

# Safeguarding Policy

*"Safeguarding is everyone's responsibility"*

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## Statement

*Working Together to Safeguard Children* 2018 (DfE July 2018) and The Children Act 1989 define the safeguarding and promotion of children and young people's welfare as:

- Protecting children from maltreatment;
- Preventing the impairment of children's health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Positive action to enable all children to achieve the best outcomes.

Dallaglio RugbyWorks believes that all children and young people have the right to enjoy a high-quality education and community engagement experience, including sport and physical activity, without any form of harassment or abuse.

All those involved with Dallaglio RugbyWorks have a moral and legal responsibility to protect all children and young people, regardless of age, disability, gender, racial origin and sexual orientation or identity from abuse. All Dallaglio RugbyWorks staff are aware, through induction training, of all forms of abuse, good practice and also what to do if abuse is suspected to ensure that the welfare of children and young people in their care is safeguarded.

Dallaglio RugbyWorks recognises that the welfare of children and young people is paramount, and our duty is to:

- Protect children and young people who receive a service from Dallaglio RugbyWorks
- Develop, train and support staff and volunteers to safeguard themselves, one another, and the children in their care
- Ensure that everyone is aware of their safeguarding responsibilities and that all staff, including have a good working knowledge of relevant policies and procedures; being familiar with the process to report concerns, instigate whistleblowing and deliver best practice

Dallaglio RugbyWorks are mindful that people who are working in partnership with the public and or voluntary sector, or contracted directly by individual schools, specialist schools, special and alternative provision, youth offending institute or community interest companies must be alert of the heightened vulnerability of a child who:

- Is disabled and has specific additional needs
- Has special educational needs, regardless of whether or not they have a statutory Education, Health and Care Plan
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including involvement with
- gangs and association with organised crime

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- Is frequently missing or going missing from care or from home
- Is at risk of modern slavery, trafficking, radicalisation or exploitation
- Has lived in family circumstances which have created challenges and risks for the child, such as exposure to drug and alcohol misuse, adult mental health issues and domestic violence
- Has returned home to their family from care
- Is misusing drugs or alcohol themselves
- Is involved in selling and/or the distribute of drugs. Involvement in this activity is known as working 'county lines'
- Is from a minoritised group or a group experiencing racial discrimination

### Safeguarding Principles

This document sets out the policy of Dallaglio RugbyWorks in relation to the programmes / projects delivered and managed by Dallaglio RugbyWorks and is based on the following principles:

- The welfare of children and young people (the Children's Act 1989 defines a young person as under 18 years of age) and disabled adults is the prime concern.
- All young people, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse.
- It is the responsibility of the child protection experts to determine whether or not abuse has taken place, but it is everyone's responsibilities to report any concerns.
- All incidents of suspicious poor practice and allegations will be taken seriously and responded to swiftly and appropriately.
- Confidentiality should be upheld in line with the Data Protection Act 1984 and the Human Rights Act 2000.

### Dallaglio RugbyWorks's Safeguarding Aims

- A commitment to the provision of a *safe* environment – Young people attending a Dallaglio RugbyWorks activity can be assured that safety, both physical and emotional is paramount. All staff at Dallaglio RugbyWorks are committed to promoting the safety and wellbeing of all young people. Dallaglio RugbyWorks acknowledge that safeguarding is everybody's responsibility.
- A commitment to making activities *fun* – As an advocate of child centred provision, staff at Dallaglio RugbyWorks are committed to delivering a programme that meets an identified need and wherever possible embraces coproduction ladder principles, ensuring young people are 'done with' not 'done to'.
- A commitment to *engaging* those excluded from mainstream provision – Staff are empowered to make decisions as to schemes of work to reflect the identified need of the group. Diversification and inclusive to the individual's needs, equalising developmental opportunity for all.
- To ensure that children feel safe and protected and that they are safe

- To celebrate the diversity of gender, ability, language, sexuality, ethnic origin, faith and culture. Dallaglio RugbyWorks believes that every adult and child should be respected and valued
- To work closely with colleagues and other professionals to ensure that every child is provided equality of opportunity to succeed
- To support our people to provide safe, fun and engaging activities that improve the life chances of children and young people, and which helps them to be healthy, stay safe and make a positive contribution to society.

### Dallaglio RugbyWorks Will Achieve These Safeguarding Aims By

- Children and young people being facilitated to communicate their wishes and feelings about decisions that affect them and, where these cannot be acted on, to be given a clear and honest explanation
- Supporting children and young people to develop their self-care and independence skills, commensurate with their age and understanding
- Helping them to take appropriate risks as a normal part of growing up and to reach their full potential, playing an active role in society
- Identifying risks to children and young people and considering ways to reduce such
- Supporting children to recognise risks and develop the ability to protect themselves from harm or abuse
- Ensuring that all staff working with vulnerable or marginalised young people are qualified, trained, supported and prioritise safeguarding for every child in our care
- Considering all staff, Full-Time, Part-Time or as 'people in positions of trust' and to manage safeguarding arrangements, including Safer Recruitment practice
- All staff will be supported to deliver activities to children and young people to the best of their ability by the charity, providing a high standard of supervision, regularly discussing issues relating to risk and safeguarding
- The charity will support its staff to ensure they routinely discuss safeguarding practice
- Its commitment to ongoing training for all staff to ensure awareness of their responsibilities and to promote best practice
- The Safeguarding Lead and other Senior Managers having an awareness of the key safeguarding partners within each Authority, as well as the arrangements for individual Agencies working together
- The Safeguarding Lead ensuring best practice and learning is regularly shared with the staff group, particularly those cases relating to specific Serious Case Reviews
- By ensuring that children, young people and Staff who are dissatisfied with the service or support provided, are given advice and information on the complaint's procedures for Dallaglio RugbyWorks and regulatory authorities. In addition, information regarding advocacy services will be routinely given to all children Dallaglio RugbyWorks care for, in a format they can understand and easily use

- Its commitment to ongoing training for all staff to ensure awareness of their responsibilities and to promote best practice, which is further defined in the next section.

## Types of Practice

### **Good Practice General:**

- Always work in an open environment – avoid private or unobserved situations. Encourage an open environment (e.g. no secrets)
- Treat all people equally, and with respect and dignity
- Always put the welfare of each person first – before winning or achieving goals
- Maintain a safe and appropriate distance and professional relationships with participants (e.g. it is not appropriate to have an intimate relationship with any participants or to share a room with them)
- Build balanced relationships based on mutual trust which empowers people to share in the decision-making process
- Ensure that if any form of manual / physical support is required, it should be provided openly and according to guidelines provided by the school or organisation
- If sports coaching, be aware that care is needed as it is difficult to maintain hand positions when the child is constantly moving. Participants should always be consulted, and their agreement gained
- Keep up to date with the technical skills, qualifications and insurance in order to continue to deliver to participants
- Involve parents / carers wherever possible, e.g. for the responsibility of their children in the changing rooms. If groups have to be supervised in the changing rooms, always ensure parents / carers / teachers / officials work in pairs
- Ensure that during any residential, adults should not enter or invite any participants into their rooms
- Be an excellent role model – this includes not smoking or drinking alcohol in the company of participants
- Give enthusiastic and constructive feedback rather than negative criticism
- Recognise the developmental needs and capacity of the participants – avoid excessive training or competition and not pushing them against their will or beyond their capabilities
- For participants over the age of 8 – the ratio of adults to children is a minimum 1:10
- For participants under the age of 8 government guidance outlined in the Care Standards Act 2000 should be followed
- All venues should have First Aid provision by ensuring:
  - There is a qualified First Aider on site
  - First Aid boxes are up to date and accessible
  - There is access to a phone to be able to contact the emergency services if required

- All communication with young people should be through Dallaglio RugbyWorks or the School and between the hours of Dallaglio RugbyWorks Programmes or through the app Player Profiles

#### **Good Practice – Changing:**

- Participants aged 11 and under must be supervised at all times in changing rooms by two members of staff, of the same gender as the participants
- Adults, working with young teams, including, staff or volunteers, should not change or shower at the same time using the same facility as participants
- If adults and participants need to share a changing facility, Dallaglio RugbyWorks must have consent from the parent/carers that their child/children can share a changing room with adults and be made aware of Dallaglio RugbyWorks' guidelines for good practice
- If younger participants need to share changing facilities with adults, their parent/carers should be allowed to supervise them whilst they are changing
- If participants are uncomfortable changing or showering in public, no pressure should be placed on them to do so. Encourage them to do this at home
- If the programme has disabled participants involve them and their carers in deciding how, if applicable, they wish to be assisted to change and ensure they provide full consent to any support or assistance required
- The use of mobile phones should be banned from the changing rooms
- Photographs and any other media are strictly banned from changing rooms

#### **Good Practice – Transportation:**

- The School will be responsible for participants in their care
- Assess whether the offsite activity is necessary and practical
- Seek permission from the host school to transport the participants off site
- Use transport provided by the School in the first instance
- Use public transport in the second instance
- It is not the staff or volunteer's responsibility to transport the participants to and from the programme
- The School will provide the parents/carers with a contact number which may be used if the parent/carer will be late to collect their child/children
- Dallaglio RugbyWorks or the School will ask the participant/parents/carer to complete a form providing contact details, information about their child/children i.e. medical details etc

#### **Good Practice – Late Collection**

If a parent /carer is late Dallaglio RugbyWorks will:

- Attempt to contact the parent /carer
- Check the programme contact number for any information regarding the participants

- Wait with the participants, at the programme venue, wherever possible with other staff /volunteers or parents. This should be done until a resolution has been found
- If parents/carers remain un-contactable staff will need to report the situation to Children's Social Care or the Police

In emergencies staff and volunteers are permitted to use their own car, providing they:

- Contact Dallaglio RugbyWorks for signoff, before the session
- Obtain additional permission from the School
- Notify the School and Dallaglio RugbyWorks of anticipated time of departure and time of your arrival
- You MUST have the appropriate business insurance

### **Practice to be Avoided:**

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable, they should only occur with the full knowledge and consent of someone in charge in the organisation or the child's parent/carers. For example, a young person sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a young person up at the end of a session.

- Avoid spending time alone with participants away from others
- Avoid taking participants alone on car journeys, however short
- Remove a participant from the school / host site without host permission
- Transport a participant via a method that has not been approved
- Send a participant home with another person without permission or consulting another member of staff
- Transport a participant in your car without permission from Dallaglio RugbyWorks and the School
- Leave a participant in your car unsupervised

The following should never be sanctioned. You should never:

- Engage in rough, physical or sexually provocative games
- Share a room with a participant
- Allow or engage in any form of inappropriate touching
- Take participants to your home where they will be alone with you
- Allow participants to use inappropriate language unchallenged
- Make sexually suggestive comments to a participant, even in fun
- Fail to act on and record allegations made by a participant
- Do things of a personal nature for any participant they can do for themselves
- Shout at and taunt a participant
- Use inappropriate language

You must always be aware:

There is a need to be responsive to a person's reactions. If a person is fully dependant on you, talk with him / her about what you are doing and give choices where possible. This is

particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

If you accidentally hurt a person, he / she seems distressed in any manner, appears to be sexually aroused by your actions, or misunderstands or misinterprets something you have done, report any such incident as soon as possible to another colleague and make a brief written note of it then follow the Dallaglio RugbyWorks Safeguarding Procedure in reporting the incident.

