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## SARACENS GROUP SAFEGUARDING POLICY FOR CHILDREN AND ADULTS AT RISK

### 1. Introduction

The Saracens Group (SG) is committed to safeguarding and protecting children and all adults who are under SG care or utilising the SG facilities. The welfare of these groups is paramount for all staff and accordingly, they must make themselves aware of the SG Safeguarding Policy. Where appropriate, the following policy will be supplemented by training and additional guidance. All concerns and allegations of abuse will be taken seriously and responded to swiftly and appropriately. SG is committed to prioritising safeguarding at a Board and Executive level to ensure that best practice in safeguarding is promoted and adhered to.

#### 1.1. Scope

Activities undertaken at the following locations/departments are under the remit of this policy including:

- Saracens Foundation (SF)
- Saracens Men and Academy Training Ground (Old Albanians)
- Saracens Women's Rugby
- Saracens Rugby Camps & Festivals
- Saracens Developing Player Pathways
- Stone X Stadium
- Stadium Tours
- Match day activities including mascotting, stewarding and Pioneering

#### 1.2. Roles & Responsibilities

SG has a comprehensive safeguarding structure which assures the safety and welfare of all that engage with the group. For the purpose of this policy the safeguarding structure consists of the **Saracens Group Safeguarding Lead (SL)** who has overall responsibility for the safeguarding of for SG, the **Foundation Safeguarding Lead (FSL)** who has overall responsibility for the safeguarding of children at the Foundation and departmental **Designated Safeguarding Officers (DSO)** who work within various areas of the group. These DSOs have special responsibilities and are the focal point for safeguarding children in their nominated area.

- The SL is responsible for implementation of the safeguarding operations, processes, and policies across SG. The SL is also responsible for the induction and training of safeguarding across SG, as well as the organisation and management of quarterly meetings to review and report on safeguarding operations and incidents. The SL forms an important part of the incident management and reporting process should incidents need to be escalated above DSO level.

- The FSL is responsible for implementation of the safeguarding operations, processes, and policies across the Saracens Foundation. The FSL is also responsible for the induction and training of safeguarding across the charity, as well as the organisation and management of quarterly meetings to review and report on safeguarding operations and incidents.
- DSOs are appointed to provide a lead for safeguarding within the SG departments. The DSOs are responsible for embedding safeguarding within their own departments as well as being the point of contact should a concern arise within their own departments.

**Key people include:**

**SG SL – Sangita Asani, People Business Partner**

- Saracens Men's & Academy DSO – Mike Hynard, Head of Academy & Player Pathways
- Saracens Women's Rugby DSO – Niamh McHugh, Women's Academy Coach
- Saracens Match Day & Pioneers DSO – Paul Lazarus, Chief Steward
- Saracens Community DSO – Richard Hope, Head of Community

**FSL – Ben Lawrence, Saracens Foundation Head of Operations**

- Saracens Foundation DSO – Mike Dobson
- Saracens Foundation DSO – Jessica Hammond
- Saracens Foundation DSO – Gill Thayne

**Saracens Group Board Member – Vic Luck**

**Saracens Group CEO/COO or equivalent**

Employees, workers, agency staff, consultants and volunteers working within SG are responsible for familiarising themselves with SG safeguarding policy, ensuring the safety and welfare of all children as well as promoting best practice and creating a safe and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect. This expectation is set on recruitment, in induction and in regular communications.

**Anybody with a concern about an individual's welfare should contact the SL or a DSO for advice in the first instance – details can be found in [Section 3](#) of this policy and on the Saracens Safeguarding website <https://saracens.com/safeguarding/>.**

### **1.3. Rules, Regulations & Legislation**

This policy is in accordance with national guidelines and is compliant with regulations set out in the 1989 and 2004 Children Act, Working Together to Safeguard Children (2023), the London Child Protection Procedures, Rugby Football Union (RFU), Safeguarding Children Rules and Premiership Rugby League Rules. This is further underpinned by the Adults at Risk Policy and the Adult Care Act 2014.

SG is fully committed to ensuring that the best practice recommended by these bodies is employed throughout the group. SG also has a responsibility to maintain regular dialogue with the Local

Safeguarding Children Board. Due to their contact with children and all adults, staff in the SG are well placed to observe signs of abuse and/or neglect.

#### 1.4. Definitions

A ‘**child**’ is defined as anyone who has not yet reached their 18th birthday.

