

Sports, Education & Nada (musical sound)

SEN Unity CIC

Child safeguarding Policy

October 2026

CHILD SAFEGUARDING POLICY AND GUIDANCE

SEN Unity CIC

Version: October 2026 (revised from July 2026)
Next scheduled review: October 2027 (or sooner if legislation/guidance changes)
Designated Safeguarding Lead (DSL): Mr A. Merchant | Contact: Director@sen-unity.co.uk

1. Introduction

SEN Unity CIC acknowledges the duty of care to safeguard and promote the welfare of children and young people and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice within the UK sport, education and leisure sector.

The policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socio-economic background, all children:

- have a positive and enjoyable experience of sport at SEN Unity CIC sessions in a safe and child-centred environment.
- are protected from abuse whilst participating in the activities provided by SEN Unity CIC.

SEN Unity CIC acknowledges that some children, including disabled children and young people or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

As part of our safeguarding policy SEN Unity CIC will:

- promote and prioritise the safety and wellbeing of children and young people;
- ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people;
- ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern;
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored;
- prevent the employment/deployment of unsuitable individuals;
- ensure robust safeguarding arrangements and procedures are in operation.

The policy and procedures will be widely promoted and are mandatory for everyone involved in SEN Unity CIC. Failure to comply with the policy and procedures will be

addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

2. Monitoring and Review

This policy will be reviewed annually (next scheduled review: October 2027), or sooner in the following circumstances:

- changes in legislation and/or government statutory guidance;
- as required by the local safeguarding partners (Multi-Agency Safeguarding Arrangements), UK Sport and/or Home Country Sports Councils, and any relevant statutory bodies;
- following a serious incident, safeguarding case review, or inspection outcome;
- as a result of any other significant change or event.

All SEN Unity CIC employees, volunteers and sub-contractors must read this policy and sign to confirm they have read and understood the document. Staff and volunteers will receive safeguarding training at induction and at least every three years thereafter, or sooner if guidance changes.

3. Legislation and Statutory Guidance

This policy has been written to reflect current legislation and statutory guidance in force in England as at October 2026. The key legal and regulatory framework includes:

Legislation / Guidance	Relevance to SEN Unity CIC
Children Act 1989	The welfare of the child is paramount (s.1); children in need (s.17); child protection enquiries.
Children Act 2004	Duty to safeguard and promote welfare; multi-agency cooperation.
Equality Act 2010	Protected characteristics including disability; duty to make reasonable adjustments; definition of disability.
Data Protection Act 2018 / UK GDPR	Processing and secure storage of personal and sensitive safeguarding data.
Data (Use and Access) Act 2025	Updated framework for lawful data sharing and access.
Safeguarding Vulnerable Groups Act 2006	DBS checks and barred list requirements for regulated activity.
Working Together to Safeguard Children 2026	Statutory guidance on inter-agency working; introduces Family Help and

	Multi-Agency Safeguarding Arrangements (MASA).
Keeping Children Safe in Education (KCSIE) 2026 or updated version	Relevant to educational settings; Annex C on online safety.
SEND Code of Practice 2015	Duties towards children and young people with special educational needs and disabilities.
Occupiers Liability Acts 1957 & 1984	Duty of care for premises and activities under our control.
Sexual Offences Act 2003	Offences including grooming, sexual activity with children, abuse of position of trust.
Serious Crime Act 2015	Offences including child sexual exploitation, coercive control, and county lines-related exploitation.

Note: The Disability Discrimination Act 1995 (as amended in 2005) has been largely superseded by the Equality Act 2010, which is now the primary legislation governing disability discrimination and the definition of disability. References to the Local Safeguarding Children Board (LSCB) are replaced by the local safeguarding partners operating under Multi-Agency Safeguarding Arrangements (MASA), established under the Children and Social Work Act 2017.

