Emotional:** through persistent lack of affection, unrealistic adult demands, verbal bullying including cyber-bullying, low self-esteem, mood swings, self-harming and depression.
- **Neglect:** persistent lack of appropriate care of children, including safety, nourishment, warmth, education and medical attention, tired and withdrawn, appearance, nothing to contribute

Children can abuse other children, and this is generally referred to as peer-on-peer abuse and can take many forms. Peer-on-peer abuse must never be tolerated or passed off as 'banter', 'just having a laugh', 'boys being boys' or 'part of growing up'. Victims of peer abuse will be treated as in all other cases of abuse, by having their allegations listened to and fully investigated.

With regards to child-on-child sexual violence and sexual harassment the School will follow the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. 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 a group of children. Staff should be aware that girls, children with special needs and LGBT children are at greater risk.

Other forms of abuse include Female Genital Mutilation, trafficking and modern slavery, Child Sexual Exploitation, Drug Exploitation, forced marriage, Radicalisation and Extremism, Bullying/Cyberbullying, fabricated or induced illness.

## Appendix B: Safeguarding Incident Report Form

<b>Name of the person the concern is about:</b>	<b>Person's programme of study/activity:</b>
<b>Person's email:</b>	<b>Person's telephone:</b>
<b>Person's current living address:</b>	
<b>Date, time and place of the incident:</b>	
<b>Names of any other persons who have been made aware of this incident:</b>	
<b>Name of person making this report:</b>	<b>Date of this report:</b>
<b>Contact details:</b>	
<b>Brief details: (what happened, who was involved, how you heard about this/ other relevant information including action taken):</b>	
<b>Action taken:</b>	
<b>External agencies contacted: Y/N                      999 or social services? Y/N</b>	
<b>If yes, please give the name and contact details of anyone spoken to:</b>	