If you do to contact the young person due to an emergency this needs to be done in a professional manner, in line with Dallaglio RugbyWorks' code of conduct. Calling a participant from your own phone is not recommended, but if this is essential it is recommended that you withhold your own number. (Use your mobile phone settings or, to withhold your number on individual calls, dial 141 before the telephone number you want to call)

### Risk Management and Risk Reduction Plans of Children and Young People

- All activities will be fully risk assessed. The shared drive will contain generic risk assessments for the charity. H&S states that health and safety is everybody's responsibility and therefore individual areas, events and activities must undergo a specific risk assessment to reflect any specific variables not recognised by the generic risk assessment before the activity begins. This specific risk assessment must be logged with Programme Manager.
- All Dallaglio RugbyWorks staff are required to dynamically assess risk 'in and subsequently on action'; during and after the activity. It is our ability to dynamically assess risk that will minimise the risk of injury, challenging behaviour and promote the welfare and safety for all.
- It is assumed that any child or young person with complex needs referred to the Charity will have a current risk assessment, completed by their referring Agency. This should clarify their needs and provide information to enable the best match to be made. If a Risk Assessment has not been forwarded, the Programme Manager will request this from the school.

It is important to ensure that risk management allows scope for risk taking and consequential learning appropriate to the child's age and level of understanding. The aim is to support all children and young people in their development and learning, which should include guidance on how to keep themselves safe.

Dallaglio RugbyWorks recognises the importance of ongoing consideration as to safeguarding issues for all children and young people, therefore risk assessments will be treated as 'live' documents and will be reviewed on an ongoing basis, but particularly at whole squad events. These settings should facilitate contributions from all staff to ensure the Plans include up to date information.

The Risk Management materials will be documented on the shared drive, accessible for all staff. A copy can be sent to the partners and anyone else who, it has been agreed, can have access to the information. Any proposed changes will be considered by the respective Programme Manager. All staff are empowered to raise any serious concerns immediately with their regional coordinator and mitigate responsively. The risk management will also be updated at the point that target dates for risks to be reduced have been set. Risk Management may also be reviewed if any of the following have occurred:

- Where a child has placed themselves or others at significant risk
- Where changes in a child's health needs have increased an existing risk
- Where a criminal offence has been committed
- Where there is reasonable cause to suspect that a child has suffered or is likely to suffer significant harm, and/or a criminal offence may have been committed
- Where there is, or has been, a serious threat to a child's life

In all such situations, the Programme Manager must be informed in a timely manner that the level of perceived risk has changed, and a new assessment needs to be completed. If the risk is manageable within the activity additional support or training to reduce risk and the timeframe for such should be considered. The safeguarding and risk management policy should also be updated to reflect any significant changes or concerns.

In addition, the details of any child or young person seen as being at significant risk will be included on the Dallaglio RugbyWorks Risk Register. This is to ensure the adequate monitoring of those who could be at risk or considered to be risky in their behaviour towards other children and young people.

### Criteria for Inclusion on the Risk Register

The following children or young people will be included on the Risk Register:

1. Any child who is identified at risk of, or subject to, Child Sexual Exploitation either via the completion of Child Sexual Exploitation toolkit, assessment by external professionals, meeting or at the point of referral.
2. Any child who has been known to self-harm on more than 2 occasions in the last 6 months.
3. Any child who has threatened suicide in the last 12 months.
4. Any child who has made an allegation against a worker (current or former), or other significant person in their lives in the last 6 months.
5. Any child who has been absent or missing from the home on more than one occasion in the last 6 months.
6. Any child who is considered at significant risk from people in their family or network, such as risk from parents. Any risk should be seen as significant based on the criteria of potential harm to self or others.
7. Any child who is seen to engage in significantly risk-taking behaviour, e.g. criminal behaviour, exploitation and/or County Lines, drug or solvent use, eating disorders etc.

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8. Any child who has been charged with a criminal offence over the 12 months.
9. Any child who is involved in a child protection investigation at the current time or who is connected to an ongoing LADO process.
10. Any child who has experienced significant harm as a result of the actions of others within their network (e.g. at school, in the community).
11. Note will be made of young people with identified significant emotional or mental health needs, and highlighted separately, in particular for 2, 3, and 7.

## Abuse

### **Recognised Forms Of Abuse:**

#### Neglect

Where an adult fails to meet a child's basic needs like food or warm clothing, fails or refuses to give children love, affection and attention. Neglect in a sports situation could include a teacher or coach not ensuring children were safe, exposing them to undue cold, heat, unnecessary risk of injury including not providing the correct kit or equipment.

#### Physical Abuse

Where someone physically hurts or injures a child or young person by hitting, shaking, squeezing, and burning, poisoning, throwing, suffocating or otherwise causing physical harm to the child. In a sports situation physical abuse might occur when the intensity of training and competition exceeds the capacity of the child's immature and growing body.

#### Sexual Abuse

Where girls and boys are abused by adults or other children – male or female – who use children to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex and fondling or showing pornographic material. In sport, coaching techniques that involve physical contact with children could potentially create situations where sexual abuse may go unnoticed. The power of the coach over young performers, if misused, may also lead to abusive situations developing.

#### Emotional Abuse

The persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. This may involve causing children to feel frightened or in danger by constantly being shouted at or taunted which may make the child very nervous or withdrawn. Emotional abuse in sport may occur if children are subjected to constant criticism, name-calling, sarcasm, bullying, racism or unrealistic pressure to high expectations.

#### Financial Abuse

Including theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.

#### Discriminatory Abuse

Including racist, sexist, that based on a person's disability, and other forms of harassment, slurs or similar treatment.

#### Institutional Abuse

May take the form of isolated incidents of poor and unprofessional practice at one end of the spectrum, through to pervasive ill treatment or gross misconduct at the other.

#### Domestic Abuse

The Government defines domestic violence as "Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between people aged 16 years or over who are or have been intimate partners or family members, regardless of gender or sexuality." This includes issues of concern to black and minority ethnic (BME) communities such as so called 'honour-based violence', female genital mutilation (Female Genital Mutilation) and forced marriage.

Where there is evidence of domestic violence, the implications for any children in the household should be considered, including the possibility that the children may themselves be subject to violence, or may be harmed by witnessing or overhearing the violence.

#### **Signs of Abuse:**

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly situated on a part of the body not usually prone to such injuries
- An injury for which the explanation seems inconsistent
- The child describes what appears to be an abusive act involving him/her
- Someone else (child or adult) expresses concern about the welfare of another child
- Unexplained changes in behaviour (e.g. becoming very quiet, withdrawn or displaying sudden outbursts of temper)
- Inappropriate sexual awareness
- Engaging in sexually explicit behaviour
- Distrust of adults, particularly those with whom a close relationship would normally have been expected
- Has difficulty in making friends
- Is prevented from socialising with other children
- Displays variations in eating patterns including overeating or loss of appetite

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- Loses weight for no apparent reason
- Becomes increasingly dirty or unkempt

## Female Genital Mutilation

### **What is Female Genital Mutilation:**

Female Genital Mutilation (Female Genital Mutilation) refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. Other terms used include sunna, circumcision, initiation or cut. In June 2015 the Government issued 'A Statement Opposing Female Genital Mutilation' in which this practice was identified as child abuse that can have 'devastating health consequences for girls and women'.

The cultural background of Female Genital Mutilation is one of the reasons that inhibit women from seeking help. The World Health Organisation estimates that, in the UK, around 137,000 woman have undergone Female Genital Mutilation and some 60,000 girls under the age of 15 are at risk of such (www.gov.uk). Female Genital Mutilation is carried out on girls as young as 5 years old and, in some countries, it is carried out shortly after birth. Despite it being illegal in the UK, recent statistics detail that "between April 2021 and March 2022 there were 11,890 total attendances at NHS Trusts and GP practices where Female Genital Mutilation was identified. Of these, 5,620 women and girls had attended hospital (digital.nhs.co.uk).

Female Genital Mutilation is prevalent in at least 30 countries, from the Atlantic coast to the Horn of Africa, areas of the Middle East and some Asian countries. In many of these cultures, it is a deeply embedded social norm, practiced by families for a variety of complex reasons. For instance, it is often thought to be essential for a girl to experience Female Genital Mutilation if she is to become a marriageable woman. In contrast however, the practice is not seen as essential to the beliefs of any faith.

Some of the reasons given for Female Genital Mutilation being carried out are:

- It brings status and respect.
- It preserves a girl's virginity/chastity.
- It is a rite of passage.
- It gives a girl social acceptance, especially for marriage.
- It upholds the family honour.
- It cleanses and purifies.
- It gives the girl and her family a sense of belonging to the community.
- It rids the family of bad luck or evil spirits.
- It is incorrectly believed to make childbirth safer for an infant.
- It is aesthetically desirable.
- It perpetuates a custom/tradition.

### Symptoms of Female Genital Mutilation:

- Difficulty urinating
- Incontinence
- Frequent or chronic vaginal, pelvic or urinary infections
- Menstrual problems
- Kidney damage and possible failure
- Cysts and abscesses
- Pain when having sex
- Infertility
- Complications during pregnancy and childbirth
- Emotional and mental health problems
- Shock due to loss of blood

### Action to be Taken:

It is now mandatory to report Female Genital Mutilation and Dallaglio RugbyWorks staff must, as soon as they are aware of a disclosure, or a concern that such may have taken place or is being arranged, contact the Designated Safeguarding Lead or other Senior Manager and refer to Safeguarding procedures. In an emergency, the Police and Ambulance Service should be contacted directly.

Female Genital Mutilation is a serious criminal offence which carries a penalty of up to 14 years in prison for anyone committing or helping someone to commit it. If Female Genital Mutilation is committed, each person who has been responsible for a child whilst it has been carried out is considered guilty of an offence.

### Bullying

#### What is Bullying:

Bullying is defined as the behaviour or actions of a person, group of people or a whole organisation, which is designed or intended, to cause distress or hurt a person or group of people.

It can take place in a variety of settings including face-to-face, via other people, on the phone or Internet, including social networking sites, such as Facebook, Snapchat and Tik Tok.

