WENTWORTH
FOUNDATION

SAFEGUARDING AND CHILD PROTECTION POLICY

Annual review due: November 2026

WENTWORTH
FOUNDATION

Foreword

The safety and well-being of all our young people is at the heart of everything we do at The Wentworth Golf and Tennis Foundation. The Board of Trustees recognises and values greatly the safety of our young people, taking full responsibility for ensuring that The Foundation works tirelessly to ensure that best practice is implemented across all of the charity's operational, administrative and development activities without compromise. This policy, together with the accompanying guidance notes and training programme, is a clear and unequivocal statement of intent that demonstrates our commitment to all of our young people, their families, our staff, our funders and supporters and all of the other key stakeholder partners from across the community within which we work.

The development and communication of this policy is once again a clear step in providing everyone working as part of The Foundation team with a clear understanding of what is expected from them when working with our young people. To ensure awareness and understanding of the changes to the policy and the practical application of it to working practices at all levels, there is an up-to-date programme of comprehensive training and development in place for all paid and voluntary members of our team. The Board of Trustees also ensures that we not only continue to charge our team of people with employing all of the good practice guidelines and principles set out within the policy at all times but also look to continue to develop and improve our policies and practices by constantly reviewing and updating our procedures as and when legislation or other reasons require it.

I would like to thank everyone for their continued commitment to the development of this core piece of our work. I set down the challenge to everyone involved with The Foundation to embrace the principles set out within it and continue to provide the highest quality safe, effective and child-friendly environments within which our young people can reach their potential.

Jon Noble
(Chair of the Trustees)

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1 Introduction to the Policy

The Wentworth Golf and Tennis Foundation (also known in this document as The Foundation) is committed to the belief that all young people have a right to protection and the needs of disabled young people and others who may be particularly vulnerable must be taken into account. The Foundation is committed to ensuring the safety and protection of all young people involved in our programmes through the operation of our Child Protection policies in line with standards in this document. Relevant policies include: Safer Recruitment; Whistleblowing; Health & Safety; and E-Safety related policies. In addition, our Code of Conduct can be found at Appendix A of this policy.

As a result of this commitment, the policy was reviewed in November 2025 to ensure that it continues to meet current Safeguarding and Child Protection polices; and it is now aligned to the 'Working Together to Safeguard Children' (2023) guidelines and Protection of Freedoms Act (2012).

The Foundation has a duty of care to safeguard directly from harm all young people involved in any programme and activity that we deliver. The Foundation also has the responsibility to ensure that, within all the programmes we deliver, any partner organisations must also have established policies and provide protection to young people.

The Foundation is committed to devising and implementing policies so that everyone in the organisation, whether they are paid staff or volunteers, accepts their responsibilities to safeguard young people from harm and abuse. This means to follow procedures to protect young people and report any concerns about their welfare to appropriate authorities.

The aim of the policy is to promote good practice, providing young people with appropriate safety/protection whilst in the care of The Foundation and to allow all staff to make informed and confident responses to specific child protection issues.

A child/young person is defined as a person under the age of 18 (Children's Act 1989)

Within this policy, any person(s) under the age of 18 will be classed as a young person or people.

1.1 Policy Statement

1.1.1 The Foundation is committed to the following:

- that the welfare of the young person is paramount
- all young people, whatever their age, culture, ability, gender, language, racial origin, religious belief and/or sexual identity, should be able to participate in any Foundation activity in a fun and safe environment
- taking all reasonable steps to protect young people from harm, discrimination and degrading treatment and to respect their rights, wishes and feelings
- that all suspicions and allegations of poor practice or abuse will be taken seriously and responded to swiftly and appropriately
- that all Foundation staff, including self-employed contractors or volunteers who work with young people, will be recruited with regard to their suitability for that responsibility

and will be provided with guidance and training in good practice and child protection procedures

- that young people should be listened to as well as given opportunities to assist in the development of safeguarding and child protection good practice

- to work in partnership with parents and young people to safeguard and protect all young people.

1.2 Communication of the Policy

1.2.1 To ensure the successful implementation of this policy it is essential that we at The Foundation communicate to our entire staff, partners, young people and their parents our commitment to safeguarding young people.

In addition, access to the Policy is available to all staff, partners, parents, participants and the general public at large via the Wentworth Golf and Tennis Foundation website. This ensures people have access to this information and are able to understand both how the policy will be implemented and the process they should follow should an issue arise.

1.3 Monitoring and Review

1.3.1 The implementation of procedures will be regularly monitored and reviewed. The Head of Foundation at The Wentworth Golf and Tennis Foundation will regularly report progress, challenges, difficulties, achievements, gaps and areas where changes are required to the Trustees via the Operations and Governance Committee.

The policy will be reviewed every year or whenever there is a major change in the organisation or in relevant legislation.

2 Organisation

2.1 The Foundation Designated Safeguarding Team

The Foundation Designated Safeguarding Team is currently:

- Designated Safeguarding Lead ('**DSL**') – Chris Allbut Head of Foundation
- Members of the Operations and Governance Committee – Qian Liu, Stuart Boyle, Chris Allbut

3 Arrangements for dealing with safeguarding concerns

3.1 Introduction - Responding to Suspicions and Allegations

3.1.1 It is not the responsibility of anyone working for The Foundation in a paid or unpaid capacity to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate people and authorities so that the necessary inquiries and actions are followed to protect the young person.

3.2 Receiving Evidence of Possible Abuse

3.2.1 The Foundation staff and volunteers may become aware of possible abuse in various ways. The foundation staff and volunteers may see it happening, may suspect it is happening because of signs that have been noticed, or may have it reported by someone else or directly by the young person affected.

3.2.2 When a young person reports directly to a Foundation member of staff or volunteer, it is particularly important for the member of staff or volunteer to respond appropriately. If a young person says or indicates that they are being abused, staff should:

- **Stay calm** so as not to frighten the young person.
- **Reassure** the young person that they are not to blame and that it was right to tell.
- **Listen** to the young person, showing that you are taking them seriously.
- **Keep questions to a minimum** so that there is a clear and accurate understanding of what has been said. (The law is very strict and child abuse cases have been dismissed where it is felt that the young person has been led, and ideas have been suggested when questioning). Only ask questions to clarify.
- **Inform** the young person that you must inform other people about what they have told you. Tell the young person this is to help stop the abuse continuing.
- **Safety of the young person** is paramount. If the young person needs urgent medical attention call an ambulance, inform the doctors of the concern and ensure they are made aware that this is a child protection issue.
- **Record** all information on the Incident Referral Form (Appendix C).
- **Report** the incident to either:

  (A) The Head of Foundation

  (B) A Trustee if the Head of Foundation cannot be contacted

3.3 Recording Information

3.3.1 To ensure that information is as helpful as possible, a detailed record should always be made at the time of the disclosure/concern (Appendix C). In recording you should confine yourself to the facts and distinguish what is your personal knowledge and what others have told you. Do not include your own opinions.

3.3.2 Information should include the following:

- The young person's name, age and date of birth.