Under the Care Act 2014, someone who is over 18 years of age, and has care and support needs is therefore defined as a ‘**adult at risk**’. They can be experiencing or be at risk of abuse and or neglect as a result of care and support needs. They could therefore be unable to protect themselves against abuse or neglect.

*Throughout this document, when referring to **children**, we are also referring to both children and adults at risk.*

‘**Safeguarding**’ is defined for the purposes of this policy as:

- Protection from maltreatment.
- Preventing impairment of mental as well as physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.

‘**Activity**’ means any activity or series of activities arranged for children by or in the name of SG. These are deemed to be regulated and therefore activate the required levels of DBS checks.

#### 1.5. Aims & Key Principles

The aims of this policy are:

- To safeguard all children and adults who interact with SG
- To ensure children and adults feel safe in SG activities.
- To demonstrate best practice in the area of safeguarding.
- To promote high ethical standards throughout SG
- To promote the SG values (Work-rate, Discipline, Honesty and Humility) in our safeguarding.
- To commit to working in partnership across the SG and with external organisations including statutory bodies to safeguard and protect those in our care.

The key principles underpinning this policy are:

- A child’s welfare is, and must always be, the paramount consideration.
- An individual child or adult’s right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs, gender or sexual identity.
- All allegations of abuse or poor practice will be taken seriously and responded to swiftly and appropriately.

## 2. SG Procedures

### 2.1. People & Recruitment

#### 2.1.1. Safer Recruitment

As part of SG recruitment and selection process, offers of work for positions which involve working with children are subject to a satisfactory Disclosure & Barring Service (DBS) check at the level deemed suitable for the position offered and subject to appropriate references. SG also require two satisfactory references and a DBS check to be completed before the commencement of employment. Only in exceptional circumstances where it is deemed business critical, can a risk assessment be completed for an individual to allow them to start work before these checks are completed. In these circumstances there will be no contact with children. Please contact the SL if you have an exceptional circumstances case.

#### 2.1.2. Induction

The SL holds a specific safeguarding induction with all new employees, casuals and volunteers within their first month of work. This includes specific safeguarding updates, signs and indicators of abuse and how to report a concern.

#### 2.1.3. Training & Awareness

All staff working in direct contact with children are required to complete the **RFU's Introduction to Safeguarding, Level 2 and Level 3** workshop before undertaking a role that requires working with children. Individuals must also undertake a refresher course, as advised by the RFU and Premiership Rugby (PRL). Details of those satisfactorily completing this course are retained by the People on Cezanne (our employee records database). A continual programme of Safeguarding awareness communications and additional training options is also provided by the SL to the SG to develop knowledge which are department specific.

We ask that all our coaches have:

- First Aid
- DBS Enhanced Certificate
- RFU Safeguarding Certificates
- Appropriate Coaching certification

#### 2.1.4. Single Central Record

The SG People Business Partner (Sangita Asani) maintains the single central record which includes all staff, casuals, volunteers and work experience students who are working with children. This record includes the coaching qualifications, DBS, Safeguarding Training and First Aid qualifications of delivery staff.

#### 2.1.5. Work Experience

SG may from time to time offer work experience placements to children. U18s should always be under the supervision of a more experienced adult member of staff with a current DBS check and should

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only undertake duties within their age and capability. A risk assessment must be completed by the People Manager prior to or on arrival. This may be shared with the parent or carer before the placement is agreed. Work experience candidates will be talked through the safeguarding reporting procedures on arrival by the SG People Business Partner.

#### 2.1.6. Volunteers

Volunteers will undergo checks commensurate with their work for SG and contact with children. Under no circumstances should a volunteer who has not been appropriately checked be left unsupervised with children. Volunteers who work only in a supervised capacity and are not in regulated activity will undergo the safe recruitment checks appropriate to their role, including a DBS check at Enhanced Level but without a barred list check.

#### 2.1.7. Contractors

External contractors who are engaged by SG and working with children undergo a suitability test prior to commencing work. This may include evidencing the contractor's Safeguarding Policy, Safety Record, Safety Policy, Liability Insurance, Risk Assessment/Method Statement and details of Competent Person. On arrival at SG the contractor will receive a site induction from a member of the **Stadium Operations or People** team which covers Safeguarding and gives details of the SG expected code of behaviour. In the event of a contractor carrying out work on an area that is usually occupied by children, this work, where possible, will be undertaken when children are not present or with SG personnel overseeing the work. The contractor will be required to avoid contact with children.

