

SAMA Organisation – Safeguarding Policy for Affiliated Members

C.1 Policy Purpose

SAMA Organisation is committed to ensuring that all children and vulnerable young adults in the care of our affiliated members are protected from harm, maltreatment, and exploitation. This Safeguarding Policy provides guidance and mandatory direction to all affiliated members to maintain the highest standards of safeguarding practice across all operational sites.

C.2 Legal Framework & Compliance

This policy is informed by:

- *The Children Act 1989 and 2004*
- *The Education Act 2002 (Section 175)*
- *Working Together to Safeguard Children (2018)*
- *Keeping Children Safe in Education (2024)*
- *SEND Code of Practice (2015)*

Affiliated Members must ensure compliance with all relevant national legislation, guidance, and best practice regarding the safeguarding of children and young people under the age of 18.

C.3 Scope

This policy applies to all affiliated members, their instructors / staff, and anyone working on behalf of or representing SAMA Organisation. It must be clearly communicated and understood at all levels of the organisation.

C.4 Aims of the Policy

SAMA Organisation requires its affiliated members to:

- C4.1 Provide a **safe and secure environment** in which all children and vulnerable young adults can thrive.
- C4.2 **Prevent harm** to children and vulnerable young people by identifying and responding to risks early.
- C4.3 Ensure the **physical and mental health** and development of children is supported and not impaired.
- C4.4 Ensure children and vulnerable young adults are raised in **safe and effective care** environments.
- C4.5 Take proactive action to **enable the best outcomes** for every child and young person.
- C4.6 Provide appropriate measures for those with **special educational needs or disabilities (SEND)**.

C.5 Roles & Responsibilities

C5.1 Affiliated Partner Leadership

Our affiliated members leadership is responsible for embedding safeguarding into all aspects of operations, ensuring all staff are trained, and that a Designated Safeguarding

Lead (DSL) is appointed at each location, a full roles and responsibilities is at [Appendix 1](#) to this Annex.

C5.2 Designated Safeguarding Lead (DSL)

Each affiliated members site must nominate a trained DSL, responsible for:

- Leading safeguarding practices
- Responding to concerns and incidents
- Liaising with statutory agencies and SAMA Organisation central safeguarding advisors
- Keeping accurate and secure records
- For a comprehensive Roles and Responsibilities of the DSL, see [Appendix 1](#) to this Annex.

C5.3 Deputy DSL

A deputy DSL must be nominated to act in the absence of the primary DSL with equivalent responsibilities (only if required based on 100+ students).

C5.4 All affiliated members Staff and Volunteers

Everyone must:

- Be alert to signs of abuse, neglect, and exploitation
- Know how to report concerns (internally and externally)
- Undertake regular safeguarding training
- Always act in the best interests of the child

C.6 Safe Recruitment Practices

All affiliated members must ensure safe recruitment practices in accordance with the SAMA People Policy. ([See Annex B](#)), this includes:

- Enhanced DBS checks
- Reference checks
- Child protection interviews
- Ongoing supervision and training

C.7 Self-Protection & Conduct Expectations

Affiliated members staff must protect themselves from misunderstandings or allegations by:

- Avoiding being alone with a child whenever possible
- Not engaging in physical contact, play-fighting, or allowing inappropriate behaviour
- Not sharing personal contact information or social media connections with children
- Ensuring images of children are only taken with parental consent and handled securely

C.8 Mandatory Policy Familiarisation

Affiliated members staff must be familiar with and adhere to the following core policies:

- Safeguarding and Child Protection

- Code of Conduct
- Whistleblowing
- Anti-Bullying
- Female Genital Mutilation (FGM)
- Prevent (Radicalisation)
- SEND Support Policy

C.9 Training & Induction

All affiliated members must ensure staff complete safeguarding induction training upon appointment and refresher training annually, including updates on changes to relevant legislation or SAMA policy. This data must be shared with SAMA Organisation in order to maintain a current record of competence.

C.9.1 Our Affiliated Members. Our affiliated members are expected to maintain currency and competence by delivering regular updates on changes to legislation or policy.