- The young person's home address and telephone number.
- Whether or not the person making the report is expressing their concern or someone else's.
- The nature of the allegation, including dates, times and any other relevant information.
- A description of any visible bruising or injury, location, size etc. Also, any indirect signs, such as behavioural changes.
- Details of witnesses to the incidents.
- The young person's account, if it can be given, of what has happened and how any bruising/injuries occurred.
- Has anyone else been consulted? If so, record details.
- Has anyone been alleged to be the abuser? Record details.

Liaise with:

(A) The Head of Foundation
(B) A Trustee

Together, your contacts will formulate an action plan and advise you of any actions you need to take. No contact with any other person should be made unless part of the action plan. Once contacted record this communication.

3.4 Reporting the Concern

3.4.1 All suspicions and allegations MUST be reported appropriately. It is recognised that strong emotions can be aroused particularly in cases where sexual abuse is suspected or where there is misplaced loyalty to a colleague. It is important to understand these feelings but not allow them to interfere with your judgement about any action to take.

3.4.2. When working within a school, please ensure that you follow the school's Child Protection policy as well as informing the School's DSL.

3.4.3 **The Foundation expects its members of staff and volunteers to discuss any concerns they may have about the welfare of a young person immediately with (A) the Head of Foundation (B) a Trustee, who will then check that appropriate action has been taken.**

3.4.4 If A or B options are not available then immediately seek advice from the NSPCC helpline, your local Children's Social Care department or the police
3.4.5 There are two reporting procedures for allegations involving either a young person or member of staff/volunteer. Where there is a complaint against an employee or volunteer, there may be three types of investigation.

- **Criminal** in which case the police are immediately involved.
- **Child protection** in which case the social services and (possibly) the police will be involved.
- **Disciplinary or misconduct** in which case The Foundation Trustees will be involved.

The Foundation staff members and volunteers are not child protection experts, and it is not their responsibility to determine whether or not abuse has taken place. All suspicions and allegations must be shared with professional agencies that are responsible for child protection.

Children's Social Care has a legal responsibility under The Children Act 1989 to investigate all child protection referrals by talking to the young person and family (where appropriate), gathering information from other people who know the young person and making inquiries jointly with the police.

NB: If there is any doubt, you must report the incident: it may be just one of a series of other incidents which together cause concern.

3.4.6 Any suspicion that a young person has been abused by an employee or a volunteer should be reported to The Head of Foundation (DSL) or a Trustee, who will take appropriate steps to ensure the safety of the young person in question and any other young people who may be at risk.

The Head of Foundation and/or an appropriate Trustee(s) will:

- Refer the matter within 24 hours to the appropriate Local Authority *Designated Officer and the Disclosure and Barring Service.*
- Include details of the allegation on a secured file.
- The parent/carer of the young person will be contacted as soon as possible following advice from the social services department.
- The Chair of the Trustees should be notified, if applicable, to implement any immediate disciplinary proceedings that may be needed.
- If applicable, the Head of Foundation should notify the relevant sport's governing body.
- If appropriate, the Director of Marketing at Wentworth Club Ltd should also be notified to decide how to deal with any media.

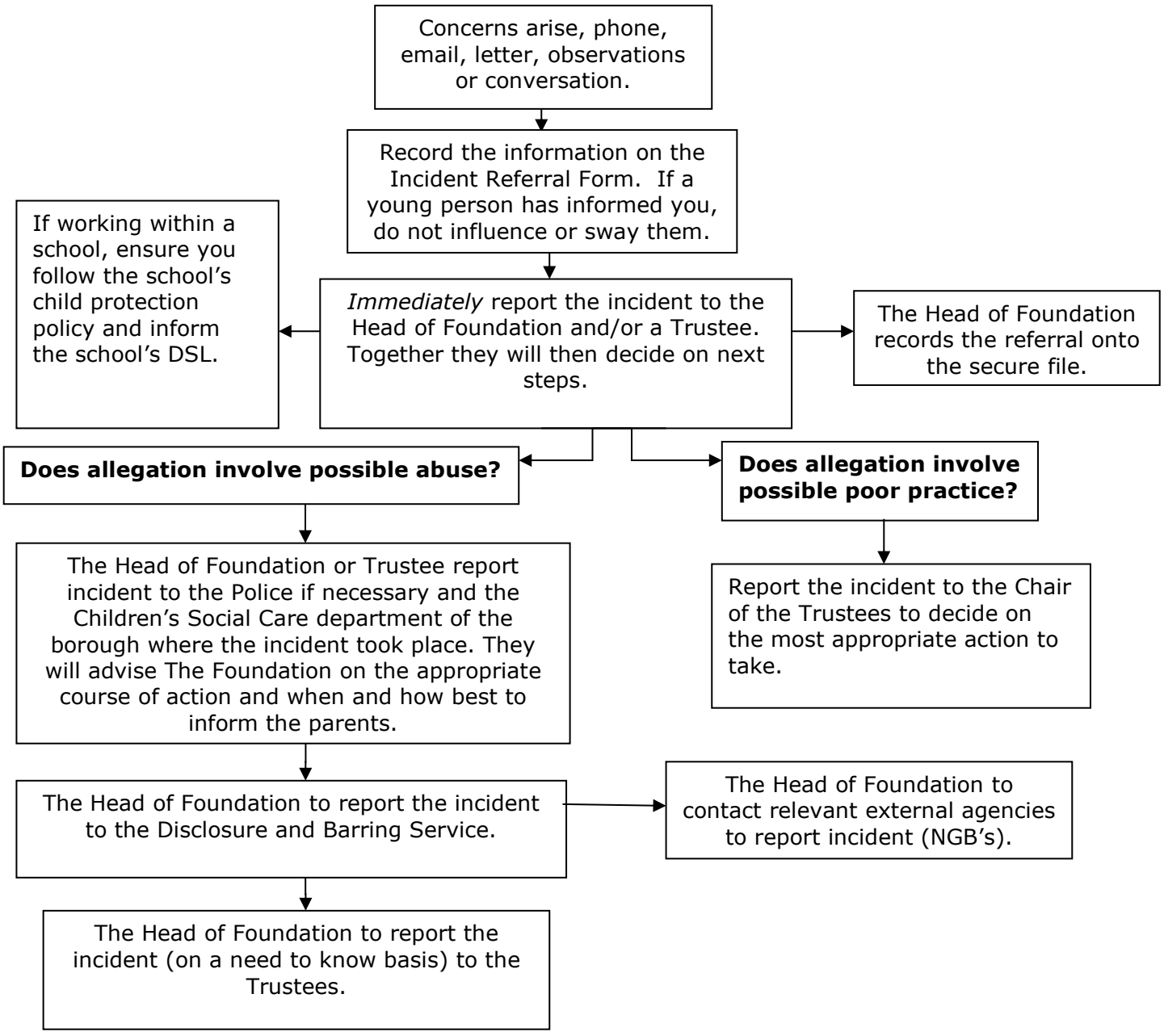
Notwithstanding the need to contact the people listed above, it is vital to maintain confidentiality on a need-to-know basis.

3.4.7 Allegations of abuse can be made some time after the event. When such allegations are made, you should follow the same procedures and have the matter reported to social services. This is because other young people may be at risk from the alleged abuser. Anyone who has a previous conviction for offences related to abuse against children is automatically excluded from working with young people.

