



NAYC/ACUK SAFEGUARDING POLICY

Calendar Year	Designated Senior Lead Person	Designated Safeguarding Children's Officers
2014	Garryl Willis	Phil Houston, Graham Hughes, Karen Anderson
2015	Shaheen Sheikh	Phil Houston, Graham Hughes, Karen Anderson
2016	Shaheen Sheikh	Richard Buckingham, Graham Hughes, Karen Anderson
2017	Shaheen Sheikh	Richard Buckingham, Graham Hughes/Garryl Willis, Karen Anderson
2018	Shaheen Kamran	Richard Buckingham, Karen Anderson, Andrew Damant
2019	Richard Buckingham	Karen Anderson, Andrew Damant
2021	Karen Anderson	Andrew Damant, Joshua Thompson, Ben Whittaker, Jasmin Holman, Iain Anderson
2022	Karen Anderson	Andrew Damant, Joshua Thompson, Ben Whittaker, Jasmin Holman, Iain Anderson
2023	Karen Anderson	Andrew Damant, Joshua Thompson, Iain Anderson; Emily Allison, Ian Andrews, Adam Eakins (Trustee)
2024	Karen Anderson	Andrew Damant, Joshua Thompson, Iain Anderson; Emily Allison, Ian Andrews, Adam Eakins (Trustee)
2025	Karen Anderson	Andrew Damant, Joshua Thompson, Rebecca Whiting, Emily Allison, Ian Andrews, Morcea Walker (Trustee)
2026	Karen Anderson	Andrew Damant, Joshua Thompson, Rebecca Whiting, Emily Allison, Ian Andrews, Morcea Walker (Trustee)

Policy Review Dates

Review Date	Changes Made (Yes/No)	By Whom	Date Shared with Staff
July 2014	No	GW/PH/GH/KA	31/7/14
October 2015	Yes	GH/KA/SS	27/10/15
October 2016	Yes	GH/KA/SS	October 2016
January 2017	Yes	GH/KA/SS/RB	January 2017
December 2018	Yes	SK/RB/KA/AD	January 2019
March 2021	Yes	KA/AD/Thirtyone: Eight	March 2021
December 22	Yes	KA/ThirtyOne:Eight	March 2023, July 2023
April 2024	Yes	KA/Thirtyone:eight	April 2024
March 2025	Yes	KA/Thirtyone Eight reviewed and advised	March 2025
April 2026	Yes	KA/ThirtyOne:Eight Reviewed/advised	April 2026



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Introduction

NAYC / ACUK strives to enable every young person it works with to reach their full potential. This is achieved on a local level through supporting a network of affiliated youth groups and projects. Key to our approach is the use of residential experience, through our purpose-built centres and facilities we provide these opportunities to young people on a national level.

As a charitable organisation working with young people, the safety and well-being of children is of the utmost importance to us. Although our primary work is with young people, our responsibility to protect at-risk adults may also apply to our workforce and to adults we encounter indirectly through our work with young people.

'Voluntary, charity, social enterprise (VCSE) and private sector organisations and agencies play an important role in safeguarding children through the services they deliver.

Like other organisations and agencies who work with children, they should have appropriate arrangements in place to safeguard and protect children from harm. Sports clubs and organisations, including voluntary and private sector providers that deliver a wide range of sporting activities to children, should have arrangements to safeguard children and should collaborate to work effectively with the safeguarding partners.

Staff need to be aware of their responsibilities for safeguarding and promoting the welfare of children, how they should respond to child protection concerns and how to make a referral to the local authority children's social care or the police if necessary.'

(Working Together to Safeguard Children and Young People, 2023)

Organisation's Commitment

1. N.A.Y.C/Action Centres UK believes that it is always unacceptable for a child or young person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and young people, by a commitment to practice which protects them. Implementing the requirements of all relevant legislation including, but not limited to, Working Together to Safeguard Children 2023, the Disability Discrimination Acts 1995 and 2005, Equality Act 2010 and referring concerns about adults with care and support needs to the local authority under the Care Act 2014

We recognise that:

- The welfare of the child/young person is paramount.
- All children regardless of age, disability, gender, racial heritage, religious belief, sexual orientation, or identity have the right to equal protection from all types of harm or abuse.
- Working in partnership with children, young people, their parents, carers and



other agencies is essential in promoting young people's welfare.

- Adults at risk of harm have the right to protection from abuse.
- Safeguarding is everyone's responsibility.

The purpose of the policy:

- To provide protection for children and young people
- To act on concerns involving adults at risk of harm
- N.A.Y.C/Action Centres UK's services, including the children of adult members and users.
- To provide staff with guidance on procedures they should adopt if they suspect a child or young person may be experiencing, or be at risk of, harm.

This policy applies to all staff and Trainees, including senior managers and the Board of Trustees, or anyone working on behalf of N.A.Y.C/Action Centres UK.

Essential Contacts

Designated Safeguarding Leads: (DSL)

Karen Anderson - NAYC & ACUK 07432 615709

Andy Damant – NAYC & ACUK 01283 795000

Emily Allison – NAYC & ACUK 01604 494100

Rebecca Whiting – NAYC & ACUK 01604 499699

Ian Andrews – NAYC & ACUK 01604 493111

Josh Thompson – NAYC & ACUK 01299 271217

External agencies

Thirtyone:eight : 0303 003 1111 (9am to 5pm) – Advise for NAYC/ACUK Ltd in an emergency call 999.

NSPCC: 0808 800 5000

Northampton Children's Services: 0300 126 1000

Northampton Social Care **0300 126 3000 (North)**

Northampton Social Care **0300 126 7000 (West)**

(For Other centres look up Children's Services and Social Care)

For non-Northampton based, the following link will help locate the relevant children services: <https://www.gov.uk/report-child-abuse-to-local-council>

Police: 101 (non-emergency) 999 (emergency)



Section 1

Prevention

Understanding abuse and the need for protection

As in the Children Acts 1989 and 2004, a child is anyone who has not yet reached his/her 18th birthday. Those that are 18 and over are recognised as adults.

Defining child abuse or abuse against an adult is a difficult and complex issue. A person may abuse or neglect by inflicting harm or failing to prevent harm. Children and adults in need of protection may be abused within a family, an institution, or a community setting. Very often the abuser is known or in a trusted relationship with the child or adult.

Harm means ill-treatment or impairment of health or development¹. Please see **Appendix 1** for details of the various categories of abuse outlined within the Working together to safeguard children and young people, 2023 Guidance document.

