



Safeguarding Policy

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Safeguarding Policy Statement

The primary objective of this policy is to establish Game-On Coaching's approach to safeguarding vulnerable adults and young people from abuse, criminal activities, exploitation, or being lured into extremist activities. This objective also embodies:

- Protecting apprentices from abuse and maltreatment.
- Preventing harm to the apprentice's health or development.
- Taking action to enable all children and young people to have the best outcomes at Game-On Coaching.

This policy is applicable to all areas of Game-On Coaching's operations and is binding on *all personnel*, including permanent and temporary employees, external associates and apprentices. The policy encompasses both preventive measures in place and guidelines for responding to concerns, allegations, or suspicions of abuse.

Game-On Coaching will look to develop the policy as and when, this will be done by working with the relevant authorities to ensure the policy is up-to-date and factors in any new risks.

As per Section 175 of the Education Act (2002), Game-On Coaching is mandated to establish and implement measures aimed at safeguarding and promoting the welfare of young people, and vulnerable adults who may be at risk of harm or abuse.

In addition, Game-On Coaching is obligated to comply with the Prevent Duty (See Prevent Policy). This policy provides a framework for these measures and should be reviewed in conjunction with other relevant policies and procedures of Game-On Coaching, including web links and appendices, such as Game-On Coaching's Safeguarding procedures that align with the Local Authority Safeguarding Procedures. This policy takes into account various publications, as well as recent and applicable guidance and legislation in this domain.

- The Children Act 1989 (as amended) - to assist the Local Authority Social Services Department acting on behalf of children in need
- The Children and Social Work Act 2017 – Safeguarding of Children (Chapter 2)
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguard Children 2018 - safeguard and promote the welfare of children
- Keeping Children Safe in Education 2022 - Safeguarding is Everybody's Responsibility
- Education and Training (Welfare of Children) Act 2021
- Human Rights Act 1998
- The Equality Act 2010 / Public Sector Equality Duty (PSED)

Designated Safeguard Officer

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Game-On Coaching Safeguarding Objectives

- To protect apprentices with Care and Support needs from harm and reduce the risk of abuse or neglect.
- To intervene whenever possible to prevent abuse or neglect.
- To safeguard apprentices by empowering them to make choices and maintain control over their lives.
- To prioritise improving the quality of life for apprentices involved.
- To raise public awareness and encourage communities and professionals to take action in preventing, identifying, and responding to abuse and neglect.
- To provide accessible information and support to help individuals recognise different forms of abuse, stay safe and healthy, and report concerns regarding their own or another apprentice's safety and well-being.
- To ensure that Game-On Coaching apprentices and staff are aware of and understand the referral process.
- Ensure that recruitment methods and processes are robust and contribute towards safe recruitment.
- Ensure that information relating to safeguarding concerns is shared appropriately with relevant agencies, in accordance with legal and regulatory requirements.

Game-On Coaching Safeguarding Commitment

Game-On Coaching aim to keep apprentices safe and will always adhere to the following:

- Listen, respect and value all.
- Appointing a team of Safeguarding Officers and a DSO (Designated Safeguarding officer).
- Having a code of conduct for both staff and apprentices (listed in this policy).
- Ensuring *all* staff understand this policy and procedures.
- Guaranteeing that effective whistleblowing procedure, as listed in Appendix 3 and complaints procedures are in place.
- Ensuring that inductions and mandatory online training is completed by apprentices and employers within the agreed timescales.
- Confirming staff are recruited safely and all relevant checks are made (e.g. CRB).
- Making sure all staff complete an online safeguarding course when starting within the organisation (within 3 days).
- Ensuring all data is stored and recorded securely and safely within GDPR guidelines.
- Making sure all staff and apprentices have access to Game-On Coaching's updates around safeguarding.
- Implementing and developing an e-safety policy (In Appendix) and any related procedures.
- Ensuring procedures are used to manage any allegations against employers or staff.
- Implementing an anti-bullying environment and making sure the policy is robust to deal with any bullying.
- Providing training, support, supervision and quality assurance for all staff through effective management.
- Applying Health and Safety measures in accordance with the law (and Health and Safety policy) to ensure a safe physical environment for all apprentices and staff.
- Sharing Game-On Coaching safeguarding procedures and information with authorised parties who need to know. Including agencies involved with apprentices and any parents or carers appropriately.
- Ensuring regular reviews of the policy, procedures and recording forms take place in order to maintain a robust policy.
- Consult staff and key stakeholders when making improvements to the policy to ensure the safeguarding processes are not hindered in terms of their effectiveness to make referrals or raise concerns.

Promoting the Safeguarding Policy

Game-On Coaching recognises there are various channels that they can utilise in order to communicate and give regular updates around the Safeguarding policy. They are as below:

- Available on website under 'policies', for any stakeholder to access at any time.
- Posters in classrooms, to raise awareness of the signs of safeguarding issues, who the DSO is, and their contact details, and how to refer.
- Safeguarding Policy in the apprentice handbook, this will include all the details as above.
- Safeguarding awareness training in apprentice induction.
- Safeguarding discussions in progress reviews with apprentice and line manager.
- Safeguarding feedback in monthly 1-1 sessions.
- Safeguarding training for all staff, as a minimum annual, this will be group training with the DSO.
- Monthly Safeguarding newsletter to apprentices and apprentices with updates.
- Virtual backgrounds containing the contact number of the DSO.
- LMS (Learner Management Systems such as BUD) to have banners on the homepage which have the contact numbers of the DSO and any other relevant authority.
- Safeguarding learning material to be given to employers, posters for staff rooms etc.
- Welfare curriculum embedded into any standard delivered.

Associated Policies and Procedures

Game-On Coaching has policies and procedures in place, many of which are relevant to implementing the Safeguarding and Prevent Policy. This includes the following:

- Equality and Diversity Policy
- Data Protection Policy (GDPR)
- Health and Safety Policy
- Anti-Bullying and Harassment Policy
- Whistleblowing Policy
- Prevent Policy
- E-Safety Policy
- Communications Policy

Definitions

Safeguarding: This is the process of protecting vulnerable people, children or young people from crime, abuse or terrorism related activity.