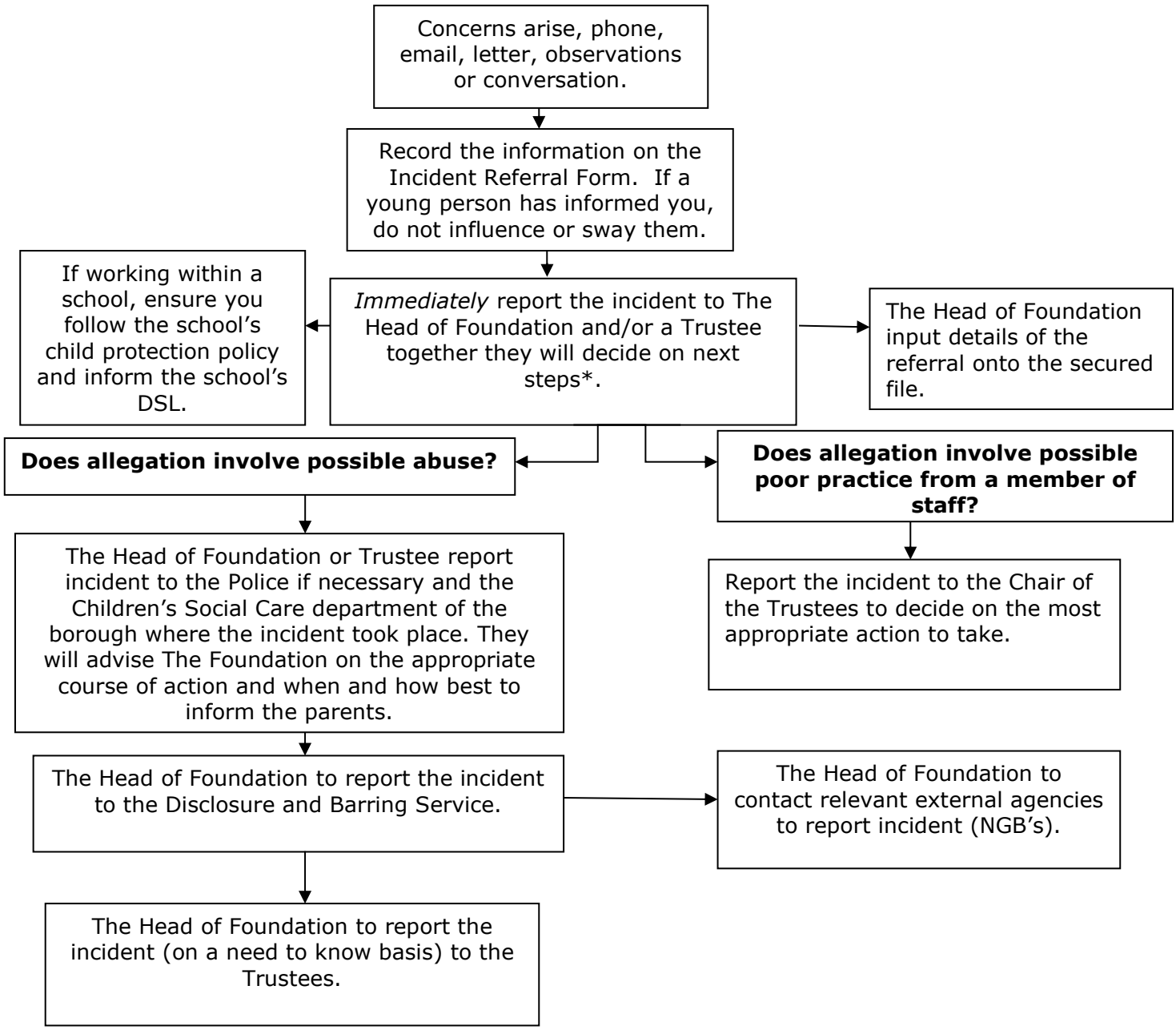
3.5 Concerns outside the immediate environment

3.5.1 You may become concerned about possible abuse to a young person which is taking place outside the immediate Wentworth Club or school environment i.e. abuse at home. You must still report your concerns to The Head of Foundation or a Trustee.

3.6 Process for responding to suspicions and allegations concerning a <u>young person</u>



3.7 Process for responding to suspicions and allegations concerning <u>any person working with young people</u>



*If the allegation involves The Head of Foundation, report the incident to the Chair of Trustees, who will decide on the most appropriate action to take. If the allegation involves the Chair of Trustees, report to another available Trustee.

3.8 Confidentiality & information sharing

3.8.1 Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only. This includes the following people:

- The Head of Foundation (DSL)
- The Chair of Trustees and other designated Trustees.
- Children's Social Care/Police.
- The parents of the young person (unless the allegation involves a parent).
- The person making the allegation.
- The alleged abuser (and parents if the alleged abuser is a young person).

3.8.2 All information should be given to the Head of Foundation and stored in a secure place for a minimum of 10 years with limited access to designated people, in line with data protection laws. Information classified as strictly confidential may only be exchanged electronically both within The Foundation and in exchanges with third parties if the information is strongly encrypted prior to exchange.

3.8.3 Timely information sharing is essential to effective safeguarding. The Data Protection Act (DPA) 2018 and the General Data Protection Regulation 2018 (GDPR) do not prevent, or limit, the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.

3.8.4 The government's *information sharing advice for safeguarding practitioners* includes seven 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information. If you are in any doubt about sharing information, you should speak to the Head of Foundation or Chair of Trustees.

3.9 Internal Inquiries and Suspension

3.9.1 The Head of Foundation and/or the Chair of Trustees will make an immediate decision about whether any individual accused of abuse should be temporarily suspended pending further police and social services inquiries.

3.9.2 Irrespective of the findings of the Children's Social Care and or police inquiries, The Foundation will assess all individual cases to decide whether a member of staff can be reinstated and how this can be sensitively handled. This may be a difficult decision; especially where there is insufficient evidence to uphold any action by the police. In such cases the Board of Trustees must reach a decision based upon the available information which could suggest that, on the balance of probability, it is more likely than not that the allegation is true. The welfare of the child should remain of paramount importance throughout.

3.10 Additional policies

3.10.1 For specific guidance on: (i) Safer recruitment; (ii) Whistleblowing, (iii) Data Protection and (iv) E-safety/use of media - covering safeguarding procedures for photography, video, publishing and on-line work, please refer to the relevant policies available.

3.11 Duty of care to employees

3.11.1 The Foundation has a duty of care to its employees to ensure their safety and well-being. An employee receiving evidence of abuse will be assisted by either the Head of Foundation or an appropriate Trustee who will put in place an action plan to support that employee throughout the process.

4 Further information, references and good practice

4.1 Introduction - Types of abuse and determining good practice

4.1.1 To provide young people with the best possible experience and opportunities at The Foundation everyone must operate within an accepted ethical framework which is set out in Appendix A - The Wentworth Golf and Tennis Foundation Code of Conduct for Staff and Volunteers.

It is not always easy to distinguish poor practice from abuse. It is therefore NOT the responsibility of employees or participants at The Foundation to make judgements about whether or not abuse is taking place. It is however their responsibility to identify poor practice and possible abuse and act if they have concerns about the welfare of the young person, as explained above.

This section will help to identify what is meant by child abuse, good practice and poor practice.