To safeguard those in our places of worship and organisations we adhere to the UN Convention on the Rights of the Child and have as our starting point as a definition of abuse, Article 19:

- 1. State parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect.*
- 2. or negligent treatment, maltreatment, or exploitation, including sexual abuse, while in the care of parent(s), legal guardian(s) or any other person who has the care of the child. Such protective measures should, as appropriate, include effective procedures for the establishment of social programmes to provide necessary support for the child and for those who have the care of the child, as well as for other forms of prevention and for identification, reporting, referral, investigation, treatment, and follow-up of instances of child maltreatment described heretofore, and, as appropriate, for judicial involvement.*

Also, for adults the UN Universal Declaration of Human Rights with reference to Article 5: *No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.*

The Care Act 2014 applies to an adult who

- Needs care and support (whether the local authority is meeting any of those needs); and
- Is experiencing, or at risk of, abuse or neglect; and

¹ Development means physical, intellectual, emotional, social, or behavioural development; Health includes physical and mental health; Ill-treatment includes sexual abuse and other forms of ill-treatment which are not physical including, for example, impairment suffered from seeing or hearing the ill-treatment of another.



As a result of those care and support needs, they are unable to protect themselves from either the risk of, or the experience of, abuse or neglect. The rights of adults to live a life free from

neglect, exploitation, and abuse are protected by the Human Rights Act 1998. Specifically, an adult's right to life is protected; their right to be protected from inhuman and degrading treatment; and their right to liberty and security. Please see **Appendix 2** for various categories and signs and indicators of abuse in relation to adults

As the focus of NAYC & ACUK is work with children and young people, in our efforts to adhere to the principles enshrined within the UNCRC, we have outlined below measures that NAYC & ACUK take in creating a safe place for children and young people within our care:

1. Safer Recruitment and Selection

NAYC & ACUK pays full regard to DfES *Guidance for Safer Working Practice for Adults who work with Children and Young People in Education* (February 2022) and the *Working together to safeguarding children and young people guidance* (2025), as well as Keeping Children Safe in Education KCSIE 2025.

We ensure that all appropriate measures are applied in relation to all employees who are likely to be perceived by the children and young people as safe and trustworthy adults, including e.g., staff employed by contractors. Safer recruitment practice includes:

- Application form (including job description and completing a self-declaration form)
- Undertaking interviews Safeguarding has been discussed.
- Scrutinising applicants (verifying identity and academic or vocational qualifications)
- Obtaining professional and character references (checking previous employment history, gaining reasons for any unsubstantiated gaps or inconsistencies, and ensuring that a candidate has the health and physical capacity for the job).
- A suitable training programme is provided for the successful applicant.
- The applicant has completed a probationary period.
- The applicant has been given a copy of the organisation's safeguarding policy and knows how to report concerns.
- Appropriate checks including the completion of an enhanced disclosure with the



Disclosure and Barring Service (where relevant). An assessment is carried out of each specific role to determine if it falls into the definition of 'regulated activity' as defined in the Safeguarding Vulnerable Groups (SVG) Act 2006. Where it is deemed that a specific role does meet the requirements an enhanced DBS check as well as a check of the barred list will be carried out.

- For staff that are 14 to 16 years of age a risk assessment will be carried out, training in the role given and restrictions on child employment followed [Child employment: Restrictions on child employment - GOV.UK \(www.gov.uk\)](http://www.gov.uk) (Disclosure checks not required, however references are obtained. All 14- to 16-year-olds are always supervised.

Please refer to the **Recruitment Policy** for additional details

2. Staff Training and Induction

NAYC & ACUK is committed to on-going safeguarding training and development opportunities for all workers, developing a culture of awareness of safeguarding issues to help protect everyone. The induction summary is to be completed by all new staff on day 1 of employment/commencement and signed to confirm completion (see attached Appendix 1)

Staff will attend a Safeguarding Training course within the first 4 months of starting employment. Staff working directly with children will attend a training course as soon as they start employment. If staff have joined and just missed an organised training, they will complete the Ihasco online training before the next training is organised.

Positions of Trust

All adults working with children, young people and vulnerable adults are in a position of trust. All those in positions of trust need to understand the power this can give them over those they care for and the responsibility they have because of this relationship.

It is vital that all workers ensure they do not, even unknowingly, use their position of power and authority inappropriately. They should always maintain professional boundaries and avoid behaviour which could be misinterpreted. The Sexual offences Act 2003 makes it an offence for someone in a position of trust to engage in sexual intercourse with someone age 16-17 over whom they are in a position of trust.

3. Management of workers – Code of Conduct

NAYC & ACUK has adopted the principles enshrined within the Working together to safeguard children and young people guidance of 2023 to guide our approach to safeguarding and the expectations we place on those who represent NAYC & ACUK when working with children and young people.



Safe work practice ensures that children and young people are safe and that all staff are aware that the nature of their work, places them in a position of trust.

NAYC & ACUK recognises that the planning and organisation of the Centre and the ways of working adopted by the staff, freelance contractors all contribute to creating the right environment for the safeguarding of children and young people.

NAYC & ACUK will, therefore, through its operating procedures, policies and practices aim to: -

- Plan activities where possible with more than one adult present and avoid 1 :1 activity out of sight and hearing from others.
- Create an environment where children, young people and adults feel comfortable and caring enough to identify behaviour they don't like or feel comfortable about.

Details of the expected **Code of Conduct** have been outlined in **Appendix 3**

NAYC & ACUK recognises that several other policies and procedures developed and operated by the organisation form part of the wider agenda of safeguarding and promoting children and young people's welfare.

This encompasses issues such as e.g., Safety; health and safety; medical needs; the security of buildings used by NAYC & ACUK; providing first aid; racist incidents; drugs and substance misuse etc. These can be accessed via HR.

We recognise that children and young people may be at risk of online sexual exploitation. We will ensure that our online safety procedures are robust, and that children and young people are confident to report any concerns about themselves or others to NAYC & ACUK staff.

4. Partnerships with others

NAYC & ACUK wants to ensure that, through effective partnership working, all the children and young people with whom they work are supported to be healthy, safe and able to enjoy and achieve so that they will make a positive contribution throughout their lives and achieve economic well-being. The organisation agrees that it is essential to establish positive and effective working relationships with other agencies. A copy of their Safeguarding Policy will be required for quality assurance.

5. Support, Advice and Guidance for Staff

Staff are supported by 6 nominated Designated Safeguarding Children's Officers (DSL's). Support is always available from:

- Thirtyone:eight - **0303 003 1111** Monday to Friday 9am to 5pm
Independent Safeguarding Consultants for NAYC & ACUK.
In an emergency call **999** and ask for the police



- Northamptonshire Multi-Agency Safeguarding Hub (MASH - 0300 126 1000)
- Police Child Abuse Investigation Team
- Designated Officer/ LADO – (use relevant contact details for local LADO)
- Safeguarding in Education service

Whistleblowing.

