



St Mary's  
University  
Twickenham  
London

# Sport St Mary's Safeguarding Children Policy

Updated:	October 2022 – Andrew Reid-Smith (SSM LSO)
Approved:	Kevin Daly (Sport Operations), & Gareth Crewe (Sport Development)
Review Date:	October 2024

# Contents

1	Introduction	P.3
2	Policy Definitions	P.3
3	Policy Statement	P.5
4	Key Contacts	P.7
5	Expectation, Incidents of Abuse or Causes for Concern	P.8
6	Safeguarding Reporting Process	P.9
7	Richmond Single Point of Access	P.11
8	Recruitment of SSM Staff and Volunteers	P.12
9	Signing In and Out	P.12
10	Safeguarding Unaccompanied Children	P.13
11	Safe Use of the Toilets and Changing Areas	P.14
12	Bullying	P.15
13	Children’s Developing Interest in their own Sexuality	P.15
14	Filming and Photography	P.16
15	Social Media	P.17
16	SSM Training and Development	P.18
17	Health & Safety and Risk Assessments	P.18
18	Reporting Medical Conditions or Other Matters	P.18
19	External Coaches Using the Sport Facilities	P.18
20	Third-Party Users of the Sport Facilities	P.19
21	Policy Monitoring and Evaluation	P.20
Appendix One	Code of Conduct for SSM Staff and Volunteers	P.21
Appendix Two	Code of Conduct for Children and Parents/Guardians/Carers Involved in Sport	P.23
Appendix Three	SSM Code of Conduct for Coaches	P.25
Appendix Four	SSM Official Filming and Photography Consent Form	P.28

# 1. Introduction

Sport St Mary's (SSM) aims to provide a safe environment for children to take part in a range of sporting activities. The department believes that a young person should never experience abuse or harm of any kind. We have responsibility to promote the welfare of all young children, and to keep them safe in the sport facilities on the main campus and at the Teddington Lock Sports Campus (TLSC). We recognise our responsibility to develop awareness of safeguarding issues and are committed to practice that reflects the University's duty of care and protects children.

This policy applies to all users of St Mary's sport facilities where the activity involves children. For all SSM programmes where young people are participating, including those run out of external venues, the detail and practice identified in this policy must be followed.

St Mary's University expects all people to accept the fundamental principle and legal requirement, that children's welfare is paramount.

The purpose of this policy is to:

- Create a safe sporting environment that protects children.
- Provide young people, parents/guardians/carers, staff, students, volunteers and third parties with principles that guide our team approach to safeguarding children.
- Outline safeguarding procedures and best practice in relation to the delivery of SSM programmes and activities, and a framework for third-party use, within the sport facilities.
- Enable children, parents/guardians/carers to have confidence in SSM's care for children.
- This policy has been developed using guidelines from the National Society for the Prevention of Cruelty to Children (NSPCC), the NSPCC's Child Protection in Sport Unit (CPSU), Government legislation and the University's Safeguarding Policy and the supporting policy on Children, Young People and Vulnerable Adults.

## 2. Policy Definitions

**Abuse** – Any action by another person, adult or child, that causes significant harm to a young person. It can be physical, sexual or emotional, but can also be about a lack of love, care and attention. Neglect and bullying, in whatever form, are also considered abuse.

**Academic Programmes including the First Star Academy** – This policy is relevant for St Mary's academic programmes if they cater for students under the age of 18. Where this takes place in any sport facilities that SSM manage, this comes under third-party usage.

**Bullying** – Behaviour that hurts someone. This includes name calling, sarcasm, hitting, pushing, spreading rumours, threatening or undermining an individual. This can occur anywhere, at school, at

home, online, and in the sport facilities. It is usually repeated over a long period of time and can hurt a child physically and emotionally – it is a form of abuse.

**Child or Young Person** – Any person under the age of 18.

**Child Protection** – Protecting individual children identified as suffering or likely to suffer harm. This includes child protection procedures which detail how to respond to concerns about a young person and form part of the safeguarding process.

**National Governing Body (NGB)** – An organisation that governs and administers a sport on a national basis.

**Regulated Activity** – When a person because of their work:

- Will carry out paid or unpaid work regularly, where that work provides an opportunity for contact with children once a week or more, or on four or more days in a 30-day period.
- Will engage in a personal care of overnight activity involving children, even if this happens only once.

(Code of Practice for the DBS, 2015)

**Safeguarding** – Action that is taken to promote the welfare of children and to protect them from harm, and is defined as:

- Protecting children from abuse, bullying and maltreatment.
- Preventing harm to a young person's health or development.
- Ensuring children grow up with safe and effective care.
- Taking action to enable all children to have the best outcomes.

**Sport Facilities** – The sport facilities owned by St Mary's University and managed by SSM, at the main campus and the TLSC. This does not include the Performance Education Centre (PEC) which is managed by the Faculty of Sport Applied Health and Performance Sciences. For any SSM programmes that are delivered in the PEC for children, this policy must be applied.

**SSM Programmes** – This refers to SIMMSport, birthday parties, student sport, the Endurance Performance Centre (EPC), the FA Women's High Performance Football Centre (FA WHPFC), fitness classes, and any events or activities that SSM coordinates, where young people are involved. These can take place on the main campus, at the TLSC or at an external venue – whatever the location the guidance and practice identified in this policy must be applied.

**SSM Staff** – Permanent, fixed term and casual staff that work for the department.

**SSM Volunteers** – Individuals volunteering in an unpaid capacity to support delivery of SSM programmes and events.

**Third-Party Users** – Any users including academic programmes and the First Star Academy, that use St Mary’s sport facilities to deliver non-SSM led programmes and activities. Third-party users must apply the policy to all delivery that involves children.

## 3. Policy Statement

SSM recognise that:

- The welfare of children is paramount, as protected in the Children Act 1989 and Safeguarding Vulnerable Groups Act 2006.
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have a right to equal protection from all types of bullying or abuse.
- Some children are additionally at risk because of the impact of previous experiences, their level of dependence, communication needs or other issues.
- Working in partnership with young people, their parents/guardians/carers, the Local Authority children’s social care, Police, NGB’s and other agencies is essential in promoting children’s welfare in sport.
- Staff or volunteers may hold a position of trust with children they meet. Any physical relationship constitutes an abuse of trust under the Sexual Relations Act 2003.