Bullying can be:

- **Emotional** – being unfriendly, excluding, tormenting (e.g. hiding possessions, threatening gestures)
- **Physical** – pushing, kicking, hitting, punching, spitting or any use of violence
- **Racist** – racial taunts, graffiti, violent or offensive gestures or language
- **Religious** – because of, or focusing on, religion or beliefs

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- **Sexual** - unwanted physical contact or sexually abusive comments
- **Homophobic** - because of, or focusing on, issues of sexuality
- **Verbal** - name-calling, sarcasm, spreading rumours, teasing
- **Cyberbullying** - e.g. using mobile phones or social networking sites to intimidate or humiliate others.

Everyone involved in looking after children share the responsibility for creating a culture which positively encourages acceptable behaviour and which challenges bullying and reduces or prevents the likelihood of it.

### **What You Should Do:**

All staff must be alert to the risk of bullying and take all reasonable steps to prevent such behaviour. They should be mindful of a child or young person's past experiences or vulnerabilities in this regard and adapt their own practice accordingly. For instance, 'banter' can be especially divisive as risks being interpreted as bullying or targeting. Strategies to tackle bullying might include:

- Implementing clear rules within the 'one another' inclusive of staff, volunteers and young people as to what is acceptable behaviour, reinforcing why bullying will not be tolerated and the measures which will be taken if staff suspect such or it is reported to them
- Provision of opportunities for children to explore issues of bullying e.g. writing stories or poems or drawing pictures about it, or for younger children reading stories to them, supporting their understanding of the same
- Encouraging children to watch videos on anti-bullying, reviewing relevant website and social media information (see information section below), appropriate to their age and understanding
- Having open discussions about bullying and why it matters
- Helping children to empathise with those who are bullied and encouraging them to be pro-active in reporting any bullying they have seen or heard
- Being good role models as Staff and Volunteers

If Staff or Volunteers have any concerns that incidents of bullying have taken place between children on programme, or that a child may be a victim or perpetrator of bullying at school or elsewhere, they must discuss this with their designated safeguarding lead.

When bullying occurs during sessions it may be relevant to convene a meeting, with all concerned, to discuss strategies to prevent or reduce this behaviour. The recommendations arising from such a meeting may include:

- The bully/bullies being asked to apologise
- In serious cases, the consideration of appropriate sanctions
- Work being undertaken with the child/children to effect reconciliation
- Ongoing monitoring after incident/incidents have been investigated and dealt with

If bullying is persistent or serious, the child's parent/carer or 'professional' should be consulted. It may be necessary to conduct a Planning Meeting, or a referral may be necessary under the Child Protection Referral Procedure.

**Minor or Non-Persistent Bullying:**

Even if bullying is not persistent or serious it should still be brought to the attention of the designated safeguarding lead at the first opportunity. Staff should inform the child's parent/carer or professional of any further action to be taken.

**Persistent or Serious Bullying:**

The designated safeguarding lead should be notified immediately, via My Concern, of any serious, persistent or intimidatory bullying and, within one working day, the parent/carer or 'professional' should be contacted by them or anyone acting on their behalf. Consideration will need to be given as to whether a Child Protection Referral should be made under Safeguarding Procedures.

Child Sexual Exploitation

**Background:**

Every Local Authority has an independent Local Safeguarding Children's Board (LSCB) who have a duty to ensure that children and young people are protected, and their welfare promoted. The Board consists of statutory and voluntary partners. For many LSCBs, and Local Authorities, Child Sexual Exploitation is a priority due to the particular vulnerability of those looked after. Practice regarding Child Sexual Exploitation can be improved through the review of past cases, auditing the response to referrals from statutory and voluntary agencies and, most importantly, making sure children and young people have access to information and people they can trust.

As with every aspect of a child's welfare, Dallaglio RugbyWorks need to regularly review their Safeguarding Procedures to ensure they remain pertinent and comprehensive. However, it is essential that staff also have access to training, information and advice. Any child or young person, of any gender, background or ethnicity can become a victim of Child Sexual Exploitation which involves the sexual abuse of and is the deliberate exploitation of children and young people, for the sexual gratification of others.

There are considerable concerns regarding the increase in Child Sexual Exploitation, and extensive research has been carried out to try and identify areas of practice that need to be improved. The following are ways that victims can be drawn into Child Sexual Exploitation:

**The Relationship/Peer Model:**

This type of grooming takes place when perpetrators befriend children or young people and make them believe they are in a loving 'relationship' or friendship, only to then coerce them to have sex with friends or associates. Peer to peer grooming can be associated with gang activity, where those carrying out the grooming is also a victim.

#### **Inappropriate Relationship Model:**

This usually involves one perpetrator, someone with exclusive power or control over a child or young person who may believe they are in a loving relationship. An indicator could be a significant age gap, or a person in a position of authority who exploits the victim for sex.

#### **Organised/Network Model and Trafficking Model:**

This type of exploitation includes the trafficking of young people, cross country, internationally or even just between houses (even on the same street) or hotels. This can be as part of an organised network of 'buying and selling' the sexual services of children and young people by perpetrators. Some victims involved in an organised network may also be used to recruit others. This model usually involves numerous victims and perpetrators and is widely reported by the media.

#### **Gangs Model:**

There continues to be a limited understanding of this model, but it can include exploitation through gang initiation rituals, gang pressure or as punishment for crossing areas/boundaries. Many gang members are also victims themselves.

Child Sexual Exploitation can also take place over the Internet with young people being encouraged to send photos or take part in activities or conversations that are inappropriate. With all types of Child Sexual Exploitation, drugs or alcohol may be given to children and young people to reduce inhibitions and encourage dependence.

#### **What To Look For:**

Training on the signs of Child Sexual Exploitation is essential for both staff as many 'normal' teenage behaviours may also be indicators of Child Sexual Exploitation. Trying to establish the reason for any changes in a child's behaviour can be particularly challenging, as it may be linked to past experiences prior to their coming into care or current issues such as time with birth family or plans for moving to a long-term fostering arrangement. Children and young people are safest when they have a positive attachment to their caregivers and feel able to share their concerns openly.

The potential for Child Sexual Exploitation should be considered if a young person:

- Has unexplained gifts or new possessions such as clothes, jewellery, a mobile phone or money that cannot be accounted for

- Is using their mobile more frequently or spending excessive amounts of time online and becoming secretive about what they are looking at or who they are talking to
- Appears to be under the influence of drugs or alcohol
- Is being picked up or dropped off in cars driven by unknown adults
- Has a significantly older 'boyfriend' or 'friend' or lots of new friends
- Has a sudden involvement in criminal behaviour or an increase in offending
- Has sexual health problems such as repeated sexually transmitted or urinary infections
- Has unexplained injuries or bruises
- Displays a change in behaviour at school including attainment, attendance and friendships
- Changes their appearance
- Has a change in relationships

If a member of staff identifies any of the above changes in a child or young person or they have any concerns regarding Child Sexual Exploitation, or any past or current abuse, should be discussed with the designated safeguarding lead and recorded on My Concern. Staff should also refer to Dallaglio RugbyWorks' safeguarding procedures. Child Sexual Exploitation is also linked to other forms of Criminal Exploitation including 'County Lines'.

## Child Trafficking

### **What Is It:**

The official definition of child trafficking as ratified by the UK government in 2008 is:

'The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in human beings'.

It is not known exactly how many children have been trafficked into, or within, the UK as recorded statistics are almost certainly an underestimate. The figures do not include prosecutions for crimes related to trafficking, such as assisting unlawful immigration, false imprisonment and causing, inciting or controlling prostitution for gain. Neither do they include international investigations where the perpetrators were prosecuted in another Country. However, it is estimated that 1 in 5 victims of trafficking are children.

Information on trafficking comes from the National Referral Mechanism (NRM) which was set up in 2009 to help identify and support victims, and, in 2022 the following was reported:

- In 2021 referrals for child potential victims increased from 4,946 to 5,463, a rise of 10%
- 79% of the referrals related to male potential victims, a rise from the previous year
- In 2021 criminal exploitation was the most common type of exploitation reported for child potential victims, accounting for 49% of child referrals (2,689)
- In line with previous years, the vast majority of all child referrals were of UK national accounting for 54% (2,981)

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- The other most represented nationalities were Vietnamese (269) and Albanian (244)

Child trafficking is child abuse where victims are recruited, moved or transported and exploited, forced to work or sold. Children are trafficked for:

- Child sexual exploitation
- Illegal adoption
- Benefit fraud
- Forced marriage
- Domestic servitude such as cleaning, childcare and cooking
- Forced labour in factories or agriculture
- Criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs, bag theft
- 'County Lines' drug dealing
- Organ harvesting

Many children are trafficked into the UK from abroad, but they can also be trafficked from one part of the UK to another. Physical, sexual and emotional abuse are often used to control victims of trafficking and many children are likely to be physically and emotionally harmed. As a crime, child trafficking is an abuse of human rights and the key pieces of legislation used to protect victims are:

- Sexual Offences Act 2003
- Asylum and Immigration (Treatment of Claimants, etc.) Act 2004
- Coroners and Justice Act 2009
- Modern Slavery Act 2015

However, it can be difficult to prosecute traffickers because:

- Legislation may be ineffective or may not exist
- Victims may be afraid to give evidence
- Trafficking networks can make it difficult to gather evidence on individuals

### **Impact on Children:**

Children who have been trafficked may find it difficult to tell anyone what has happened to them. They may also be inconsistent in the telling of their experiences, having been threatened by those who have trafficked them. Many victims don't speak English. Children are often too scared to speak out because they are frightened of:

- What will happen to them, their friends and family
- A lack of trust in adults and the 'authorities'
- Being prosecuted for a crime
- Being returned to their home country where they may have witnessed or experienced abuse, neglect or violence

- Juju or witchcraft rituals which have been performed as part of grooming

They may also feel, or been made to feel, guilty or ashamed about the abuse they have suffered. Some traffickers create stories for victims to recite in case they are approached by anyone in authority, but if a child is suffering from Post-Traumatic Stress Disorder (PTSD) they may have difficulty in recalling details or have gaps in their memory.

Child trafficking can have a long-lasting and devastating effect. Being kept captive or living and working in poor conditions can have a serious impact on a child's mental and physical health. They may also be suffering from the effects of multiple forms of neglect, and it is likely that they will feel distressed and alienated if they have been separated from their families, friends, communities and culture. Trafficked children are often kept hidden with no access to education or opportunities for social and emotional development.

Children exploited for domestic servitude and forced labour can suffer physical injuries and develop problems with their emotional and mental health. Those trafficked for sexual exploitation are at high risk of prolonged periods of sexual violence causing physical injuries, sexually transmitted infections and, for girls, multiple pregnancies.

The Modern Slavery Strategy, published in 2014, outlines the inter-agency response to human trafficking with a focus on the need to raise awareness of child trafficking and ensure victims are treated as in need of child protection. All children in care are vulnerable, but those who have been subjected to trafficking require Social Workers and Foster Parents to be vigilant. Risk Management and Risk Assessments must be robust and regularly reviewed.