We will seek to follow the principles contained in the Public Interest Disclosure Act 1998. Therefore, we expect that all employees will report improper actions and omissions. Whilst all malpractice and acts of discrimination will be investigated, it is especially important that suspicions of abuse are immediately reported to the DSL. It is, of course, the right of any individual as a citizen to make a direct referral to the safeguarding agencies or seek advice from Thirtyone:eight, although NAYC & ACUK hope that staff and volunteers will use the procedures outlined within this document. If, however, the individual with the concern feels that the DSL's have not responded appropriately, or where they have a disagreement with the DSL's as to the appropriateness of a referral, they are free to contact an outside agency direct. We hope by making this statement that NAYC & ACUK demonstrate its commitment to effective safeguarding and the protection of all those who are vulnerable. The policy can be found in People HR.

Section 2

Responding well

Instructors, youth workers and other adults working for NAYC & ACUK are well placed to observe any physical, emotional, or behavioural signs which indicate that a child may be suffering significant harm.

The relationships between staff and children and young people, which foster respect, confidence and trust, can lead to disclosures of abuse, and staff being alerted to concerns.

It is not the responsibility of the staff to investigate concerns or to determine the truth of any disclosure or allegation.

1. Recognising concerns regarding a child or young person

Staff will immediately report to their line manager, who will then report to the DSL

- any suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- any explanation for injury given which appears inconsistent or suspicious
- any behaviour which gives rise to suspicions that a child may have suffered or maybe suffering harm (e.g., worrying drawings or play, inadequate care, ill treatment, emotional maltreatment)
- any concerns that a child is presenting signs or indicators of abuse or neglect



- any significant changes in a child's presentation
- any concerns regarding person(s) who may pose a risk to children

Record concerns on the appropriate form which can be accessed from the relevant Designated Children's Officer or your line manager, or QR code from displayed posters.

2. Responding to a child or young person making an allegation of abuse

Children and young people who are being abused will only tell people they trust and with whom they feel safe. Youth workers and instructors often share a close relationship with participants and may therefore be someone in whom a child/young person might like to place their trust. They want the abuse to stop. By listening and taking what a child/young person says seriously you will already be helping to protect them.

Don't worry that you may be mistaken. **Your role is to pass concerns on to your line manager or the DSL.** It is better to have discussed it with somebody with the experience and responsibility of making an assessment. In the absence of the Lead DSL, the Deputy DSL should be contacted immediately.

Appendix 4 gives you guidelines on **how to respond well** to a child, young person or adult making a disclosure or allegation of abuse.

3. Recording and Monitoring

- Ensure you record concerns relating to a child or adult on the appropriate Incident report form within one hour of receiving an allegation or disclosure.
- This can be accessed from the relevant Designated Safeguarding Children's Lead or HR database
- Ensure that you record only facts and as far as possible verbatim of what was shared and hand it to the Designated Safeguarding Lead as quickly as possible (submitted in person or emailed, as is appropriate).
- Any copies of written notes will be stored in the Safeguarding folder on One Drive, which is securely handled and stored.
- In discussion and direction with your DSL, discuss arrangements for monitoring and if needed pastorally support the child or young person. DSL will involve line managers as required. Do not make your own arrangements no matter how well-meaning the motivation.

4. Procedure to be followed by the DSL following the reporting of concern, allegation or disclosure.

The DSL may contact the appropriate agency, Social Services/Police, in the area the child or adult lives, or they may first ring the Thirtyone:eight Helpline for advice, who will confirm their advice in writing.



If this is the case, the DSL (in conjunction with you where appropriate) must then complete that Local Authority's referral form. This must be sent to Social Services within **2 working days** including details of the date, time, place, and people who were present at the discussion.

There may be further actions following a safeguarding referral. This will include taking the lead from Social Services or other statutory agencies that may be involved i.e., police, LADO, Adult social services etc. Often an assessment of risk and need will be initiated by the intervening agency and where appropriate information is shared with the referring organisation should there be an on-going need for further support. The DSL may need to inform others depending on the circumstances and/or nature of the concern such as Chair or trustee responsible for safeguarding who may need to liaise with the insurance company or the Charity Commission to report a serious incident and report to the incident to DBS.

See **Appendix 5** for a flowchart on this process.

5. Allegations of abuse against a person who works with children/young people.

Where there is either a concern or an allegation is made against, any person working in or on behalf of the organisation that he or she has:

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child or
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children

The person who has received an allegation or witnessed an incident will immediately inform the DSL and make a record. (If the person receiving information or witnessing an incident is from an external service or agency then they should also notify their own Safeguarding Lead.

If an allegation is made against any DSL, the matter will be reported to the Trustee for Safeguarding of NAYC & ACUK who will proceed with guidance and support from the remaining DSL's and/or Thirtyone: Eight as well as advice from HR regarding standing down the worker till otherwise advised.

The Designated Safeguarding Lead, in accordance with Local Safeguarding Children Board (LSCB) procedures will:

- Liaise with Children's Social Services regarding the safety of the child.
- Make a referral to a designated officer called a Local Authority Designated Officer (LADO) whose function is to handle allegations against adults who work with children and young people whether in a paid or voluntary capacity. The police may be consulted to see if there is a concern that a crime may have been



committed. DSL in conjunction with HR to discuss standing down staff members till otherwise advised.

- If concerns are substantiated or the duty to refer applies, make a referral to Disclosure and Barring Service for consideration of the person being placed on the barred list for working with children or adults with additional care and support needs. This decision should be made by LADO if they are involved.

See **Appendix 6** for a flowchart on this process. Please also see **Appendix 7** for a detailed matrix on Safeguarding roles and responsibilities within the organisation.

Parents/carers should always be contactable and ready to come to remove the child or young person if necessary.

The workers should be clear about the procedures and be confident in the support that will be given by their managers.

6. Information Sharing/Confidentiality

“The Children Act 1989 makes clear where there are concerns that a child is, or may be, at risk of significant harm, the overriding consideration is to safeguard the child.”

NAYC & ACUK adheres to the "Information Sharing: Advice for Practitioner's" Guide HM Government, 2024 - [DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers](#)

. Therefore, all relevant information about a child, young person or adult at risk will be held on record when they access the Centre. The Activity Centre will collate, store, and agree access to this information and ensure all staff are aware of and adhere to agreed procedure (NAYC ACUK Ltd GDPR policy) (Data protection Act 2018)

7. Supporting a child/survivor of abuse

Pastoral Care

NAYC & ACUK is committed to considering appropriate arrangements for pastoral care, working with statutory agencies as appropriate, and supporting all those who have been affected by abuse who have contact with or are part of the organisation.