Radicalisation: This is the process in which an individual comes to support any terrorist acts or extremist ideologies associated with terrorism. A vulnerable apprentice may be more vulnerable to being drawn toward this.

A Child/vulnerable young person – in accordance with The Education Act 2011, and therefore in accordance with the law, is “anyone who has not yet reached their 18th birthday....” Game-On Coaching shall regard any young person below the age of 18 as a child/vulnerable young adult.

Vulnerable adults are individuals who may be susceptible to abuse, harm, or exploitation due to mental health issues, physical health conditions, or personal circumstances.

Harm refers to the mistreatment or negative impact on an individual's health and development, which could include witnessing the mistreatment of others. Development encompasses physical, intellectual, emotional, social, or behavioural growth. Health includes both physical and mental well-being. Ill-treatment involves non-physical forms of abuse, including sexual abuse.

Abuse and neglect are forms of maltreatment that involve inflicting harm or failing to prevent harm to a child or vulnerable young adult. These individuals may experience abuse in a family, institutional, or community setting, either by someone known to them or, less commonly, a stranger. The perpetrator of abuse or neglect may be an adult, child, or multiple individuals.

Role of the Designated Safeguarding Officer

All staff are required to work in partnership to ensure the protection of young people involved in Game-On Coaching training, support services and recruitment.

The DSO (Designated Safeguarding Officer) has overall responsibility for Safeguarding and Prevent and includes the following roles:

- Communicating and reporting the policy to all associated, including staff, contractors and associates. The DSO must provide advice, information and training on the protection of young people and vulnerable adults.
- Being the main contact within the business for the protection of young people and vulnerable adults.
- Ensuring and establishing contacts with local partners, such as the police and any Safeguarding teams.
- Implementing and ensuring risk assessments are completed and signed off by the Directors.
- Responsible for managing the Safeguarding and Prevent Action plan.
- Keeping up to date with the latest knowledge on Prevent and Safeguarding issues.
- Ensuring that any policy and reporting procedures are monitored. They must also be reviewed in accordance with any changes in legislation.
- Maintaining any confidential records and actions taken of any reported cases.

Expectations of Stakeholders

By stakeholders actioning their responsibilities below, Game-On Coaching can prevent safeguarding issues by achieving the following:

- Assisting both children and young adults in safeguarding themselves against risks.
- Educating and training staff and any external associates.
- Raising awareness of what preventative measures can be put in place.
- Supplying guidance and information.

All Staff

Game-On Coaching recognises that safeguarding is a duty of all staff members, regardless of their position in the company. Safeguarding training will be mandatory for all staff, this will include group training, completion of the relevant safeguarding modules, such as from the 'Education and Training Foundation'. Game-On Coaching will also purchase a subscription to 'The Safeguarding Company', an online platform that has safeguarding training on, and allows the completion of training to be monitored, as well as give staff a vast array of resources. Game-On Coaching understands that any staff member could be able to identify a apprentice who could have safeguarding issues, and therefore will ensure all training for all staff covers the following:

- Staff will know where to go for advice in relation to safeguarding or child/vulnerable adult protection issues or when they are uncertain about whether to refer to a concern about an apprentice.
- Staff know Game-On Coaching's procedure for referrals on vulnerable adult protection issues.
- Staff understand that they have the right to contact the appropriate agencies, such as the LADO, or the CSCP (Coventry Safeguarding Children Partnership) or MASH (Multi Agency Safeguarding Hub) if they feel that concerns are not being passed on appropriately by designated Game-On Coaching staff.
- Staff are aware of the requirement to keep detailed, accurate, secure written records of any referrals or concerns.
- Staff are able to recognise and respond to safeguarding and welfare concerns.
- Staff understand their responsibilities in being alert to the signs of abuse.
- Staff know how to respond to a student who discloses abuse or is at risk of self-harm.
- Staff understand that there is a need to take special care when working with young people with special needs or vulnerable adults and to be alert to signs of abuse as they may not be able to raise concerns themselves.
- Staff aware of appropriate approaches to confidentiality and disclosure of information.
- Staff understand Game-On Coaching's guidance on relationships with students.

Senior Management Team

Measures are in place which address the following (DBS checks, staff recruitment, Staff training and development, off the job training, online reviews, workplace visits, guidance and support for apprentices and monitoring the use of IT).

DBS Checks

Human Resource policies that implement safer recruitment:

- The commencement of employment is dependent on the completion, verification, and submission of all required documentation to the Human Resources department.
- Supervision must be arranged and maintained until the DBS check is finalised. That employee will not be able to meet/make any contact with apprentices until the DBS comes back to Game-On Coaching.
- Prior to the start of employment, the submission of DBS applications, along with supporting documents, to HR is mandatory.

- In case the DBS check reveals any disclosures, a risk assessment must also be carried out.

Staff Recruitment

Safeguarding measures around this are:

- Application forms must be completed (including relevant questions) when applying for a role.
- A CV is required, but an application must also be fully completed.
- Verification of identity.
- Examination of the barred list.
- Comprehensive background check using an enhanced DBS certificate.
- Verification for prohibition from teaching.
- Check for a 'Section 128' direction for management roles in independent schools, including academies and free schools.
- Verification of professional qualifications.
- Verification of the right to work in the UK.

Off-the-job Training

Safeguarding and Prevent policies will be promoted throughout completion of the apprenticeship. It will include the following:

- During the Game-On Coaching apprentice induction, apprentices will receive an introduction to Safeguarding and learn how to report any concerns they may have. In addition, there will be a diverse range of curriculum topics offered, including optional e-learning modules and workbooks covering practical life skills.
- Monthly "Hot Topics" sessions will also be held, allowing apprentices to expand their knowledge on subjects related to Safeguarding, Prevent, Equality, Diversity, and Inclusion. These sessions will raise awareness on how to identify potential risks and stay safe both in their professional and personal lives.

Staff Training and Development

New staff who start at Game-On Coaching will undergo an induction which will cover safeguarding and prevent training, which will be conducted by the DSO. This will include:

- An introductory training session which has specific training on the Prevent Duty Policy and Safeguarding Policy.
- Staff roles and responsibilities and how to report and identify Prevent Duty and safeguarding issues
- How to follow the referral process, as stated in the Appendix

All staff, including board members will partake in ongoing training at an appropriate level. Individuals will complete regular refresher training at least annually. Regular updates will be a standard part of team meetings, board meetings, senior management meetings and one to ones between managers and delivery staff. Any new information from agencies, or the relevant safeguarding partners will be used to update the Safeguarding Policy and any safeguarding training resources.