4.2 What is Child Abuse?

4.2.1 Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and is an abuse of power or a breach of trust. Abuse can happen to a young person regardless of their age, gender, sexual orientation, race, religion or ability.

4.2.2 The main types of abuse: **physical abuse, sexual abuse, emotional abuse, neglect and bullying**. The abuser may be a family member, someone the young person encounters in residential care or in the community, including sports and physical activities. Any individual may abuse or neglect a young person directly or may be responsible for abuse because they fail to prevent another person harming the young person.

4.2.3 Abuse in all its forms can affect a young person at any age. The effects can be so damaging that, if not treated they may follow the individual into adulthood.

4.2.4 Young people with disabilities may be at increased risk of abuse through various factors such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves or adequately communicate that abuse has occurred.

4.3 Types of Abuse

4.3.1 **Physical Abuse:** where adults physically hurt or injure a young person e.g. hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, and drowning. Giving young people alcohol or inappropriate drugs would also constitute child abuse.

In sport, physical abuse may occur when the nature and intensity of training disregard the capacity of the young person's immature and growing body.

4.3.2 **Sexual Abuse** occurs when adults (male and female) use young people to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal intercourse and fondling. Showing young people pornography or talking to them in a sexually explicit manner are also forms of sexual abuse.

In sport, activities which might involve physical contact with young people could potentially create situations where sexual abuse may go unnoticed. Also, the power of the coach over young athletes, if misused, may lead to abusive situations.

4.3.3 **Emotional Abuse:** the persistent emotional ill treatment of a young person, likely to cause severe and lasting adverse effects on the young person's emotional development. It may involve telling a young person they are useless, worthless, unloved or inadequate. It may feature expectations of young people that are not appropriate to their age or development. It may cause a young person to be frightened or in danger by being constantly shouted at, threatened or taunted which may make the young person frightened or withdrawn.

In sport, this may occur when the young person is constantly criticised, given negative feedback, expected to perform at levels that are above their capability. Other forms of emotional abuse could take the form of name calling and bullying.

4.3.4 **Neglect** occurs when an adult fails to meet the young person's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the young person's health or development. Examples of this could be; failing to provide adequate food, shelter and clothing; failing to protect from physical harm or danger; or failing to ensure access to appropriate medical care or treatment.

In sport, this could occur when a coach does not keep the young person safe or exposes them to undue cold/heat or unnecessary risk of injury.

4.3.5 **Bullying** may come from another young person or an adult. Bullying is defined as deliberate, hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves. There are four main types of bullying.

It may be physical (e.g. hitting, kicking, slapping), verbal (e.g. racist or homophobic remarks, name-calling, graffiti, threats, abusive text messages), emotional (e.g. tormenting, ridiculing, humiliating, ignoring, isolating from the group), or sexual (e.g. unwanted physical contact or abusive comments).

In sport bullying may arise when a parent or coach pushes the young person too hard to succeed or a rival athlete or official uses bullying behaviour.

4.3.6 Additional forms of abuse exist - See appendices for details of: Female Genital Mutilation; 'Honour based' violence; Forced marriage; Child sexual exploitation; Child criminal exploitation; child-on-child abuse including 'sexting'; radicalisation; homelessness; serious violence; private fostering; 'upskirting'; early help; child abduction and community safety incidents; modern slavery; cybercrime; and domestic abuse.

4.4 Indicators of Abuse & mental health issues

4.4.1 Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that a young person is being abused may include one or more of the following:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- An injury for which an explanation seems inconsistent.
- The young person describes what appears to be an abusive act involving them.
- Another young person or adult expresses concern about the welfare of a young person.
- Unexplained changes in a young person's behaviour e.g. becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper.
- Inappropriate sexual awareness or engaging in sexually explicit behaviour.
- Distrust of adults, particularly those with whom a close relationship would normally be expected.
- Difficulty in making friends.
- Being prevented from socialising with others.
- Displaying variations in eating patterns including over-eating or loss of appetite.
- Losing weight for no apparent reason.
- Becoming increasingly dirty or unkempt.
- Over-tiredness.
- Suicidal threats or behaviours.
- Displaying frequent unexplained minor injuries.

4.4.2 Signs of bullying include:

- Behavioural changes such as reduced concentration and/or becoming withdrawn, clingy, depressed, tearful, emotionally up and down, reluctance to go training or enter competitions.
- An unexplained drop-off in performance.
- Physical signs such as stomach aches, headaches, difficulty in sleeping, bed-wetting, scratching and bruising, damaged clothes, bingeing e.g. on food, alcohol or cigarettes.
- A shortage of money or frequent loss of possessions.

4.4.3 Signs of grooming behaviours include:

- being over friendly with children
- having favourites
- taking photographs of children on a personal mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door

- using inappropriate sexualised, intimidating or offensive language (including, but not limited to, making comments on body shape and using terms such as babe and princess).

4.4.4 Mental health

Mental health problems can, in some cases, be an indicator that a young person has suffered, or is at risk of suffering, abuse, neglect or exploitation. Staff will not attempt to make a diagnosis of mental health problems – The Foundation will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify young people whose behaviour suggests they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how young people's experiences can impact on their mental health, behaviour, and education.
Staff who have a mental health concern about a young person that is also a safeguarding concern will act in line with this policy and speak to the Head of Foundation or Chair of Trustees. The Foundation will access a range of advice to help staff identify young people in need of additional mental health support, including working with external agencies.

It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place.

It is NOT the responsibility of those working at The Foundation to decide that child abuse is occurring, it is however their responsibility to act on any concerns by reporting any incident or concern as outlined above, as well as completing an Incident Referral Report Form (Appendix C).

4.5 Good Practice

4.5.1 By promoting good practice the occurrence of abuse of young people should be reduced and this should also protect The Foundation staff and volunteers, thus reducing the likelihood of allegations arising. All personnel should adhere to the following principles and action:

- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- If involved in a 1:1 (coahing/mentoring) situation, give some thought before the meeting to the venue and environment where the meeting will take place. Avoid private, closed places; instead meet in an open, transparent space. If privacy is needed, make sure that the room/office has windows and is situated in a natural walkway. Always inform a colleague of your meeting.
- Make the experience of your sports programme or session fun and enjoyable: promote fairness, confront and deal positively and pro-actively with bullying, harassment or any other inappropriate behaviour.
- Treat all young people equally and with respect and dignity.
- Always put the welfare of the young person first.
- Staff should always use the mobile phone and tablet supplied to you by The Foundation (for further detail on E-safety/use of media - covering safeguarding procedures for photography, video, publishing and on-line work, please refer to the E-safety related policies available).
- Maintain a safe and appropriate distance with participants (e.g. it is not appropriate for staff or volunteers to have an intimate relationship with a young person or to share a room with them when traveling overnight).

