

Activate Management Ltd
Safeguarding Policy for Children

Review Document:

Policy Introduced	January 2006	Notes
Reviewed annually	2006 – 2025 (D Taylor)	
Last Updated	10th Feb 2026 Oliver Uffindall	Updated with KCSIE 2025, layout, removal of NCS wording, and grammatical changes. Amended hours for Activate DSL number. Removal of appendices to separate linked documents.

Safeguarding Statement & Commitment

At Activate Management Ltd, your child's safety, wellbeing, and enjoyment are at the heart of everything we do. We are fully committed to creating an environment where every child feels safe, valued, and supported.

We follow recognised national safeguarding guidance and operate robust procedures to ensure children and staff are always protected. This includes safer recruitment practices, comprehensive staff training, and clear processes for reporting and responding to concerns.

All staff and coaches working with us are vetted, fully safeguarding trained, and expected to uphold the highest standards of professional conduct. Our dedicated Designated Safeguarding Lead (DSL) team oversees safeguarding across all of our programmes and is available to support parents, guardians, and staff whenever needed.

We believe safeguarding is everyone's responsibility. If you ever have a concern about a child's welfare we encourage you to speak to our team. We will always listen and act promptly.

Together, we can ensure every child has a safe, positive, and memorable experience with us.

Appendices

- Appendix 1 – Definitions
- Appendix 2 – Safeguarding staff support
- Appendix 3 – Safeguarding procedures
- Appendix 4 – Disclosures and how to report effectively
- Appendix 5 – Maintaining safe working practice – poster
- Appendix 6 – Information sharing
- Appendix 7 – Allegations against members of staff
- Appendix 8 – Safeguarding background
- Appendix 9 – Trans and Transgender inclusion
- Appendix 10 – Harmful sexual behaviour help
- Appendix 11 – DBS referral background
- Appendix 12 – Coercive Control background and information
- Appendix 13 – Safeguarding Flow Chart (Included in this document)
- **Appendix 14 – Local information – LADO contact details, local allegation processes etc. (Added separately as required)**

Accessing the Safeguarding Appendices

This Safeguarding Policy is designed to provide all essential information in a clear and accessible format. Additional documents including extended procedures, detailed definitions, safer recruitment processes, reporting forms, and training materials are held in a separate Safeguarding Appendix Pack.

Parents/Guardians and venue partners can access these documents by emailing: info@we-activate.co.uk to request the documents.

We aim to provide requested documents within **3 working days**.

Terminology & Definitions

Children - For the purpose of this document and for Activate's safeguarding policies and procedures, children are defined as:

"Any person under the age of 18 years"

Activate has a separate Safeguarding Policy for Adults which is provided to staff within their training and through the Activate staff portal.

Additional detailed definitions of child and adult at risk can be found in **Appendix 1**

Safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

Abuse, Neglect, and Exploitation

Abuse, neglect, and exploitation are forms of maltreatment to an individual. These terms refer to a violation of an individual's human and civil rights by any other person(s) and include serious physical and sexual assaults as well as cases where the standard of care does not adequately support the individual's health or development.

Abuse to children or adults at risk may consist of a single act or repeated acts and may be an act of neglect, or omission or it may occur when a vulnerable person is persuaded to enter into a financial or sexual transaction to which they have not consented or cannot consent. Children and adults at risk may be abused or neglected through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in any relationship or in an institution or community setting and may result in significant harm to or exploitation of the individual

Abuse can also take place using electronic communication as well as solely online. Abuse can occur within all social groups regardless of religion, culture, social class or financial position. Children and Adults may be abused by those known to them or, more rarely, by a stranger. Adults, children, peers, paid or voluntary workers, health or social care workers may abuse them. Often people do not realise they are abusing and sometimes the stress of caring can cause a carer to act out of character.

Imminent / immediate risk

It is important that all staff understand their role and responsibilities with respect to safeguarding. It is essential to ensure that:

If there is an **immediate risk of harm**, then call **999**[Key contact details](#)

Designated Safeguarding Lead (National)

Oliver Uffindall (National) oliver@we-activate.co.uk 0121 227 4385

- Responsible for the overall safeguarding policy and dissemination of this information to senior project leaders to ensure they can identify and deliver training.
- Responsible for supporting senior project staff in the management of safeguarding incidents across programmes and supporting in the liaison between project leads and external bodies when appropriate

Trained Designated Safeguarding Officers (National & Regional as identified)

- Oliver Uffindall (Director – National) oliver@we-activate.co.uk 0121 227 4385
 - Tom Swainston (Director - National) tom@we-activate.co.uk 0121 227 4385
 - Sammi Woodward (General Manager) – sammi@we-activate.co.uk 0121 227 4385
- Responsible for regional delivery of safeguarding policies & procedures, staff training & supervision, & implementation of the required policies & procedures.
 - Regional support mechanism for the reporting and management of safeguarding issues raised, including liaison with local partnerships as required.
 - Responsible for overseeing the reporting of safeguarding incidents across programmes and liaising with external bodies as required.