All those who have contact with children in this situation must be alert to the risk of abduction or the continuation of grooming strategies. Victims may not feel able to share their fears, but changes in their behaviour and/or mood and presentation should be noted and reported to their Designated Safeguarding Lead.

#### **Action to be Taken:**

If a child discloses that they have been trafficked, or held against their will at any time, staff and volunteers must:

- Follow Dallaglio RugbyWorks child protection procedures, contacting the designated safeguarding lead
- Contact the Police if it is deemed that a child is at immediate risk
- Not question the child but record any information they give as soon as possible
- Make a detailed record of who they spoke to regarding their concerns including any advice they were given and any action to be taken in My Concern

#### **Criminal Exploitation**

### What is Criminal Exploitation:

Criminal exploitation is a form of child abuse where children and young people are manipulated and coerced into criminal behaviour. Sometimes, this can involve the trafficking of them to commit crimes or be sexually exploited. Research by Barnardos has shown that 'vulnerable children and young people are increasingly at risk from interconnected forms of adversity'. Those who are targeted can also be groomed, physically and/or emotionally abused, sexually exploited or trafficked.

Studies show that a child or young person is more at risk of being recruited if:

- they have been excluded from school
- they have special education needs
- there are problems at home like neglect, domestic abuse or sexual abuse
- they have problems with their mental health
- they live in areas known to have active gangs

Some of the dangers of criminal exploitation include:

- being subjected to threats, blackmail and violence
- being exploited and forced to commit crimes
- being arrested for crimes committed by the gang and not the individual member
- not being able to leave or cut off ties with the gang
- having their safety or the safety of friends and family threatened
- risk of physical harm or rape, severe injury or being killed
- risk of emotional abuse
- misusing drugs, alcohol and other substances
- the long-term impact on education and employment options

### County Lines:

County Lines is the police term for urban gangs exploiting others into moving drugs from a hub, usually a large city, into other suburban areas, market and coastal towns, using dedicated mobile phone lines or "deal lines". Although the typical age of those involved is 15-16 years, children as young as 12 years old have been exploited into carrying drugs for gangs. This can involve them being trafficked away from their home area, staying in accommodation where they can manufacture and sell drugs.

There is an increasing number of children and young people who are becoming involved in the distribution and supply of drugs in this way.

Centralised groups use them to move drugs around the country whilst collecting the profits to be laundered elsewhere. County Lines, is having a dramatic effect on local communities, introducing serious criminal behaviour, high levels of violence and the exploitation of children, young people and vulnerable adults, who are often drawn into these networks because they are vulnerable. They may be easily coerced through the

threat of violence (towards them or other family members) and/or tempted by a lifestyle that involves access to drugs and money. Predominantly, Class A drugs such as heroin, crack cocaine and spice are being moved. Police have highlighted the use of young white children (referred to as 'clean skins') to carry drugs, as they are felt to attract less attention.

Should a mule (a person who carries drugs) or runner (who delivers drugs ordered through a dedicated phone number) use or lose drugs or money, they will be subject to 'taxing'. This is one of the ways senior members of the gang set an example to others, and the Police report numerous incidents of violence which include slashing, stabbing, beating and breaking bones.

In the available literature, there is frequent reference to sexual violence, often with female drug users being forced into prostitution to pay off drug debts or punished by rape.

County Lines reduces the risks for those involved at the top, as there is a nationwide network of groups who change frequently. Local contacts help identify vulnerable people who are coerced or threatened into letting dealers use their accommodation (called cuckooing) as a base. They are often recruited because they are Class A drug addicts and see it as a way of getting free drugs, but they can also be elderly, have physical or mental health issues or be sex workers. Once a network of addresses has been established, the controlling urban group sets up a regular delivery of drugs to supply a growing local demand. When a distribution network is established, the next area is identified, and contacts made. The constant changes of personnel significantly reduce the risk of being detected or individual members collaborating to set up their own network.

If a child has become involved in County Lines, they may exhibit any of the following signs:

- Returning home late, going missing from school or foster home and being found outside of the local area
- Increased drug and/or alcohol use or having large amounts of drugs on them
- Having unexplained amounts of money, clothes or mobile phones
- Being secretive about who they are talking to and where they are going. This can include a high level of texts or phone calls
- Being isolated or withdrawn
- Having relationships with older adults or groups who appear to be very controlling
- Increasingly disruptive or aggressive behaviour
- Committing petty crimes like shop lifting or vandalism
- Using sexual, drug related or violent language or new slang words
- Having hotel cards or keys to an unknown place
- Having unexplained injuries and refusing to seek medical help
- Carrying weapons (most often knives)
- Gang association or isolation from peers or networks
- Self-harming for children who have been in care due to abuse or neglect

If you have any concerns that a child or young person in your care is involved in County Lines, please speak with designated safeguarding lead immediately and record it in My Concern.

### What is Gang Activity:

A gang has been described as a “relatively durable group who have a collective identity and meet frequently. They are predominantly street-based groups of young people who see themselves (and are seen by others) as a discernible group for whom crime and violence is integral to their identity”. Those looked after are vulnerable to radicalisation and Child Sexual Exploitation, but they are also at risk of becoming involved in gang activity and criminal exploitation, such as ‘County Lines’ because of:

- Low self-esteem and resilience
- Attachment difficulties
- Family or friends who are involved in gang activity
- An acceptance of exploitation, violence (including domestic violence), misuse of alcohol and drugs arising from experience of abuse and/or neglect
- An increased likelihood of contact with young people who are actively involved in gangs if they are currently in secure or residential units

The problem of gang involvement is a multi-agency issue; working in partnership and information sharing is vital to safeguarding those at risk of gang-related harm. Safeguarding needs to focus on those who are on the edge of becoming involved in gangs as well as those who are already actively involved and it is important to recognise that a young person may be both a perpetrator and a victim. Research shows that the more a young person is involved in a gang, the less likely they are to talk about it. However, if they do talk about gang involvement, it should always be taken very seriously. Some indicators of gang involvement are:

- Sudden loss of interest in school accompanied by a decline in attendance or academic achievement
- Becoming emotionally “switched off”, but also showing signs of frustration and/or rage
- Starting to use new or unknown slang words, unusual ways of talking or hand signs
- Staying out unusually late or regularly breaking an agreed curfew
- Sudden changes in appearance - dressing in a particular style or
- ‘uniform’ similar to that of other young people they are mixing with
- No longer wanting to attend leisure, sport, family or social activities
- Unexplained physical injuries and refusal to seek medical treatment
- Talking about another young person who seems to have a lot of influence over them
- Associating with known or suspected gang members
- Expressing aggressive or intimidating views towards other groups of young people, some of whom may have been friends in the past

- Avoiding or being scared to go into certain areas
- Concern about the presence of unknown youths in their neighbourhood

Most gang members are male, although may be female and the latter are often subservient and used to carrying or hiding weapons or drugs. Girls are very vulnerable within the gang hierarchy, as initiation rituals or threats from one gang to another can involve sexual violence. Research shows that they are reluctant to identify or report their attackers or seek medical treatment. Female gang members are often involved in recruiting other girls in their school or social network, with younger girls who are easier to coerce and intimidate, being targeted. Once involved, both male and female members can become bound into the gang through a fear of retaliation if they leave, or the risk of violence from opposing gangs.

### **What do Children and Young People Need?**

Discussions on this topic need to be sensitive and non-judgmental. Young people may be facing dangerous and potentially fatal challenges, just because they enter the 'wrong territory' or reject the prevalent drug culture. It is important that we do not define those we care for by their past experiences or current behaviour. They need to be encouraged to discuss their hopes and aspirations, as well as their fears and worries. It is vital that we praise them for their achievements, making sure that we are there for them no matter what. Due to the seriousness of gang violence, statutory and voluntary agencies are now working cooperatively to tackle the problem by trying to influence others before they are pulled into involvement with County Lines or gang activity.

Dallaglio RugbyWorks views gang activity, criminal exploitation, Child Sexual Exploitation, trafficking and radicalisation very seriously, and designated safeguarding leads can provide information on the services and support available to protect children and young people.

Should a member of staff have concerns that a child or young person is involved, or is likely to become involved in gang activity, Dallaglio RugbyWorks' safeguarding procedures should be followed. The designated safeguarding lead must consider, on a case by case basis, whether to make a referral to the Local Authority for a multi-agency assessment to be carried out. All concerns must be recorded accurately in My Concern.

### Radicalisation

#### **Background:**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism.

Extremism is defined in "Keeping children safe in education" (2015) as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual

liberty and mutual respect and tolerance of different faiths and beliefs... calls for the death of members of our armed forces, whether in this country or overseas.'

Any idea or belief can become extreme:

- Political Extremism
- Environmental Extremism
- Animal Rights Extremism
- Religious Extremism

These views may pose a threat to certain groups in society and may or may not, become violent.

Procedures need to be regularly reviewed to ensure that emerging themes or concerns are thoroughly addressed. There continues to be extensive coverage of the risk to children and young people being drawn into violent extremism. The risk may come through known contacts, introductions by friends or family members, school or faith groups, and increasingly through the Internet and social media.

Some individuals and groups hold extreme political or religious ideals, which have the potential to alienate young people from accepted societal values and beliefs. Staff and volunteers need to be aware of how those engaged on Dallaglio RugbyWorks' programmes can be coerced into groups that might put themselves and others at risk.

Some children and young people can often feel, or see themselves, as rejected by society and, although their behaviour and habits can change for several reasons, they are particularly vulnerable to exploitation. Any significant change of behaviour needs to be recorded and discussed with the designated safeguarding lead. If a young person is being drawn into extreme violence or radicalisation, changes in their behaviour may include:

- Use of inappropriate language including intolerance of specific groups
- Possession of violent extremist literature
- Accessing websites relating to military training skills and techniques, weapons, or explosives
- Withdrawal from family, friends, or peers
- Promoting a violent response to specific groups or events
- Association with known extremists
- Trying to recruit others to an extremist ideology

### **Prevent Duty:**

From 1 July 2015 all those providing services to children are subject to a duty known as The Prevent Duty. Government advice is available which explains what this means, how compliance with the duty can be demonstrated in addition to information and resources available. Local Safeguarding Boards have established referral routes, such as through

Local Authority Multi Agency Safeguarding Hub (MASH) teams. This is available to those who are identified as particularly vulnerable to radicalisation.

The Prevent Duty means that all organisations working with children and young people must ensure that staff are familiar with the issues relating to radicalisation by providing training, literature, and resources. Training on the Prevent Duty is identified as Core Training for all approved staff and volunteers.

The Dallaglio RugbyWorks Designated Safeguarding Lead has completed training on The Prevent Duty and can provide advice or liaise where necessary with Local Safeguarding Boards or the Department of Education Counter Extremism Helpline which can be contacted via the following means:

Emailing [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk) or through the contact form which can be found at <https://report-extremism.education.gov.uk/> or by calling 020 7340 7264.