4. Roles and Responsibilities

Designated Safeguarding Lead (DSL): Mr A. Merchant

The DSL is responsible for:

- acting as the first point of contact for all safeguarding concerns and disclosures;
- making timely referrals to children's social care and/or the police (same-day verbal referral, followed by written referral within 24 hours where appropriate);
- maintaining accurate, dated and secure safeguarding records;
- ensuring staff and volunteers receive appropriate safeguarding training;
- liaising with local safeguarding partners, schools, and other agencies;
- reporting serious incidents to the Charity Commission / Companies House and relevant regulators as required by Working Together 2026.

All staff, volunteers and sub-contractors have a responsibility to recognise and report concerns. It is not the role of any SEN Unity CIC employee to investigate abuse — our duty is to report concerns promptly to the DSL, who will refer to the appropriate statutory authorities. Only children's social care, the NSPCC and the police have statutory powers to investigate when a child is considered at risk.

5. Working with Disabled Children and Young People

SEN Unity CIC safeguarding responsibilities are further heightened because all its participants are disabled and there is considerable evidence to suggest that disabled people are more at risk, in safeguarding terms, than their non-disabled peers. They are also less likely to receive the protection and support they need when they have been abused.

The NSPCC report "We have the right to be safe": Protecting Children from Abuse (Miller D, Brown J, October 2014) identified the following factors that increase risk and lessen protection for disabled children and young people:

- attitudes and assumptions — e.g. a reluctance to believe disabled children are abused; minimising the impact of abuse; and attributing indicators of abuse to the child's impairment;
- barriers to the disabled child and their family accessing support services;
- issues related to a child's specific impairment — e.g. dependency on a number of carers for personal or intimate care; impaired capacity to resist/avoid abuse; difficulties in communicating; and an inability to understand what is happening or to seek help;
- limited opportunities for disabled children to seek help from someone else;
- a lack of professional skills, expertise and confidence in identifying child protection concerns and the lack of an effective child protection response.

Definitions

Any child with a disability is by definition a "child in need" under section 17 of the Children Act 1989.

The Equality Act 2010 defines a disabled person as someone who has:

> *"A physical or mental impairment which has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities."*

For the purposes of this document, a disabled child or young person refers to anyone accessing SEN Unity CIC's activities who is up to the age of 18. For young people aged 18 and over who continue to access services, safeguarding duties transition to adult safeguarding under the Care Act 2014, and the DSL will ensure appropriate handover to adult services.

Accessible Communication

SEN Unity CIC is committed to ensuring that all children and young people, regardless of their communication needs, are able to raise concerns and be heard. We will:

- use easy-read, symbol-supported and visual materials where appropriate;
- allow additional time and use communication aids, interpreters or advocates as needed;
- avoid making assumptions about a child's capacity to understand or report abuse;

- ensure disclosures are recorded in the child's own words and communication style.

6. Recognising Abuse

This policy will be used whenever a SEN Unity CIC employee, volunteer or sub-contractor has concern about the welfare of a child or young person. The action will depend on the nature of the concern.

A child may make a disclosure of information to a SEN Unity CIC employee concerning their physical or emotional welfare or make a comment about a bruise or other injury. It may be straightforward, or it may be indirect. Children rarely make false allegations of abuse, and all disclosures must be taken seriously.

All disclosures must be taken seriously. The member of staff must make it clear to the child that the information cannot be kept a secret and that if something harmful is being done, it can be stopped. It is important to acknowledge that this is likely to be very difficult for the child to acknowledge and confide such matters. Always be ready to listen.

A member of staff may receive information concerning a child's welfare from another person or another child. Again, such information should be taken seriously and reported first to the DSL, who will decide what action, if any, is to be taken.

Recognising abuse can often be difficult and employees may be reluctant to report suspicion, for fear of reprisal. The following key points must be adhered to:

- Everybody has a responsibility to report suspected or alleged abuse.
- Individuals should take note, not only of major incidents, but also of signals which make them feel suspicious or concerned.
- Report also if there is a worrying change in a child's behaviour. Your intuition as well as observation will be taken seriously.
- Discuss any worries, however unspecific, with the DSL. Please do not keep worries to yourself.
- All such worries will be recorded.
- Great caution should be exercised. The presence of symptoms does not mean it is inevitable that a child is being abused.