C.9.2 Our Affiliated Members Staff. Instructors / Staff must acknowledge receipt and reading of updated guidance.

C.9.3 Specialist Training. DSLs and Deputies must complete:

- Formal safeguarding training (minimum biennially)
- Annual knowledge refreshers (self-directed or facilitated)
- Specialist modules including online safety and radicalisation awareness

C.9.4 Training Records

A record of all safeguarding training must be maintained and reviewed by affiliated members management and shared with SAMA Organisation upon request.

C.10 Underpinning Principles & Values

C.10.1 Child-Centred Approach

- The welfare of the child or young person is paramount. All actions and decisions must reflect this priority, a child's welfare is paramount.
- Every child is unique and must be respected.
- Partnership with families should be pursued when safe and appropriate.
- Children have a right to be heard.
- Information should be shared only when necessary for protection.
- All communication must be clear and accessible.
- Early support is key to safeguarding success.
- Every child, regardless of background, ability, culture, or circumstance, has the right to protection. Safeguarding must reflect an inclusive approach that acknowledges diversity.

C.10.2 Confidentiality and Information Sharing

Information should only be shared on a need-to-know basis and in accordance with GDPR, except when necessary to protect a child or young person from harm.

C.10.3 Partnership with Parents/Carers

Where appropriate, parents/carers will be engaged in safeguarding processes, informed about concerns, and supported to contribute to the child's welfare.

C.10.4 Listening to Children and Young People

Children should be empowered to speak up and feel safe doing so. Their views should be sought, listened to, and taken seriously.

C.10.5 Transparency and Accountability

Affiliated members operations must operate openly and be accountable for safeguarding practices, including maintaining documentation of all safeguarding activity.

C.10.6 Commitment to Safety

All children and young people must be protected from harm while under SAMA affiliated members care.

C.11 Recognising an Issue

All SAMA Organisation affiliated members employees will have received training in respect of the company specific Safeguarding & Welfare policy and recognise the signs and symptoms associated with children encountering both physical and mental issues, and the procedure to follow in order to engage early intervention.

C.11.1 Child abuse and Neglect.

Child abuse is any form of physical, emotional or sexual mistreatment, or lack of care that leads to injury or harm. An individual may abuse or neglect a child directly, or by failing to protect them from harm. Some forms of child abuse and neglect are listed below:

- Emotional abuse is the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve making the child feel that they are worthless, unloved, or inadequate. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.
- Physical abuse can involve hitting, shaking, throwing, poisoning, burning, suffocating or otherwise causing physical harm to a child. Physical harm may be also caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to a child.
- Sexual abuse involves forcing or enticing a child to take part in sexual activities, whether or not the child is aware of what is happening. This can involve physical contact, or non-contact activities such as showing children sexual activities or encouraging them to behave in sexually inappropriate ways.
- Neglect is the persistent failure to meet a child's basic physical and emotional needs. It can involve a failure to provide adequate food, clothing and shelter, to protect a child from physical and emotional harm, to ensure adequate supervision or to allow access to medical treatment.
- Indicators that suggest neglect or abuse outside of the SAMA Organisation setting, eg in the child's home, or that a girl may have been subjected to (or is at risk of) female genital mutilation, or that the child may have witnessed domestic abuse.
- Inappropriate behaviour displayed by a member of staff, or any other person. For example, inappropriate sexual comments, excessive one-to-one attention beyond the requirements of their role, or inappropriate sharing of images.

C.11.2 Child on Child Abuse (Bullying).

Children are vulnerable to abuse by other children. Child-on-Child abuse is taken seriously by SAMA Organisation and our affiliated members and employees and will be subject to the same child protection procedures as other forms of abuse. All employees are aware of the potential uses of information technology for bullying and abusive behaviour between young people and will not dismiss abusive behaviour as normal between young people. The presence of one or more of the following in relationships between children should always trigger concern about the possibility of child on child abuse:

- Sexual activity (of primary school-aged children) of any kind, including sexting.
 - One of the children is significantly more dominant than the other (eg much older).
 - One of the children is significantly more vulnerable than the other (eg in terms of disability, confidence, physical strength).
 - There has been some use of threats, bribes or coercion to ensure compliance or secrecy.
 - If peer-on-peer abuse is suspected or disclosed SAMA and our affiliated members will follow the same procedures as set out above for responding to child abuse.