#### 2.1.8. Third Party Organisations and Partnerships

SG commitment to Safeguarding should be outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services. If other organisations provide services or activities for children for whom SG is responsible, we will check that they have appropriate procedures in place, including Safer Recruitment procedures. SG will obtain written confirmation from supply agencies or third-party organisations that agency staff or other individuals who may work at SG with children have been through appropriate safer recruitment procedures.

#### 2.1.9. Disclosure & Barring Service.

SG works with the RFU to have all the background checks processed for the relevant staff. New staff will provide all their identification documentation to the relevant DSL or who process the initial application through the GMS portal. SG is committed to providing equal opportunities to staff and therefore a positive CRC will not necessarily result in a bar from work. Should a positive DBS be received, a risk assessment will be carried out by the SL and relevant Head of Department /People Business Partner and where applicable the department DSO can also assess the information contained within the DBS. The member of staff will also be asked to attend an interview prior to a recruitment decision being made. The Rehabilitation of Ex-Offenders Act 1974 and the Protection of Freedoms Act 2012 should be considered in all cases before a final decision is made. If a new member of staff has been subject to a DBS check by their previous employer, SG will still require a further check. SG will ensure that all temporary staff and external consultants identified in roles that are working with children, sign a Self-Declaration Form and in any case, will not have unsupervised access to children

during their time with SG. Where there are any persons under the age of 18, a DBS must be processed by a third-party provider as GMS does not allow for applications to be made for those under 18. Once the employee reaches their 18<sup>th</sup> birthday, a new application can be made through the RFU and all relevant training must be carried out in line with the normal DBS procedures.

## 2.2. Ratios & Supervision of Children

Any activity undertaken by SG will always give full consideration to the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision.

- Regardless of these ratios a minimum of 2 members of staff or a delivery partner staff member will always be available to supervise an activity. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).
- Coaching and staffing arrangements must always meet the needs of all children and ensure their safety. SG staff must ensure that children are adequately supervised and decide how to deploy staff to ensure children's needs are met.
- The RFU recommends that there should always be at least one DBS checked adult in charge of any group of children. The RFU recommend minimum supervision ratios which must be adhered to by SG staff. Where the SG is taking responsibility for the care of the children, parents/carers should not be included in supervision calculations.
- <https://keepyourbootson.co.uk/wp-content/uploads/2022/07/safeguardingpolicybooklet.pdf>
- Where the SF are providing programmes/activities/events, the **Risk Assessment** should be referenced to ascertain appropriate and safe ratios. This includes Match Day Half Time Activities.

## 2.3. Children at Match Day Events

During Match Day there are often groups of children who are visiting the stadium with parents or other professionals in organised groups. If SG is providing an event such as a tour/festival at the stadium, SG do not take full responsibility for these individuals. Instead, SG will take responsibility for children during designated activities organised by SG. For organised groups where SG is primarily responsible for participants attending a match day at StoneX Stadium, for any activity, the minimum ratio for children over 5 years of age is 2 responsible adults for every 10 children this is reduced to 7 for children under 5 years of age.

All children who attend StoneX Stadium for an activity, festival or event including Mascots and Ball Boys/Girls must be accounted for on a **register**. Parental/carers consent must be taken regarding how the individual will be collected at the end of their experience or whether the individual is able to walk home alone. All parents / carers are required to sign the register on collection of their children.

SG will only allow children to be match day mascots or ball persons once parental/carer consent has been obtained. A signed image consent form is also required before any images are published in the SG match day programme. No photographs of mascots or ball persons featured in SG publications will be accompanied by personal information about the individual, such as their school, home address or local sports team. Whilst at StoneX Stadium, mascots and ball persons are accompanied at all times by a member of staff who have a valid DBS. Staff who are responsible for mascots and ball persons on a match day are also required to have a good level of understanding and awareness of safeguarding children.

## 2.4. Lost Children

A lost child should be treated as a serious incident and the escalation process should be followed. <https://saracens.com/safeguarding/reporting-a-concern/>. All sites where the SG deliver from will have a **risk assessment** that will include any additional measures taken to ensure a child does not go missing whilst in our care. For instance, ensuring that gates are locked. In any incident where a child is unaccounted for during or after a session the incident reporting and escalation procedure should be followed.