- Avoid unnecessary physical contact with young people. Where any form of manual/physical support is required, it should be provided openly and with the consent of the young person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the young person's consent has been given.
- In extreme cases where a young person is becoming a danger either to themselves, to other young people or to you, physical contact/restraint may be required, however, to be judged lawful the force of restraint used must be proportionate to the consequences it is intended to prevent.
- If appropriate, involve parents/carers wherever possible, e.g. where young people need to be supervised in changing rooms, encourage parents who have undertaken a *DBS* check to take responsibility for their own child. If groups must be supervised in changing rooms always ensure parents, coaches etc. work in pairs. If on school premises, liaise with the school to follow the school policy.
- Keep up to date with the technical skills, qualifications and insurance in sport.
- Never transport a young person unless in an emergency; in this case it is the coach's responsibility to contact the young person's parents, carers AND their line manager for permission BEFORE they transport the young person. In such circumstances, always transport the young person in the back seats of the car and ideally there should be at least one additional adult to the driver acting as an escort.
- Be an excellent role model: this includes not smoking or drinking alcohol in the company of young people.
- Always give enthusiastic/constructive feedback rather than negative criticism.
- Recognise the developmental needs and capacity of the young person, do not risk sacrificing welfare in the desire for team/personal achievements. Avoid excessive training or competition and pushing them against their will.
- Do not undertake any medical treatment on a young person, unless qualified to do so. The Foundation should secure written parental consent for its qualified members of staff to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment.
- Keep a written record of any injury that occurs, along with details of any treatment given, coaches might use the existing Wentworth Club Ltd procedures when using their facilities.

- All staff must seek clarification regarding the appropriate risk assessment documents they should use for each activity/site/venue. These will be supplied by Wentworth Club Ltd or the school a session is being delivered in.

4.6 Coaching/Staff Ratios

4.6.1 All activities/events must comply with the ratios set by the relevant Governing Body. The Foundation staff will always adhere to these ratios, as well as consult with the appropriate host agency when working in a school setting, special education needs environment or with physically disabled young people.

4.6.2 A list of Governing Body ratios can be found by liaising with the relevant National Governing Body.

4.7 Trips

For any trips or overnight stays, all staff must refer to the Foundation Trips Policy, which can be obtained from the Head of Foundation, along with the mobile phone policy and various other relevant 'Trips Documents'. When organising a trip, staff must ensure all young people complete the Overnight Consent and Emergency Information Form.

If you are on an overnight stay with an under 18's team, please ensure that no person aged 18 or over shares a room with any young person under the age of 18.

Ensure that, if mixed teams are taken away, they should always be accompanied by a male and female member of staff or DBS checked volunteer on overnight trips.

Ensure that on overnight trips adults do not enter a young person's room unless it is absolutely necessary, in which case, always enter the room with a colleague and leave the young person's door open. Never invite a young person to your room.

While on an overnight trip, no young person should be allowed to leave the hotel unsupervised.

When on an overnight trip, ensure that you have liaised with the hotel staff and the night staff/security to inform them that in no circumstances are any young people allowed to leave the building and, if for some reason this did happen, that they contact a member of staff immediately.

4.8 Changing Rooms

4.8.1

- If possible, young people should be supervised in the changing rooms by a member or members of The Foundation staff. The member(s) of staff should be positioned by the door, with the door open (where appropriate) to supervise the young people by listening for concerning behaviours or incidents and entering the changing room only if necessary.
- As far as possible, members of The Foundation staff will only supervise or assist young people of the same gender.
- Young people will be made aware that a Foundation staff member will enter the changing room if necessary - in response to a disturbance, for example. If there is a need for an adult to enter the room, they will alert the young people to this by announcing it to give them the opportunity to cover up if they want to.
- Adult staff should not change or shower at the same time using the same facility as young people.
- If you are involved in a mixed gender activity, separate facilities should be made available.
- If young people are uncomfortable changing or showering in public, no pressure should be placed on them to do so. Encourage them to do this at home. This should always be the case for younger children (primary school age).
- If your activity/event has participants with disabilities, involve them and their carers in deciding how they should be assisted and ensure they are able to consent to the assistance that is offered.
- No photographic equipment to be used in the changing rooms. This includes cameras, video cameras and mobile phones with photographic capabilities.

4.9 Medical Treatment of Young People

4.9.1

- It is recommended that no young person should be treated in any situation where the young person is on his/her own in a treatment room with the door closed. It is The Foundation's policy that all treatment procedures should be 'open' i.e. the door remains open, parents are invited to observe treatment procedures and only undertaken by appropriately qualified members of staff.
- Prior to medical or health treatment being carried out on a young person, written consent from the parents must first be obtained unless it is an emergency.
- It is recommended that all treatment procedures are explained fully to the young person and verbal consent is given before they are carried out.
- It is recommended that, if treating an area of the body which is potentially embarrassing to a young person (i.e. the groin), a suitable adult (ideally a parent), acting as a chaperone, must be present.
- It is important to always maintain medical confidentiality and patient dignity.

4.10 Poor Practice

4.10.1 The following should be avoided except in emergencies.

- Do not transport young people in your car unless in an emergency and even so, permission MUST WITHOUT FAIL be obtained from the young person's parents or carer AND the Head of Foundation or Trustee. Ideally there should be at least one additional adult to the driver acting as an escort.
- Avoid spending time alone with young people away from others.
- If cases arise where these situations are unavoidable, they should only occur with the full knowledge and consent of the Head of Foundation or Trustee or appropriate person from the school/activity/event and the young person's parents. For example, a young person sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a young person up at the end of a session. In all cases, such incidents should always be recorded.

4.10.2 The following are regarded as poor practice and should be avoided by all personnel:

- Engaging in rough, physical or sexually provocative games, including any forms of inappropriate behaviour.
- Use of your personal mobile phone or tablet other than in extreme emergencies.
- Over-friendly behaviour/nature with participants.
- Allowing or engaging in inappropriate touching of any form.
- Allowing young people to use inappropriate language unchallenged.
- Making sexually suggestive comments to a young person, even in fun.
- Reducing a young person to tears as a form of control.
- Allowing allegations made by a young person to go unchallenged, unrecorded or not acted upon.
- Doing things of a personal nature that the young person can do themselves.
- Sharing a room with a young person.

4.10.3 If during your care you accidentally hurt a young person, the young person seems distressed in any manner, appears to be sexually aroused by your actions and/or if the young person misunderstands or misinterprets something you have done, report any such incidents as soon as possible, as well as making a written note of it. If appropriate they should then inform the young person's parents of the incident.

5. Childcare Disqualification Requirements

Staff covered by the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 ("the regulations") must comply with its requirements. For further information, the Department for Education has published statutory guidance, available to download here: https://www.gov.uk/government/publications/disqualification-under-the-childcare-act-2006

5.1 Do the Regulations apply to you?

Front Line Workers are covered by the Act if they provide childcare in either "Early Years" or "Later Years" up to the age of 8. This applies to individuals irrespective of their employment status. So, it applies equally to directly employed staff and volunteers who work on a regular basis.

Type of Worker	Children's age	During School hours	Outside School hours*
Front line Staff or Manager	Reception or younger	Covered by the regulations	Covered by the regulations
	Above reception but under 8	Not covered	Covered by the regulations
	Over 8	Not covered	Not covered

**Outside school hours does not include school clubs, e.g. choir or school sports' teams, but does include after-school provision.*

Under the Regulations an individual is disqualified and therefore not permitted to work with children if any of the following applies to them: -

- being cautioned for or convicted of certain violent and sexual criminal offences against children and adults;
- grounds relating to the care of children (including where an order is made in respect of a child under the person's care);
- having registration refused or cancelled in relation to childcare or children's homes or being disqualified from private fostering.