C.12 Recognising a Safeguarding Concern

All affiliated members and their staff should be trained to identify and respond to safeguarding issues. The following outlines the types of abuse and indicators to watch for:

C.12.1 Types of Abuse

- **Emotional Abuse:** Verbal attacks, shaming, persistent criticism, or isolation leading to emotional harm.
- **Physical Abuse:** Any physical harm, including hitting, shaking, or poisoning.
- **Sexual Abuse:** Involving a child in sexual activities, including grooming or exposing them to inappropriate content.
- **Neglect:** Failure to provide for a child's basic physical or emotional needs, such as food, supervision, medical care, or affection.

C.12.2 Common Signs of Abuse or Neglect

- Sudden changes in behaviour or mood
- Deterioration in appearance or general well-being
- Unexplained bruises, injuries, or marks
- Concerning comments made by the child
- Reports or signs of domestic abuse or Female Genital Mutilation (FGM)
- Inappropriate adult behaviour towards children (e.g. excessive one-on-one attention, inappropriate comments)

C.12.3 Peer-on-Peer Abuse. Children may abuse other children. This includes:

- Bullying, including cyberbullying
- Sexual behaviour between children (especially where there is an imbalance of power)

- Threats, coercion, or exploitation between peers

Any suspicion of peer-on-peer abuse must be treated as a serious safeguarding concern and reported immediately.

C.13 **Prevent and FGM Awareness**

- **FGM** is a form of child abuse and must be reported immediately if suspected or disclosed.
- All affiliated members are expected to understand their **Prevent Duty** obligations—this includes reporting concerns that a child may be vulnerable to radicalisation or extremism.

C.14 **Responding to Concerns or Disclosures**

If a child shares something that causes concern:

C.14.1 **Listen carefully**—do not interrupt or press for details.

C.14.2 **Avoid judgment**—use open questions such as "Tell me what happened" (**TED** approach: **Tell, Explain, Describe**).

C.14.3 **Reassure**—let the child know they've done the right thing by speaking up.

C.14.4 **Do not promise confidentiality**—explain that you may need to share information for their safety.

C.14.5 **Report Immediately**—record details using the Initial Concern Form and contact the Safeguarding Lead.

C.15 **Procedures for Concerns**

Any safeguarding concern must be taken seriously and handled in line with local child protection procedures.

C.16 **Core Safeguarding Duties**

- Everyone shares responsibility for safeguarding.
- Every child should feel safe and protected.
- Concerns should be responded to appropriately and promptly.
- Risk of radicalisation must be assessed and addressed.
- Special care is required for children with SEND or medical conditions.
- A culture of listening to children must be maintained.
- Behaviour must be managed to ensure a safe and respectful environment.

C.17 **Online Safety**

Affiliated members must have clear online safety guidelines in place, even if device use is limited during activities.

C.17.1 **Online Risks**

Online safety risks fall into three categories:

- **Content** – Exposure to harmful or inappropriate material
- **Contact** – Harmful interactions with others online
- **Conduct** – Children's own behaviour leading to risk

C.17.2 **Response to Incidents**

All breaches or incidents involving online safety must be:

- Reported immediately
- Logged and reviewed
- Managed in line with safeguarding procedures

C.18 Whistleblowing and Reporting

Affiliated members must support a culture where concerns are reported without fear:

- Unacceptable behaviour by any instructor / staff, adult or student must be reported
- Whistleblowers are protected and supported by SAMA Organisation and our affiliated members clubs.
- Use internal confidential reporting channels as needed

C.19 Referral and Escalation

If abuse or serious neglect is suspected:

- Raise an initial Concern Form, capturing the detail pertaining to the concern, a template is at [Appendix 2](#) of this Annex.
- Immediately notify your Designated Safeguarding Lead within the affiliated members club, the DSL will then escalate to the SAMA Organisation DSL / Child Protection Officer
- If the concern is urgent or a child is in immediate danger, contact your **local children's social care service or police**
- A SAMA Organisation Reporting a Concern Flowchart is at [Appendix 3](#) to this Annex.