### 2.4.1. Stadium

It is rare for a child to become separated from the adult that they have attended with. Stadium staff, match day stewards and Pioneers are trained to deal with such instances and have a clear protocol to follow. For example- Pioneers are instructed to stay with the child (in pairs) for 15 minutes and wait for the parents, after that they escort the child to security and an announcement would be made within the stadium. For clarity, Pioneers are volunteer stewards and provide customer facing matchday/event assistance.

### 2.4.2. Match Day

Please see matchday protocols and Pioneer briefing documents for more details on the processes and procedures followed throughout a matchday. For this information, please contact Saracens Group Head of Match Day Production – [hermanbeetge@saracens.net](mailto:hermanbeetge@saracens.net).

### 2.4.3. Unaccompanied Children

A child must be 16 years old or over to be able to attend a match unaccompanied. A under 16 child cannot attend on their own. They must have a responsible person aged 16 or over with them.

## 2.5. Use of Images

Most people who take or view photographs or videos do so for entirely innocent and legitimate reasons. However, sadly, some people abuse children through taking or distributing images, we must therefore ensure we have safeguards in place. All images are taken by SG officials who have been briefed by the member of staff (and where possible a DSO) responsible for the activity being photographed / filmed. Please refer to **SG Data Protection Policy** for more information on the use of personal information. In all circumstances where children are being photographed the following will apply in order to protect them:

- Before taking or publishing images of children (for example on our website or in an email) parental consent is sought in writing at the start of each season or prior to the event. Parents/Legal Guardians are responsible for informing SG of any change of circumstances within the season which may affect consent.
- Parents/Legal Guardians will be informed of how the image will be used. SG will not allow an image to be used for something other than that for which it was initially agreed.
- All children featured in SG publications will be appropriately dressed and will have clothing garments covering their torso and from at least the bottom of their neck to their thighs, and feature safety equipment such as shin pads or guards.
- Only use the first name of the child on any publication if consent has been given. *Ticket or Season Ticket (as applicable) holders who enter the Ground acknowledge that photographic images and / or video and / or sound recordings (and / or still images taken from video recordings) may be taken of them and may also be used in televised and / or radio coverage of Matches and / or for promotional or marketing purposes by the Club, Premier Rugby Limited or other third parties. CCTV is in operation at the Ground.*
- Encourage children to tell us if they are worried about any photographs that have been taken of them.
- Where possible, the image will focus on the activity taking place and not a specific child.
- Where appropriate, images represent the broad range of people participating safely in the event.
- Designated SG photographers will, where applicable, undertake a DBS and attend a Safeguarding workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the 'Use of Images' policy issued by SG and by the PRL from time to time. Saracens Identification will be worn at all times.
- Children who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any SG document.
- It is our intention that recordings of children for the purposes of legitimate coaching aids are only filmed by SG officials and are stored safely and securely at the SG premises.
- Any instances of inappropriate images should be reported to the SL immediately.
- Photography is forbidden in private areas such as changing rooms, toilets, showers, whilst a child is in a state of undress.

## 2.6. Gifts & Favouritism

Staff should take care that they do not accept any gift that might be construed as a bribe by others or lead the giver to expect preferential treatment. Staff members should report any gifts to the People Team (Group Head of People, People Business Partner, Safeguarding Lead). SG recognises that there are occasions when children or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a "thank you", and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others. Staff should report any gifts received to their line manager. Similarly, it is not permitted for staff to give personal gifts to children. This could be misinterpreted as a gesture either to bribe, or to single out the child. It might also be perceived that a "favour" of some kind is expected in return. Any reward given to a child must first be agreed with the staff member's line manager and the Group Head of People as part of a structured reward system and not based on favouritism.



## 2.7. Online Safeguarding

Staff, volunteers, and coaches should never use with children through their personal social media accounts, phones, or email addresses to communicate with children. Instead, they should write to the parent, guardian or carer through their official work email or phone.

The exception would be members of the **Saracens Academy, Women's Academy** which contains 15–18-year-olds. Communications can take place directly between coaches and these individuals providing:

- the 'child' is a current member of the Saracens Academy and has signed a New Starter Form to declare their involvement in the Saracens Academy
- and / or communication is from a Saracens.net email address and/or communications is via the Sports Train app where parents also have full access and / or communication is via WhatsApp group with at LEAST two members of Saracens contracted staff.