SSM will seek to keep children safe by:

1. Valuing, listening and respecting them, and involving them in decisions whenever it is possible and appropriate.
2. Having a Lead Safeguarding Officer (LSO) and Designated Safeguarding Officers (DSO’s) that are organisational points of contact, who are trained to deal with safeguarding matters. The LSO has overall responsibility for the implementation of the policy and fulfils a ‘facilitative’ rather than investigative role. It is the responsibility of the Local Authority and/or the Police to investigate any potential risks, and when dealing with sport the relevant NGB may also need to support. The DSO’s are responsible for providing immediate support in terms of dealing with any situation and recording information (not investigating), and for liaising with the LSO.
3. Taking all concerns, suspicions or allegations of abuse seriously and responding swiftly and appropriately.
4. SSM programmes and activities will support safeguarding through adopting a Code of Conduct for SSM Staff and Volunteers (Appendix One). The Departmental Administrator will ensure that all SSM staff and volunteers (except for paid and volunteer Coaches who will fall under the Code of Conduct for Coaches) are signed up to this code.

5. SSM programmes and activities will support safeguarding through a Code of Conduct for Children and Parents/Guardians/Carers (Appendix Two). This will be displayed on noticeboards on the main campus and at the TLSC.
6. SSM programmes and activities will support safeguarding through a Code of Conduct for Coaches (Appendix Three). The Assistant Head – Sport Development will ensure that all Coaches (paid and voluntary) are signed up to this code.
7. Ensuring that for SSM programmes that all SSM staff (including paid Coaches) and volunteers (including voluntary Coaches) that meet the regulated activity criteria (Section Two), have a Disclosure and Barring Service (DBS) Enhanced Criminal Record with Children’s Barred List Check. The Assistant Head – Sport Development will coordinate an up to date SSM DBS register for all necessary staff, volunteers and Coaches, to ensure that everyone’s DBS certificate is current. SSM will also maintain appropriate supervision levels with at least two NGB qualified and DBS checked adults present and will aim to work to the following NSPCC best practice guidelines.

<b>Child’s Age</b>	<b>Number of Adults</b>	<b>Number of Children</b>
0-2	1	3
2-3	1	4
4-8	1	6
9-12	1	8
13-17	1	10

- If there is a temporary shortfall in SSM coaching provision the department may, in line with Department of Education guidance, use a Coach for SSM programmes and activities who has a DBS check awaiting completion. This person must work under close supervision of a Coach who has had their DBS check approved.
- Recruiting SSM staff and volunteers appropriately.
- Setting clear conditions for third-party users of the sport facilities that they should follow, including external Coaches (Coaches that are not SSM Coaches).
- Setting clear conditions for unaccompanied children.
- Setting clear conditions for children’s use of toilets and changing areas.
- Defining bullying and clarifying appropriate action to deal with any bullying incidents or allegations.
- Setting clear conditions for filming and photography for sessions that involve children.
- Providing SSM staff and volunteers with safeguarding support, training and supervision.
- Ensuring activities are risk assessed and where they involve young people, they reference safeguarding and protecting children. The Assistant Head – Sport Operations will be responsible

for coordinating the completion of risk assessments, and for ensuring that all SSM and third-party risk assessments are up to date.

- Ensuring that the SSM Safeguarding Children Policy is referenced within relevant SSM Terms & Conditions, and contracts.
- Sharing information and good practice about safeguarding children on the SSM website, and on notice boards at the main campus and TLSC to include the list of DSO's and helpful contacts.
- Ensuring that anyone reporting a genuine concern about the wellbeing of a child they believe to be at risk, can be sure that this will be taken seriously in accordance with the Safeguarding Reporting Process (Section Six). This would involve raising concerns and information with relevant external agencies such as the Richmond Single Point of Access (SPA), the Police and NGB's, and involving children, staff, students, parents/guardians/carers, and third-party users appropriately.
- Using St Mary's policies and procedures to manage any safeguarding complaints or allegations against SSM staff, students and volunteers, with reference to external agencies as required.

## 4. Key Contacts

### Internal:

#### **St Mary's Senior Management Lead**

Jo Blunden, Chief Operating Officer

020 8240 4169

[jo.blunden@stmarys.ac.uk](mailto:jo.blunden@stmarys.ac.uk)

#### **SSM Lead Safeguarding Officer (LSO)**

Andrew Reid-Smith, Head of Sport

020 8240 4330

[andrew.reid-smith@stmarys.ac.uk](mailto:andrew.reid-smith@stmarys.ac.uk)

#### **SSM Designated Safeguarding Officers (DSO's)**

Kevin Daly, Assistant Head – Sport Operations

020 8240 4096

[kevin.daly@stmarys.ac.uk](mailto:kevin.daly@stmarys.ac.uk)

Robert Watson, Sports Centre Manager

020 8240 4229

[robert.watson@stmarys.ac.uk](mailto:robert.watson@stmarys.ac.uk)

**External:**

**NSPCC**

0808 800 5000 (24-hour freephone helpline)

[help@nspcc.org.uk](mailto:help@nspcc.org.uk)

**Richmond SPA**

020 8547 5008 (Monday to Friday, 8am to 5.15pm) or for out of hours, 020 8770 5000

**British Gymnastics**

0345 1297 129

[integrity@british-gymnastics.org](mailto:integrity@british-gymnastics.org)

**Football Association**

[safeguarding@thefa.com](mailto:safeguarding@thefa.com)

**Middlesex FA**

020 8515 1919

[safeguarding@middlesexfa.com](mailto:safeguarding@middlesexfa.com)

**Lawn Tennis Association**

[safeguarding@lta.org.uk](mailto:safeguarding@lta.org.uk)

**The Rugby Football Union**

020 8831 6655

[safeguarding@rfu.com](mailto:safeguarding@rfu.com)

**British Athletics**

07920 532 552

[safeguarding@uka.org.uk](mailto:safeguarding@uka.org.uk)

**NSPCC Child Protection Helpline**

0808 800 5000

## 5. Expectation, Incidents of Abuse or Causes for Concern

Staff, students, volunteers and third parties who work with young people are advised to always maintain an attitude towards safeguarding of *'it could happen here,'* in other words be proactive.

Any incidents which cause concern in respect of a child should in the first instance, be reported immediately to the LSO or a DSO, who will then directly inform the LSO. If the LSO for that area is away from St Mary's, a DSO will contact one of the other designated LSO's (Listed in Section Six).