Thirtyone:eight have defined the following pointers (see Thirtyone:eight guidance - Pastoral Care, Online Safeguarding Manual) to consider as a code of practice for those who may offer pastoral care whether to a child or adult:

- Avoid any behaviour that may give the impression of favouritism or a 'special' relationship.
- When providing mentoring and/or coaching roles this should be clearly defined



- Be aware of the pitfalls of over-dependency in pastoral relationships. This dependency can apply both ways. Ensure adequate supervision with your line manager.
- Workers should be aware of the limits of their ability/competence and seek further help when faced with situations outside their expertise.
- A pastoral carer can face situations that conflict with their role particularly in the area of confidentiality e.g., knowing where pastoral relationships and friendships overlap or when a pastoral relationship develops into a romantic attachment. The person offering pastoral care should declare any area of conflict with their supervisor and in these situations another carer should be appointed.

Working With Offenders and those who may pose a risk.

When someone attends our Organisation and is known to have abused children, is under investigation, or is known to be a risk to adults with care and support needs, the Organisation will supervise the individual concerned and offer pastoral care. However, in its commitment to safeguarding the protection of children and adults with care and support needs, boundaries will be set for that individual which they will be expected to keep. These boundaries will be based on an appropriate risk assessment through consultation with appropriate parties.

See **Appendix 8** – Behaviour Risk Assessment



APPENDICES

Appendix 1

Categories and signs and indicators of abuse – children

Physical Abuse may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.

Possible Indicators include:

- Visible injuries such as bruises, cuts, marks or scars
- Injuries that are unexplained or inconsistent with the explanation given
- Frequent or repeated injuries
- Loss of hair in clumps
- Unexplained falls
- Changes in behaviour, such as becoming unusually subdued or withdrawn.
- Significant changes in weight, appearing underweight or malnourished.
- Failure to seek medical treatment or frequently changing doctors.

Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (e.g., rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, or encouraging children to behave in sexually inappropriate ways; or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse as can other children.

Possible indicators include:

- Physical injuries or bruising, particularly around the thighs, buttocks, upper arms or neck
- Pain, bleeding or itching in the genital area, or discomfort when walking or sitting.
- Sexually transmitted infections
- Pregnancy in someone who is unable to consent.
- Use of sexualised language that is uncharacteristic or not age-appropriate.
- Significant changes in sexual behaviour or attitude



Emotional Abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill treatment of another. It may involve serious bullying (including cyber-bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Possible indicators include:

- Low self-esteem or lack of confidence
- Attachment difficulties
- Depression or persistent low mood
- Self-harm
- Eating difficulties or disorders
- Signs of distress such as tearfulness, anger or anxiety
- Reluctance to be alone with a particular person.
- Appearing detached or emotionally distant
- Fear of making mistakes
- Difficulty managing strong emotions.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food and clothing, shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger.
- ensure adequate supervision (including the use of inadequate caregivers); or
- ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Possible indicators include:

- Poor personal hygiene (e.g., appearing unwashed or smelling strongly)
- Living in unsuitable home conditions (e.g., no heating or unsafe environment)
- Inadequate or inappropriate clothing
- Being hungry or showing signs of malnutrition



- Frequent, untreated medical issues or unused medication
- Physical signs such as sores, skin problems, poor muscle tone or prominent joints
- Delayed language, social or developmental skills
- Being left alone for long periods
- Withdrawal, depression or anxiety
- Tiredness or difficulty concentrating
- Self-soothing behaviours such as substance misuse or self-harm
- Poor school attendance or performance

Other forms of abuse:

Domestic Abuse, any incident or pattern of incidents of controlling coercive or threatening behaviour, violence, or abuse between those aged 16 or over who are or have been intimate partners or family members, regardless of gender or sexuality (Government revised definition, 2013). And subsequently in 2021 Children are recognised as victims of domestic abuse in their own right if they see, hear or experience the effects of abuse between two personally connected individuals who are aged 16 or over. However, abusive behaviour directed at a person under the age of 16 is child abuse rather than domestic abuse.

This can encompass, but is not limited to, the following types of abuse: psychological, physical, sexual, financial, emotional.

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur using technology. Child sexual exploitation is never the victim's fault, and all children and young people under the age of 18 have a right to be safe and should be protected from harm. (Department for Education, 2017). The Sexual Offences Act 2003 introduced several new offences to deal with those who sexually exploit children and young people. The offences protect children up to the age of 18 and can attract tough penalties.

Child-on-child abuse

All staff should be aware that children can abuse other children (often referred to as child-on-child abuse), and that it can happen both inside and outside of school or college and online. All staff should be clear as to the school or college's policy and procedures regarding child-on-child abuse and the important role they must play in preventing it and responding to where they believe a child may be at risk from it. All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child-on-child abuse they should speak to their designated safeguarding lead or line manager. It is essential that all staff understand the importance of challenging inappropriate behaviours between children, many of



which are listed below, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviour, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

Female Genital Mutilation (FGM)

“Female genital mutilation (FGM) is a collective term for procedures which include the removal of part or all of the external female genitalia for cultural or other nontherapeutic reasons. This may be performed on girls aged between four and thirteen and sometimes newborns or on young women before marriage or pregnancy” (Working Together, 2018)

The practice is :

- medically unnecessary,
- extremely painful and
- has serious health consequences even death (both at the time when the mutilation is carried out and in later life).

The Female Genital Mutilation Act 2003 made it an offence for UK nationals or permanent UK residents to carry out FGM abroad, or to aid, abet, counsel, or procure the carrying out of FGM abroad, even in countries where the practice is legal. A mandatory reporting duty for FGM requires regulated health and social care professionals and teachers in England and Wales to report known cases of FGM in under 18-year-olds to the police. The FGM duty came into force on 31 October 2015.

Child criminal abuse including County lines.

County lines is a form of criminal exploitation where urban gangs persuade, coerce or force children and young people to store drugs and money and/or transport them to suburban areas, market towns and coastal towns (Home Office, 2018). It can happen in any part of the UK and is against the law and a form of child abuse.

Fabricated or Induced Illness (FII)

A clinical situation in which a child is, or is very likely to be, harmed due to parental behaviour and action, is carried out in order to convince doctors that the child's state of physical and/or mental health or neurodevelopment is impaired or more impaired than is actually the case.

NAYC & ACUK is committed to work in partnership with parents, carers and families to support with online safety at home and children feeling safe in the community, and while socialising with peers to enable potential situations of Child Sexual Exploitation to be identified rapidly and ensure a swift response follows which will be in line with Northamptonshire Safeguarding Children Board (NSCB) procedures so that clearly defined interventions can be put in place without delay. NSCB have developed useful resources on this subject which can be accessed here in cases where there are concerns about CSE: <http://www.northamptonshirescb.org.uk/more/borough-and-district-councils/child-exploitation-resources/>. Concerns with evidence which indicate possible CSE in children under 13 years old must result in an immediate referral into the MASH.