5.2 What do you have to do if the Regulations apply to you?

If any of the above applies to you then you may be disqualified and therefore must inform the Head of Foundation (see clause 2 for details) immediately.

6. Training

New staff and volunteers must complete the appropriate essential training within the designated timeframe listed below. All staff must refresh specific training in line with the timescales listed below in the table. This programme includes training on online safety

Coaching Staff

Name Of Course	**Mode of Delivery**	**Length of Delivery**	**Timeframe for delivery**	**Frequency of refresher**	**Notes**
SCUK/NSPCC/PGA/LTA Welfare Child Protection	Classroom	3-4 hours	Within the first month before starting coaching	Not necessary	Valid certificates achieved within 6 months prior to starting will be accepted
The Foundation Child Protection	Classroom	1-2 hours	Within the first month before starting coaching	Annually	

Office Staff

Name Of Course	**Mode of Delivery**	**Length of Delivery**	**Timeframe for delivery**	**Frequency of refresher**	**Notes**
SCUK/NSPCC/PGA/LTA Welfare Child Protection	Classroom	3-4 hours	Within the first month	Not necessary	Valid certificates achieved within 6 months prior to starting will be accepted
The Foundation Child Protection	Classroom	1-2 hours	Within the first month	Annually	

Volunteers

Casual Helper (Volunteers irregularly, supervised at all times and is not given access to changing rooms)

Name Of Course	**Mode of Delivery**	**Length of Delivery**	**Timeframe for delivery**	**Frequency of refresher**	**Notes**
The Foundation Child Protection	Classroom	1-2 hours	Before volunteering	Annually	Annual refresher if volunteer is a voluntary lead or consistently delivers 4 hrs per month or there are exceptional circumstances (to be reviewed every June)

Voluntary Assistant (Volunteers regularly, supervised at all times)

Name Of Course	**Mode of Delivery**	**Length of Delivery**	**Timeframe for delivery**	**Frequency of refresher**	**Notes**
SCUK/NSPCC/PGA/LTA Welfare Child Protection	Classroom	3-4 hours	Within the first 3 months	Not necessary	Valid certificates achieved within 6 months prior to starting will be accepted

*The refresher notes apply to all volunteer categories

Trustee (Volunteers regularly, no unsupervised contact with participants)

Name Of Course	Mode of Delivery	Length of Delivery	Timeframe for delivery	Frequency of refresher	Notes
SCUK/NSPCC/PGA/LTA Welfare Child Protection	Classroom/ online	3-4 hours	Within the first 3 months	annual online training compulsory via Greenhouse's e-learning portal	Lead Trustee for Safeguarding attends annual refresher. All Trustees invited.

External Training:
Training is delivered by industry recognised providers. Courses will be booked and recorded through the Head of Foundation. It is the trainee's responsibility to evidence attendance at each course by presenting the Head of Foundation with a valid certificate.

Internal Training:
Training is delivered by staff with recognised tutoring skill and subject knowledge.

Each internally delivered course will have a lead tutor assigned to the course. Lead tutors are responsible for ensuring consistent messaging throughout training. Before identified tutors are able to deliver the course they must shadow the lead tutor for a minimum of two sessions.

The lead tutor will review the course content and slides annually, updating content and communicating and explaining changes to other tutors.

7. Gifts, rewards, favouritism and exclusion

Settings for our programmes should have policies in place regarding the giving of gifts or rewards to participants and the receiving of gifts from them or their parents/carers and staff should be made aware of and understand what is expected of them

Staff need to 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. There are occasions when participants or parents wish to pass small tokens of appreciation to staff; e.g., at Christmas or as a thank-you and this is usually acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value (more than a few pounds). The Head of Foundation should be informed if a gift has been received. Similarly, it is inadvisable to give such personal gifts to participants or their families. This could be interpreted as a gesture either to bribe or groom. It might also be perceived that a 'favour' of some kind is expected in return.

Any reward given to a participant should be in accordance with agreed practice, consistent with the school or setting's behaviour policy, recorded and not based on favouritism. Adults should exercise care when selecting children for specific activities, jobs or privileges to avoid perceptions of favouritism or injustice. Similar care should be exercised when participants are excluded from an activity. Methods of selection and exclusion should always be subject to clear, fair, agreed criteria.

This means that staff should:

- Be aware of and understand the organisation's relevant policies in the setting where they work, e.g., rewarding positive behaviour

- Ensure that gifts received or given in situations which may be misconstrued are declared and recorded only give gifts to participants as part of an agreed reward system
- Where giving gifts other than as above, ensure that these are of insignificant value and given to all participants equally
- Ensure that all selection processes of participants are fair
- Ensure that they do not behave in a manner which is either favourable or unfavourable to individual participants

8. History

Version	**Date**	**Changes**	**Approved**
1.01	Nov 2025	None	

APPENDIX A
The Wenworth Golf and Tennis Foundations Safeguarding and Child Protection Code of Conduct

If a concern arises through a phone call, email, letter, conversation or observation, record the information on an Incident Referral Form then immediately tell The Head of Foundation or an available Trustee. Never just ignore it.

All The Foundation staff, workers and volunteers must adhere to the following good practice guidelines:

Participant Relationship

- Never engage in a personal relationship with a Foundation participant or young person in a school in which you deliver a coaching session.

- Never engage in any behaviours that are seen as 'grooming'. The signs of grooming include:
  - being over friendly with children
  - having favourites
  - taking photographs of children on your personal mobile phone
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door
  - using inappropriate sexualised, intimidating or offensive language (including, but not limited to, making comments on body shape and using terms such as babe and princess).

- Develop an appropriate working relationship with participants, based on mutual trust and respect.

- Maintain a professional relationship at all times, including outside of working hours.

Communication

- When communicating to a young person by phone, only ever use your work mobile. Ensure that the conversation/text is only ever regarding the programme and never encourage the young person to reply, except when appropriate for example in an emergency. In no circumstances should you use your personnel mobile/iPad.

- Do not accept a young person as a friend on any social media site. If you currently have a participant under the age of 18 as a friend on a social media site, please delete them immediately. All social media, including Twitter communication must be undertaken through the official Wentworth Golf and Tennis Foundation or Wentworth Club Ltd channels.

Transportation

- Never transport a young person in your car unless in an emergency; in this case it is your responsibility to contact the young person's parents, carers AND The Head of Foundation BEFORE you transport the young person. In such circumstances, always transport the young person in the back seats of the car and ideally there should be at least one additional adult to the driver acting as an escort.

Health & Safety

- Ensure the safety of all children by providing effective supervision, proper pre-planning of coaching sessions and always using safe methods.
- Consider the wellbeing and safety of participants before the development of performance.
- Administer minor first aid in the presence of others and where required call the Emergency Services
- Have access to a telephone for immediate contact to emergency services if required.
- Establish and address the additional needs of disabled participants or other vulnerable groups.

Behaviour

- Encourage and guide participants to accept responsibility for their own performance and behaviour.
- Encourage all children not to discriminate on the grounds of religious beliefs, race, gender, social classes or lack of ability.
- Do not allow any rough or dangerous play, bullying, or the use of bad language or inappropriate behaviour.