Below are examples of incidents which you would need to discuss with a LSO:



- A child is accidentally harmed or injured.
- A child that displays unexplained changes in behaviour or personality, that is withdrawn, aggressive, lacks social skills and has few friends, that has knowledge of adult issues inappropriate for their age, that goes missing or runs away, that chooses to wear clothes that cover up their body.

These signs don't necessarily mean that a child is being abused, but they are aspects that would raise concern and may mean that something worrying could be happening in a child's life.

- Any concerning behaviour from adults who you know have children in their care, which makes you worried for the child/children's safety and wellbeing.
- You have been required to physically restrain a young person to prevent them from harming themselves or someone else or causing significant damage to property.
- You observe or hear something worrying about any person involved in delivery to young people (staff member, student, volunteer or a member of a third-party organisation) taking place outside the sport facilities. This would also extend to SSM programmes being delivered by SSM staff and/or volunteers out of an external venue, or even a third-party person working out of another sport facility.
- You see any suspicious marks on a young person.
- A child discloses information to you that might indicate they are being groomed, harmed or at risk of harm.
- You hear of any allegations made by a young person of events outside of St Mary's, for example at home or school, that are a cause for concern.

## 6. Safeguarding Reporting Process

In most instances, it is not expected that individual staff, students, volunteers, parents/guardians/carers or third-party users will report allegations directly to, or engage with external agencies, such as the Local Authority, the Police or NGB's. The exception to this is where there is concern of immediate risk to a child in which case the appropriate external agencies (Police and/or the Ambulance Service) should be contacted straight away on 999. External organisations may need to engage with staff, students, volunteers, parents/guardians/carers or third-party users as part of their follow up investigations.

If you are worried about a child's welfare or safety (based on something a child has disclosed, or that you have observed and/or heard) you must act and in doing so, should remember the following:

- Take seriously any suspicion or allegation of abuse.
- Try to remember any relevant information. If possible, look to differentiate between opinions and feelings, and facts that are known.

- Do not promise confidentiality. Be honest and inform the young person that that you may need to pass on the concern.
- It is important that you remember that you are not an expert in child protection, and it is not your responsibility to investigate. Your duty is to adhere to the procedure and report anything to a LSO or DSO.

If the LSO for that area is away from St Mary's, a DSO will contact one of the other designated LSO's, who are:

Jane Chambers, Interim Director of the Institute of Education  
[jane.chambers@stmarys.ac.uk](mailto:jane.chambers@stmarys.ac.uk)

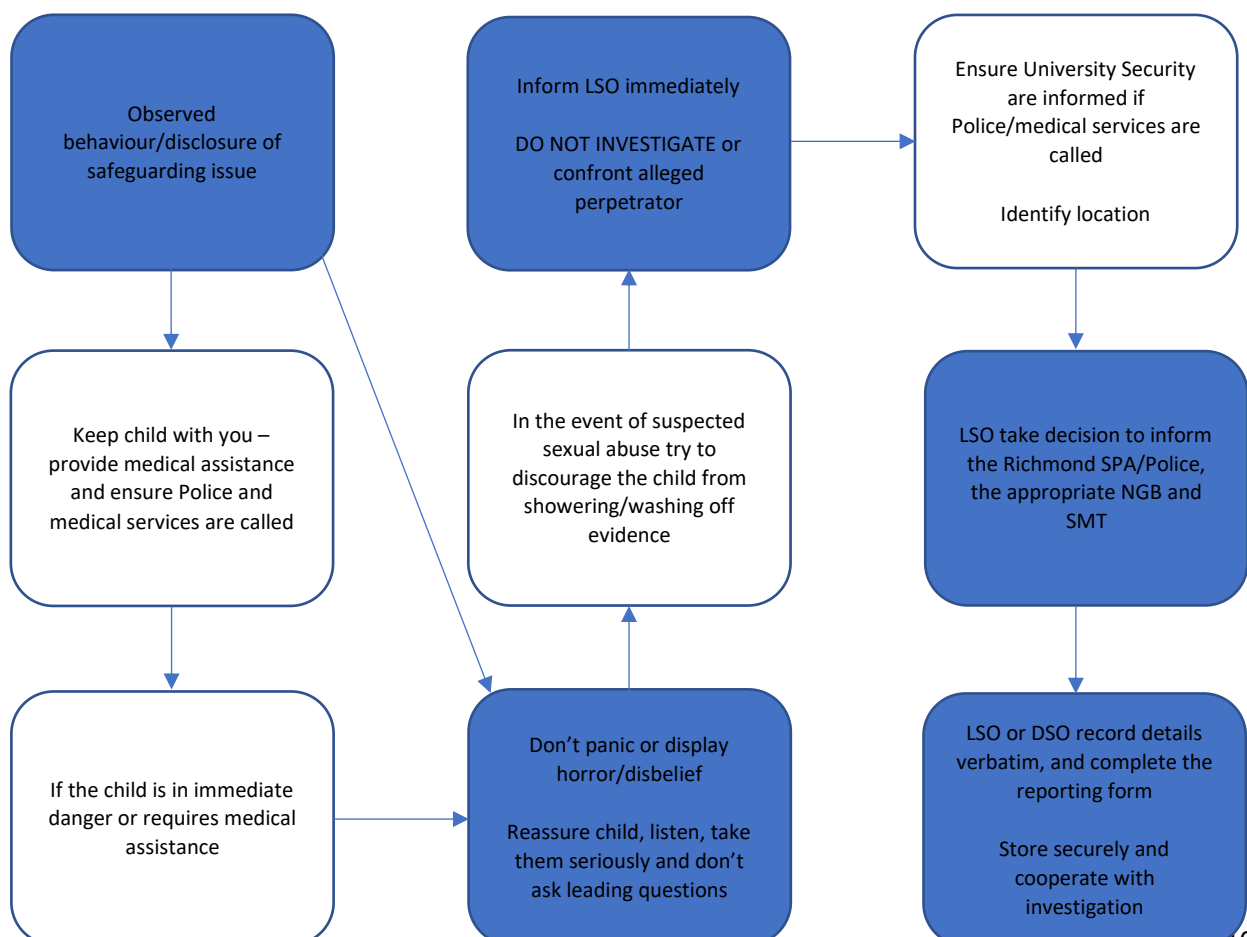
Alison Henderson, Interim Director of Human Resources  
[alison.henderson@stmarys.ac.uk](mailto:alison.henderson@stmarys.ac.uk)

Helen A'Court, Head of Registry Services  
[helen.acourt@stmarys.ac.uk](mailto:helen.acourt@stmarys.ac.uk)

Chris Paget, Director of Estates and Campus Services  
[chris.paget@stmarys.ac.uk](mailto:chris.paget@stmarys.ac.uk)

Sue Whitham, Head of Student Services  
[sue.whitham@stmarys.ac.uk](mailto:sue.whitham@stmarys.ac.uk)

On receiving a report that is judged to be a safeguarding concern, the LSO will unfold the Safeguarding Reporting process below.