All communications should be relevant to the work or project. The staff and coaches will provide detailed guidance to parents, guardians, and carers on how to access our online materials or content safely. This will reduce the risk of scams or harmful materials being available to children.

***Reporting Online Abuse or Risk - The reporting procedure for online abuse or risk will be the same as for face-to-face delivery. However, if appropriate the SL and Online Safety Coordinator may contact site or SG social media administrators to raise concerns for children.***

## 2.8. Academy & Pathway

SG is committed to the welfare and safety of all within the Academy and in our player pathways. SG recognises the importance of communication and works closely with parents, carers, schools and local authorities to ensure that the wellbeing of all children is paramount. SG Academy and Pathway teams adhere to the SG Safeguarding Policy which has been written to provide staff with the processes and procedures to follow to safeguard children.

### 2.8.1. Transport

When children are being transported on behalf of SG they shall be accompanied by their manager or coach. Where possible, players being transported on behalf of SG should travel in groups of two or more. Players will only be transported with prior consent from their parents.

### 2.8.2. Development Player Programmes (DPP)

The Academy use the Rugby Football Union (RFU) Development Player Programme in several counties (Essex, Kent, Hertfordshire). The coaches on the DPP will be expected to follow all the Saracens Academy and [RFU regulations](#), policies and guidance in safeguarding children, as well as the RFU Regulations for [Age Grade Rugby](#). Of note:

- All DPP coaches undertaking work for the Saracens Group are registered with the Rugby Football Union.

- DPP Lead coaches who are engaged in identifying players under the age of 18 also undergo a DBS and are required to undertake the RFU Safeguarding Children Workshop (Level 2 and Level 3).
- As best practice, we request DBSs from our volunteer coaches. It is understood that DPP Lead coaches, who are DBS checked by Saracens, must ensure they are present whenever a volunteer coach is delivering in a session. Volunteer coaches who have supplied external DBS evidence, will not be allowed to deliver a Saracens DPP session unsupervised.
- All DPP DBS and qualification checks are managed centrally, and Saracens will issue each coach with the digital verification email to display this information on request.
- References are sought for all DPP Lead coaches and, on recruitment, DPP Lead coaches identifying players under the age of 18 are issued with a copy of the RFU rules and regulations and the Safeguarding Policy.
- All County DPP Sessions run by SG Staff have an **Emergency Action Plan** detailing nearest medical facilities
- Academy and DPP coaches regularly review RFU Regulation 15 – Age Grade Rugby and RFU Regulation 21 – Safeguarding

#### 2.8.4. Medical

The physio and medical department have a duty to follow the Chartered Society of Physiotherapists code of conduct rules including the [Code of Members' Professional Values and Behaviour](#) and [Duty to report](#). These codes of conduct will be issued to all full-time, part-time and casual members of medical staff during their induction on their first day of employment. This provides the medical and physio staff a framework which need to be adhered to when working with children. There will be occasions where medical treatment is necessary during evening training sessions and weekend fixtures and unfortunately, due to staffing numbers, SG is unable to guarantee that two members of staff are present during treatment sessions. SG is fully committed to equal opportunities for all individuals and, as such, SG employs both male and female medics and cannot guarantee same-sex medical support. All members of the medical department have a valid DBS and are required to complete the **RFU Introduction to Safeguarding course**.

Medical Safeguarding Thresholds: Any medical treatment involving tertiary, or emergency care would be escalated to the Safeguarding Lead and reported via My Concern.

#### 2.8.5. U18, U21 & First Team Progression

As players progress through the Academy system, they may have the opportunity to train and play with the adult provisions of Saracens. Obviously, this carries several safeguarding concerns as they will be entering an adult provision and be susceptible to adult behaviours and language. All coaches must adhere to **RFU regulations on 17-year-olds playing with adults**. SG will support the player(s) during this transition via Head of Culture, Head of Psychological Performance, Team Manager, Saracens Doctor, and General Manager of Sport and Head Coaches. Parents will be included, and consent sought where issues arise.