After reporting a suspicion, you and the DSL may be asked to attend a child protection conference or Family Help meeting with children's social care. Schools may also have their own procedures that they abide by and that may involve you.

7. Categories of Abuse

Abuse can include:

- Physical abuse
- Neglect
- Sexual abuse

- Emotional abuse
- Online abuse and digital harm (including grooming and exploitation)
- Peer-on-peer abuse and bullying
- Child criminal exploitation (including county lines, cuckooing and drug-related exploitation)
- Child sexual exploitation (CSE)
- Impact of domestic abuse and parental substance misuse / mental health

7.1 Physical Abuse
Definition: "The actual or likely physical injury to a person, or a failure to prevent physical injury or suffering to a person."

Physical signs and symptoms characteristic of physical abuse (indicative only, not comprehensive):

- High suspicion: human bite marks; bilateral black eyes; fingertip bruising; bruising on soft tissue areas (cheeks, torso, buttocks, thighs) in non-mobile children.
- Medium suspicion: burns or scalds (especially glove/stocking or imprint marks); bruising in sites not easily injured; unusual cuts or marks; frequent accidents; head injuries.
- Low suspicion: any injury (particularly repeated accidents); strange or unusual behaviour e.g. aggressiveness; fear of a parent/carer or going home.

7.2 Neglect
Definition: "Persistent or severe neglect of a person, including the failure to meet basic needs such as food, shelter, hygiene, medical care, and — for disabled children — communication and care needs."

Physical indicators of neglect can include:

- abnormalities of skin and hair; poor hygiene; persistent hunger; non-attendance at school/activities; missed medical or therapy appointments; untreated medical conditions; inappropriate or inadequate clothing for weather/activity.

Behavioural indicators of severe neglect include:

- severe withdrawal; food scavenging or stealing; frequent tiredness; poor social relationships.

7.3 Sexual Abuse
Definition: "Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities including prostitution and sexual exploitation, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways. This includes online and digitally mediated abuse."

Alerting signs or symptoms include:

- hints at having sexual activity or having uncomfortable secrets;
- behaving in a sexual manner or using sexual words beyond developmental expectation;
- severe eating disorders in older children; self-harm or self-mutilating behaviour;
- fire-raising; running away; unexplained money, gifts or mobile phones;
- secretive use of devices or social media; distress following online activity.

7.4 Emotional Abuse
Definition: "The serious adverse effect on the emotional and behavioural development of a person, caused by persistent or severe emotional ill-treatment, rejection, or the persistent non-recognition of a child's worth."

Alerting signs or symptoms include:

- severe withdrawal; severe aggression; bullying behaviour; scapegoating; persistent name-calling; delayed development; low self-esteem; anxiety or depression.

7.5 Online Abuse and Digital Harm
Disabled children and young people may be at increased risk of online harm due to greater time spent online, difficulty recognising grooming or exploitation, and targeted approaches by abusers. Staff must be alert to:

- online grooming (building trust online to facilitate abuse);
- coercion to share explicit images or videos ("sextortion" / "nude image abuse");
- child sexual exploitation facilitated through social media, gaming platforms or apps;
- cyberbullying and peer-on-peer online abuse;
- radicalisation or exposure to harmful content.

SEN Unity CIC will ensure any devices or online platforms used in sessions are safe, age-appropriate and supervised. Children will be supported to understand online safety in an accessible format.

7.6 Child Criminal and Sexual Exploitation
Staff must be alert to indicators of exploitation, which may include: unexplained absences; returning home late or going missing; association with older or unknown individuals; unexplained money, gifts, phones or clothing; drug or alcohol misuse; self-harm; significant changes in emotional wellbeing; or signs of physical/sexual assault. County lines exploitation and "cuckooing" (where a vulnerable person's home is taken over by drug dealers) may affect families of children we work with.

8. Reporting Abuse and Referral Procedure
Levels of concern:

1. Concern but no obvious injury or direct allegation.

2. Suspicious injuries and behaviour.
3. Disclosed information.

In all instances, contact the DSL first.