Appendix 2

Safeguarding Adults at Risk of Harm

Who is an adult at risk of abuse?

The adult safeguarding duties under the Care Act 2014 apply to an adult, aged 18 or over, who has needs for care and support (whether or not the local authority is meeting any of those needs) and; is experiencing, or at risk of, abuse or neglect; and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.

Care and support are the mixture of practical, financial, and emotional support for adults who need extra help to manage their lives and be independent - including older people, people with a disability or long-term illness, people with mental health problems, and carers. Care and support include assessment of people's needs, provision of services and the allocation of funds to enable a person to purchase their own care and support. It could include care home, home care, personal assistants, day services, or the provision of aids and adaptations

The rights of adults at risk of harm to live a life free from neglect, exploitation and abuse are protected by the Human Rights Act 1998. Specifically, a vulnerable adult's right to life is protected; their right to be protected from inhuman and degrading treatment; and their right to liberty and security.

What is abuse?

Abuse can be defined as the mistreatment of an individual or group by another individual or group, often resulting in a violation of human and rights. The abuse can vary from treating someone in a disrespectful way which significantly affects the person's quality of life, to causing actual physical suffering. Abuse can happen anywhere – in a person's home, in a residential or nursing home, a hospital, in the workplace, at a day centre or educational establishment, in supported housing or in the street.

Categories of abuse in adults

Physical abuse: this is usually the use of force to cause pain such as hitting, pushing, pinching, shaking, misusing medication, scalding, restraint, hair pulling. Sexual abuse such as rape, sexual assault to which the adult at risk has not or could not have consented or to which they were pressured into consenting.

Psychological or emotional abuse such as threats of harm or abandonment, being deprived of social or any other form of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, being prevented from receiving



services or support.

Financial or material abuse such as theft, fraud or exploitation, pressure in connection with wills, property, or inheritance, misuse of property, possessions, or benefit.

Neglect such as ignoring medical or physical care needs and preventing access to health, social care or educational services or withholding the necessities of life such as food, drink, and heating.

Discriminatory abuse such as that based on race or sexuality or a person's disability and other forms of harassment or slurs

Institutional/organisational/ acts of omission abuse can sometimes happen in residential homes, nursing homes or hospitals when people are mistreated because of poor or inadequate care, neglect and poor practice that affect the whole of that service.

Domestic Violence or abuse - An incident or pattern of incidents of controlling, coercive or threatening behaviour, violence, or abuse... by someone who is or has been an intimate partner or family member regardless of gender or sexuality. Includes psychological, physical, sexual, financial, emotional abuse; so-called 'honour-based' violence; Female Genital Mutilation; forced marriage.

Sexual Abuse - including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.

Modern Slavery encompasses a range of serious crimes, including slavery, human trafficking, forced or compulsory labour, and domestic servitude. It involves situations where individuals are exploited, controlled, or coerced through threats, deception, or abuse of power. Traffickers and exploiters may use physical, psychological, financial, or emotional pressure to force people into inhumane working or living conditions. Victims may be deprived of their freedom, prevented from leaving, or compelled to work or provide services against their will. Modern slavery is a grave violation of human rights.

Signs and Symptoms of Adult Abuse

Adult abuse can present in many ways, and staff should remain alert to signs that may indicate a person is at risk. Indicators can include unexplained injuries, changes in behaviour or mood, withdrawal, fearfulness, poor hygiene, malnutrition, untreated medical needs, or signs of emotional distress. Adults experiencing abuse may appear anxious, depressed, unusually passive, or fearful of certain individuals. Abuse can also be suggested by sudden changes in finances, living conditions, or social relationships. No single sign confirms abuse, but any



concern should be taken seriously and reported in line with safeguarding procedures.

The rights of vulnerable adults

Dignity and respect: - all vulnerable adults will be accorded the same respect and dignity as any other adult, by recognising their uniqueness and personal needs

Equality and diversity: - all vulnerable adults will be treated equally, and their background and culture will be valued and respected

Fulfilment: - all vulnerable adults will be invited to engage in activities and offered services that enable them to fulfil their ability and potential

Independence: - all vulnerable adults will have as much control as possible over their lives whilst being safeguarded against unreasonable risks

Privacy: - all vulnerable adults will be free from unnecessary intrusion into their affairs; and there will be a balance between the individual's own safety and the safety of others

Safety: - all vulnerable adults will feel safe, and live without fear of violence, neglect or abuse in any form

Support: - all vulnerable adults will be supported to report any form of abuse and to receive appropriate support following abuse for as long as may be required

Who might be causing the abuse?

The person who is responsible for the abuse is often well known to the person being mistreated or exploited and could be:

- A paid care worker or volunteer
- A health worker, social care or other worker
- A relative, friend or neighbour
- Another resident or service user
- An occasional visitor or someone who is providing a service
- People who exploit adults at risk
- An unpaid carer
- Another adult at risk

The role of the ACUK Centre

All ACUK workers should be aware of the above and when working with adults at risk should be aware of the rights of vulnerable adults and these should shape their practice and approach to



the adults. They should note any unexplained injuries, concerns voiced by the adult, behaviours which suggest unexplained fears or anxieties and any observations which give the ACUK worker cause for concern. The safeguarding procedures should then be followed.

If the adult has a carer or support worker with them, as much information as to their needs, emotional and physical should be gathered from the carer. These should be recorded and made accessible to all ACUK staff who will be working with the group or supporting them in the centre, whilst taking care that the confidentiality and privacy rights of the vulnerable adult are recognised and adhered to.

Patience and repeated instruction may be needed when the adult undertakes activities. Care should be taken to be sure that the instructions have been understood and that the adult is able and wants to continue with the activity. The vulnerable adult should never be pushed into an activity against their will.

If the equipment such as harnesses are to be used the support worker should support and advise the ACUK staff when they are carrying out the fitting of the harness. This should never be done in an isolated or one to one situation, to safeguard both the worker and the adult. The vulnerable adult's consent needs to be obtained and they need to understand the procedure before staff undertake the fitting.

The adult should be closely observed during the activity and the carer or support worker should be used to use to keep the ACUK staff member informed if the adult is beginning to experience undue fear or anxiety.

Risk assessment procedures should take account of the needs of the vulnerable adults.

ACUK instructors and workers should be confident that, if they have any concerns or are unsure that they are able to cope with the needs of the adult, they know whom to turn to in the organisation for advice and support.



Appendix 3

Behaviour and Conduct

NAYC & ACUK staff and freelance contractors work with children and young people in challenging activities and settings, managing complex relationships with both children and young people and with their leaders and/or staff. Many children and young people undertaking challenging activities for the first time are anxious and excited.