### **Action to be Taken**

Any safeguarding risk or concerns relating to radicalisation, must follow Dallaglio RugbyWorks' safeguarding procedures and recorded in My Concern.

### Honour Based Violence

#### **What is Honour Based Violence:**

Honour based violence can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Other terms used may be Izzat, Ghairat, Namus or Sharam. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Honour based violence takes many different forms and, while it is mostly females who experience it, for instance by being abused, disowned, or possibly being forced into having an abortion, boys and men can be victims too. For young victims, it is a form of child abuse. Examples of honour based violence include:

- physical abuse such as kicking and beating
- psychological pressure such as strict monitoring, humiliation, threats, harassment
- domestic and/or sexual violence including rape of themselves or other family members
- forced marriage or abortion
- kidnap and/or abandonment (leaving someone in their country of origin or sending them back to such)
- forced suicide or honour killing (murder)
- female genital mutilation (see separate policy)

Honour based violence can be distinguished from other forms of violence, as it is often committed with a degree of approval and/or collusion from other family and/or community members. Women, men and younger members of the family can all be involved in the abuse.

Statistics from the Home Office ([www.gov.uk](http://www.gov.uk)) detail that in the year ending March 2022, there were 2,887 honour based violence related offences recorded by the Police in England and Wales. This was a 6% increase on the previous year. Within this:

- 77 offences related to Female Genital Mutilation
- 141 were forced marriage offences
- 17% of offences reports were for controlling and coercive behaviour.
- Assault with injury and assault without injury accounted for 14% each of the total.

The Halo Project estimate that there are 12-15 reported honour killings each year in the UK ([www.haloproject.org.uk](http://www.haloproject.org.uk)).

While there is no specific offence of honour based violence, the Crown Prosecution Service describes 'honour'- based violence as an incident or crime "which has, or may have, been committed to protect or defend the 'honour' of the family and or the community." 'Honour' can be the motivation, excuse or justification behind a range of violent acts against women and girls.

#### **Risks:**

Young victims may find themselves in abusive and dangerous situations against their will with no power to seek help due to the involvement of family members and those within their communities. Behaviour that could lead to honour based violence responses include:

- Wearing what is considered to be inappropriate make-up or clothing
- The existence of a boyfriend or relationship which is perceived to be unacceptable e.g., a gay/lesbian relationship
- Rejecting a forced marriage
- Pregnancy outside of marriage
- Being a victim of rape
- Inter-faith relationships (e.g., same faith, but different ethnicity)
- Leaving or attempting to leave a spouse or seek a divorce
- Kissing or showing intimacy in a public place
- The use of alcohol and drugs

#### **Indicators:**

It is likely that an awareness that someone has been the victim of an honour-based crime will only come to light after an assault of some kind has taken place or if a child is reported as missing. There are inherent risks for victims in disclosing such abuse, with added pressure associated with the fear of criminalising their parents' behaviour. Young

people may face significant harm if their families and/or communities realise they have asked for help. They are also likely to have a fear of retribution from their family or community of being forced into engagement and/or marriage. Unreasonable restrictions on the young person, such as removal from education or virtual imprisonment, may also occur.

Some families go to considerable lengths to find those who run away, and children and young people who leave home are at risk of significant harm if returned to their family. They may be reported as missing by their families with no mention made as to the reason. Therefore, it is important that underlying reasons for a child or young person going missing are fully explored.

### **Protection and Action to be Taken:**

It takes a lot of courage for a child or young person to disclose that they are afraid either that they will be, or have been, subjected to honour based violence. It is essential, therefore, that Dallaglio RugbyWorks' staff take such matters seriously and that agencies work together to act in a manner that will not further jeopardise the child or young person's safety. Where a child or young person discloses fear of honour based violence in respect of them or another, Staff must:

- Take the disclosure seriously. Any suspicion or disclosure of violence or abuse against a child in the name of honour should be treated as seriously as any other suspicion or disclosure of significant harm against a child.
- Explain to the child or young person the limits of confidentiality, what information may have to be shared, with whom and for what purpose.
- Make a clear recording of all the information that is disclosed in My Concern.
- Contact their designated safeguarding lead **immediately**, and follow Safeguarding procedures.
- Do not approach the family or community leaders or share any information with them.

In cases of violence in the name of honour and of forced marriage, it will be essential for the multi-agency team to consider other siblings in the family that may be experiencing, or at risk of, the same abuse. Any information of this nature which is given to you by the young person should be clearly recorded in detail, and information shared immediately, as per Dallaglio RugbyWorks' Safeguarding Policy.

### **Issues:**

Addressing the needs of the individual is key, as honour based violence victims will require a tailored response dependent on a number of factors, including language and cultural barriers, how long they have been in the country, their social and family networks and their economic circumstances.

Staff will need to work alongside other professionals to ensure that the child is safe, while supporting their emotional needs. Any relevant cultural and religious needs will also need to be respected and supported in an appropriate way.

### **The 'One Chance Rule':**

All practitioners working with victims of honour based violence need to be aware of the 'one chance' rule. That is, they may only have one chance to speak to a potential victim, and therefore only one chance to save a life. This means that all practitioners working within statutory agencies need to be aware of their responsibilities and obligations when they come across these cases. If the victim is not heard and supported, that one chance might be wasted.

### Unacceptable Behaviour

#### **Statement:**

We are committed to providing a professional and fair service to everyone we work with and our Statement of Purpose sets out what stakeholders can expect from us. In return we ask that stakeholders respect our staff.

We won't tolerate threatening, abusive or violent behaviour. Under these circumstances no member of staff should be required to or feel obliged to deal with any stakeholder either face to face, over the phone or in correspondence.

#### **About This Position Statement:**

This position statement enables us to deal with unacceptable behaviour, professionally, consistently and fairly.

It lets both staff and stakeholders know what we consider to be unacceptable and outlines the steps we may take to deal with such behaviour.

#### **What Behaviour is Unacceptable?**

For the purposes of this position statement, unacceptable behaviour is defined as:

- Behaviour or language (written, verbal or online) that we consider may cause staff to feel intimidated, afraid, offended, threatened or abused. Examples of this include (but are not exhaustive):
- Communication that we consider to be unreasonably demanding, or unreasonably persistent in its frequency, type and nature. By this we mean face to face, telephone online or through social media.
- Inflammatory/derogatory statements, remarks of a racial, xenophobic or discriminatory nature and unsubstantiated allegations.

- Violent behaviour – Physical contact made in an aggressive or threatening manner. This includes: pushing; jostling; kicking; punching; physical restraint; sexual assault; spitting and use of weapons
- Threatening behaviour – Words or actions that cause a person to be concerned for their safety, the safety of colleagues, or the safety of their property. This includes visual threats or gestures; aggressive stance; sexually explicit or threatening language or body language; abusive phone calls; on-line bullying, use of aggressive dogs and obstruction or aggressive use of vehicles.
- Abusive behaviour – Words or actions that cause a person to feel harassed, intimidated or distressed. This includes: offensive gestures; aggressive stance; abusive, provocative or obscene language and inappropriate use of social media.
- Wilful damage to property – This can belong to the Agency, its employees, contractors, or volunteers. This includes: buildings; fixtures; fittings; equipment and vehicles.

### What Action Will We Take?

Our position on threatening or violent behaviour, racism or xenophobia is very simple: zero tolerance.

We will not tolerate it inside our organisation, and we won't tolerate it against our staff from people outside the organisation. If we feel that a stakeholder's behaviour is unacceptable we will take the following steps:

**Step 1 Identify:** Behaviour is recognised as unacceptable, we will ask the individual to modify their behaviour and explain why. If the behaviour continues staff are advised to remove themselves from the situation.

**Step 2 Report:** Unacceptable behaviour reported internally, the staff member will inform their line manager about the situation and the incident will be recorded.

**Step 3 Review:** Unacceptable behaviour investigated, the line manager will investigate the situation and decide what action to take. Where relevant we will keep the individual informed. In some instances, we may need to escalate to the Police.

### Reporting, Recording and Responding

#### Responding to Disclosures:

How to respond to disclosures of abuse:

- React calmly so as to not frighten the child
- Tell the child he/she is not to blame and that he/she has the right to tell
- Take what the child says seriously
- Keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said

- Reassure the child but do not make promises of confidentiality, which may not subsequently be feasible, and explain why promises cannot be made
- Make a full record of what has been said, heard and/or seen as soon as possible

It is not the responsibility of anyone working under the auspices of sport in a paid or unpaid capacity for Dallaglio RugbyWorks, to take responsibility or to decide whether or not child abuse is taking place. However, there is a responsibility to protect children in order that the appropriate agencies can then make inquiries and take any necessary action to protect the child.

### **Reporting Procedures:**

Dallaglio RugbyWorks staff should in the first instance use the My Concern software or the My Concern App to report any incident of concern. Follow the instructions and add as much information as possible. This alerts the Dallaglio RugbyWorks Designated Safeguarding Lead and Deputy Designated Safeguarding Leads to the concern and a Case Manager will be assigned.

Safeguarding reports should be factual and provide as much detail as possible on including but not limited to the context for any situations, a list of those present, their behaviour and any concerns expressed by those attending. Recordings should complement other communication that takes place, such as sharing of information in meetings, supervision, by phone or in email.

The My Concern reporting system is available to all staff and all staff are responsible for reporting any concerns they have. This is regularly checked and discussed during supervision with staff. Whether staff will record on either a daily or weekly basis is based on several factors, such as how settled the activity was or behaviours(s) were, the frequency of the activity and the 'time served' with that group and or individuals. Any significant risks or concerns need to be highlighted to the Regional Coordinator as soon as possible alongside this, as staff cannot be sure when daily log recordings will be read.

Good records can provide a valuable resource as they:

- Provide a history of work undertaken with the child
- Record decisions made and the child or young person's views
- Protect the child, partner organisation and Dallaglio RugbyWorks
- Provide continuity if staff leave
- Help other professionals review the work carried out, aiming to record and analyse any examples of best practice
- Provide a picture for the child in the future of their lived experience within the community

Recording relating to any concerns, allegations or action taken by Dallaglio RugbyWorks in relation to a staff member must be entered on My Concern within 12 hours of the information first being raised. The Programme Manager for the staff member, with whom

the child or young person being worked with is responsible for making a clear record, specifying the name and status of those spoken to. If this is not possible, they must speak with the Head of Delivery (Safeguarding Lead) giving reasons as to why they cannot meet the recording deadline.

All staff also need to complete recordings relating to any concerns or allegations within the above timescale. If they are unable to do so, they should contact their Programme Manager in the first instance, or subsequently the Designated Safeguarding Lead (Head of Delivery).

If a child is in immediate danger, the Designated Safeguarding Lead should be contacted and obtain the advice of MASH on 020 8489 4470. If you are calling between 5pm and 9am weekdays or anytime at the weekend, call the Emergency out-of-hours duty team on 020 8489 0000. If you or a child is in immediate danger you should always phone 999.