Safeguarding Professional Conduct

- Treat all young people fairly and ensure they feel valued.
- Appreciate the efforts of all young people and do not over-train the young people. Never exert undue influence over performers to obtain personal benefit.
- Be positive, approachable and offer praise to always promote the objectives of The Foundation.
- Never use sanctions that humiliate or harm young people.
- Do not abuse members physically, emotionally or sexually.
- Maintain confidentiality about sensitive information.
- Respect and listen to the opinions of young people.
- Take time to explain rules and techniques to ensure they are clearly understood.
- Create an environment where every individual has the opportunity to participate in a sport in an environment free of fear and harassment.
- Recognise the rights of all participants to be treated with respect and as individuals.
- Always be a positive role model for participants and ensure that the environment is as safe as possible, considering and minimising any possible risks.

Sharing Concerns and Recording Incidents

- Do not let any allegations of abuse of any kind or poor practice go unchallenged or unrecorded. Incidents and accidents must be recorded in the line with Greenhouse/school's procedures.

- Report accidents or incidents of alleged abuse or poor practice to the designated person.

The Wentworth Golf and Tennis Foundation is committed to providing a high quality, safe and child friendly environment for staff, volunteers, workers and participants and therefore operates a zero-tolerance policy in connection with the above.

I …….. confirm that I have read Part one of Keeping Children Safe in Education (September 2025) together with the above statement. I agree to comply with the Wentworth Golf and Tennis Foundation Safeguarding & Child Protection policy and adhere to all the areas of good practice listed above. In addition, I confirm I will inform The Foundation of any personal/family relationship with a Foundation participant.

…… **……**
Signed Dated

WENTWORTH
FOUNDATION

APPENDIX B - Incident Referral Form and Online Reporting

Your name: Your position in organisation: Contact Tel No's: Home: Mobile: Work: Address: Email:
Young Person's name: Address: Date of Birth: Male or female? Parent / carers name: Does the young person have a disability? If so, please detail:
Date and time of the incident:
Your observations:
Exactly what the child or vulnerable adult says and what you said (Remember, do not lead the child or vulnerable adult – record actual details. Continue on separate sheet if necessary)
Action taken so far:
Information on the alleged abuser:

You should refer all concerns immediately by speaking with The Head of Foundation and sending them this form. Have you contacted any external agencies yet? If so, please complete below.	
Social services	Name and contact number: Date and time: Details of advice received:
Local Safeguarding Partners	Name and contact number: Date and time: Details of advice received:
Police	Name and contact number: Date and time: Details of advice received:
Local Authority	If yes – which: Name and contact number: Date and time: Details of advice received:
NGB	If yes – which: Name and contact number: Date and time: Details of advice received:
Other	Which: Name and contact number: Details of advice received:
Signature: Print name: Date:	

Once completed, please make sure that you then immediately forward it on to the The Head of Foundation (DSL) by email

WENTWORTH FOUNDATION

APPENDIX C - Child Protection Referral Contact details

Surrey
Telephone: 0300 123 1650 (option 3)
Email: LADO@surreycc.gov.uk

Kingston and Richmond
Telephone: 07774 332675
Email: LADO@achievingforchildren.org.uk

Berkshire:

Bracknell Forest
Telephone: 01344 351572
Email: lado@bracknell-forest.gov.uk

Reading
Telephone: 01189372684
Email: LADO@reading.gov.uk

Slough
Telephone: 07927 681858
Email: LADO@sloughchildrenfirst.co.uk

West Berkshire
Telephone: 01635 519093
Email: LADO@westberks.gov.uk

Windsor and Maidenhead
Telephone: 07774 332675
Email: LADO@achievingforchildren.org.uk

Wokingham
Telephone: 0118 9746141
Email: LADO@wokingham.gov.uk

APPENDIX D Additional forms of abuse **If you have a concern about a particular child, you must follow normal safeguarding procedures as set out in the Wentworth Golf and Tennis Foundation SCP Policy (see clause 3.4, Reporting the concern).**

Female Genital Mutilation (FGM)

What is FGM?

- FGM is illegal (under the Female Genital Mutilation Act 2003) it is an offence to subject a girl or woman to FGM in the UK; to assist a girl to perform it on herself; for UK nationals or permanent residents to perform FGM abroad; or to assist anyone to perform FGM abroad.

- FGM includes any mutilation of a female's genitals for so-called cultural or other non-medical reasons. FGM is medically unnecessary, extremely painful and has serious health consequences, both at the time when the mutilation is carried out and in later life. FGM is illegal and is a child protection issue.

- FGM can be practised at any age, however the majority of cases take place between the ages of 5 and 8 years old. People from African countries as well as parts of the Middle East and Asia are more likely to practise FGM than other communities. Whilst not all people from these regions will practise FGM, and there are many people in these communities in the UK who are working to eradicate this practice, you should be aware of this issue for girls from these regions.

- Schools and youth settings are well-placed to identify girls at risk of FGM. Safeguarding girls at risk of harm through FGM poses specific challenges because the families involved may give no other cause for concern. However, there remains a duty for all staff to act to safeguard girls at risk of FGM.

Indicators that a girl may be at risk of FGM

- She has a parent from a practising community (see paragraph three above)
- She and her family have a low level of integration into a community
- The mother or any sisters have experienced FGM
- She has talked about, or you know about, the arrival of a female family elder
- She talks about it to other children
- She refers to a 'special procedure' or 'special occasion' or 'becoming a woman'
- She is out of the country for a prolonged period
- She is taking a long holiday to her country of origin or another country where the practice is prevalent (parents may talk about it too)

Indicators that a girl has experienced FGM

- A girl has problems walking/standing/sitting
- She spends a lot of time in the bathroom/toilet
- She has prolonged or repeated absences from school
- She is asking for help but giving a lack of explicit information

Action required

If you have any information that a child is potentially or actually at risk of significant harm you should follow the procedure set out in the Wentworth Golf and Tennis Foundation SCP Policy (see clause 3.4, Reporting the concern).

'Honour based' violence

So-called 'honour based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and /or community, including FGM, forced marriage and practices such as breast ironing, virginity testing and

hymenoplasty (stitching or surgery, undertaken to reconstruct a hymen). All forms of so-called HBV are abuse, regardless of the motivation and should be handled and escalated as such. We need to be alert to the possibility of a child being at risk of HBV or already have suffered HBV.

Indicators that a child is at risk of 'Honour based' violence

- the warning signs that FGM may be about to take place
- the warning signs that forced marriage may be about to take place, or may have already taken place

Forced Marriage

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or other forms of coercion are used to cause a person to enter into a marriage.

Child Sexual Exploitation (CSE)

CSE occurs when people use the power they have over children to sexually abuse them. It can relate to organised crime, individual abuse within relationships, penetrative acts or non-penetrative sexual acts such as sexual touching, masturbation, oral sex and the misuse of sexual images. It is against the law for someone in a position of trust, to abuse their power over children.

We have a duty of care for all children who may be vulnerable to CSE. The Foundation staff are trained to be vigilant and look out for signs and symptoms, such as children;

- skipping school or going missing for periods of time
- displaying inappropriate sexualised behaviour
- appearing with unexplained gifts that cannot be accounted for
- with emotional difficulties or mood swings
- with signs of unexplained physical harm

Refer to DofE Guidance for further Information on Child Sexual Exploitation.