The LSO or DSO will record any safeguarding concerns raised via the [reporting form](#).

Where child abuse and/or a criminal offence may have occurred involving an NGB Coach, member of staff or volunteer, the relevant NGB is also one of the external agencies that would need to be involved, alongside the Police and Local Authority SPA. Also, examples such as these which involve SSM staff or students, would also be reported to either HR or the Registry as appropriate. Any internal investigation and action relating to potential serious breaches of Codes of Conduct, the Staff Disciplinary Policy or Student Disciplinary Policy, may need to unfold alongside wider external agency processes, and the SPA may advise on this.

## 7. Richmond Single Point of Access

The SPA is a statutory setup that Richmond has in place to have management and oversight of cases.

It should be noted that complaints procedures are separate to the allegations process and just because someone does not wish to make a complaint, this does not mean that an allegation should not be considered and investigated.

The LSO must make a referral to the SPA in every case where it is alleged that a person working with children has:

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

The LSO must consult with the SPA within 24 hours (or one working day), and it the DSO's responsibility to gather information, not to investigate. It should be noted that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. The HM Government guide 'Working Together to Safeguard Children' 2018 highlights that fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of young people.

The SPA will assess whether the allegation meets the threshold for their involvement, they will advise on next steps and the inclusion of other agencies and steps thereafter and will monitor the progress of cases.

If an allegation is substantiated and a person is dismissed or a setting ceases to use a person's services, or a person resigns, the SPA will discuss with the setting and HR whether referral to the DBS is required for consideration of inclusion on the barred list.

## 8. Recruitment of SSM Staff and Volunteers

All SSM staff, permanent, fixed-term contract and casuals, will be appointed in line with current HR policies and procedures for recruiting staff.

All SSM staff, volunteers and Coaches (paid and voluntary) that meet the regulated activity criteria (Section Two) must have a DBS Enhanced Criminal Record with Children's Barred List Check.

The HR recruitment process for permanent staff requires:

- Applications to be via a fully completed application form with an accompanying CV.
- Verification of qualifications by checking original certificates.
- A minimum of two references. At least one reference must be able to comment upon the candidate's ability to work safely with children.

The SSM recruitment process for volunteers requires the same as above, except applications can be made with a detailed CV.

For all SSM staff and volunteers, a review of the SSM Safeguarding Children Policy is included as part of their induction, plus safeguarding training is provided.

If there is a temporary shortfall in SSM coaching provision the department may, in line with Department of Education guidance, use a Coach for SSM programmes and activities who has a DBS check awaiting completion. This person must work under close supervision of a Coach who has had their DBS check approved.

## 9. Signing In and Out

For SSM programmes such as SIMMSport that involve children, there will be a signing in and out process to safely pass children across to the department, and to collect them. The Assistant Head of Sport - Development will ensure this process is in place for SSM programmes.

The process for SIMMSport activities is the following:

- The SIMMSport Head Coach for the session will ensure that an accurate register is taken at the start and end of every session to ensure that every child has been checked in and out.
- Young people must be checked in and out by parents/guardians/carers or a nominated adult, at the specified location. For SIMMSplitz this is the Green Gym reception area, and for SIMMSAthletics it is the entrance to the Sir Mo Farah Athletics Track. For SIMMSport Holiday Camps, this will be the Sport Centre reception.

- Parents/guardians/carers who drop off a child at their first session will be given a unique reference for their child that will need to be provided upon collection. This code will be valid for all programmes for that academic year.
- When dropping their children off for the first session of a new programme, the SIMMSport Head Coach will ask the parent/guardian/carer to confirm their address and contact details to ensure that SSM have up-to-date details for all participants.
- In situations where it is a different parent/guardian/carer collecting a child from the one dropping them off, SSM should be made aware at drop-off who will be collecting the child. The parent/guardian/carer will need to pass on the unique code for the child to be collected at the end of a session.
- At the end of a session, the parent/guardian/carer will confirm the unique code to the SIMMSport Head Coach who will release the child providing that the code is correct. Other coaches will ensure that children do not leave the facilities until they have been checked out with the Head Coach.
- No child will be released to anyone unless the unique code is provided. If the person looking to collect the child does not have the unique reference, SSM will contact the parents/guardians/carers on the details previously provided. If the person that has arrived has personal ID this will be used to confirm to the parents/guardians/carers who they are, and to check they are authorised to collect the child. They will be required to check the young person out. If a child is not collected and parents/guardians/carers cannot be contacted, after 30 minutes SSM will contact the Local Authority children's social care. A [reporting form](#) will also be completed.

## 10. Safeguarding Unaccompanied Children

Children registered on SSM programmes that are aged less than 12 years old, must be accompanied by an adult (18+) and delivered to SSM. All children must be signed in and out, in accordance with the signing in and out process (Section Nine).

Whilst visiting or using the sport facilities children aged 12 or under must be accompanied by an adult (18+) until they are delivered to SSM or the third-party user. Third-party users have responsibility for maintaining up to date registers and would want to adopt a signing in and out process of their own. Parents/guardians/carers may, if possible, wish to remain present whilst third-party activity happens.

When a child under 12 years old is not registered on SSM or third-party programmes, they remain the responsibility of their parents/guardians/carers.

When a child of any age is found to be unsupervised or unaccompanied (unless they are permitted to visit alone by their parents/guardians/carers, or additional arrangements have been agreed), SSM staff must ensure their safety and welfare. SSM staff will keep the child monitored in a safe place and every effort is to be made to identify the parents/guardians/carers. If they cannot be located or contacted, after 30 minutes SSM will contact the Local Authority children's social care and a [reporting form](#) must be completed.

For children older than 12, it is the parents/guardians/carers that have responsibility to assess if it is safe for their child to visit the sport facilities unaccompanied. If parents/guardians/carers deem that it is not suitable for children of this age to visit the facilities alone, then they must raise this with SSM or the third-party concerned (whichever is more relevant) to see whether it is possible to put additional arrangements in place.

For a child aged more than 12, SSM can still assess and appropriately raise any concerns with parents/guardians/carers about their decision to allow a child to visit the sport facilities unaccompanied.