C.20 Confidentiality & Information Sharing

C.20.1 SAMA Organisation emphasises the critical importance of confidentiality in all matters related to safeguarding and child protection. While children should feel that they can speak in confidence, absolute confidentiality cannot be promised. A recommended way to explain this to a child is:

“I will keep our conversation confidential and agree with you what information I can share, unless you tell me something that will affect your personal safety or that is illegal. I will tell you if I need to pass information on and who I will tell.”

C.20.2 Effective safeguarding relies on the exchange of relevant information between professionals. This must always be handled in accordance with relevant laws. Information should only be shared when necessary and done so respectfully and lawfully.

C.20.3 In general, personal information should not be disclosed to third parties (including other agencies) without the informed consent of the individual concerned. However, the welfare of the child takes precedence. Disclosure may proceed without consent if:

- It is necessary to protect the child or others from harm
- It is required to prevent or detect a serious crime
- It is justified in the public interest

C.20.4 SAMA Organisation follows current government guidance on information sharing where safeguarding concerns are present.

C.20.5 Under Section 47 of the Children Act 1989, statutory agencies are legally required to cooperate in child protection investigations. SAMA Organisation will share any information relevant to such investigations if requested by the Police or Children's Social Care.

C.20.6 Legal advice should be sought when there is uncertainty about information sharing. This ensures that all actions are legally justified and prioritise the child's safety.

D.20.7 SAMA Organisation works collaboratively with affiliated members, organisations, and authorities to share safeguarding information effectively.

C.21 Policy Implementation

Affiliated members are responsible for embedding this policy within daily operations, staff handbooks, and induction procedures.

C.22 Monitoring and Review

SAMA Organisation will conduct periodic audits of safeguarding practices at affiliated members sites to ensure compliance and effectiveness. This policy will be reviewed annually or in response to major changes in legislation or safeguarding incidents.

Appendix 1 – Annex C DSL Roles & Responsibilities

1.C.1 Designated Safeguarding Lead (DSL)

1.C.1.1 SAMA Organisation will maintain a trained and competent nominated a DSL who is responsible for matters relating to child protection and welfare for the business in compliance with current legislative direction). This role is to be replicated by all affiliated members; they must be trained and competent inline with this policy.

1.C.1.2 The DSL should be a senior member of staff within the business and take lead responsibility for safeguarding and child protection (including online safety). They should be appropriately trained (DSL Qual) and available to provide advice and support to all SAMA Organisation / partnered staff on child welfare and child protection matters,

1.C.1.3 The DSL has the freedom to act in all matters of child welfare and protection within the SAMA Organisation in conjunction with our affiliated member, underpinned by necessary levels of authority.

1.C.1.4 The DSL is responsible for the Safeguarding, Child Protection and Welfare policies for the SAMA Organisation and can provide guidance and direction for our partnered organisations. This responsibility includes the continual review of the policy to ensure that it remains compliant with all legislative amendments and revisions.

1.C.2 Duties / Role

The DSL and DDSL (if appropriate) will:

1.C.2.1 Manage referrals:

- Refer cases of suspected abuse to the local authority (Kent & Sussex) children's social care as required.
- Support staff who make referrals to local authority children's social care.
- Refer cases to the Channel panel through the universal referral form where there is a radicalisation concern as required.
- Support staff who make referrals to the Channel panel.
- Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required.
 - Refer cases where a crime may have been committed to the Police as required (the guidance NPCC- When to call the police should help DSLs understand when they should consider calling the police and what to expect when they do).
- If after a referral the child's situation does not appear to be improving the DSL (or the person that made the referral) should press for reconsideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.
- Report cases of prejudice, hate based incidents or hate crimes to the Local Authority through the online reporting system. Hate crimes should also be reported to the police.
- Access a range of advice to help them identify children in need of additional mental health support.