#### 2.8.6. Off-Site Activities

All off site activities are subject to a **Risk Assessment** and / or will have an **Emergency Action Plan sheet (Appendix 1, 2 and 3)** to satisfy health and safety and safeguarding requirements. Where these activities are provided by and managed SG, our own safeguarding and child protection procedures

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apply. SG as event organisers have a responsibility to take all reasonable steps to ensure that the activities provide as safe an environment as possible. When children, for whom SG responsible, attend off-site activities, including residential visits and work-related activities, the DSO or Safeguarding Lead will check that effective risk assessments and safeguarding arrangements are in place such as effective supervision. SG follow both the **Child Protection in Sport Unit** and the **RFUs recommended guidance** for ensuring the safety and welfare of children whilst travelling. All parents, children will be informed of safeguarding reporting procedures prior to an off-site activity taking place.

## 2.9. Community Activity – The Saracens Foundation

The Saracens Foundation (SF) ensures full compliance with RFU standards and guidance and endeavours to adhere to the rules and guidelines issued regarding safeguarding. All SF activities comply to guidance related to:

- DBS and Coaching Qualifications
- Adult: Child Ratios
- Risk Assessment
- Service Level Agreements & Partnership Agreements
- Registration & Dispersal Procedures
- Accident / Incident Report Forms
- Saracens Code of Conduct
- Late Collection Procedures
- First Aid / Administration of Medication
- Transporting Children
- SG Medication Administration Policy.

This Policy is written in consultation with the Head of Foundation, Saracens Foundation DSO and the FSL and is under constant review. The SF will obtain parental consent for all activities using a Parental Consent Form. The SF will do everything it can to safeguard children in its care but recognise that in some circumstances, due to the nature of the work carried out, obtaining parental consent for specific activities is not always possible. In accordance with the procedures detailed above, SF staff and casual coaches who work with children will complete an Enhanced DBS check every 3 years. It is an expectation of all staff who work with children to keep their certificates up to date. All certificates including DBS, RFU Safeguarding, and First Aid expire after three years. All SF staff are required to re-apply for their DBS no later than 3 months before expiry. All SF staff and casual coaches are responsible for ensuring they attend an RFU recognised First Aid and RFU Safeguarding Course at least 1 month before the expiration of their previous certificate.

### 2.9.1. Certificate Expiration

Where a certificate expires but the individual has applied within the recommended timeframe, the individual will be taken off regulatory activity and will be provided with alternative non-regulatory duties, at the Head of Foundation's discretion. Casual coaches will not be offered work until they are able to provide evidence of recertification. If an employee has not applied for recertification within the recommended timeframe, at the SL and Head of Foundation's discretion, the individual may be suspended without pay until re-certification is complete and evidence is provided.

### 2.9.2. Sessional Workers

All sessional workers (casual coaches) are expected to attend regular safeguarding updates delivered by the FSL. Work will not be offered if the sessional worker cannot attend. If a sessional worker has not worked for SF for 6 months, they will be made inactive on the Single Central Record. In order to re-start work and if their DBS is still within its three-year term, the individual will be required to submit a self-declaration form and attend a Safer Working Practice induction, delivered by the Safeguarding Lead. If any of the above certificates have expired these will be required to be renewed before work can be offered.

### 2.9.3. Departmental Risk Assessments

The SF undertakes a Risk Assessment for each Activity they operate on a bi-annual basis, and these are completed in consultation with the SFL and, where necessary, the SL and Health and Safety Manager. All children are encouraged to wear appropriate shoes and protective equipment as appropriate to the sports activity. Coaches are required to adapt the sessions should there be participants who are unable to wear the required clothing and equipment.

### 2.9.4. Activities for Disabled Persons & Adults at Risk

The SF carries out all activities for disabled persons and adults at risk under the guidelines of the **Equality Act 2010** and **Safeguarding Vulnerable Groups Act 2006**, and in accordance with the SG Safeguarding Policy.

### 2.9.5. HMP Activities and Programmes

Where individuals are required to work within Her Majesty's Prisons (HMP) appropriate DBS and additional police vetting checks will be required. Additional safety training will be provided by the local establishment and governance protocols will be outlined within a Service Level Agreements. For instance, safeguarding referral pathways will be in line with the establishment's protocols.

### 2.9.6. Employability

SG reserve the right to gather further information on participants should they have any additional concerns about their potential risk to staff, themselves or other participants. Deployment to programmes is therefore at the discretion of the Safeguarding Lead and Head of Foundation, based on satisfactory reference checks and DBS.