Many of the activities undertaken require physical contact between staff and freelance contractors and children and young people. Staff and freelance contractors will ensure that:

- Whilst recognising that physical contact with children and young people is sometimes appropriate and necessary this should be appropriate to the activity being undertaken and the level of anxiety or distress displayed by the children or young people taking part in the activity.
- Whilst recognising that physical contact with children and young people is sometimes appropriate this should only take place in public situations.
- Avoid being alone with individual children and young people especially in the following circumstances/locations: bedrooms, toilets and washrooms; vehicles; areas indoors or outdoors where they are not readily visible to others. This includes cleaning and housekeeping duties in toilets, washrooms, and common areas.
- These procedures are overridden only where there is an overriding safety requirement to do so.

NAYC & ACUK aims to provide a setting and activity programme for children and young people that will build the confidence and self-esteem of the children and young people that are resident at an Activity Centre or attending NAYC clubs and activities. To this end all staff and freelance contractors should aim to adhere to the following code of conduct:

Good Practice:-

- Treat everyone with dignity, respect, and fairness, and have proper regard for individuals' interests, rights, safety, and welfare.
- Work in a responsible, transparent, and accountable way.
- Be prepared to challenge unacceptable behaviour or to be challenged.
- Listen carefully to those you are supporting.
- Avoid any behaviour that could be perceived as bullying, emotional abuse, harassment, physical abuse, spiritual abuse, or sexual abuse (including inappropriate physical contact such as rough play and inappropriate language or gestures).
- Seek advice from someone with greater experience when necessary.



- Work in an open environment – avoid private or unobserved situations.
- Follow policies, procedures and guidelines and report all disclosures, concerns, allegations, and suspicions to the safeguarding co-ordinator.
- Don't make inappropriate promises particularly in relation to confidentiality.
- Do explain to the individual what you intend to do and don't delay acting.

Unacceptable behaviour

- Not reporting concerns or delaying reporting concerns
- Taking unnecessary risks
- Any behaviour that is or may be perceived as threatening or abusive in any way.
- Passing on your personal and/or social media contact details and any contact that breaches NAYC ACUK Ltd.'s social media policy.
- Developing inappropriate relationships
- Smoking and consuming alcohol or illegal substances
- Favouritism/exclusion – all people should be equally supported and encouraged.

Working with children and young people with special needs

Children and Young People with Special Needs

Children with special needs are especially vulnerable to abuse – disabled children are three times more likely to be abused. The following should be used in addition to the procedures outlined in the general safeguarding policy.

Special Needs

- A learning difficulty which means they learn at a significantly slower rate than the majority of children of the same age.
- Behavioural difficulties which make socialising, forming relationships, control of emotional outbursts, reading social contexts etc difficult
- There may be very specific difficulties such as:
 - autism which will result in specific and recognisable behaviour patterns
 - ADHD which will result in poor concentration, restlessness etc
- Physical disabilities which may make access to a range of activities problematic



The rights of children and young people with special needs

All children and young people with special needs have the same right as all children and young people to fulfil their potential:

Dignity and Respect: -

- **Dignity and respect:** - all children and young people with special needs will be accorded the same respect and dignity as any other child or young person, by recognising their uniqueness and personal needs.
- **Equality and diversity:** - all children and young people with special needs will be treated equally and their background and culture will be valued and respected.
- **Fulfilment:** - all children and young people with special needs will be invited to engage in activities and offered services that enable them to fulfil their ability and potential
- **Independence:** - all children and young people with special needs will have as much control as possible over their lives whilst being safeguarded against unreasonable risks
- **Safety:** - all children and young people with special needs will feel safe, and live without fear of violence, neglect or abuse in any form
- **Support:** - all children and young people with special needs will be supported to report any form of abuse and to receive appropriate support following abuse for as long as may be required

All workers should be aware of the above and when working with children and young people with special needs should be aware of their rights and these should shape their practice and approach to the children and young people. They should note any unexplained injuries, concerns voiced by the child or young person, behaviours which suggest unexplained fears or anxieties and any observations which give the ACUK worker cause for concern. The safeguarding procedures should then be followed.

Working with children and young people with special needs

As much information as possible should be gathered from the child or young person's parent or carers about their particular needs:

- What they will need to be best supported
- What particular fears or anxieties may they feel
- What behaviours may they exhibit?
- What interventions are most likely to effectively manage these behaviours?



This information should be recorded and shared with all the workers who may have contact with the child or young person. This to be done with due regard to the confidentiality procedures regarding information sharing and storage.

The parent/carer's signed permission should be obtained re any intervention which may be used.

The expectations of the workers regarding behaviour and the safety of other children and young people should be made clear to both the parent and carers and the child/young person. It should also be clear what the procedure will be if the safety of others or the child or young person is deemed by the worker to be unacceptable.

The child or young person should know how the worker will signal that their behaviour is inappropriate and given responses which will enable them to manage their behaviour – a place of quiet in which to calm down for example.

Thought should be given to the optimum number of children/young people in the group and the mixture of needs within the group.

Workers should always be in teams of no less than 2.

Physical restraint should never be used except when the safety of another child or young person is seriously in doubt and should never be used by a worker who has not received training in its use. If in doubt clear the room of other children and young people whilst the manager stays with child/young person to ensure their safety.

Parents/carers should always be contactable and ready to come to remove the child or young person if necessary.

The workers should be clear about the procedures and be confident in the support that will be given by their managers.

Training and development

In order that workers are confident in their ability to work supportively, effectively, and safely with the special needs of the children and young people they should receive training in:

- the management of challenging behaviour
- the range of special needs with which they may be working.
- the procedures adopted by NAYC and ACUK to safeguard the children, young people and themselves.



As much information as possible should be gathered from the child or young person's parent or carers about their particular needs:

- What they will need to be best supported
- What particular fears or anxieties may they feel
- What behaviours may they exhibit?
- What interventions are most likely to effectively manage these behaviours?

This information should be recorded and shared with all the workers who may have contact with the child or young person. This to be done with due regard to the confidentiality procedures regarding information sharing and storage.