Whilst every effort will be made to protect children, SSM cannot be responsible for ensuring the safety of children that are in the sport facilities without the department's knowledge.

## 11. Safe Use of the Toilets and Changing Areas

Whenever possible it is recommended that SSM and third-party users encourage children participating in activities to arrive already changed and ready to go.

If requested at the booking stage, SSM will see if it is possible to allocate dedicated toilet and changing facilities for children for the duration of any activity. This would be detailed as part of any confirmation of booking and SSM would coordinate the necessary arrangements. It should be noted that due to operational requirements and capacities, that it is unlikely that it will be possible to allocate dedicated toilet and changing areas.

To provide a safe environment for children to use the toilets and changing facilities, the following procedures must be adhered to:

- SSM staff and volunteers and third-party users supervising children using these areas must have a DBS Enhanced Criminal Record with Children's Barred List Check.
- SSM staff and volunteers and third-party users must designate specific visits for changing and using the toilets during activities.
- SSM staff and volunteers and third-party users must ensure that prior to allowing children to use these areas, that they check and wait for all adults to leave. Once children have entered, the supervising adult will wait outside to ensure others cannot access whilst the young people are inside. The accessible toilets can be used as an alternative space, but the same guidance applies.
- SSM staff and volunteers and third-party users must not take a single child to use the toilets or changing areas, there must be at least two other children even if they do not need to use these facilities.
- Children over the age of 12 can use the toilets and changing areas unaccompanied, however it is recommended that those supervising should still wait outside for children of this age.

## 12. Bullying

SSM will address all forms of bullying and staff and volunteers will work together to do so.

Children with a disability, those from a BAME background, those that identify as LGBTQ+, or those with learning difficulties are more vulnerable to this form of abuse and are more likely to be targeted.

For SSM programmes, staff and volunteers will support the children involved in any allegations of bullying and the parents/guardians/carers by:

- Providing a safe environment for children who wish to talk about bullying or any other issue that affects them, and carefully listening to them.
- Supporting and assisting children being bullied by upholding their right to play and live in a safe environment which allows for healthy development.
- Objectively investigating any reported incidents of bullying. SSM staff and volunteers must follow the Safeguarding Reporting Process (Section Six) and it will need to be appropriately assessed to see if any communication with external agencies is required; a [reporting form](#) must be completed. If the children attend the same school, then it may be advisable to let their school know what has happened.
- Supporting and encouraging those that bully to stop bullying and prohibiting sanctions against those that have bullied that involve periods of isolation, or which diminish or make individuals look or feel foolish in front of others.
- Discussing any bullying incident with the children's parents/guardians/carers and informing them of the action taken (both victim and bully), and what action will be taken in future sport activities.

When third-party users suspect that a child involved in their activity has been subjected to bullying or a child discloses an incident, it must be investigated by their nominated safeguarding representative who will communicate the situation to SSM. The Safeguarding Reporting Process (Section Six ) must be applied and it will need to be appropriately assessed to see if any communication with external agencies is required; a [reporting form](#) must be completed. If the children attend the same school, then it may be advisable to let their school know what has happened. The nominated safeguarding representative will undertake any discussions with the children involved, the parents/guardians/carers, or external agencies and will keep SSM informed of all developments.

## 13. Children's Developing Interest in their own Sexuality

Staff, students, volunteers or third parties should not seek to make judgements regarding the nature of children's developing interest in their own sexuality. Any concern should be reported to a DSO who will discuss what further action may be needed with the LSO. NSPCC guidance suggests that where there is a

significant difference in age, power relationship or understanding, or there is use of threats or bribes or the behaviour occurs in secret, then the concern should be discussed with the Local SPA.

## 14. Filming and Photography

SSM does not advocate the banning of filming and photography of children participating in sporting activities. This policy aims to put appropriate and proportionate safeguards in place to ensure the sporting environment remains safe when images are taken using a camera or any device, including mobile phones.

The policy adopts different approaches for official filming and photography (anything which is not taken by parents/guardians/carers), and for images taken by parents/guardians/carers.

For official filming and photography, SSM staff and volunteers and third-party users, must follow the procedures outlined below:

- Obtain advance (at least five days) written permission from the Assistant Head – Sport Operations, for filming and photography to go ahead in the sport facilities by following the steps below.
- Provide a brief to the Assistant Head – Sport Operations, that states the content of any filming and photograph, what it is for, where it will be displayed and how it will be used.
- Provide the Assistant Head – Sport Operations, with the contact details and proof of identification for the person/s who will be taking any film and photographs, and where appropriate a Public Liability Insurance certificate.
- Provide a completed copy of the Filming and Photography Consent Form (Appendix Four) that gains consent from the child and parents/guardians/carers, for images to be taken.
- SSM staff and volunteers are not permitted to use personal digital equipment, such as mobile phones and cameras, to record images of young people, other than with the written permission of the Assistant Head – Sport Operations. Any images that are taken with permission, must then be transferred immediately and solely to the St Mary's network and then deleted from the staff device.

Once written permission for official filming and photography has been gained from the Assistant Head – Sport Operations, on the day that this activity is going ahead the procedures below must be followed:

- The person/s that will be filming and photographing must wear something that identifies them as an official film maker/photographer.
- Unless any child is supervised by SSM or the appropriate third-party user, and/or parents/guardians/carers are present, one-to-one filming or photography is not allowed (even if consent has been gained).



- No filming or photography device, including mobile phones, must be used in toilets or changing rooms, so that no images are ever taken in these areas. Also, no images may be taken in ways or from angles that suggest inappropriate or abusive intent. For instance, when a camera or some other device is operated at ground level pointing up shorts and skirts.
- No taking of any images or creation, transmitting, displaying or publishing any material that is likely to specifically identify children.

Other professional film makers and photographers, or any students that wish to take film or photographs of children participating in sport, must also apply to the Assistant Head – Sport Operations, following the steps identified above to seek permission.

The Assistant Head – Sport Operations, will provide all those that have been authorised to film and photograph, with a briefing to emphasise what is appropriate in terms of content and behaviour.

Parents/guardians/carers are entitled to take photographs in public areas, which includes appropriate images of children playing sport. Whilst these groups do not need to gain advance permission from SSM, they should apply the other guidance defined above. Also, they must not take film or photographs of a child with a sticker or badge as they will not have given consent for their image to be taken.