Human Resources Policies that include safeguarding are as follows:

- All new staff must complete training on safeguarding within 3 days of employment commencing. This will be a specific training session between the DSO and new staff.
- Staff must complete any training as required by Game-On's Prevent Duty Policy
- Inductions include an introduction to the Safeguarding Policy and how to report any concerns.
- Staff must annually complete CPD around safeguarding, or when changes occur.
- Online sessions will include topics that will be covered and will include Safeguarding and Prevent. Opportunities to embed these topics into the lesson plans will be highlighted.

IT Monitoring

Any IT equipment provided to apprentices and staff will be subject to monitoring its use. Filters will be applied to restrict the access to any harmful context that includes being drawn into extremist behaviour, for more info see the extract of the IT Policy listed in this policy.

Any use deemed inappropriate will be reported to the DSO and appropriate action will be taken.

Delivery Staff and Non-SMT Staff

Workplace Reviews and Visits

Apprentice knowledge will be checked to make sure they understand issues related to safeguarding and Prevent Duty. This will be part of the formal progress review process. It will be ensured that any knowledge in understanding will ensure objectives are set to help rectify the issues via the use of both discussions and questioning about specific topics.

Game-On Coaching coaches will check in with the apprentice to see whether apprentices are getting the protected 'off the job' training time, breaks and appropriate support, this will come in the form of the delivery staff's workplace visits/reviews.

As part of the visit there will be a coaching session, in which the coach will provide the apprentice with clear expectations and giving sufficient notice of deadlines or work required can help them plan their work life balance.

Apprentice Support and Guidance

The Apprenticeship Handbook and materials provided on the induction will include information related to safeguarding. The apprentices will also receive advice and support through the DSO and any staff member at Game-On Coaching.

As a component of the welfare assistance, Game-On Coaching possesses various external charities and organisations that can refer apprentices and staff to for Information, Advice, and Guidance (IAG).

From services catering to mental health and wellbeing to aid for individuals with caregiving duties, apprentices can obtain support that is specifically tailored and suitable for their

individual situations. Game-On's extensive catalogue offers pertinent options for external assistance, providing direct pathways to a diverse range of care providers.

Training

If an apprentice misses a session, Training Officers will look to receive a response from the apprentice within 0-2 hours. If a response fails, the employer will then be contacted for an update/reason for their absence. Once again, should this fail, Training Officers will look to make contact with the apprentices next of kin. This inquiry makes sure the apprentice is safe and personal issues can be supported, should this be the case.

Training Officers will try to rearrange within the same calendar month and upload evidence from the employer or apprentice as to why the session had been non-attended.

If the Training Officers couldn't arrange within the calendar month they will prioritise the following month and try to arrange as early as possible. Repeated failure to attend booked sessions would result in Training Officers contacting the employer to discuss and see if they can support.

Training Officers will report to SMT any apprentices that are flagged at risk of non-compliance through weekly tracking, catch ups etc.

Training Officers will ensure that there is a paper trail of evidence to show cancelled sessions and any discussions/emails between apprentice and employer.

Game-On Coaching's LMS (BUD) will also contain a section on the homepage which has useful contacts on, safeguarding will be included on this.

Virtual backgrounds for the trainer will have contact details for the DSO.

Employers/Apprentice Line Manager

Game-On Coaching recognises that employers and line managers have a crucial role in helping safeguarding apprentices, Game-On Coaching will work with apprentice line managers and employers to ensure they adhere to the following:

- Familiarise themselves with relevant government legislation, surrounding safeguarding, such as Safeguarding Vulnerable Group Act 2006, this information will be supplied by Game-On Coaching.
- Take appropriate steps to understand what safeguarding means in practice at their organisation, in the context of the responsibilities they have for the staff they employ.
- Ensure that any staff working with apprentices in a position of trust is appropriate for the role and do not present any danger or threat.
- Ensure that any people working with young or vulnerable people have completed an appropriate check with the Disclosure and Barring service (DBS).

- Ensure staff at the apprentice's workplace are vigilant in checking the apprentice is safe at home.
- Having a good relationship between the apprentice and their line manager is vital. It encourages them to speak up when they are struggling either with their apprenticeship or in their personal lives.

Below are ways to maintain a strong working relationship.

- Creating an open and honest relationship – show apprentices where to access resources, message boards or who to contact if they want to talk, and their rights as an employee.
- Partner the apprentice with a work buddy, they can be an external person for support and guidance.
- Catch ups - they do not have to be about work nor in a formal setting. Listen to specific problems as everybody experiences different stresses.
- A healthy work environment - colleagues will need to understand the workload and the balance apprentices have with work and off-the-job training. This can cause a lot of stress and anxiety (see Health and Safety Policy for additional guidance) especially whilst they prepare for their end-point assessment.

There are more practical elements that can go a long way in providing assurance to the apprentice. For example: protecting OTJ training time, so the apprentice does not have to sacrifice it to pick up work activities. It is a requirement that the apprentice receives a minimum 20% off-the-job training.

Apprentices

Apprentices are expected to complete any Safeguarding training as set out by Game-On Coaching, this is to not only increase awareness to better protect themselves, but also to help safeguard others. Apprentices are also expected to be vigilant in looking out for safeguarding issues with their peers, and to report any concerns they have.

Apprentices Reporting a Safeguarding Concern

Game-On Coaching encourages apprentice's to be vigilant and have a proactive approach to the safety and welfare of themselves, their peers and others on site.

This Includes:

- Reporting any safeguarding concerns to a member of staff or directly to a DSO with whom they feel comfortable discussing these concerns.

- Abiding by the Game-On Coaching Apprentice Code of Conduct (see Appendix 5) which is designed to safeguard all those on Game-On Coaching sites or using Game-On Coaching facilities, including the IT network.
- Behaving in a way that does not compromise them or lead to allegations of a criminal or safeguarding nature.