1.C.2.2 Work with others:

- Act as a point of contact for all contact with outside agencies.
- Liaise with the DSL of partnered organisations if a letter of sharing is in place. (iv) For Looked-After children have available the details of the child's social.
- Liaise with staff on matters of safety and safeguarding (including online and digital safety,) and when deciding whether to make a referral by liaising with relevant agencies; and
- Act as a source of support, advice and expertise for staff
- Act as the POC for all safeguarding cases in coordination with the LADO

1.C.2.3 Undertake training:

- Undergo training to provide them with the knowledge and skills required to carry out the role. This training should provide them with a good understanding of their own role and the process, procedures and responsibilities of other agencies, particularly children's social care and should be updated at least every two years.
- Undertake Prevent awareness training and Action Counters Terrorism(ACT) Training.
 - Refresh their knowledge and skills (this might be via e-bulletins, meeting other DSLs, or simply taking time to read and digest safeguarding developments and news such as those provided by the NYSCP (<https://www.safeguardingchildren.co.uk/professionals/nyscp-ebulletin/>) and NSPCC)
- At regular intervals, as required, but at least annually, to allow them to understand and keep up with any developments relevant to their role so they.
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as early help assessments.
- Have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required.
- Ensure each member of staff has access to and understands the SAMA child protection policy and procedures, with an understanding of our affiliated members clubs procedures.
- Remain alert to the specific needs of children in need, those with special educational needs and young carers.
- Understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).
- Keep detailed, accurate, secure written records of concerns and referrals.
- Understand and support SAMA and partnered staff in regards to the requirements of the Prevent duty, including online safety and are able to provide advice and support to staff on protecting children from the risk of radicalisation. Encourage a culture of listening to children and taking account of their wishes and feelings.
- Recognise the additional risks that children with SEN and disabilities (SEND) face online, for example from online bullying, grooming and radicalisation and be confident and have the capacity to support SEND children to stay safe online.

1.C.2.4 Raise awareness

- Ensure SAMA Organisation safeguarding and child protection policies are known, understood and used appropriately by all including our affiliated members.
- Ensure the SAMA Organisation child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly.
- Ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of SAMA Organisation play in this.
- Link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues.

1.C.2.5 Manage child protection Records and Casefiles.