### 2.9.7. Code of Conduct

Each session delivered by SF applies a behaviour code of conduct policy which defines the behaviour expectations of both participants and staff. For more information, please contact FSL – Ben Lawrence.

### 3. Guidelines in the Event of Concern

If you work or intend to work with children, you are automatically placed in a position of trust that carries authority, status, power and responsibility. If the adults involved are positive role models displaying high moral and ethical standards, the benefit to young people's development can be significant. Unfortunately, it is also possible for adults in sport to do a lot of harm through direct action or by failing to respond to concerns. It is likely that if you have a concern this will be about poor practice rather than abuse. Both occur in rugby, and other sporting activities and both require a response.

#### 3.1. Recognising signs of abuse

There are many different forms of abuse that fall into the categories identified by the NSPCC as follow. Should you have any concern that abuse is occurring you should contact the SL or a DSO immediately.

- **Physical Abuse-** Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts. It isn't accidental- children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped, or having objects thrown at them. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell – this is known as fabricated or induced illness. There is no excuse for physically abusing a child. It causes serious, and often long-lasting harm – and in severe cases, death.
- **Honour Based Violence-** A person who is at risk of honour-based violence is at significant risk of physical harm (including being murdered) and/or neglect and may also suffer significant emotional harm through the threat of violence or witnessing violence directed towards a sibling or other family members. Honour based violence cuts across all cultures and communities.
- **Sexual Abuse-** Sexual abuse involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, 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.
- **Harmful Sexual Behaviour-** Harmful sexual behaviour includes using sexually explicit words and phrases, inappropriate touching, using sexual violence or threats; full penetrative sex with other children or adults.
- **Child Sexual Exploitation-** Child sexual exploitation (CSE) is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them. Children may be tricked into believing they're in a loving, consensual relationship. They might

be invited to parties and given drugs and alcohol. They may also be groomed and exploited online. Some children are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

- **Neglect**- Neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); failing to protect from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Emotional Abuse**- Emotional abuse is the persistent emotional maltreatment such as to cause severe and persistent adverse effects on emotional development. It may involve conveying the individual is worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving 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. This may include 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 cyberbullying), causing the individual to frequently to feel frightened or in danger, or the exploitation or corruption of children.
- **Bullying** - Bullying is behaviour that hurts someone else – such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It can happen anywhere – at school, at home or online. It's usually repeated over a long period of time and can hurt an individual both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night. SG has a zero-tolerance approach to bullying and any reported incidents of bullying will be taken seriously and investigated by the SL.
- **Financial abuse and or extortion** – This can be the mistreatment of a adult at risk in scenarios where there is financial theft of money or property, being defrauded, being put under pressure in relation to money or other property and having money or property misused.
- **Radicalisation & Extremism**- SG recognises that some people are more vulnerable to radicalisation, including those who may be isolated/marginalised in society (through mental health or disability) and may have no other support. Those who attend sports activities are not immune from this risk and therefore SG ensure that all staff who work with children are equipped at identifying potential indicators of abuse in regards to radicalisation and extremism. The following definitions are taken from the HM Government Prevent Strategy 2011.
  - ¥ Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate on terrorist activity.
  - ¥ Extremism is vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of

different faiths and beliefs. We also include in our definition of extremism calls for the death of members of the armed forces.

Section 26 of the Counter-Terrorism and Security Act 2015 (the Act) places a duty on certain bodies ("specified authorities" listed in Schedule 6 to the Act), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This guidance is issued under section 29 of the Act. The Act states that the authorities subject to the provisions must have regard to this guidance when carrying out the duty.

- **FGM Mandatory Reporting Duty**- Female genital mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is abuse. It's dangerous and a criminal offence. Section 74 of the Serious Crime Act 2015 amended the Female Genital Mutilation Act 2003 to introduce the legal duty for regulated health and social care professionals and teachers to make a report to the police if:
  - they are informed by a girl under the age of 18 that she has undergone an act of FGM; and/or
  - they observe physical signs that an act of FGM may have been carried out on a girl under the age of 18.