Safeguarding Concerns that an apprentice may have regarding themself or another apprentice:

- Bullying
- Abuse – Domestic/Physical/Sexual/Psychological/Financial/Neglect
- Discrimination
- Radicalisation - Holding an extreme/radical view/ideology
- Sexual Harassment
- Sexting
- Homelessness

It is important for all apprentices to understand that they have the right to be protected and should speak up if they feel at risk while at work. No concern should be considered too trivial, and it is better to speak out than suffer in silence.

If an apprentice suspects a safeguarding issue, they should first report it to their Game-On Coaching trainer or senior manager. Alternatively, they can contact the Game-On Coaching Designated Safeguarding Officer.

Referral Process

Staff making referral concerns about an apprentice's behaviour but *with no disclosure* about any abuse.

The signs of abuse might not always be obvious, and an apprentice might not tell anyone what is happening to them. Staff should therefore question behaviour if something seems unusual and try to speak to the apprentice, alone, if appropriate, to ask how they are doing.

Indicators of Safeguarding Issues

- Absence - Missing work or not turning up for their training session or coaching session
- Changes in appearance
- Changes in behaviour and character - becoming quiet or loud, aggressive or withdrawn
- Changes in emotional health - crying, anxiety or low mood
- Excessive alcohol consumption
- Physical injuries - for example, cuts or bruises

- Talk of poor living conditions
- Self harm
- Use of drugs
- Withdrawing from certain activities - reluctance to go online, sudden changes in use of technology.

The nature and severity of concerns regarding an apprentice's wellbeing can vary, as well as the duration and how they were identified. If any staff members have concerns about an apprentice's welfare, they should seek assistance from the DSO, if they need to. The staff member or DSO will then identify which of the following the concern is:

- Urgent: contact at risk victim immediately, review information and escalate as required
- Important/ Medium: reach out to victim within two working days, discuss concerns and draw of plan of review
- Low: follow up questions with victim within two working days, continue to monitor the situation

In the event that an apprentice discloses incidents of *abuse or welfare issues* to a staff member, it is the staff member's responsibility to inform the apprentice that they are required to report this information to the Designated Safeguarding Officer (see guidance below). The DSO will gather as much information as possible regarding the situation and assess whether it constitutes a safeguarding issue or another type of concern.

If further investigation is deemed necessary, the DSO may organise a meeting with relevant parties, such as the apprentice, their parents and coaches.

Game-On Coaching recognises that safeguarding incidents are not over once the referral has been made, and that apprentices will need support during the process and after. During and after the process, the DSO will act as a point of contact for the apprentice, whether it is pastoral support, or arranging external support or guidance, the DSO will look to facilitate this.

The most important consideration is whether sharing information is likely to support the safeguarding and protection of an individual.

Necessary and proportionate

When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is a key element of the GDPR and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

Relevant

Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

Adequate

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

Accurate

Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

Timely

Information should be shared in a timely fashion to reduce the risk of missed opportunities to offer support and protection to a child. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore place a child or young person at increased risk of harm. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

Secure

Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.

Record

Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with Game-On Coaching procedures.

If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with Game-On Coaching's own Retention policy, the information should not be kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there should be a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

Game-On Coaching also recognises sharing is also essential for the identification of patterns of behaviour when a vulnerable individual is at risk of going missing or has gone missing, when multiple individuals appear associated to the same context or locations of risk, or in



relation to young adults in the secure estate where there may be multiple local authorities involved in an individual's care.

Disclosure

When a disclosure has been made to a member of staff, it is crucial they report this to the DSO immediately.

After any additional investigations have been conducted, a follow-up meeting will be held to determine the final outcome.

The Designated Safeguarding Officer (DSO) will document the matter, regardless of whether it is deemed a safeguarding issue or not. It is crucial for Game-On Coaching to maintain a clear and comprehensive summary of all disclosures made, the steps taken to address them, and any decisions made.

This information will be stored in a confidential safeguarding file that is separate from the individual apprenticeship or employee files. Referrals will be acknowledged in writing by young adult's social care and kept in the safeguarding file.

Records must be kept for 6 years following the last interaction with the service user. Note that in cases of genuine safeguarding issues, the DSO or their deputy is obligated to report them to the Independent Safeguarding Authority or Local Authority Designated Officer (LADO).

If a staff member has concerns about another staff member who may pose a threat to an apprentice, they should report it to the DSO or training management.

If there are concerns or allegations about a member of the training management, they should be reported to other members of the management team or DSO or to the designated officer(s) at the local authority.

If there are concerns or allegations about a DSO, they should be reported to other members of the management team or other DSOs or to the designated officer(s) at the local authority. (Source: Keeping Children Safe in Education, section 38 [2021]).

Game-On Coaching have a duty of care to their employees and ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

It is essential that any allegation is dealt with very quickly, in a fair and consistent way that provides effective protection for the child/young adult and at the same time supports the person who is the subject of the allegation. (Keeping Children Safe in Education, Section 208 [2021]) All options to avoid suspension should be considered.

Where it is clear that an investigation by the police or young adult's social care services is unnecessary, the designated officer(s) should discuss the next steps with the relevant agency. (Keeping Children Safe in Education [2021])

Further Policies to consider Education and Training (Welfare of Children) Act 2021 to impose duties on certain education and training providers in relation to safeguarding and promoting the welfare of children/vulnerable young adults.

Never coach or lead the apprentice in any way.

Any staff member dealing with a disclosure should adhere to the following:

- Express gratitude to the apprentice for their disclosure and acknowledge that they did the right thing by coming forward, in order to provide reassurance.
- Take factual notes of the apprentice's account using their own words, avoiding adding personal interpretation, but including details of their behaviour and appearance.
- Use questions to clarify your understanding, without probing or interrogating the apprentice, and avoid making them repeat themselves unnecessarily, even if you know them well.
- Be honest with the apprentice that you cannot keep their disclosure confidential and explain that you will need to inform authorised individuals.
- Stay calm and composed, recognising that this is a difficult situation for the apprentice.
- Create a safe and secure environment for the apprentice, assuring them that you take the matter seriously and minimising any further anxiety.
- Report the issue immediately to the Designated Safeguarding Officer.
- Include as many details as possible in your report, using Part 1 and 2 of the reporting form Appendix 2, including apparent physical signs of abuse or other circumstances that led to your suspicions. If the apprentice has disclosed, provide an accurate written account of the information shared with you.