### **Records and Information:**

Information passed to the school, social services or the police must be as helpful as possible, hence the necessity for making a detailed record at the time of the disclosure/concern.

Information should include the following:

- Date and time of what has occurred and the time the disclosure was made
- Names of people who were involved
- What was said or done by whom
- Any action taken by the group to investigate the matter
- Any further action, e.g. suspension of a worker or volunteer
- Where relevant, reasons why there is no referral to a statutory agency
- Names of person reporting and to whom reported

Reporting the matter to the school, police or social services department should not be delayed by attempts to obtain more information. Wherever possible, referrals telephoned to the social services department should be confirmed in writing within 24 hours. A record should also be made of the name and designation of the school, social services member of staff or police officer to whom concerns were passed, together with the time and date of the call, in case any follow-up is needed.

Once the concern information has been submitted in the software it will ensure GDPR compliance.

For allegations relating to staff members, please consult with Human Resources and the Safeguarding Lead around recording policies. Guidance can also be found within the Staff Handbook and Whistleblowing Policy which outline our responsibilities relating to safeguarding for those who are employed in positions of trust.

### **Social Services:**

Social Services have a statutory duty under The Children's Act 1989 to ensure the welfare of children. When a child protection referral is made its staff has a legal responsibility to investigate. This may involve talking to the child and family and gathering information from other people who know the child. Enquiries may be carried out jointly with the police.

### **Sharing Concerns with Parents:**

There is always a commitment to work in partnership with parents and carers where there are concerns about their children. Therefore, in most situations, it would be important to talk to parents or carers to help clarify any initial concerns. For example, if a child seems withdrawn, there may be a reasonable explanation. However, the first point of contact for all incidents will be the Safeguarding Lead at the school the child attends.

There are circumstances in which a child may be placed at even greater risk if such concerns were shared (e.g. where a parent or carer may be responsible for the abuse or not able to respond to the situation appropriately). In these, or where concerns still exist, any suspicious, allegation or incident of abuse must be reported to the designated person as soon as possible and recorded.

### **Designated Officer:**

It is the responsibility of the individuals working with the young person in question to inform the relevant Safeguarding Lead at the school. If the Designated Safeguarding Lead is not available the person discovering or being informed of the abuse should immediately contact the Deputy Safeguarding Lead. In these circumstances you do not have to give your name but it is helpful if you can.

### **Expert Advice:**

If you are not sure what to do, you can obtain advice by telephone by calling the NSPCC 24-hour free phone Helpline on 0808 800 500. The police also have specially trained safeguarding teams who will give guidance and support, and deal with out-of-office enquiries when social services are not available.

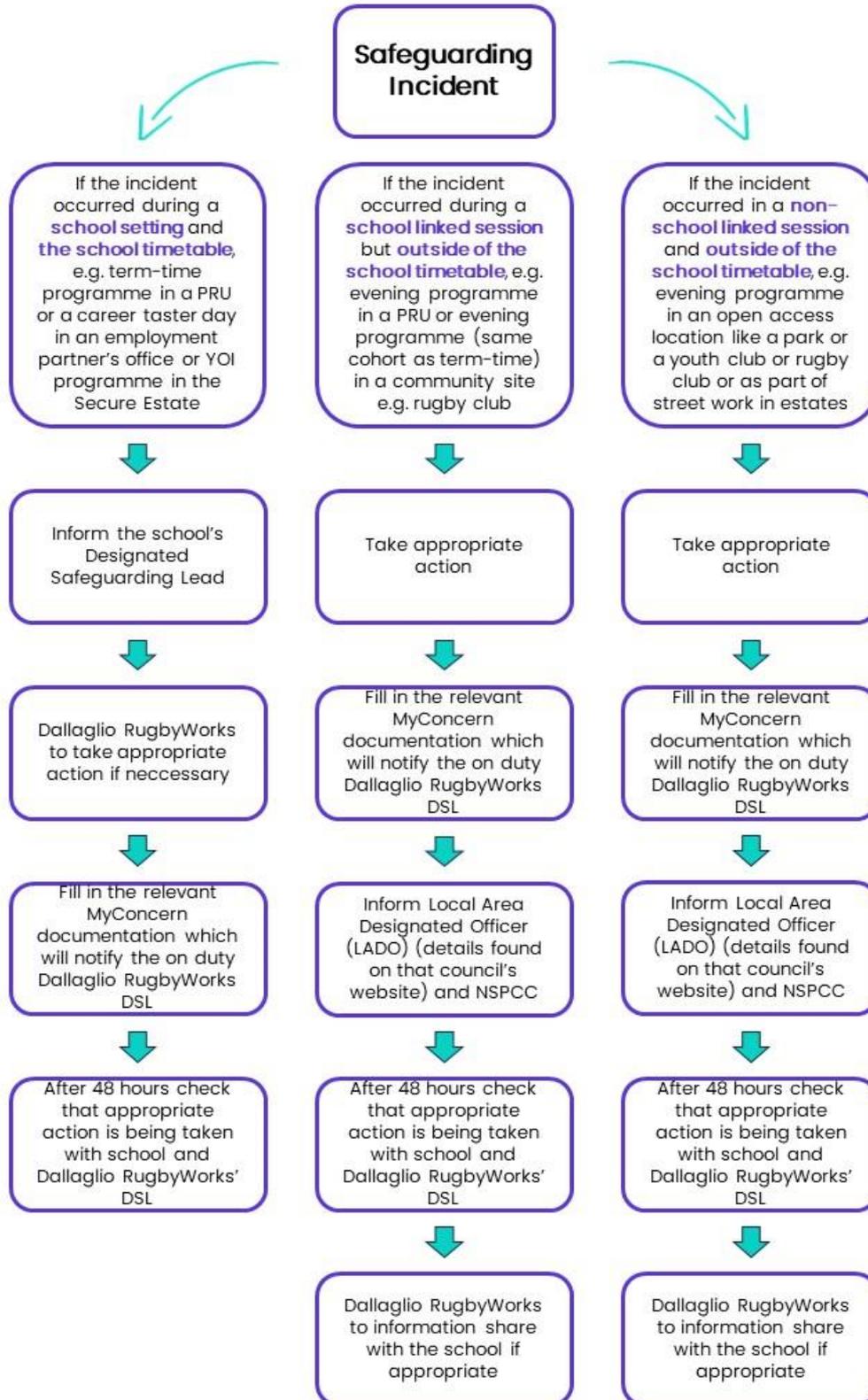
### **Child Welfare and Concern Report Procedure:**

The members of the Senior Leadership Team are always available for Safeguarding Incidents. The individual members are on duty on rotation over the 7 days in week so that cover is always present. The full process for reporting can be found in the Standard Operating Procedures.

**Red** – Suspect abuse, serious allegations

**Amber** – Re-occurring low-level concerns, police incidents

**Green** – Low-level concern, reports of incidents



**Safeguarding Reporting Procedure – Delivery Staff/Volunteers:**

At time of the incident ensure all staff and young people are safe



As soon as possible make accurate notes on the incident – written or using My Concern App  
Use My Concern App/Software

Where possible include:

- a. Date and times – of incident
- b. Names of all involved (staff and YPs)
- c. As much detail as possible

If using My Concern App revisit the Concern on the software and add in / complete as much information as possible – not already included

Once submitted it will alert the DSL and DDSL that a new concern has been raised. They can then follow up any issues raised.

## Social Media and Online Safety

Dallaglio RugbyWorks strongly believes that children and young people should have access to the Internet and other related technology, but also recognises the importance of safeguarding them from potential risk when using such. This policy aims to identify how Staff can keep children and young people safe.

The following rules and principles must be followed:

- When using digital images staff should inform and educate participants about the risk associated with taking, sharing, publicising and distributing them. They should recognise the risks attached to publishing their own images on the internet, including social networking sites.
- Staff and volunteers are allowed to take digital / video images to support their work but must follow Dallaglio RugbyWorks policies including obtaining informed consent. These images are allowed to be taken on personal equipment but must always be in a professional manner.
- Digital and video images should be passed to the communications team promptly and then deleted from personal equipment immediately.
- Care should be taken when taking images that participants are appropriately dressed and are not participating in activities that might bring the participants or Dallaglio RugbyWorks into disrepute.
- Participants, staff and/or volunteers must not take, share, publish or distribute images of others without their written permission.
- Photographs publicised on the Dallaglio RugbyWorks website, or elsewhere must be selected carefully and comply with good practice guidelines on the use of such images.
- Parents / carers permission should be obtained at all times for participants under the age of 16 years.

### **Why Use Social Media:**

The widespread use of social media brings opportunities to understand, engage and communicate with participants and practitioners in new ways, it is important that we use these technologies effectively and flexibly.

How to use social media safely, there are 3 basic online identities:

- Personal
- Professional
- Organisational

By modelling good practice in your own engagement with the internet you can support participants to be safe, and to engage positively. All staff and volunteers working for Dallaglio RugbyWorks need to model the positive use of technologies.

If you have a professional /work profile on the internet, make sure your profile clearly explains:

- who you are
- who you work for
- how participants can verify your identity
- offer links to summaries of any relevant policies and information participants should be aware of (i.e. who to contact if any concerns/complaints about your activities on site)
- always be honest about any limits to your engagement online (i.e. I can't offer one to one advice here, but you can contact XYZ if you want someone to talk to)

### Bullying

Bullying in any form is unacceptable and with new technologies comes a new form of bullying, cyberbullying. Cyberbullying is no different from any other forms of bullying; the behaviour is the same and the impact is no less devastating. Cyberbullying is the term used to define bullying behaviour that takes place via mobile phone or over the internet through emails, instant messaging and social networking sites.

### Friend Requests

If you have a personal social networking account – do not 'friend' participants or add them to your contact list. You may be giving them access to personal information and allowing them to contact you inappropriately. They may also be giving you access to their personal information and activities without realising it.

### Groups

If you create a group, host discussions or are encouraging media-sharing think about the rules /guidelines for participants engaging with this. You may find it useful to create group agreement with participants and the sorts of language and discussions allowed. Make sure these are accessible to all participants and are moderated by a Dallaglio RugbyWorks member of staff. If you want to use a web based social network site for a group or whole organisation, consider using a service that doesn't give you contact access to personal information and updates or allows collaboration without requiring permission i.e. a Facebook fan page or twitter list.

Keep a record of your activities on social media. Apply the same level of recording of your online activities as you would in face-to-face work.

Be a good ambassador. Whilst it is everyone's personal decision whether to use social media networks and tools you should always be aware that your behaviour and opinions reflect on Dallaglio RugbyWorks.

Before you post anything on the internet at work or at home, ask yourself these questions

- Could this public expression impair my ability to work with my colleagues on a friendly basis?
- Would it make my colleagues uncomfortable?
- Would it make participants uncomfortable?
- Would it make parents / carers / other professional uncomfortable?
- Could it damage the reputation of my organisation?