### **3.4. Reporting a disclosure or suspicion of abuse or poor practice**

It can be very hard for people to reveal abuse. Often, they fear there may be consequences. Some delay telling someone about abuse for a long time, while others never tell anyone, even if they want to. It is important to distinguish that if there are concerns relating to adults at risk, then consent will be required from the adult before reporting to a DSO/SL. A DSO or the SL should be contacted as early as possible and **within 24 hours** in any circumstance, however it is recognised that an individual may need to respond to a situation immediately. With this in mind, the following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice:

- Listen carefully. Avoid expressing your own views on the matter. A reaction of shock or disbelief could cause the child to 'shut down', retract or stop talking.
- Let them know they've done the right thing. Reassurance can make a big impact to someone who may have been keeping the abuse secret.
- Tell them it's not their fault.
- Say you believe them.
- Don't talk to the alleged abuser. Confronting the alleged abuser about what someone told you could make the situation a lot worse for the individual.
- Explain what you'll do next. If age appropriate, explain to you'll need to report the abuse to someone who will be able to help.
- Don't delay reporting the abuse. The sooner the abuse is reported after the person discloses the better. Report as soon as possible so details are fresh in your mind and action can be taken quickly.
- **Write down everything said and what was done and email [safeguarding@saracens.net](mailto:safeguarding@saracens.net) or using the MyConcern Reporting Tool if you are a DSO or SL. A referral must be made to SG within 24 hours of the incident taking place.**



- Seek medical advice if necessary
- Make sure you tell a DSO immediately; they will know how to follow this up and where to go for further advice.
- **DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.**

### 3.5. Recording Allegations or Suspicions of Abuse or Poor Practice

The SL should be contacted **immediately** if you have concerns about a child or receive a complaint or allegation that a worker/volunteer 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;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children

The DSO must immediately report any allegation to the SL, who will ask for a written factual statement from the person making the report. **A MyConcern Form must be completed, and an email notification sent to the SL – [safeguarding@saracens.net](mailto:safeguarding@saracens.net).**

Any statement made by the individual should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, keeping any questions to a minimum and they should be of an open format. **Where possible, SG will ensure that any child concerned is immediately protected from any possible risk of harm.**

Investigations into possible abuse will require careful management. In these cases, the SL will first seek the advice of the RFU, Children's Social Care, Adult Services, a Local Authority Designated Officer (LADO) or the Police before setting up an internal inquiry and take their advice on informing the Child's parents/carers. In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, SG must provide a report to the RFU Head of Safeguarding Children, PRL Head of Safeguarding Children.

Any external local authority provision will naturally take the lead on any case. Providing it is appropriate to do so the SL will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from the external agency. Escalation to inform board level will take place at the SL earliest opportunity.

### 3.6. Allegations of abuse made against members of Saracens's Staff

Advice from the People Team must be sought with 24 hours and depending on the nature of the allegation, there may need to be consideration for redeployment or even suspension as a neutral act pending the investigation. This is needed in certain circumstances to protect both the professional from further allegations being made and the children from being subjected to further risk until there is more proof as to what happened.

**Where the allegation is serious, or there is serious risk of harm, the SL or DSO shall immediately (within 24 hours) inform the LADO of the Borough where the alleged incident took place so that he or she can consult with the Police and local authority children's social care colleagues as appropriate.**



Where the SL or DSO are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.

The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation. This process would only be carried out once the advice of the abovementioned external bodies had been sought and only then in consultation with the SL. Providing it does not contradict any advice received from the LADO, any internal investigation will be carried out in line with the SG disciplinary procedures, insofar as they are applicable.

Where the allegation relates to a member of the SG Safeguarding structure, **Chief Executive Officer, Charlie Beall**, must be informed immediately.

### 3.7. Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all SG staff is that no guarantee of confidentiality can be given to a child (although this does not necessarily mean that the parents / carers have to be told). Safeguarding is the priority.

A child should never be pressured to give information or show physical marks unless they do so willingly. If they chose to show markings, two members of staff should be present and any marks raising concern should be recorded on the skin map included within the report form.

There are actions which staff have to and are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need-to-know basis and nobody should have any reservations about referring any issue to the SL. However, the protection of the child is supreme and safeguarding with override confidentiality.

## 4. Date and Review

This policy is applicable to Season 2025-2026 and is under constant review. A revised policy will be drafted annually with the next scheduled review due in April 2026 or use in the following season. The policy may also be subject to review following incident learning outcomes, a major incident, organisational or legislative change.

I \_\_\_\_\_ can confirm that I have read and understood the policy and will adhere to the necessary reporting requirements of this policy in light of any incidents that I am aware of.

Date\_\_\_\_\_

Signature\_\_\_\_\_