A report template is attached at Appendix 2. However, staff must not delay reporting due to lack of time to complete the template. Immediate referrals can be made using the Designated Safeguarding Officer's email or contact number. If the DSO is unavailable, contact the office for a member of SMT.

The Designated Safeguarding Officer will let you know who will be dealing with the referral. Once you have reported the concern the responsibility for taking any further decisions or actions resides with the Designated Safeguarding Officer.

Only the Designated Safeguarding Officers or a Director can make a decision to refer a complaint or allegation to external agencies, including the Local Authority Designated Officer (LADO), Social Services, the Police, or other relevant agencies, having gathered and examined all relevant testimony and information.

How Information is Recorded

Once an apprentice referral is made, the Designated Safeguarding Officer will follow Game-On's procedures for handling Safeguarding referrals. This includes arrangements for confidential storing of records.

Information sharing decisions should be recorded, whether or not the decision is taken to share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with organisational procedures.

If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with Game-On Coaching's Retention Policy, the information should not be kept any longer than is necessary.

Confidentiality Statement

The safety and well-being of the child, vulnerable young adult, or young person is of utmost importance. As part of their daily responsibilities, staff may have access to confidential information regarding apprentices. Under certain circumstances, staff may be given highly sensitive or private information. However, staff must never use confidential or personal information about an apprentice or their family to benefit themselves or others. This information must never be used to intimidate, humiliate, or embarrass an apprentice.

Confidentiality and trust must be upheld to the fullest extent possible, but staff must prioritise the safety and well-being of the apprentice. The level of confidentiality will be determined by the need to safeguard the apprentice. When an apprentice discloses abuse or if abuse is suspected, the staff member must promptly relay the information to the Designated Safeguarding Officer. If a staff member is unsure whether to share information or maintain confidentiality, they should consult the Designated Safeguarding Officer.

Game-On Coaching adheres to the Data Protection Act 1998. However, the Act does not prohibit staff from sharing information when necessary to protect the apprentice's safety and well-being.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1062969/Information_sharing_advice_practitioners_safeguarding_services.pdf

Staff Code of Conduct

To ensure all staff, contractors and associates don't put themselves in a position where an allegation of abuse can be made, they must adhere to the following professional boundaries (but not limited to these):

- Avoid any inappropriate familiarity with apprentices
- Avoid any unnecessary physical contact with apprentices
- Always report potential concerns
- Avoiding any unaccompanied journeys with any apprentices
- Always report and act upon any allegations made by apprentices
- Do not engage with apprentices on social media
- Understand that it is a criminal offence to engage in sexual activity with anyone under the age of 18 (as they are deemed to be in a position of trust)
- Do not invite apprentices to visit at home or socialise with them

In certain cases in accordance with the law, Game-On Coaching have the right to report to the appropriate authorities any concerns raised.

IT Policy Extract

To ensure the safety of students online, Game-On Coaching will ensure reliable and efficient IT monitoring and filtering systems are established for all of the Game-On Coaching equipment that is used, such as laptops and Wifi. Full policy can be found on Game-On Coaching's website.

Game-On Coaching will stay updated on what websites which will be added to the blacklist filtering systems and firewalls. This will be through updates from local authorities/LADO, and also any websites/content that Game-On Coaching deems could be a safeguarding issue.

Game-On Coaching will look to restrict access to these websites, and have vigorous filters in place to stop alternative methods that can be used to bypass the filtering systems to access these sites.

The below is extracted from Game-On Coaching's IT Policy, any breaches will cause safeguarding issues:

- Unauthorised access may occur when someone uses another user's login credentials (username and password) or accesses a computer in an area where they are not authorised to be.
- Assisting or encouraging unauthorised access is prohibited.
- Sending abusive, harassing, offensive, or intimidating emails is not allowed.

- Making false and harmful statements about another person, such as by maligning, defaming, slandering, or libelling them, is not tolerated.
- Loading, viewing, storing, or distributing pornographic or otherwise offensive material is prohibited.
- Attempting to access, modify, damage, or destroy another authorised user's data is strictly prohibited.

It is strictly prohibited to use any IT equipment, such as computers, laptops, or mobile phones, to access, download, produce, or disseminate illegal content, including abusive images of children or young individuals, either among colleagues or children.

Annual Review of the Policy

The Game-On Coaching Board of Directors are responsible for implementing and monitoring the Safeguarding Policy. The number of safeguarding cases will be reviewed on a regular basis. Game On Coaching will liaise with any relevant governing bodies, employers and apprentices to ensure the Safeguarding Policy is robust and competent. The policy will be reviewed on an annual basis to ensure that all updates to legislation are reflected and best practice is adapted.

Game-On Coaching will adhere to the following process:

Review policies, and implement any changes in order to minimise the threat of new risks, or on the advice of Safeguarding Agencies. This will be on an annual basis at a minimum unless needed to change immediately.

Reports from monitoring and review activities regarding safeguarding will be reviewed by SMT and presented on a monthly basis. An annual report will also be compiled for stakeholders to see the impact of the policy.

This policy will be reviewed annually by SMT within four weeks of a review of any serious safeguarding incident which highlights any weaknesses in the policy.

This policy and the associated guidance and procedures document is to be made available to all staff and apprentices in various formats appropriate to Game-On Coaching audiences, e.g. in Apprentice Handbooks, on website etc.

Game-On Coaching will record all safeguarding incidents and store them securely, to restrict unauthorised access. On a monthly basis the DSO will look at the data collected to identify any themes or trends and look to improve the policy in order to mitigate the risks. (see below)

Possible Actions:

- Training could be required for all staff members in order to combat a new risk.
- Policies are updated/new policies created.

Senior Management Team Meetings

As part of all SMT meetings, EDI will always be a point on the agenda to discuss any concerns. Any immediate concerns will be dealt with initially without requiring an SMT meeting to take place.