Parents/guardians/carers are advised that there can be negative consequences to sharing images linked to information about their own or other people’s children on social media, and care should be taken about ‘tagging.’

SSM staff and volunteers, third parties and parents/guardians/carers should ensure that all images are appropriately and securely stored.

Anyone that has concerns about filming and photography of children in the sport facilities should report this to an SSM DSO, and if necessary, the Safeguarding Reporting Process (Section Six) will be unfolded, and a [reporting form](#) completed.

## 15. Social Media

All children, parents/guardians/carers, staff, students, volunteers and third parties should observe the [St Mary's Social Media Policy](#), and in addition:

- SSM staff and volunteers should not allow parents or young people to add them as a friend, nor must they add them as friends on social networking sites except where the site is established as a closed group for the purposes of the activity.
- No one should create, transmit, display or publish any material that is likely to specifically identify children.
- SSM staff and volunteers should not use their personal mobile phones as part of working, this should be reserved for times when they are off duty.

## 16. SSM Training and Development

The department recognises the need for training and development of SSM staff in safeguarding children matters. St Mary's and SSM will organise necessary training, including required online training, to support each role and help staff remain up to date about safeguarding matters.

## 17. Health & Safety and Risk Assessments

SSM follow the [St Mary's H&S Statement of Intent](#) to provide a safe environment for everyone in the sport facilities.

SSM will ensure that all activities are risk assessed and where activity involves children, that they reference safeguarding and protecting young people. The Assistant Head – Sport Operations will be responsible for coordinating the completion of risk assessments, and for ensuring all SSM and third-party risk assessments are up to date.

## 18. Reporting Medical Conditions or Other Matters

For all SSM programmes that involve children, SSM staff will register children and as part of this process any relevant medical conditions will be noted so that if needed, suitable safeguarding arrangements can be put in place. Parents/guardians/carers should report this information and any subsequent changes in their child's medical condition.

When registering for SSM programmes, parents/guardians/carers can report any other matters that they feel may be important to help safeguard their child/children, or any other child/children. Any information that is disclosed will remain confidential.

Third-party users should also maintain up to date information on medical conditions for all children participating in the activities that they run.

## 19. External Coaches Using the Sport Facilities

If an external Coach seeks to hire St Mary's sport facilities, or if an external person seeks to hire the same facilities for a session in which an external Coach will be coaching children, then the organiser (either the external Coach or the external person) must declare at the point of requesting hire, that coaching is intended to take place.

Before any booking can be made, and subject to availability of facilities, the Sport Operations team will apply the following process:

- Ask the external Coach or external person who is making the booking request, to complete a booking form and include all the required details in the coaching section.
- Ask the external Coach to provide proof of coaching accreditation with no recorded issues on a DBS Enhanced Criminal Record with Children's Barred List Check, that is no more than two years old.
- The Sport Operations team will verify any coaching accreditation and DBS certificate via the relevant National Governing Body portal, or directly with the National Governing Body. If credentials cannot be verified, then the external Coach will be asked to provide any additional proof of their approved coaching status for the Sport Operations team to check. No booking will be taken until valid proof of the external Coach's ability to safely coach has been received and confirmed.
- Once credentials are verified the Sport Operations team will add the external Coach to an Approved List of External Coaches with the starting date identified. The Sport Operations team will ask approved Coaches to provide up to date details of their credentials every two years.

The Assistant Head – Sport Operations will be responsible for coordinating that the Approved List of External Coaches is up to date.

- SSM will treat all criminal disclosures carefully and confidentially. Criminal records will be assessed on a need-to-know basis by the LSO and DSO's, in compliance with the DBS code.

## 20. Third-Party Users of the Sport Facilities

These are the staff, volunteers and persons representing any third-party user that is delivering activities to under 18s. For the purposes of this policy this includes external clubs, schools and organisations, and St Mary's academic programmes and the First Star Academy (when activity involves children).

Third-party users have a duty of care over the children participating in their activity. This includes responsibility for:

- Keeping up to date attendance registers.
- Keeping up to date contact records.
- Maintaining up to date information on medical conditions.
- Ensuring that first aid provision is available.
- Having a safeguarding policy and a nominated safeguarding representative. The Assistant Head – Sport Operations will keep a List of all Third-Party Nominated Safeguarding Representatives, and all third parties must share the representatives' contact details.

- Reporting any safeguarding concerns to SSM as per the Safeguarding Reporting Process (Section Six) and working with SSM, any external agencies that must be informed, and involving children, parents/guardians/carers appropriately.
- Ensuring that all staff, Coaches (paid and unpaid), and volunteers that meet the regulated activity criteria (Section Two), have a Disclosure and Barring Service (DBS) Enhanced Criminal Record with Children’s Barred List Check. The third-party is responsible for maintaining an up-to-date DBS register for all necessary staff, volunteers and Coaches, and for ensuring that everyone’s DBS certificate is current. Third-party users should also meet appropriate supervision levels with at least two NGB qualified and DBS checked adults present and should aim to work to the following NSPCC best practice guidelines. Third-party users are responsible for highlighting any activity that falls outside these recommended supervision ratios and where appropriate, the approach should fall within any National Governing Body guidelines.

<b>Child’s Age</b>	<b>Number of Adults</b>	<b>Number of Children</b>
0-2	1	3
2-3	1	4
4-8	1	6
9-12	1	8
13-17	1	10

- Providing SSM with a risk assessment and where activity involves young people, referencing safeguarding and protecting children.

SSM’s responsibilities for third-party users are as follows:

- Sharing information and good practice about safeguarding children on the SSM website, and on notice boards at the main campus and TLSC to include the list of DSO’s and helpful contacts.
- Ensuring that when regular bookings happen that activities are risk assessed and where this involves young people, they reference safeguarding and protecting children. The Assistant Head – Sport Operations will work with third-party users to ensure risk assessments are in place.
- Check and question any practices that appear to fall outside this policy.
- Be clear in notifying third-party users that failure to comply with this policy could result in the cancellation of hire without any refund.

## 21. Policy Monitoring and Evaluation

The SSM Safeguarding Children Policy will be reviewed by the SSM LSO and the Assistant Heads (Sport Operations, and Sport Development) at least every two years or as changes in legislation or best practice happen.

# Appendix One – Code of Conduct for SSM Staff and Volunteers

## Purpose of the Code of Conduct

SSM are committed to the promotion of an environment that encourages and supports participation, play and performance, and upholds the dignity and respect of all involved to help provide a safe context.