Always express ideas and opinions in a respectful manner, make sure your communications are in good taste, be sensitive about linking to content and do not denigrate or insult others, including competitors.

#### **Protection:**

It is essential you protect confidential information, yourself and your organisation. Online postings and conversations are not private. Realise that what you post will be around for a long time and could be shared by others.

- Avoid identifying and discussing others – including other organisations, your friends and co-workers – unless you have their permission
- Obtain permission before posting pictures of others, or before posting copied information
- Externally communicating sensitive, confidential or financial information that is not intended for the public including; information related to specific projects / sessions, participants, partners, funders, partnership deals, funding bids, salary etc.) is ALWAYS forbidden and may be grounds for immediate dismissal and legal action
- Posts should not speculate on Dallaglio RugbyWorks future plans, funding bids, recruitment or business prospects
- Astute criminals can piece together information you provide on different sites and then use it to impersonate you or someone you know – or even re-set your passwords
- If you do post personal information on a site like Facebook or Twitter, criminals can use it to send you emails that appear to come from a friend or other trusted source – even the site itself. Don't click links or attachments unless you trust the source.

#### **Disclaimer:**

If you have a blog / social media presence and talk about work-related issues, add a disclaimer; to each page making clear that the views you express are your alone. Be aware that the disclaimer does not free you from the obligations under the Codes of Conduct policy.

Use a respectful Tone You may not post any material that is obscene, defamatory, profane, libellous, threatening, harassing, abusive, hateful or embarrasses another person. This includes but is not limited to comments regarding our organisational name, our

employers, partners and competitors. You may not personally attack fellow employees, customers, stakeholders, management committee members, managers or participants.

Be transparent. It is important to keep distinct lines between your personal and professional life in the online world. Even when you are talking as an individual, people may perceive you to be talking on behalf of (organisation). It may be appropriate to add a disclaimer as above.

LOGO's - Only those authorised by Dallaglio RugbyWorks may use the organisation's logos in communications, so be sure you do not include this in your personal blogs or postings.

Speak the truth. If you are in a discussion that relates to Dallaglio RugbyWorks don't make unsubstantiated claims about features or performance. If you need to respond or make a comment on something specific, verify details through your line manager. Also, because situations change, make sure references or sources of information are current.

Keep your cool. One of the aims of social media is to create dialogue, and people won't always agree on an issue. When confronted with a difference of opinion, stay calm. Express your points in a clear, logical way. Sometimes, it's best to ignore a comment and not give it credibility by acknowledging it with a response.

Stay timely. Part of the appeal in social media is that the conversation occurs almost in real time. So, if you are going to participate in an active way, make sure you are willing to take the time to refresh content, respond to questions and update information regularly, and correct information when appropriate.

### **Purpose Of Using Social Media**

- To allow participants to use and access modern technology and methods of communication of their choice
- To provide a means of communicating with other participants in their programme and contributing to discussion and decision making regarding their participation
- To promote outcomes for participants, including enjoyment and achievement and making a positive contribution
- To provide a means of children and participants accessing information relating to their project, the wider community and beyond

### **Principles Of Using Social Media**

- We will reflect and reinforce our core values through the use of social media
- We will evidence our compliance with relevant legislation in relation to social media
- The use of social media will allow us to communicate with participants through a medium of their choice

- The use of social media will allow us to share information appropriately and safely with participants
- We can reinforce and provide evidence of good practice in our use of social media
- Using skilled staff to support the use of social media will help safeguard participants
- Using social media will ensure that we remain accountable to service users, funders and commissioners for the way in which we provide services
- Social media aimed at practitioners should be set up separately to be aimed at participants

### **Responsibilities:**

Staff and managers will ensure that:

- Programme clients (i.e. Schools) are informed of Dallaglio RugbyWorks' policies relating to this area of work
- Any participants utilising Dallaglio RugbyWorks' media team are above the legal age limit of 13 as upheld by all social media providers
- Dallaglio RugbyWorks will work with the programme client to promote e-safety to participants and their parents/carers
- Skilled workers will be responsible for overseeing the development and implementation of a social media presence in our organisation
- Skilled workers will take responsibility in any project for monitoring and moderating web pages
- Skilled workers will have the authority to remove offensive or inappropriate content
- Skilled workers will take responsibility for responding to any safeguarding concerns arising out of participants use of social media, including cyber-bullying and report any concerns to their manager immediately
- Any social media pages developed will adhere to (organisation) branding guidelines including use of logos, colour schemes, layout etc
- Information posted by staff will be accurate, relevant, updated regularly and removed where necessary
- Project information for participants and their parents will include information about their safe use of technology and social media

### **Adopting Best Practice:**

By adopting the points highlighted in these guidelines Dallaglio RugbyWorks will be putting into place the best possible practice to protect children/participants wherever and whenever photographs and recorded images are taken and stored.

These guidelines focus on the following key areas:

- The publishing of photographic and/or recorded images of participants
- The use of photographic filming equipment on Dallaglio RugbyWorks' programmes
- The use of video equipment as a promotional material/coaching/education aid

And adopt the following key principles:

- The interests and welfare of participants taking part on programmes are paramount
- Parents/carers and participants have a right to decide whether their images are to be taken, and how those images may be used
- Parents/carers and participants must provide written consent for their images to be taken and used
- Images should convey the best principles and aspects of the programme, such as fairness and fun
- Care should be taken to ensure that images are not sexual or exploitative in nature, nor open to obvious misinterpretation and misuse
- Images should only be taken by authorised persons, as agreed in the protocol for a particular event/ programme
- All images of participants should be securely stored
- In the case of images used on websites, particular care must be taken to ensure that no identifying details facilitate contact with a child by a potential abuser

#### **Publishing Images – Easy Rules to Remember:**

- Ask for written permission from the participant and parent/carer/s to take and use their image. This ensures that they are aware of the way the image is intended to be used to represent the sport/programme. Our Consent Form is one way of achieving this
- If the participant is named, avoid using their photograph
- If a photograph is used, avoid naming the participant. And NEVER publish personal details (e.g. email addresses, telephone numbers, addresses etc.) of a participant
- Only use images of participants in suitable dress to reduce the risk of inappropriate use
- Try to focus on the activity rather than a particular child and where possible use photographs that represent the broad range of participants taking part in the programme
- Ensure that images reflect positive aspects of participants involvement in the programme (enjoyment/competition etc.)

#### **Use of Photographic Filming Equipment at Dallaglio RugbyWorks's Programmes:**

Dallaglio RugbyWorks does not want to prevent parents, carers or other spectators being able to take legitimate photographs or video footage of participants. However, there is evidence that certain individuals will visit events to take inappropriate photographs or video footage of participants. All athletes, staff and volunteers should be vigilant about this possibility. Any concerns during a programme should be reported to the DSL.

During a programme:

- Participants or parent/guardian (depending on age) will sign a consent form to use their image

- This image can then be used for the next two years
- After this time further consent is required from the participant to continue to use this image
- If consent is not given the image will be permanently deleted
- At any time, participant can withdraw the use of their image. If the image is already in the public domain then Dallaglio RugbyWorks has no obligation to withdraw this, but the image will be no longer used by Dallaglio RugbyWorks.

### **Virtual Communication Platforms:**

When using an online platform for delivery or setting up online communities RugbyWorks ensure Virtual Communication Platform Risk Assessments are carried out which mitigate the risks of the following:

- Who can join the sessions
- What is the most suitable platform to host delivery – schools' platform, a RugbyWorks endorsed platform, a community on social media
- What information can be shared
- How will sessions be moderated

At the beginning of every online session online delivery scripts covering the following are delivered to participants:

- GDPR – Who is on the call, what is being shared
- Health & Safety – Is your area safe? Are you safe to take part
- Safeguarding – Review of Safeguarding principles

Participants have to agree and sign up to the RugbyWorks Online Learning – Code of Conduct.

### Monitoring a Child's Use of the Internet

There should be a discussion at the beginning of each activity to ensure boundaries of phone use are understood to manage the frequency and duration of Internet use by children and young people.

Dallaglio RugbyWorks will run regular training on Internet safety which provides additional information and practical advice on all areas covered in the safeguarding section of the staff Handbook.

Dallaglio RugbyWorks recognises that children can be more vulnerable if they are using electronic equipment in their own personal space. Mobile phones can, with careful planning and safeguards, be used positively on an activity if this is risk assessed and deemed appropriate.

### Use of Images:

Staff should discuss the taking of photographs and videos with the parent, carer and partner organisation when children and young people join an activity. If the child is of sufficient age and understanding their consent should be sought before any photos or recordings are made. No child will be photographed or filmed, in their night-clothes, underwear, or without clothes.

The Risk Management must state who can give agreement for any recording. This should be discussed using the delegated authority decision making toolkit. No images or information relating to a child or young person or their family should be placed on any social media site at any time. If it come to Dallaglio RugbyWorks' attention that images have been circulated online, an investigation will be initiated.

### Child Protection and Safeguarding Referrals

The welfare and safety of children is a shared responsibility and Dallaglio RugbyWorks believe it is unacceptable for them to experience abuse or neglect at any time in any setting. Dallaglio RugbyWorks recognises its legal and moral duty to safeguard the welfare of children, to protect them from harm and respond quickly where there are concerns that a child is, or may be, suffering significant harm. Dallaglio RugbyWorks works in partnership with Local Authority Children's Services, Police and other relevant agencies to ensure that child protection concerns are handled sensitively and professionally with the best interests of the child at the forefront of any decision making.

The key principles of safeguarding are that:

- Children have a right to be safe and should be protected from all forms of abuse and neglect
- Safeguarding children is everyone's responsibility
- Children are best protected when there is a coordinated response from all relevant agencies

Further information can be obtained from the Department of Education website (see below).

This policy is also relevant to the recruitment and employment of staff, employee and Foster Parent conduct, disciplinary procedures, health and safety policies and confidentiality. Where there are concerns that a child or young person engaged in a Dallaglio RugbyWorks activity has suffered, or is likely to suffer, significant harm because of actions, committed or omitted, by a member of staff, the relevant procedures will be followed.

This policy addresses concerns regarding Child Protection, which must be robustly addressed regardless of the status of the alleged abuser, including the child's family, friends, Foster Parents and other known or unknown adults, Dallaglio RugbyWorks or other Agency employees or unrelated children and young people.

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## Reporting Concerns or Allegations

For concerns or allegations relating to Dallaglio RugbyWorks staff, see the 'Whistle Blowing' policy. This outlines Dallaglio RugbyWorks' responsibilities relating to the safeguarding for those who are in positions of trust.

All concerns or allegations regarding a child or young person Dallaglio RugbyWorks is working with must be reported at the earliest opportunity to the Designated Safeguarding Lead who is the Programme Manager or if they are not available and/or it is outside of office hours, the Head of Delivery. This includes concerns or allegations about another child, a visitor to the family home, the child's family, a teacher, Social Worker or any other persons.