Author	Ashleigh Gorton
Owner	Arron Cheshire
Last update	30/03/2023
Next Review	29/03/2024
Signatories	
Ashleigh Gorton	
Arron Cheshire	
Mitchell Goodall	

Safeguarding Contacts

Advice for Young People by Young People

www.coap.org.uk (coping with drug or alcohol or other difficult situations at home or with a parent)

Alternative to Samaritans (for Young People) Get Connected is a confidential 24 hour free telephone helpline that might be a suitable alternative to the Samaritans –
www.getconnected.org.uk or 0808 808 4994

Bullying (including Cyber) Workplace

http://www.supportline.org.uk/problems/bullying_at_work.php

Cyberbullying <http://www.nhs.uk/Livewell/Bullying/Pages/Cyberbullying.aspx> or
<http://www.saferinternet.org.uk/about/helpline>

Child Sex Exploitation:

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/childsexualexploitation/what-is-child-sexual-exploitation/> or <http://www.stopitnow.org.uk/> or 0808 1000 900

Domestic Violence For women: <http://www.nationaldomesticviolencehelpline.org.uk/> or 0808 2000 247

Domestic Violence For men: http://www.mensadvicepline.org.uk/mens_advice.php.html or 0808 801 0327

Drug or Alcohol Abuse Drugs - <http://www.talktofrank.com/> or call: 0300 123 6600 text: 82111

Alcohol -

<https://www.drinkaware.co.uk/understand-your-drinking/is-your-drinking-a-problem/alcohol-support-services> or call: 0300 123 1110

Both - <http://www.addaction.org.uk/>

Eating Disorders B-Eat - <https://www.b-eat.co.uk/support-services/helpline> or Adults 0345 634 1414 email help@beat.co.uk.

Under 25's 0345 634 7650 email fyp@b-eat.co.uk
<http://www.eatingdisorderssupport.co.uk/help/links-resources>

E-Safety - <http://www.saferinternet.org.uk/about/helpline> or 0844 381 4772

Extremism, Radicalisation and Terrorism

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevention-duty> or 020 7340 7264 email: counter.extremism@education.gsi.gov.uk

Faith Abuse <http://www.equalityadvisoryservice.com/app/home> or 0808 800 0082

FGM

<http://www.nhs.uk/NHSEngland/AboutNHSservices/sexual-healthservices/Pages/fgmresources.aspx> or 0800 028 3550

Forced Marriage Karma Nirvana Victim Support 0800 5999 247

<https://www.gov.uk/guidance/forcedmarriage> Forced Marriage Unit email fmu@fco.gov.uk or 020 7008 015; Outreach email fmuoutreach@fco.gov.uk ; Facebook: Forced Marriage page; Twitter: @FMUnit

Gangs and Youth Violence For concerned adults -

<http://www.nspcc.org.uk/preventing-abuse/keeping-childrensafe/stayingsafe-away-from-home/gangs-young-people/> or 0808 800 5000

For young people - <http://www.childline.org.uk/Pages/Home.aspx> or 0800 1111

Gender Based Violence Solace Advice Hub email advice@solacewomensaid.org.uk or 0808 802 5565 Women and Girls Network Advice Hub email advice@wgn.org.uk or 0808 801 0660

24 Hour Domestic Violence Helpline 0808 2000 247

Living with a Family Member's Addiction to Alcohol or Drugs

<http://www.nhs.uk/Livewell/drugs/Pages/caring-for-a-drug-user.aspx> or 0300 123 6600

<http://www.adfam.org.uk> Long Term Absence <http://fitforwork.org/employee/> or 0800 032 6235

Mental Health Problems

http://www.nhs.uk/conditions/stress-anxiety-depression/pages/mentalhealth_helplines.aspx

Self-Harm or Suicidal Thoughts Suicide

<http://www.nhs.uk/conditions/Suicide/Pages/Introduction.aspx> Self-Harm

<http://www.nhs.uk/conditions/Self-injury/Pages/Introduction.aspx> Sexting

<http://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/sexting/> or call: 0808 800 5000 (18 and over) 0800 1111 (under 18)