All SSM staff and volunteers are expected to realise the importance of the following statements and standards, and to work to them at all times in relation to SSM programmes and the operation of St Mary's sport facilities.

## St Mary's Values

Our values are the foundation of how the University operates on a day-to-day basis, and we strive to embody them in everything we do. Underpinning our values is a set of behaviours that characterise not only who we are as a higher education institution, but also frame what we strive to be as St Mary's staff and volunteers.

1. Living our value of **Inclusiveness** means we strive to:

- Acknowledge difference without judgement.
- Welcome all to our community with warmth, kindness and understanding.
- Better ourselves through our contribution to society.
- Nurture the talent of those within our community.
- Embrace individual uniqueness which strengthens our community.

2. Living our value of **Generosity of Spirit** means we strive to:

- Go the extra mile to serve with a smile, encourage friendships and acts of kindness.
- Build supportive relationships with our colleagues.
- Positively create a culture of support and empowerment.
- Be compassionate to those in need.
- Be the first to offer a helping hand.

3. Living out value of **Respect** means we strive to:

- Communicate openly, honestly and with care.
- Treat everyone with fairness.
- Move away from criticism and toward understanding.
- Listen openly, accepting that others may have different opinions.
- Cultivate and environment of empathy and understanding.

4. Living our value of **Excellence** means we strive to:

- Be determined in our pursuit of excellence.
- Be unwavering in aspiring to the highest standards.

- Lead, encourage and inspire others for the benefit of our community and society.
- Celebrate our accomplishments and learn from our mistakes.
- Work hard towards our shared goals recognising that we achieve more together.

## General and Safeguarding Expectations and Behaviours

1. Value and celebrate diversity and make all reasonable efforts to meet individual needs.
2. Always be professional and respectful and treat all people fairly.
3. Always keep clear boundaries between your personal and work life, including on social media.
4. Refrain from smoking, consuming alcohol or drugs, swearing and using a personal mobile whilst carrying out professional duties.
5. Be a positive role model. Always act with integrity and kindness whether someone is looking or not.
6. Be proactive in helping to create a safe and inclusive working environment.
7. Always work to the procedures and best practice defined in the SSM Safeguarding Children Policy.
8. Help create a team culture that is based on support and understanding, and what we can do for others. Never gossip about a colleague or speak in a derogatory fashion about another member of staff 'behind their back.'
9. If you and a colleague disagree on a professional matter, speak to them respectfully and with generosity to develop shared understanding and positive outcomes. Appreciate difference and if it's not possible to reach a good solution, agree with the colleague to invite the appropriate line-manager into the discussion.
10. If you see staff and volunteers not striving to meet St Mary's values, and/or not meeting the expectations and behaviours defined in this code, be an active bystander in respectfully providing an appropriate, reasonable and helpful point-of reference.

I hereby certify that I have read the Code of Conduct for SSM Staff and Volunteers, and I agree to abide by the content therein.

Print name:

Signed:

Date:

# Appendix Two – SSM Code of Conduct for Children and Parents/Guardians/Carers Involved in Sport

## All Children are Asked To:

1. Be friendly, supportive and welcoming to other children and adults.
2. Enjoy participating and play fairly and honestly.
3. Respect and listen to other children, parents/guardians/carers, staff, volunteers, Coaches and Officials.
4. Don't smoke, use bad or inappropriate language, or consume alcohol or drugs, including on social media.
5. Not bully, intimidate or harass anyone, including on social media.
6. Take care of the sport facilities, and any sport equipment including your own.
7. Talk to a SSM Designated Safeguarding Officer (DSO) about any concerns or worries that you may have about yourself or others and realise that the DSO will always listen to you and help.

## All Parents/Guardians/Carers Must:

1. Positively reinforce your child and other children about their participation in sport and the benefits that they gain from this.
2. Place emphasis on each child's participation, enjoyment and learning over competition and performance.
3. Never ridicule or diminish a child for anything including their participation in sport or losing a game.
4. Respect and listen to all children, other parents/guardians/carers, staff, volunteers, Coaches and Officials.
5. Always behave responsibly in the sport facilities, and respect any decisions that Coaches, Officials, volunteers and staff make.
6. Encourage your child and other children to play by the rules.
7. Deliver and collect your child punctually to the sport facilities, with everything they will need including water and clothing for all weather conditions.

8. Make sure your child is aware of what this Code of Conduct asks them to do. If there is any confusion over the detail, please ask an SSM staff member and they will help.
9. On registration of your child to an SSM programme, provide your contact details plus any relevant information on medical conditions your child may have that the department would need to be aware of. If there are subsequent changes to your child's medical condition you should update SSM accordingly.
10. On registration of your child to an SSM programme, you should communicate any other matters that you feel SSM should know about that may help to safeguard your child or any other child. Any information that is disclosed will remain confidential.
11. Always work to the procedures and best practice defined in the SSM Safeguarding Children Policy.



# Appendix Three – SSM Code of Conduct for Coaches

Coaches play a crucial role in the development of all sports and in the lives of the athletes they coach. They have a unique position of trust and the need for Coaches to understand and act on their responsibilities is vital, as is the need to promote participation for fun and enjoyment.

The Code of Conduct for Coaches reflects the principles of good coaching practice.

## **Responsibilities – Professional Standards**

To maximise the benefits and minimise the risks to athletes, Coaches must attain an appropriate level of competence through qualifications, and a commitment to ongoing training to ensure safe and correct practice.

## **Responsibilities – Personal Standards**

Coaches must demonstrate proper personal behaviour and conduct at all times.

## **Rights**

Coaches must respect and champion the rights of every individual to participate in sport and physical activity.

## **Relationships**

Coaches must develop a positive relationship with their participants (and others) based on openness, honesty, mutual trust and respect.

## **1. Responsibilities – Professional Standards**

As a responsible Coach, I will:

- Abide by the terms of my National Governing Body (NGB) coaching licence.
- Abide by the NGB, St Mary's University and Sport St Mary's Safeguarding Policies and procedures.
- Keep my professional knowledge and skills up to date, be appropriately qualified for the activities I lead, and renew my Coach licence as and when required by my NGB.
- Where required, ensure I have obtained an acceptable criminal record check (DBS) and work with Sport St Mary's to do this.
- Ensure that activities I direct, or guide, are appropriate for the age, maturity, experience and ability of the individual athlete.
- Be aware of the current national and international regulations on anti-doping in sport. I will not assist, support or ignore practices, policies or procedures that contravene national or international anti-doping regulations.
- Never try to recruit, either overtly or covertly, athletes who are already receiving coaching. (If approached by an athlete receiving coaching, refer them immediately to the Coach currently providing coaching support).
- In circumstances where I need to demonstrate a technique through physical contact, always provide an explanation and seek consent before touching the athlete (never touch an athlete aged under 18 to demonstrate a technique without another adult being present).
- Observe the recommended national guidance on Coach/athlete ratios.
- Cooperate fully with others involved in the sport such as technical officials, team managers, other Coaches, doctors, physiotherapists, sport scientists and representatives of the governing body in the best interests of the athlete.