If there is an immediate risk of harm to a child, call the police on 999. If a child discloses abuse, the DSL will contact children's social care and/or the police immediately. Referrals should be made verbally on the same day, followed by a written referral within 24 hours using the form in Appendix 1. We must NOT try to investigate the matter ourselves where there is a strong suspicion of physical or sexual abuse. Leave this to the police and/or children's social care.

Information Sharing and Confidentiality
Staff should be open and honest with children and families about information sharing unless doing so would place a child at increased risk. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information to safeguard a child; information may be shared without consent where it is necessary to protect a child from significant harm. When in doubt, share concerns with the DSL, who will advise on lawful information sharing with statutory agencies.

Record Keeping and Retention
All safeguarding concerns, disclosures and referrals must be recorded in writing, dated and signed, using the child's own words as far as possible. Records must be stored securely and confidentially, separate from general personnel files. Safeguarding records will be retained for a minimum of 7 years after the child's last contact with SEN Unity CIC, or until the child reaches the age of 25, whichever is longer, in line with Working Together 2026 and Information Commissioner's Office guidance.

9. Allegations About a Member of Staff, Coach or Volunteer

All complaints of child abuse against SEN Unity CIC employees, volunteers or sub-contractors will be handled swiftly, sensitively and in line with the local safeguarding partners' procedures and Working Together 2026.

If an allegation concerning physical or sexual abuse is made about a SEN Unity CIC staff member, the DSL will seek advice from children's social care and/or the police child protection unit, informing them of the incident and discussing the necessary action to be taken. The DSL will also notify the board/directors of SEN Unity CIC.

The staff member will be informed of the allegation. This must be done without questioning the employee about the complaint and making it clear that they have the right to be accompanied by a representative or friend at all stages. Consideration will be given to the staff member's contact with children pending investigation, and the statutory duty to refer to the Disclosure and Barring Service will be applied where appropriate.

10. Serious Incidents and Notifications

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- harm to the organisation's beneficiaries, staff, volunteers or others who come into contact with the organisation through its work;
- loss of the organisation's money or assets;
- damage to the organisation's property;
- harm to the organisation's work or reputation.

Under Working Together 2026, the DSL must notify the local safeguarding partners of any serious safeguarding incident. Where applicable, SEN Unity CIC will also notify the Charity Commission, Companies House, the Disclosure and Barring Service, and the NSPCC Child Protection in Sport Unit as required.

11. Recruitment and DBS Policy

What this policy covers

This policy sets out the organisation's obligations on handling recruitment into job roles that involve working with vulnerable people and on monitoring and reporting information about staff and volunteers received during the course of their engagement. It also sets out responsibilities for reporting abuse and the procedure for doing so.

Recruitment

SEN Unity CIC will make it clear when advertising jobs or volunteer roles whether the work will involve "regulated activity" as defined by the Safeguarding Vulnerable Groups Act 2006. Before an applicant can be employed or engaged in regulated activity, the organisation will require a satisfactory Enhanced Disclosure with a barred list check from the Disclosure and Barring Service (DBS) to confirm suitability to carry out regulated activity.

For volunteers, a DBS check is required where the role involves regulated activity. For volunteers in less frequent roles, a check is required where the volunteer's activity amounts to more than 3 days in a 30-day period, or includes overnight activity with children. All volunteers and staff will also be subject to identity verification, reference checks, and a safeguarding self-declaration.

Work that becomes regulated activity

If work either becomes regulated activity or an individual is asked to perform work that is regulated activity, SEN Unity CIC will require a satisfactory Enhanced Disclosure with a barred list check. If an individual refuses to undertake this check, or appears on the barred list, the organisation will investigate whether they can continue in activities that are not regulated, but reserves the right to terminate the engagement.

If added to a barred list during engagement
If an individual is added to a barred list during their engagement, SEN Unity CIC is legally obliged not to allow them to continue in regulated activity. This may mean the organisation cannot continue to employ or engage them. If notified that an individual has been barred, the organisation will investigate whether they can continue in non-regulated activities, but reserves the right to dismiss without notice.