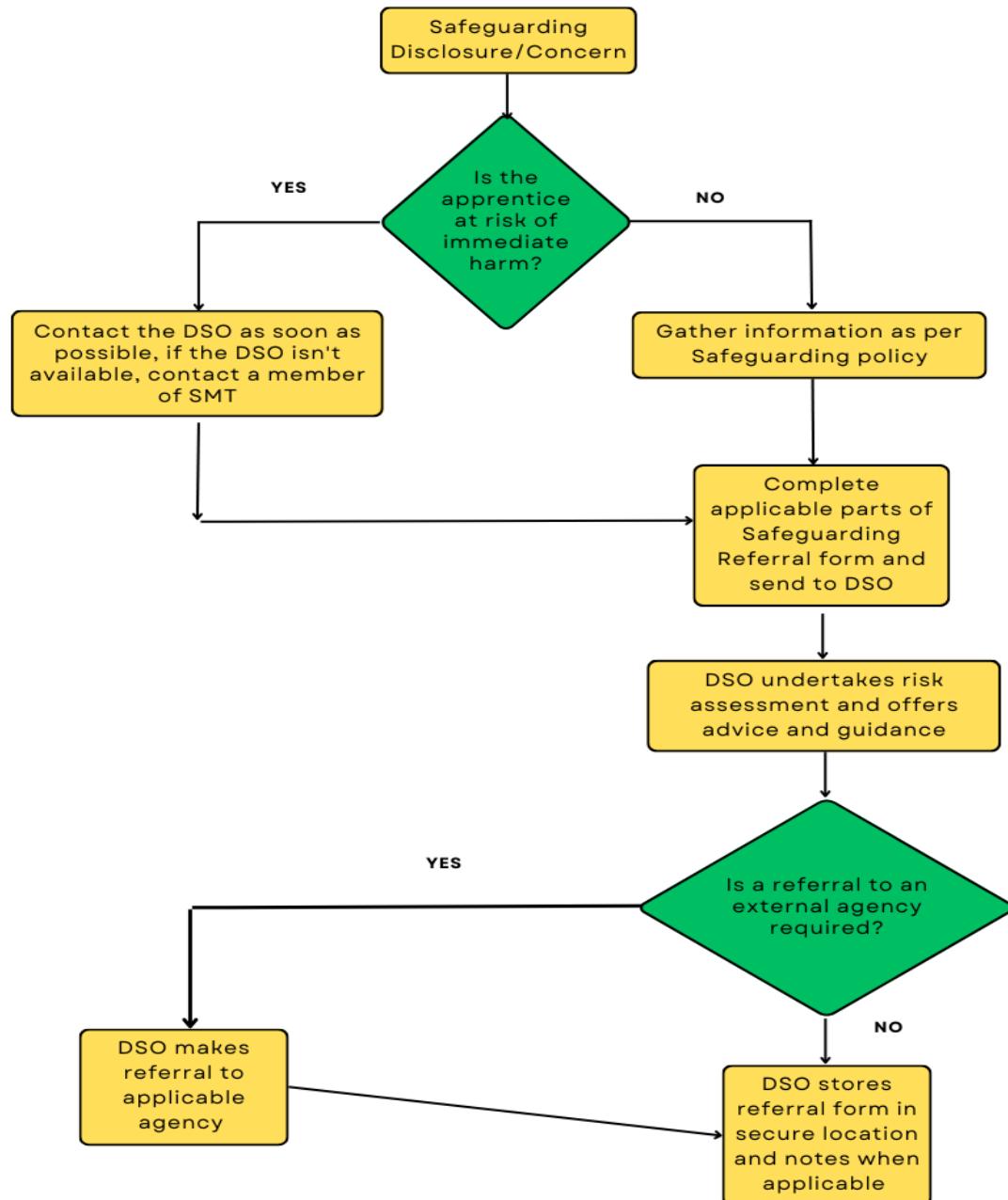
Teenage Pregnancy

<http://www.nhs.uk/conditions/pregnancy-and-baby/pages/teenagerpregnant.aspx> or 0300 123 2930

Trafficking, Exploitation and Modern Slavery

<http://www.salvationarmy.org.uk/human-trafficking> or 0300 303 8151

Safeguarding Referral Process Flowchart - Appendix 1



Safeguarding Disclosure Form - Appendix 2

To be completed in full by ALL relevant staff members, and sent to DSO.

Part 1 – Information

Staff Member Information			
Staff member raising concern:		Job role:	
Staff member contact number:		Staff member email:	
Apprentice Information			
Apprentice Name:		Apprentice ID:	
Apprentice contact number:		Gender:	
Apprentice DOB:		Age:	
Apprentice Postcode:			
Please tick one:			
<input type="checkbox"/> I am reporting my own concerns. <input type="checkbox"/> I am responding to concerns raised by someone else (record details below)			
Name of person raising concern if not staff member:		Contact number(s)	
Designated Safeguarding Officer (DSO):		Date disclosure reported to DSO	

Part 2 – Incident / Disclosure details

Details

Date of incident/ disclosure:		Time:	
Other persons present at time of incident/disclosure:	Y/N	Location of incident/disclosure:	
Reason for concern (please tick)			
Disclosure by apprentice <i>Concern or risk of harm</i>		Summary of disclosure: <i>Details of the incident or concerns (include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay)</i>	
Disclosure relates to apprentice or another apprentice			
Disclosure is current			
Disclosure is historic			
Type of Concern <i>Circle relevant concern(s)</i>	Mental / Physical / Emotional / Other		
Name of other persons present:		Contact number(s)	
Notes of any difference in recollection of incident/disclosure:			
Attitude to concern			
Apprentice attitude towards our concern:			

Attitude of parent/carer/other support networks as reported by apprentice:			
Apprentice informed of duty of care to report concern:	Y/N		
Any additional comments:			
Declaration			
Signature:		Date:	

Part 3 – DSO Decision and Action *(To be completed by Designated Safeguarding Officer)*

Designated Safeguarding Officer (DSO) name:		Date disclosure received:	
Action taken by DSO:			
Rationale for decision making / actions taken:			
Follow up action by DSO:			
Feedback given to person reporting the concerns:			

Has information been sought or shared with Social Worker or another external agency?	Y/N
Name of agency:	
Named person:	
Contact details:	
Time/date of contact:	
Summary of information / advice received:	

Decision <i>(complete for all safeguarding concerns)</i>		
Internal referral <i>(complete 4a)</i>	Y/N	

External referral (<i>complete 4b</i>)	Y/N	
No immediate referral (<i>complete 4c</i>)	Y/N	
Decision clearly communicated to apprentice	Y/N	
Declaration		
Signature:		Date:

Part 4 – Referral and Follow Up

Part 4a – Internal referral (<i>complete if applicable</i>)	
Referral to:	
Person making referral:	
Date referral made:	
Notes:	

Part 4b – External referral action plan (<i>complete if applicable</i>)	
Referral to:	
Person making referral:	
Date of referral	
Information to be shared with agency:	
Response requested from agency:	
Person responsible for following up:	
Follow up on (date):	

Part 4c – Support and follow up communication with client/External agencies
(complete for all safeguarding concerns)

Contact date & time	Support and or follow up communication	Date action to be delivered by

Whistleblowing Policy - Appendix 3

Introduction

This policy sets out the procedure for raising concerns and whistle-blowing for Game-On Coaching. Game-On Coaching recognises the importance of providing a safe and confidential environment for Game-On Coaching employees to raise concerns about wrongdoing or malpractice. This policy aims to ensure that all concerns are dealt with appropriately and that individuals who raise concerns are protected from victimisation or retaliation.

Scope

This policy applies to all employees, volunteers, and contractors of Game-On Coaching, including those who have left Game-On Coaching but have concerns about actions that occurred during their employment. It also applies to any individual or organisation that has a business relationship with Game-On Coaching.

Definition of Whistle-Blowing

Whistle-blowing is the act of disclosing information about suspected wrongdoing, malpractice, or dangers to the public or the environment, which is in the public interest. It can include reporting concerns about fraud, health and safety issues, harassment, discrimination, or any other illegal or unethical behaviour.