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Appendix 4

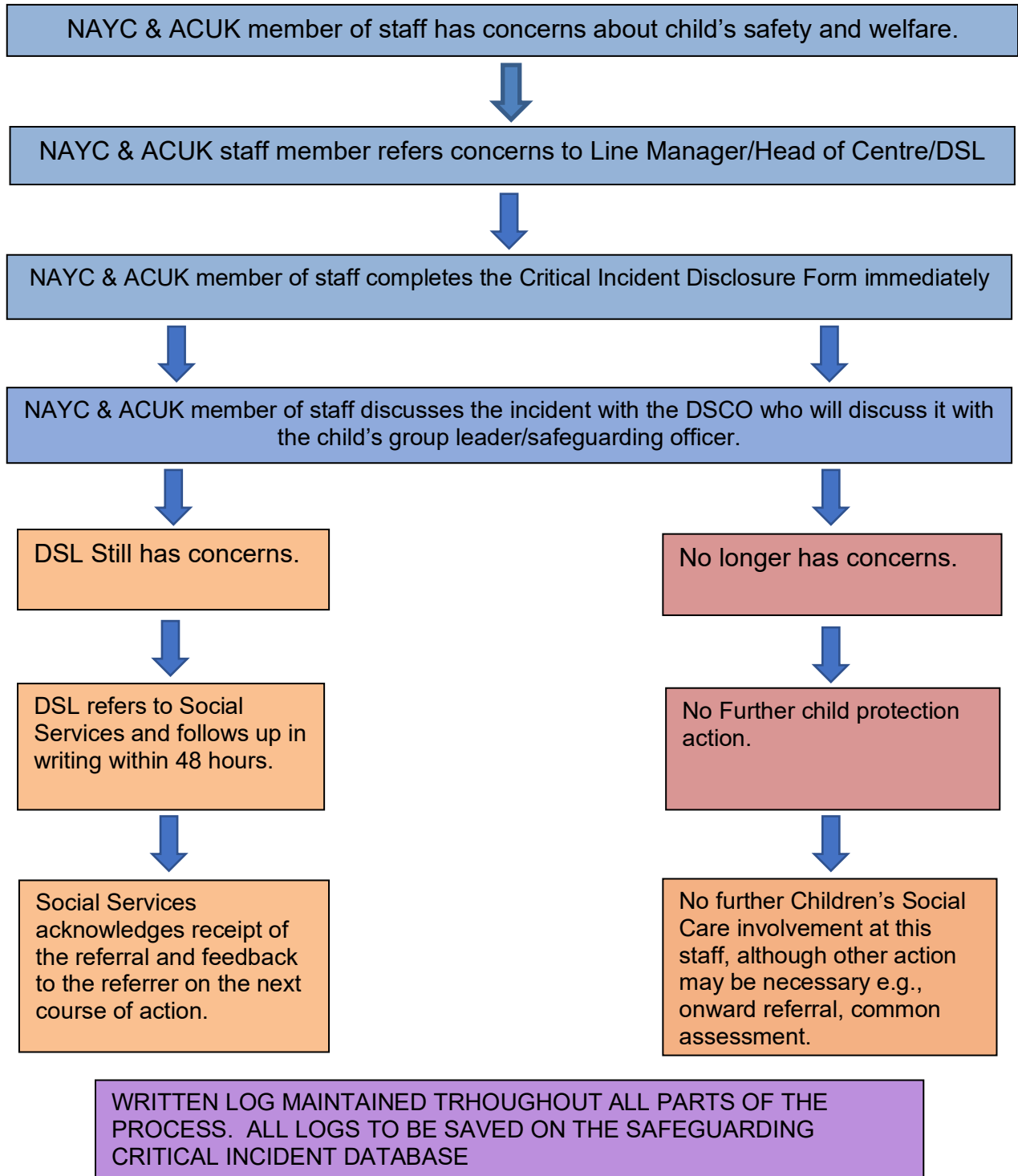
Responding well to a child, young person or adult disclosing or alleging abuse

1. Don't panic. React calmly so as not to frighten the child/young person.
2. Show that you have heard what they are saying, and that you take their allegations seriously, and that they were right to confide in you.
3. Reassure them that they are not to blame.
4. Allow them to talk, do not prompt or ask questions. Do not interrupt them when they are recalling significant events. Don't make them repeat their account. Make sure you understand what they are saying.
5. Be honest straight away and explain what actions you may have to take, in a way that is appropriate to their age and understanding.
6. Do not promise to keep what you have been told a secret, as you have a responsibility to disclose information to those who need to know. Reporting concerns is not a betrayal of trust.
7. Do not allow shock or distaste to show.
8. Do not confront the abuser.
9. Write down what you have been told, repeat back in their own words what they have said.
10. Write down all you have been told or seen on an incident form.
 - The reason for the concern
 - What was said or witnessed, and details of any other persons present
 - Dates and times of incidents and when the notes were made
11. Report your concerns to the DSL or most senior members of staff on the premises.



Appendix – 5

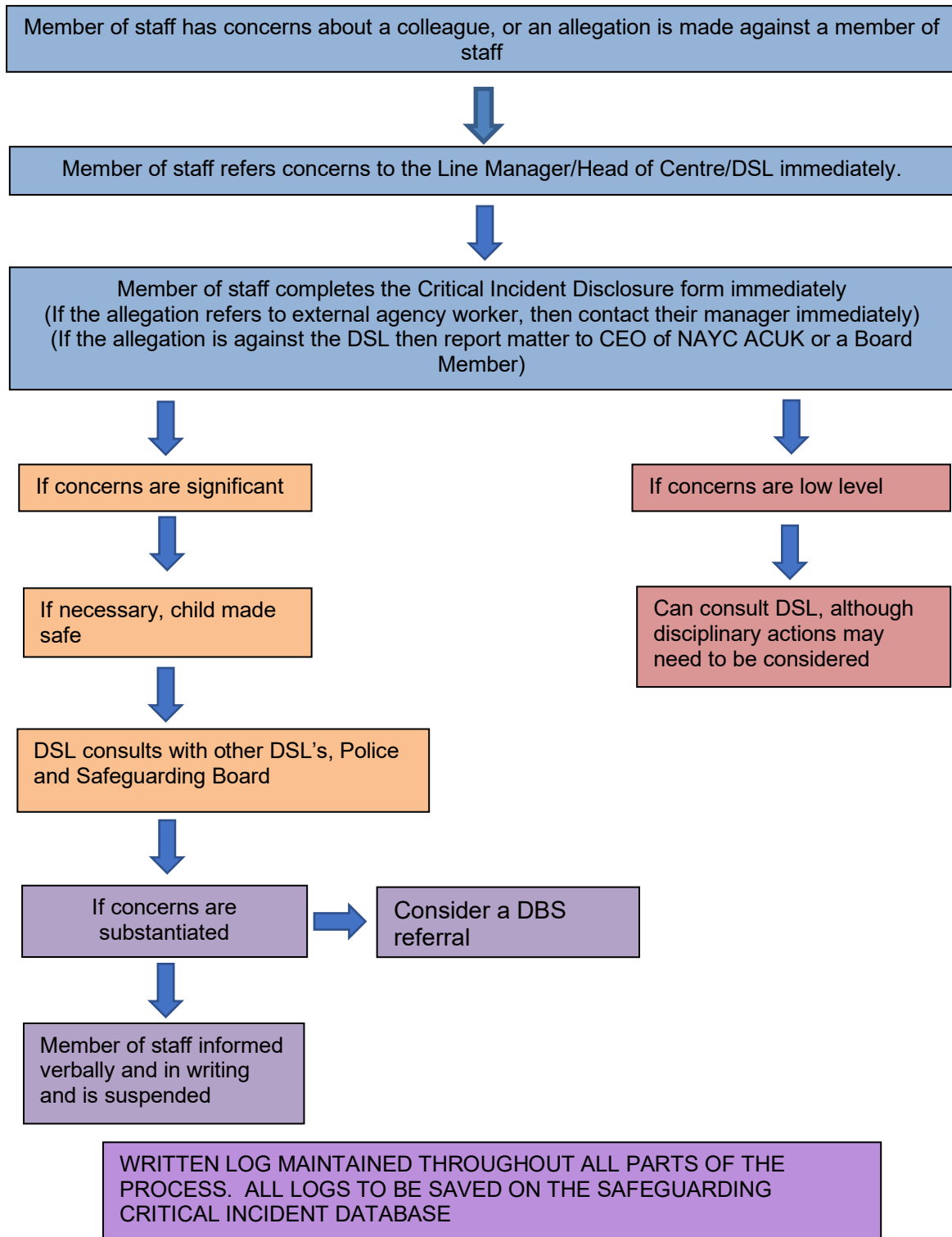
NAYC & ACUK REFERRAL PROCEDURES – CONCERNS OF CHILDS SAFETY AND WELFARE.