Where the concern or allegation relates to historical abuse, it should not be assumed that the allegation has been previously shared or addressed and a referral should still be made. The Designated Safeguarding Lead will liaise with the appropriate multi-agency safeguarding hub (MASH) or equivalent.

## Immediate Risk

If a child needs urgent medical attention or protection, the staff member must act immediately. This may include calling the emergency services and informing them that a child has experienced or is at risk of experiencing significant harm as relevant. Although it should not take precedent over responding to a child's safety and welfare, the member of staff must contact the Regional Coordinator, or whoever is on duty as soon as they are able to regarding the need to take emergency action.

Dallaglio RugbyWorks Designated Safeguarding Lead, or in their absence another Senior Manager, must be contacted by the Regional Coordinator to whom the staff has spoken. Once the immediate risk to the child is addressed the following procedures must be followed.

## Referring Concerns to Children's Social Care and Safeguarding Partners

When contacted by a staff member regarding a concern or allegation, the Designated Safeguarding Lead or other Senior Manager must decide if a referral should be made to the Multi-Agency Safeguarding Hub (MASH), or equivalent.

A verbal referral to MASH must subsequently be made in writing, and feedback given on any action taken within 48 hours of them being contacted. If no feedback is received within this timescale, the Designated Safeguarding Lead should contact Children's Social Care to establish what action has or will be taken.

If there are concerns regarding the response to the referral made to Children's Social Care, the Designated Safeguarding Lead should contact the relevant Manager of the MASH (or LADO, CADS etc) team who is dealing with the referral. Contact between

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everyone involved in making the referral, including those who initially expressed concern, must be comprehensively recorded.

Under no circumstances should information about the concerns or allegations be shared with anyone to whom the referral relates. As and when this is felt to be necessary, it is the responsibility of the Local Authority to liaise with relevant agencies to decide what information will be shared.

Information about any action taken should be shared with the child's Foster Parents and other relevant members of staff within Dallaglio RugbyWorks on a need-to-know basis. All those who are aware of the allegations or concerns should be reminded of the Dallaglio RugbyWorks policy relating to confidentiality.

Where there are concerns relating to significant harm to a child, which lead to an Initial or Core Assessment by Children's Social Care, any information held by Dallaglio RugbyWorks about the child will be openly shared with Children's Social Care.

### Section 47 Enquiries

Dallaglio RugbyWorks will cooperate fully with Children's Social Care should a decision be made to undertake a Section 47 Enquiry (Children Act 1989). This will include attending Strategy Meetings as required and sharing information from case records. Dallaglio RugbyWorks and the relevant Local Authority must identify who will be responsible for liaising with the Regulatory Authority.

### Safe Environment

The programmes being run by Dallaglio RugbyWorks will take place throughout England and Wales.

### Insurance

Dallaglio RugbyWorks has comprehensive insurance, which will cover the programmes covered by this policy document.

### Code Of Conduct And Ethics

We are committed to safeguarding and promoting the well-being of all participants, staff and volunteers all associated with all Dallaglio RugbyWorks programmes. It is important that all those involved should at all times, show respect, and understanding for the welfare of others. The essence of good ethical conduct is summarised below and anything that falls outside of this is directly linked to our disciplinary procedures.

- Respect the rights, dignity and worth of every person and will treat everyone equally within the context of them taking part in activities regardless of age, ability, gender, race, ethnicity, religious belief, sexuality or social/economic status.

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- Consider the wellbeing and safety of participants before the development of performance.
- Develop an appropriate working relationship with participants based on mutual trust and respect.
- Make sure all activities are appropriate to the age, ability and experience of those participating and ensure that all those taking part are prepared physically and mentally when learning new skills.
- Display consistently high standards of behaviour and appearance, dressing suitably and not using inappropriate language at any time.
- Never exert influence over participants to obtain personal benefit or reward.
- Never condone rule violations.
- Always report any incidents, referrals or disclosures immediately following appropriate guidelines set out in Dallaglio RugbyWorks' Safeguarding Policies and Procedures.
- Ensure that confidential information is not divulged unless with the express approval of all those concerned.
- Ensure that staff /participant ratios are maintained.
- Ensure that all issues /complaints go through the approved channels.
- Ensure neutrality in all activities.
- Arrive in plenty of time to set up activities and ensure that risk assessments are undertaken.
- At the outset clarify with participants (and where appropriate) their parents/carers exactly what is expected of them of what they can expect from you.
- Never transport participants in your own vehicle and will not arrange transportation for participants in private vehicles where they will be travelling solo.
- Never communicate inappropriately with participants by email, text, phone or social media.
- Never accept friend requests on social media platforms with participants.
- Be aware that discriminatory, offensive and violent behaviour will not be tolerated, and all complaints will be acted upon.
- Build balanced relationships based on mutual trust which empowers participants to share in the decision-making process.
- Maintain a clear boundary between friendship and intimacy with participants and do not conduct inappropriate relationships with participants.
- Never enter into a physical or emotionally dependant relationship should ever be formed with a participant or previous participant of any of our programmes.

## Further Information

### General:

- Children Act 1989: Guidance and Regulations Volume 4
- Children Act 2004
- Working Together to Safeguard Children 2018 (<https://www.gov.uk>):  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working\\_Together\\_to\\_Safeguard\\_Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)

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- NSPCC Core-Info leaflets – Evidence Based Resource relating to abuse and neglect.  
<https://learning.nspcc.org.uk/Search?term=core+info>
- See also NSPCC <https://learning.nspcc.org.uk/safeguarding-child-protection>
- [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk) for information on Internet safety and other identified risks.

#### Female Genital Mutilation:

- <https://www.nhs.uk/conditions/female-genital-mutilation-fgm/>
- <https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>
- <https://www.gov.uk/female-genital-mutilation-help-advice>  
<https://www.who.int/news-room/fact-sheets/detail/female-genital-mutilation>  
<https://www.endfgm.eu/female-genital-mutilation/what-is-fgm/>
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/942454/Working\\_together\\_to\\_safeguard\\_children\\_inter\\_agency\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf)

#### Bullying:

- <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/bullying-and-cyberbullying/>
- <https://youngminds.org.uk/find-help/feelings-and-symptoms/bullying/>  
<https://www.nationalbullyinghelpline.co.uk/kids.html> <https://www.anti-bullyingalliance.org.uk/> <https://www.bullying.co.uk/anti-bullying-week/anti-bullying-week-videos/>
- <https://childhood101.com/bullying-videos-kids/>

#### Child Sexual Exploitation:

- National Working Group – An organisation who tackles Child Sexual Exploitation  
<https://www.nwgnetwork.org/> Barnardos <https://www.barnardos.org.uk/what-we-do/protecting-children/cse>
- NSPCC <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-sexual-exploitation/> Child line <https://www.childline.org.uk/info-advice/bullying-abuse-safety/abuse-safety/sexual-abuse/>
- Children's Society <https://www.childrenssociety.org.uk/information/professionals/abuse/>  
CEOPS <https://www.ceop.police.uk/Safety-Centre/How-can-CEOP-help-me-YP/>

#### Child Trafficking:

- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/97845/human-trafficking-strategy.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/97845/human-trafficking-strategy.pdf)
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/181550/Human\\_Trafficking\\_practical\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/181550/Human_Trafficking_practical_guidance.pdf)

[info@dallaglorugbyworks.com](mailto:info@dallaglorugbyworks.com) | [www.dallaglorugbyworks.com](http://www.dallaglorugbyworks.com)

- <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>
- <https://www.ecpat.org.uk/news/in-2021-more-children-than-ever-before-identified-as-potential-victims-of-modern-slavery>
- <https://www.ecpat.org.uk/news/child-victims-of-trafficking-share-their-experiences-and-call-for-change-as-the-uk-government-continues-to-attack-modern-slavery-laws>
- <https://www.ecpat.org.uk/news/child-victims-of-trafficking-share-their-views-and-experiences-in-new-research>
- <https://www.ecpat.org.uk/news/one-in-three-trafficked-children-go-missing-from-local-authority-care>
- <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/child-trafficking/>  
<https://www.savethechildren.org/us/charity-stories/child-trafficking-myths-vs-facts>
- Helpline:  
Child Trafficking Advice Centre - [help@nspcc.gov.uk](mailto:help@nspcc.gov.uk) or call 0808 800 5000

#### Criminal Exploitation:

- Child line <https://www.childline.org.uk/info-advice/>
- CEOPS <https://www.ceop.police.uk/Safety-Centre/How-can-CEOP-help-me-YP/>
- National Crime Agency (NCA) <https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/drug-trafficking/county-lines>
- Crime Stoppers <https://crimestoppers-uk.org/keeping-safe/community-family/county-lines>
- Barnardos - <https://www.barnardos.org.uk/what-we-do/protecting-children> including
- [https://www.barnardos.org.uk/sites/default/files/uploads/who-will-notice-who-will-ask\\_0.pdf](https://www.barnardos.org.uk/sites/default/files/uploads/who-will-notice-who-will-ask_0.pdf)
- NSPCC- <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/>
- County Lines - <https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines>
- Children's Society <https://www.childrenssociety.org.uk/what-we-do/our-work/tackling-criminal-exploitation-and-county-lines>
- Children's Commissioner  
<https://www.childrenscommissioner.gov.uk/?s=county+lines>
- <https://www.childline.org.uk/info-advice/bullying-abuse-safety/crime-law/gangs/>
- <https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/>
- <https://www.catch-22.org.uk/offers/gangs/>
- <https://www.victimsupport.org.uk/you-co/types-crime/violent-crime/gangs-and-street-violence/>
- <https://www.powerthefight.org.uk/>

Radicalisation:

- Working Together to Safeguard Children 2018 (<https://www.gov.uk>):
- [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/729914/Working\\_Together\\_to\\_Safeguard\\_Children-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/729914/Working_Together_to_Safeguard_Children-2018.pdf)
- Working Together to Safeguard Children: a guide to inter Agency working to safeguard and promote the welfare of children 2018
- Working Together: transitional guidance: for Local Safeguarding Children
- Boards, local authorities, safeguarding partners, child death review partners, and the Child Safeguarding Practice Review Panel
- <https://www.gov.uk/government/publications/prevent-duty-guidance>
- <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/>

Honour Based Violence:

- <https://www.haloproject.org.uk/> Call: 01642 683 045
- **Karmina Nirvana:** <https://karmanirvana.org.uk/> UK Helpline: 0800 5999 247 Monday to Friday, 9-5
- **True Honour:** <https://www.truehonour.org.uk/> Telephone: 07480 621711 or email [contact@truehonour.org.uk](mailto:contact@truehonour.org.uk)
- **Refuge:** <https://www.refuge.org.uk/our-work/forms-of-violence-and-abuse/honour-based-violence/> Freephone, 24-hour National Domestic Abuse Helpline **0808 2000 247**