Duty to refer information to the DBS
By law, SEN Unity CIC has a duty to refer certain information to the Disclosure and Barring Service. This includes:

- if the organisation has dismissed an individual because they have harmed, or may harm, a vulnerable adult or child;
- if an individual has resigned in circumstances where there is a suspicion that they have harmed, or may harm, a vulnerable adult or child (this applies where an allegation has been made and the individual resigns before disciplinary action);
- if the organisation has suspended an individual and has reason to think they have engaged in "relevant conduct" or has harmed, or may harm, a vulnerable adult or child, or has received a caution or conviction for a relevant offence.

12. Further Information and Contacts

Organisation	Contact
Childline (for children)	0800 1111
NSPCC Helpline (for adults with concerns)	0808 800 5000
Police (immediate danger)	999
Local children's social care (out-of-hours)	Appropriate to each Local Authority
NSPCC Child Protection in Sport Unit (CPSU)	www.thecpsu.org.uk
Annex A (KCSIE 2026) / Working Together 2026	www.gov.uk/government/publications
Information Commissioner's Office (data protection)	www.ico.org.uk

Key references:

- Miller, D. and Brown, J. (2014) "We have the right to be safe": protecting disabled children from abuse. [London]: NSPCC. www.nspcc.org.uk
- Working Together to Safeguard Children 2026 — www.gov.uk/government/publications/working-together-to-safeguard-children

- Keeping Children Safe in Education 2026 (Annex C: online safety) — www.gov.uk/government/publications/keeping-children-safe-in-education
- Children Act 1989 — www.legislation.gov.uk/ukpga/1989/41
- Children Act 2004 — www.legislation.gov.uk/ukpga/2004/31
- Equality Act 2010 — www.legislation.gov.uk/ukpga/2010/15

Related Documents

Other related SEN Unity CIC policies include (details available on request):

- Photography and Social Media Policy
- Public Interest Disclosure (Whistleblowing) Policy
- Disciplinary Policy and Procedure
- Behaviour Management Policy
- Online Safety Policy

Appendices

Appendix 1: Safeguarding Referral / Concern Form

Name of organisation:	SEN Unity CIC
Coach / staff member in attendance:	
Address:	
Daytime / evening telephone:	
Email address:	

Child / young person details:

Name of child/young person:	
Address:	
Date of birth:	
Gender:	
School / setting (if known):	
Parent/carer name and contact:	

Concern details:

Date and time of concern / disclosure:	
Location:	
Reported by (name and role):	
Nature of concern (use child's own words):	
Any witnesses (names and contact details):	
Action taken so far:	
Agency contacted (name, role, time, date):	
Consent given for referral? (Yes / No / Not applicable — explain):	
DSL name and signature:	
Date referred to children's social care / police:	
Written referral sent (date):	

In the event of an accident or incident, complete the Accident/Incident Reporting Form (Appendix 2) in addition to this form where appropriate. Two copies should be completed: one retained in the incident file and one forwarded to the DSL. Parents/carers must be contacted. Emergency services or a GP should be contacted if required. Record all facts, witnesses and any further action. Senior management must sign off any action required.

Appendix 2: Allegation About a Staff Member, Coach or Volunteer

Use this form for concerns about the behaviour of a staff member, coach or volunteer towards a child/children (e.g. suspicions, allegations, poor practice or possible abuse). Complete all sections and submit to the DSL immediately. Do not question the individual concerned.

Name of person making report:	
Role / relationship to organisation:	
Date and time report made:	
Name of person allegation is about:	
Their role:	
Child/children involved (names if known):	
Nature of allegation / concern (factual detail):	
Any witnesses:	
Immediate action taken (e.g. contact with children suspended):	
Agencies notified (children's social care / police / DBS):	
DSL signature and date:	

Staff / Volunteer Acknowledgement

By signing this document, I confirm that I have read, understood and agree to uphold SEN Unity CIC's Child Safeguarding Policy and Procedures. I understand my duty to report any safeguarding concern promptly to the Designated Safeguarding Lead.

Signed: _____

Print name: _____

Role: _____

Date: _____