External Contacts

In the event of none of the above being available a list of suitable and related external contacts can be found within the digital staff hubs during the programme seasons.

Activate provides staff with local details as required, these include contact details for the LADO, as well as information related to the local allegations management process, and out of hours numbers for relevant support services. These will be added as a separate appendix to the policy or within management packs held digitally on the central staff hub

Current external contact – Dom Taylor proactive@we-activate.co.uk – Responsible for safeguarding policy reviews and provision of advice and guidance where necessary to senior staff.

Legislation and relevant guidance:

Activate is committed to ensuring that policies and procedures remain up to date and are reflective of current legislation and guidance, currently including:

The Children Act 1989 & 2004 (as amended)	Female Genital Mutilation Act 2013
Children and Social Work Act 2017	Sexual Offences Act 2003
Safeguarding Vulnerable Groups Act 2006	Modern Slavery Act 2015
Protection of Freedoms Act 2012	Equality Act 2010
Working together to safeguard children 2018 (Updated June 2025)	Data Protection Act 2018
Keeping children safe in education 2018, updated and amended in September 2025	UN Convention on the rights of the child 1989
Childcare act 2006 (as amended in 2018)	What to do if you're worried a child is being abused: Advice for practitioners (2015)
Prevent Duty (2015)	

Policy Statement

Activate Management Ltd provides sport and activity to children aged between 5 – 17 years old in a variety of settings and venues across the UK. This is delivered primarily in day camps or residential activities but also extends to delivery of the other programmes.

Activate acknowledges the duty of care to safeguard and promote the welfare of children and adults at risk and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and Ofsted and any other regulatory body requirements. Activate is committed to working with all relevant partners and statutory bodies to ensure that safeguarding policies and procedures are met, and legislation complied with.

This document can be viewed alongside other Activate policies and procedures which contribute to the overall strategy to ensure the safeguarding of children and adults remains paramount. The additional documents include:

- Safeguarding Policy – Adults
- Activate Digital Safeguarding Policy
- Equality & Diversity
- Anti-Bullying Procedure
- Whistle Blowing Policy
- Safer Recruitment Document
- Anti-trafficking and slavery policy
- Working with children and young people code

- Prevent Policy
- Mobile & Social Media Guidance/E-Safety Policy
- Staff Code of Conduct – Appendix
- Complaints Policy

This policy recognises that the welfare and interests of participants are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all participants

- Have a positive and enjoyable experience at all Activate activities in a safe and child centred environment
- Are protected from abuse, neglect, or exploitation whilst participating in programmed sessions or outside of the activity whilst the child is in our care. There are four primary categories of abuse (physical, sexual, emotional, and neglect); in addition to these we also take account of “Bullying” as a form of abuse. Definitions of these can be found within the “Safeguarding Procedures” section of the Parents Guide.

Activate 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 Activate will:

- Promote and prioritise the safety and wellbeing of all participants
- 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 participants
- 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. Activate will respond to incidents or reports of abuse quickly, and always within 24 hours.
- 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 Activate. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

This policy forms part of Activates’ safeguarding procedures, there are additional specific procedures in place for use in instances of bullying and for ‘Child on Child’ abuse as referenced in

the Governments Safeguarding Children in Education document.

*Note the term peer on peer abuse has in many instances been replaced by the term child on child abuse to reflect that this type of abuse could be between children of different ages, not just by those of similar ages which is often considered with the term peer.

Activate is aware of relevant legislation and guidance and is committed to ensuring that we remain up to date with a compliant to all relevant legislation. As part of this process Activate refers to the 'Safeguarding and Child Protection Standards for the Voluntary and Community Sector' This includes making sure that staff are aware of and standards are met including:

- Standard 1 – Recruitment, induction and supervision
- Standard 2 – Protecting children and young people
- Standard 3 – Preventing and responding to bullying
- Standard 4 – Running safe activities and events
- Standard 5 – Recording and storing information
- Standard 6 – Sharing information and working with other agencies

Details are available from the NSPCC.

Activate Staff and their role in reducing incidents

Activate recognises the need to ensure that staff are provided with the necessary skills to deliver high quality programmes. Activate is also committed to ensuring that can embed the following principles into their work.

- A culture of listening to vulnerable groups to be embedded.
- Safe working practice for working with potentially vulnerable groups which help to protect children and staff and volunteers and reduce the risk of allegations being made. See the 'Safe Working Practice' poster provided to staff, at the end of this document.