Principles

This policy is based on the principles set out in Sir Robert Francis' Freedom to Speak Up Review. These principles include:

- A culture of openness, honesty, and transparency
- Encouraging and facilitating the raising of concerns
- Effective leadership and governance
- A supportive and fair working environment
- Robust and effective procedures for handling concerns
- Continuous learning and improvement

Procedures

Employees who have concerns about any wrongdoing or malpractice should follow the following procedures:

Step 1: Speak to your line manager or supervisor

If an employee has concerns about any wrongdoing or malpractice, they should first speak to their line manager or supervisor. The line manager or supervisor should listen carefully to



the concerns and take appropriate action to address the issue. If the employee feels uncomfortable speaking to their line manager or supervisor, they should contact the Whistle-Blowing Officer.

Step 2: Contact the Whistle-Blowing Officer

If an employee is uncomfortable speaking to their line manager or supervisor or if they are not satisfied with the response they receive, they should contact the Whistle-Blowing Officer. The Whistle-Blowing Officer is responsible for receiving and investigating concerns raised under this policy. The Whistle-Blowing Officer can be contacted via email, phone, or in writing.

Step 3: Investigation and Follow-Up

The Whistle-Blowing Officer will investigate the concerns raised and provide feedback to the employee who raised the concerns. If the employee who raised the concerns is not satisfied with the response they receive, they can escalate their concerns to the next level of management or to an external authority.

Step 4: Confidentiality

Game-On Coaching will keep the identity of the employee who raised the concerns confidential, subject to any legal requirements or obligations to disclose. Game-On Coaching will take all necessary steps to protect the employee from any victimisation or retaliation.

Training

All employees will receive training on this policy and the procedures for raising concerns and whistle-blowing. The training will include information on the importance of speaking up, the benefits of a culture of openness and transparency, and the support available for employees who raise concerns.

Review

This policy will be reviewed annually to ensure it remains up to date and in line with best practice. Any amendments to the policy will be communicated to all employees.

Signed by:

[Name and Position of Senior Manager]

[Date]

Anti Bullying and Cyberbullying Policy - Appendix

4

Anti Bullying

For full information regarding the Anti Bullying Policy, please refer to the appendix in the EDI Policy. Please see below a version including key points

Purpose

Game-On Coaching is committed to providing a safe and inclusive learning environment for all apprentices. Game-On Coaching does not tolerate any form of bullying or cyberbullying in any of our training programs. This policy outlines Game-On Coaching's approach to preventing and responding to bullying and cyberbullying.

Definition of Bullying and Cyberbullying

Bullying is any intentional behaviour that causes harm, distress, or intimidation to an individual or group of individuals. It can be physical, verbal, or psychological in nature, and can occur in person or through technology. Cyberbullying is a form of bullying that takes place using digital devices or online platforms such as social media, email, and messaging apps.

Prevention and Education

Game-On Coaching will take a proactive approach to prevent bullying and cyberbullying by providing education and training to all apprentices, trainers, and staff. Game-On Coaching will incorporate this policy into the induction and training programs to ensure that all individuals (both staff and apprentices) understand what constitutes bullying and cyberbullying, the potential impacts of such behaviour, and their responsibilities in preventing it.

Apprentices are encouraged to use technology responsibly and to treat others online with kindness and respect.

If an apprentice witnesses someone being bullied online, they should not engage with the bully and instead report the incident to a member of Game-On Coaching's staff.

Apprentices should also be mindful of the information they share online and be cautious of giving out personal information to strangers.

Reporting and Investigation

Any apprentice who experiences or witnesses bullying or cyberbullying should report it to their trainer, the designated safeguarding officer, or the apprenticeship manager as soon as possible. All reports will be taken seriously and treated confidentially. We will investigate all reported incidents promptly and fairly, and take appropriate action to address the behaviour and support those affected.

Disciplinary Action

Bullying and cyberbullying are serious offences and may result in disciplinary action, up to and including termination of the apprenticeship. Depending on the severity and frequency of the behaviour, Game-On Coaching may take any of the following actions:

- Inform the apprentice's employer and/or parents/guardians of the behaviour
- Provide support and counselling to the victim
- Provide counselling and support to the perpetrator
- Issue a formal warning to the perpetrator

Conclusion

Game-On Coaching is committed to providing a safe and inclusive learning environment for all apprentices. This policy sets out Game-On Coaching's approach to preventing and responding to bullying and cyberbullying. Game-On Coaching will review this policy regularly to ensure that it remains effective and up to date.

Apprentice Code of Conduct - Appendix 5

1. Attendance and Punctuality: Apprentices are expected to attend all training and coaching sessions, and other activities as scheduled. Apprentices are expected to arrive on time and to notify their coach in advance of any absence or lateness.
2. Professionalism: Apprentices are expected to conduct themselves in a professional manner at all times, including using appropriate language and dress. Harassment, discrimination, or any form of unprofessional behaviour will not be tolerated.
3. Respect: Apprentices are expected to respect the rights and opinions of others, including their fellow apprentices, coaches, and staff. Disruptive or disrespectful behaviour will not be tolerated.
4. Learning Environment: Apprentices are expected to contribute to a positive learning environment by participating in discussions, asking questions, and sharing their knowledge and experiences with others. Apprentices are also expected to keep the training area clean and organised.
5. Safety: Apprentices are expected to follow all safety procedures and guidelines as instructed by their instructors. This includes the use of personal protective equipment, such as safety glasses, gloves, and hearing protection.
6. Academic Honesty: Apprentices are expected to be honest in their academic work and to not engage in any form of cheating or plagiarism. Any form of academic dishonesty will result in disciplinary action.
7. Confidentiality: Apprentices are expected to maintain the confidentiality of any sensitive or confidential information they may come across during their apprenticeship training. This includes protecting the privacy of other apprentices, trainers, and staff.
8. Compliance: Apprentices are expected to comply with all relevant laws, regulations, and policies, including those related to health and safety, equal opportunity, and data protection. Apprentices are also expected to sign any apprenticeship documents such as reviews when needed.
9. Professional Development: Apprentices are expected to take an active role in their professional development by seeking out additional learning opportunities and engaging in self-reflection and evaluation of their progress. These opportunities will be supplied by Game-On Coaching, in the form of having membership to industry bodies.
10. Feedback: Apprentices are expected to provide constructive feedback to their trainers and the training provider to improve the quality of the apprenticeship training



program. Game-On Coaching appreciates all feedback and wants to ensure apprentices have the best experience possible.