- Develop an environment that promotes the wellbeing and safety of athletes above other considerations, including the development of performance.
- Consistently promote positive aspects of the sport such as fair play and never condone rule violations or the use of prohibited or age-inappropriate substances.
- Accept that all designated Sport St Mary's staff have a responsibility for safeguarding children's wellbeing and adults at risk and protecting them from harm and are prepared to respond to any concerns of abuse or poor practice.

## 2. Responsibilities – Personal Standards

As a responsible Coach, I will:

- Consistently promote positive aspects of the sport (e.g., fair play) and never condone rule violations or adopt or encourage the use of prohibited or age-inappropriate substances or techniques.
- Never engage in the massage of an athlete under the age of 18 years. I understand that I require an up-to-date and recognised qualification in sports massage or another relevant qualification from a recognised body or authority to engage in the massage of an athlete over 18 years.
- Be aware that my attitude and behaviour directly affects the behaviour of athletes under my supervision.
- Avoid swearing, abusive language and irresponsible or illegal behaviour, including behaviour that is dangerous to me or others, acts of violence, bullying, harassment, and physical and sexual abuse.
- Avoid destructive behaviour and leave all facilities in an appropriate condition.
- Not carry or consume alcohol or illegal substances while coaching or attending events directly linked to coaching.
- Avoid carrying any items that could be dangerous to me or others, excluding equipment used during my coaching activity.
- Challenge inappropriate behaviour and language by others and report any suspected misconduct by other Coaches or other people involved in sport as soon as possible.
- Act ethically, professionally and with integrity, and take responsibility for my actions.

## 3. Rights

As a responsible Coach, I will:

- Provide coaching services without discrimination on grounds of age, gender, sexual, cultural, ethnic, disability or religious preference.
- Respect the rights, dignity and worth of every athlete and treat everyone equally, regardless of background or ability.
- Make the athlete's health and welfare my primary and overriding concern.
- Respect the athlete's right to self-determination when deciding who they are coached by.
- Respect the right of all athletes to an independent life outside of sport.
- Report any accidental injury, distress, misunderstanding or misinterpretation whenever possible to Sport St Mary's in the first instance.
- Never exert undue influence to obtain personal benefit or reward.
- In no way undermine, put down or belittle other Coaches or practitioners, or allow those behaviours to exist within the athletes and groups that I lead/manage – including those behaviours towards other athletes or groups of athletes.

## 4. Relationships

As a responsible coach, I will:

- At the outset, clarify with athletes (and where appropriate, with parents or carers) exactly what it is that is expected of them and what athletes are entitled to expect from me.
- Develop healthy and appropriate working relationships with athletes based on mutual trust and respect, especially with those athletes under 18 years or who are adults at risk.
- Never incite or engage in sexual activity, inappropriate touching or communication (in person or social media or any other form of verbal or non-verbal communication) with an athlete under 18 years of age.
- Never incite or engage in sexual activity, inappropriate touching or communication (in person or social media or any other form of verbal or non-verbal communication) with an athlete who is an adult at risk coached by me or under my supervision.
- Not use my position as a Coach to incite or engage in sexual activity, inappropriate touching or communication (in person or social media or any other form of verbal or non-verbal communication) with athletes I coach who are aged over 18 years.
- Avoid spending time alone with young athletes (under 18) unless clearly in the view of other adults.
- Ensure that parents/carers know and have given consent before taking a young athlete (under 18) away from the usual training venue.
- Never take young athletes (under 18) alone in my vehicle.
- Never invite a young athlete (under 18) alone into my home.
- Never share a bedroom with a young athlete (under 18).

## Breach of the Code of Conduct

I understand that if I do not follow the code, I may be in breach of the terms and conditions of my licence and could be subject to disciplinary action and sanction by my NGB. Additional to any disciplinary actions that they may decide upon, Sport St Mary's may also decide to implement disciplinary actions. I may:

- Receive a verbal warning.
- Receive a written warning.
- Be monitored by another Coach.
- Be required to attend supplementary training.
- Be suspended by Sport St Mary's.
- Be required to leave or be dismissed by Sport St Mary's.
- Be referred to my NGB and the DBS/Disclosure Scotland/AccessNI.

Any minor misdemeanours and general misbehaviour will be dealt with immediately by your line-manager and/or the Assistant Head - Sport Development. A serious and persistent breach of the code will result in disciplinary action and could lead to dismissal.

Print name:

Signed:

Date:

# Appendix Four – SSM Official Filming and Photography Consent Form

In accordance with the SSM Safeguarding Children Policy this form is to be used to seek consent from the child and their parents/guardians/carers, for them to be involved in official photography and filming taking place in the St Mary’s sport facilities, or SSM official filming or photography being carried out at an external venue.

SSM will not permit official photographs, video or any images of young people to be taken without the required consent being gained. For children aged under 18, consent must also be gained from parents/guardians/carers.

The department will follow the SSM Safeguarding Children Policy that details the authorisation process for official filming and photography, and how any images should be appropriately stored and used thereafter. If you become aware of images not being used appropriately, contact a DSO immediately.

Print name of the child:

Age of child:

Declaration of Consent – Child Aged Under 18	
<b>Please tick the boxes that apply:</b>	
<input type="checkbox"/>	I consent to being photographed and/or filmed
<input type="checkbox"/>	I can confirm that I had read, or have been made aware of how the images and/or film will be stored and used
<b>Print name:</b>	
<b>Signature:</b>	
<b>Date:</b>	

Declaration of Parent/Guardian/Carer – Child Aged Under 18	
<b>Please tick the boxes that apply:</b>	
<input type="checkbox"/>	I consent to being photographed and/or filmed
<input type="checkbox"/>	I can confirm that I had read, or have been made aware of how the images and/or film will be stored and used
<b>Print name:</b>	
<b>Signature:</b>	
<b>Date:</b>	