Appendix – 6

NAYC & ACUK REFERRAL PROCEDURES – CONCERN ABOUT COLLEAGUE OR ALLEGATION AGAINST STAFF MEMBER





Appendix – 7

Safeguarding Roles and Responsibilities

	Chief Executive (NAYC & ACUK)	Designated Safeguarding Lead	All Staff
Responsibilities	All areas of the organisation are covered by and must abide by the organisations Safeguarding Policy and procedures, which are accessible and compliant with guidance and locally agreed inter-agency procedures, and the policy is made available to visiting institutions on request;	Will ensure that the policies and procedures adopted by NAYC & ACUK are fully implemented and followed by all staff.	Fully comply with the NAYC & ACUK policies and procedures Attend appropriate training! Inform the DSL or their line manager of any concerns (See contact Tel. Numbers on display in the office)
	All areas of the organisation operate safer recruitment procedures and make sure that all appropriate checks are carried out on staff who work with children	Will ensure that sufficient resources and time are allocated to enable the DSL and other staff to discharge their safeguarding responsibilities	
	All areas of the organisation have procedures for dealing with allegations of abuse against staff that comply with guidance from the local authority and locally agreed inter- agency procedures	Will ensure that all staff feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner in accordance with agreed whistle blowing policies	
	A senior member of the youth development/activity centres leadership team and deputy/deputies are designated to take lead responsibility for safeguarding	Liaise with Local Authority's Designated Officer when managing all allegations made against members of staff	
	All staff undertake appropriate training	Referrals 1. Refer cases of suspected abuse or allegations to the relevant investigating agencies 2. Act as a source of support, advice, and expertise within the centre 3. Liaise with Head of NAYC & ACUK to inform him/her of any issues and ongoing investigations and ensure there is always cover for this role.	



	<p>Any Safeguarding deficiencies, weaknesses that are found regarding safeguarding arrangements – Staff will remedy immediately.</p>	<p>Training</p> <ol style="list-style-type: none"> 1. Ensure all staff access appropriate safeguarding training which should include recognising signs of abuse and what action they should take (i.e., inform DSL of any concerns). This training should be updated at least every 2 years. 2. Understand the importance of signs and indicators of abuse and how 'minor' concerns when seen within a cumulative context can form a picture of significant harm. 3. Recognise when it is appropriate to make a referral 4. Have a working knowledge of how Safeguarding Children's Partnership operate, the conduct of a Safeguarding case conference and be able to attend and contribute to these. 5. Ensure that all staff have access to and understand the NAYC & ACUK Safeguarding policy. 6. Ensure that Safeguarding is included in induction training. 7. Ensure all staff have access to standardised recording format for reporting concerns 8. Keep detailed, accurate, secure, written safeguarding records and know how to transfer and archive these records 9. Attend relevant multi agency training 	
	<p>Liaising with the Designated Senior Lead Person and /or partner agencies in the event of allegations of abuse being made against a Centre Manager</p>	<p>Raising Awareness</p> <ul style="list-style-type: none"> • Ensure the Safeguarding policy is updated and reviewed annually • Ensure all staff fully comply with the centres policies and procedures 	
	<p>Where services or activities are provided on the Centre premises by another body, the body concerned has appropriate policies and procedures in place regarding safeguarding children and liaises with the body on these matters where appropriate</p>		



Appendix – 8

BEHAVIOUR RISK ASSESSMENT

Group/Contractor/ Individual Name			
Subject of Risk Assessment (include age for children):-		Centre:-	
Date of Risk Assessment:-		Review Date:-	
Responsible Leader:-		Review Frequency:-	
Reason a risk assessment is being carried out (including a view on the individual's awareness and acknowledgement of the concerns):-			
Professionals/others involved (if applicable):-			
What are the concerns?	Given this, what are the possible risks? Who is at risk?	Can the risk be managed? What measures can be adopted to safeguard in this situation?	
Action by whom?	Action by when?	Date Completed	



Policy reviewed by Thirtyone:eight

And

Policy agreed: *John Whittaker*
John Whittaker (Apr 7, 2026 14:58:20 GMT+1)

John Whittaker
on behalf of NAYC/ACUK Ltd

Date: April 2026

Review Policy April 2027






NAYC ACUK SAFEGUARDING POLICY APRIL 2026

Final Audit Report

2026-04-07

Created:	2026-04-07
By:	Karen-Leigh Anderson (HR@acuk.net)
Status:	Signed
Transaction ID:	CBJCHBCAABAAomSq4eDUIz1PO94hxLL568ink_M6bxwc

"NAYC ACUK SAFEGUARDING POLICY APRIL 2026" History

-  Document created by Karen-Leigh Anderson (HR@acuk.net)
2026-04-07 - 11:06:59 AM GMT
-  Document emailed to John Whittaker (john@acuk.net) for signature
2026-04-07 - 11:07:04 AM GMT
-  Email viewed by John Whittaker (john@acuk.net)
2026-04-07 - 1:57:47 PM GMT
-  Document e-signed by John Whittaker (john@acuk.net)
Signature Date: 2026-04-07 - 1:58:20 PM GMT - Time Source: server
-  Agreement completed.
2026-04-07 - 1:58:20 PM GMT