Child criminal exploitation: County lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to transport drugs and money from urban to suburban areas or rural areas. Key to identifying potential involvement in county lines are monitoring absences from school, when a victim may have been used to traffic drugs. County lines exploitation can:

• affect any child or young person under the age of 18

• still be exploitation even if the activity appears to be consensual

• involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence

• be perpetrated by individuals or groups, males or females, and young people or adults and

• is typified by some form of power imbalance of those perpetrating the exploitation.

Child-on-Child abuse

The Foundation staff should be aware that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include bullying, cyber bullying, gender-based violence/ sexual assaults and sexting. Abuse should never be tolerated or passed off as 'banter' or 'part of growing up'. This could for example include girls being sexually touched/ assaulted or boys being subject to initiation-type violence.

Allegations made against participants by their peer(s) are likely to be considered a safeguarding matter when the allegation:

- is made against an older participant and refers to their behaviour towards a younger or more vulnerable participant
- is of a serious nature, possibly including a criminal offence
- raises risk factors for other participants
- indicates that other participants may have been affected by this participant

Incidents of child-on-child abuse will be investigated and dealt with in accordance with The Foundation's safeguarding policy and procedures.

In the case of 'sexting' we follow the guidance given to schools and colleges by the UK Council for Child Internet Safety (UKCCIS) published in August 2016: 'Sexting in schools and colleges, responding to incidents and safeguarding young people'**.**

Radicalisation and the Prevent duty

What is the Prevent duty?
Under section 26 of the Counter-Terrorism and Security Act 2015, there is a duty to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

What does it mean?
It is essential that staff can identify children who may be vulnerable to radicalisation and know what to do when they are identified. Protecting them from the risk of radicalisation should be seen as part of wider safeguarding duties and is similar to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation).

How to assess the risk of radicalisation

- There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may need help or protection.
- Children at risk of radicalisation may display different signs or seek to hide their views. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.
- Even very young children may be vulnerable to radicalisation by others, whether in the family or outside, and display concerning behaviour.
- The Prevent duty does not require unnecessary intrusion into family life but as with any other safeguarding risk, action must be taken when behaviour of concern is observed.
- General safeguarding principles apply to keeping children safe from the risk of radicalisation.

Homelessness

Any concerns over homelessness should be raised as early as possible in line with the reporting process outlined above. The Head of Foundation will be aware of the contact details and referral routes into the Local Housing Authority

Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because "they have to"

A referral to a Local Housing Authority does not replace a Safeguarding or Child Protection referral where a child is being harmed or at risk of harm. For 16- and 17-year-olds, homelessness may not be family-based.

Serious violence

The indicators which may signal a pupil is at risk from, or is involved with, serious violent crime include, but are not limited to, the following:

- Increased absence from school
- A change in friendships
- New relationships with older individuals or groups
- A significant decline in academic performance
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions

Some of the most significant risk factors that could increase a pupil's vulnerability to becoming involved in serious violent crime include, but are not limited to, the following:

- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behaviour

Private fostering

Private fostering is when a child under the age of 16 (or 18 if disabled) is looked after for 28 days or more by someone who is not their parent or a relative, and the arrangement was made privately. Where The Foundation becomes aware of a participant being privately fostered, they will report the concern following the process outlined above as soon as possible so that the school/ Local Authority can be notified to allow it to conduct any necessary checks.

Upskirting

Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.
A "specified purpose" is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

"Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.
Upskirting will not be tolerated. Any incidents of upskirting will be reported in accordance with this policy and a decision will then be made on the next steps to take, which may include police involvement.

Early help

Early help means providing support as soon as a problem emerges, at any point in a young person's life. Any participant may benefit from early help, but in particular early help may be needed for young people who:

- Have SEND (whether or not they have a statutory EHC plan).
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.
The DSL will take the lead where early help is appropriate.

Domestic abuse

In line with the Domestic Abuse Act 2021, "domestic abuse" is defined as abusive behaviour of a person towards another person (including conduct directed at someone else, e.g. the person's child) where both are aged 16 or over and are personally connected. "Abusive behaviour" includes physical or sexual abuse, violent or threatening behaviour, controlling or coercive behaviour, economic abuse, psychological or emotional abuse, or another form of abuse. "Personally connected" includes people who:

- Are, have been, or have agreed to be married to each other.
- Are, have been, or have agreed to be in a civil partnership with each other.
- Are, or have been, in an intimate personal relationship with each other.
- Each have, or had, a parental relationship towards the same child.
- Are relatives.

The Foundation will recognise the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of domestic abuse. All staff will be aware of the signs of domestic abuse and follow the appropriate safeguarding procedures where concerns arise.

Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents and other relatives, other people known to the victim, and strangers.
Participants will be provided with practical advice to ensure they can keep themselves safe outdoors.

Cyber-crime

Cyber-crime is defined as criminal activity committed using computers and/or the internet. This includes 'cyber-enabled' crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and 'cyber-dependent' crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

- Unauthorised access to computers, known as 'hacking'.
- Denial of Service attacks, known as 'booting'.
- Making, supplying or obtaining malicious software, or 'malware', e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures where concerns arise. This may include the DSL referring participants to the National Crime Agency's Cyber Choices programme.

Modern slavery

Modern slavery encompasses human trafficking and slavery, servitude, and forced or compulsory labour. This can include CCE, CSE, and other forms of exploitation.
All staff will be aware of and alert to the signs that a participant may be the victim of modern slavery. Staff will also be aware of the support available to victims of modern slavery and how to refer them to the National Referral Mechanism

Action required

As explained above, if you have a concern about a particular child, you should follow normal safeguarding procedures as set out in the Wentworth Golf and Tennis Foundation SCP Policy (see clause 3.4, Reporting the concern).

APPENDIX E

Further reading:

- HM Government (2018) Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

- https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

- Disclosure and Barring Service (DBS) checks (previously CRB checks) https://www.gov.uk/disclosure-barring-service-check/overview

- DBS Update Service https://www.gov.uk/dbs-update-service

- Protection of Freedoms Act (2012) – Chapter 5 http://www.legislation.gov.uk/ukpga/2012/9/part/5/chapter/1/enacted

Contacts and Advice:

Expert organisations

- Barnardo's
- Lucy Faithfull Foundation
- NSPCC
- Rape Crisis
- University of Bedfordshire: Contextual Safeguarding
- UK Safer Internet Centre

Support for victims

- Anti-Bullying Alliance
- MoJ Victim Support
- Rape Crisis
- The Survivor's Trust
- Victim Support

Toolkits

- Brook
- NSPCC
- Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire

Further information on confidentiality and information sharing

- Gillick Competency Fraser Guidelines
- Government Information Sharing Advice
- Information Commissioner's Office: Education
- NSPCC: Things to Know and Consider

Further information on sexting

- UK Council for Child Internet Safety: Sexting Advice
- London Grid for Learning – Collection of Advice

Support for parents

- Parentzone
- Parentsafe – London Grid for Learning
- CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact
- CEOP Thinkuknow – Supporting Positive Sexual Behaviour