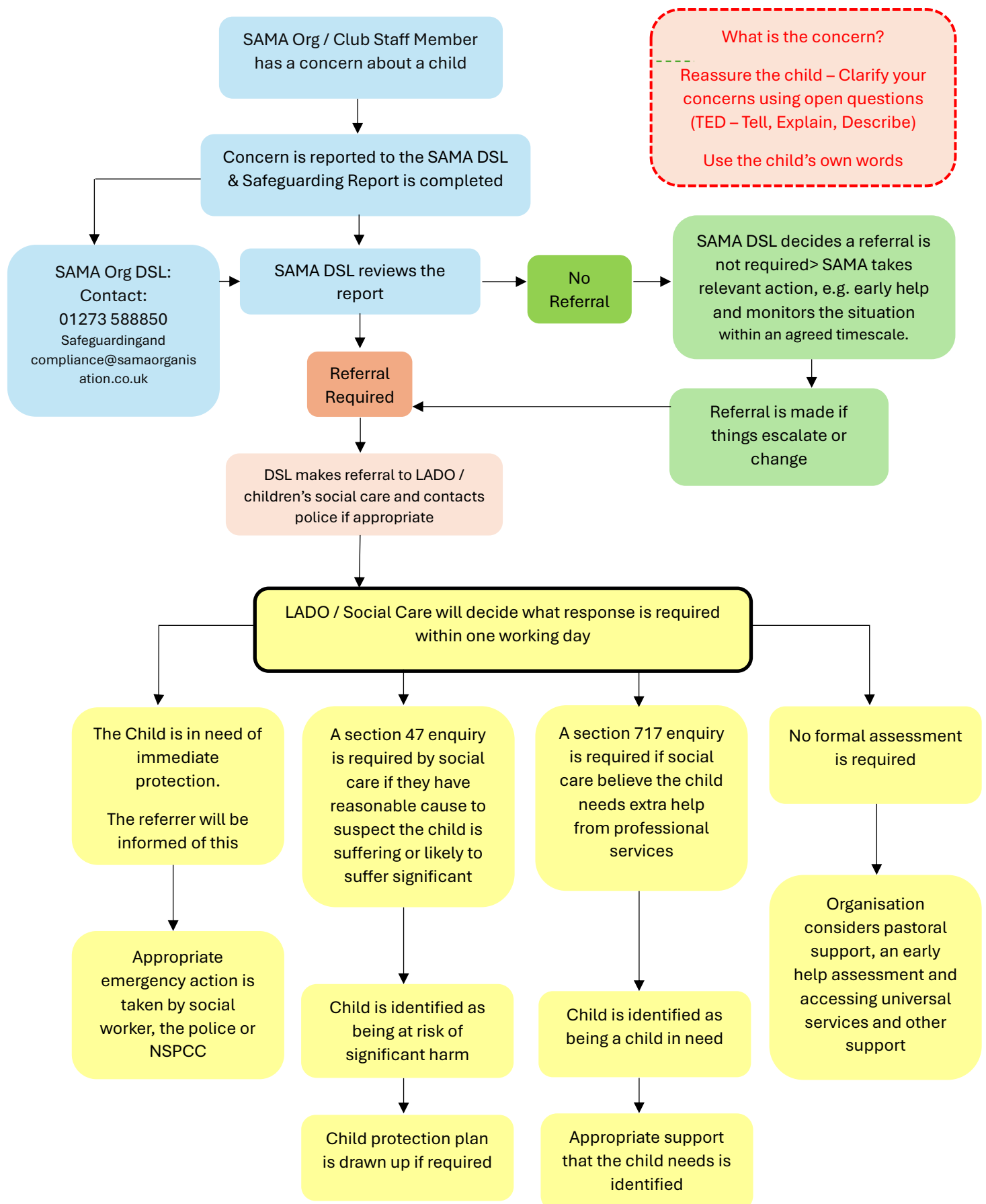
- Ensure the security and integrity of all records pertaining to safeguarding and child related issues in coordination with the Regional Safeguarding hubs direction.
- Ensure that CP records are retained for an appropriate length of time in consultation with the regional safeguarding hub.

1.C.2.6 Availability

- On request by LADO.
- During periods of absence the DDSL is to substitute for roles and responsibilities as listed.

Appendix 2 – Annex C Raising a Concern Flowchart

Flowchart of the Procedures for Responding to Safeguarding Concerns



Appendix 3 – Safeguarding Report Form

PROTECTED DOCUMENT – CONFIDENTIAL WHEN COMPLETED

Safeguarding Incident Report Form

(Confidential – To be completed immediately upon concern)

SECTION 1 – CHILD DETAILS

Full Name of Child:

Date of Birth:

Home Address:

Primary Carer / Guardian (Name & Relationship):

SECTION 2 – REPORTING PERSON DETAILS

Name:

Role / Position:

Contact Number:

Email Address:

SECTION 3 – INCIDENT / DISCLOSURE DETAILS

Date of Incident / Disclosure:

Time:

Location of Incident / Disclosure:

How Was the Concern Identified?

- ☐ Child disclosure
- ☐ Observed signs
- ☐ Third-party report
- ☐ Other:

Type of Safeguarding Concern:

- ☐ Physical Abuse
- ☐ Emotional Abuse
- ☐ Sexual Abuse
- ☐ Neglect
- ☐ Other:

Were There Any Witnesses?

- ☐ Yes
- ☐ No

If Yes, Provide Names and Roles:

SECTION 4 – INCIDENT DESCRIPTION

Provide a factual account of what occurred or was disclosed. Use the exact words of the child where possible. Do not interpret or paraphrase. Include:

- What was said or seen
- How and when it was disclosed
- Context and setting
- Actions taken immediately following the concern

Date Completed:

Signature of Reporting Person:

CONFIDENTIALITY STATEMENT

This form is confidential. It must be submitted directly to the Designated Safeguarding Lead (DSL). All handling and storage must comply with SAMA Organisation's Data Protection and Safeguarding Policies. No copies should be made or shared without express permission from the DSL.