Scope

The following types of abuse are covered by this policy/appendices and within training provided to staff:

- Domestic Abuse / Coercive Control
- Sexual Abuse
- Neglect
- Online Abuse
- Physical Abuse
- Emotional Abuse
- Child Sexual Exploitation
- Female Genital Mutilation (FGM)
- Bullying and Cyber Bullying
- Child Trafficking

- Grooming
- Harmful Sexual Behaviour
- Financial or Material Abuse
- Modern Slavery
- Discriminatory Abuse
- Radicalisation / Extremism ('Prevent')
- Peer on Peer / Child on Child Abuse (Contextualised Safeguarding)

Training

- All staff will be trained on safeguarding, including responsibilities surrounding 'Prevent', 'Cyber Safety', and 'Modern Slavery'
- Staff will be trained on how to monitor and how to report safeguarding issues including a clear chain of command and reporting process Identified in the appendix as Safeguarding Procedures. Activate focuses on '**Recognise, Respond, Report, Record**' as a process.
- Training will be reviewed regularly (at least annually and/or when legislation or guidance changes)
- Staff training is recorded on the Activate Staff training portal as well as within individuals training records.
- Staff training will reflect the requirements of our various partner organisations – these include but are not limited to, Ofsted, The NSPCC, Government bodies.

Monitoring

The policy will be reviewed annually, or in the following circumstances:

- Changes in legislation and/or government guidance
- As required by the Local Safeguarding Children Partnership or organisation, UK Sport and/or Home Country Sports Councils and Ofsted
- As a result of any other significant change or event.

This policy is our general statement on child safeguarding and welfare. This policy should be viewed along with the additional policies and procedures related to Activate and our activities as identified above.

Designated Persons

Activate has clearly identified Designated Persons responsible for safeguarding.

The Designated Persons within Activate have a combined responsibility for safeguarding and will be led by the Designated Safeguarding lead, all Safeguarding staff will:

- Take responsibility for promoting positive safeguarding procedures and the implementation of good practice within his/her area of responsibility.
- Receive information from and ensure appropriate advice is given to all Staff, temporary staff, agency staff and volunteers.
- Record information on the Proactive Reporting system; assess incoming information promptly and take appropriate action.
 - In addition, staff will ensure that their rationale for decision making on safeguarding concerns and referrals are documented within the process (KCSIE 2025 update)
- Ensure staff are familiar with procedures for referrals, and where and when to make appropriate use of these.
- Be aware of and have the contact details of the local safeguarding children's partnerships or organisations and all other relevant agencies and make sure all Staff know where this information is held and their responsibilities if they are required to contact these people.
- Support other organisations and agencies in an Early Help assessment. These should be kept under constant review and a referral made to Children's Social Care if the child or young person's situation doesn't improve
- Ensure that the local safeguarding children's team keep the Designated Person informed of safeguarding matters as appropriate including the opportunities for training provided by the Local Safeguarding Partnership Board in their area.
- Ensure the safeguarding leads for external partners for example, delivery partners are known, and their details are readily available to all relevant Staff.
- Make sure all Staff within their geographical area of responsibility are aware of their role and how to contact them or their deputy (where applicable) in their absence.
- Ensure that participants and parents/carers have access to safeguarding information and processes.
- Assess the safeguarding development needs of all staff and ensure that steps are taken to spread good practice, and that all staff are fully familiar with this policy and procedures and any updates to this policy are clearly communicated to all - including third party providers.
- When an alert is raised, consider whether parents/carers need to be contacted and if any doubt speak to the Safeguarding Lead, or Deputies.
- Monitor the number of safeguarding concerns; keeping confidential records for up to 7 seven years of incidents and feed back to their programmes and their General Manager on the quality of their safeguarding work as required and annually.
- Have additional Advanced safeguarding training that will be refreshed every 3 years

Reporting

- Activate includes safeguarding and all aspects associated within this document/policy as requiring to be reported.
- Safeguarding issues must be reported to the Designated Safeguarding Lead and all safeguarding concerns will be investigated fully and recorded. Reports should be made as soon as a disclosure or incident is apparent, and this should always be done within 1 hour of the initial raising of the issue.
- Safeguarding issues or suspicions will also be reported to external bodies as required within safeguarding legislation, best practice, and statutory requirements. This will be completed by

Safeguarding trained staff within 24 hours of a report being made.

- Designated safeguarding staff will be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including rationale for those (KCSIE Updated 2025)
- Staff are trained on their responsibilities including what and when to report, and methods of reporting.

During residential weeks Activate will operate a 24-hour Safeguarding and Incident phone line. This will be provided to all staff and will be the first line of reporting in the event of a safeguarding concern or incident. During day camp delivery the phone is available 8am to 8pm.

This phone line will only be manned by staff who have completed advanced safeguarding training. The line will be manned on a rota basis with clear communication to staff on responsibilities.

Activate has assigned the following person as our designated safeguarding lead:

Oliver Uffindall (Director) – oliver@we-activate.co.uk 0121 227 4385

Definitions and Coverage

Definitions of the types of abuse, together with signs and symptoms are included in the attached appendices (Appendix 8)

Staff are made aware of the need to report allegations of abuse including those that may not have occurred whilst in the care of Activate (Historical allegations of abuse)

Safeguarding Procedures Background

Activate acknowledges the importance of protecting children from abuse. All complaints, allegations or suspicions are taken seriously. We will not promise confidentiality; however, we have strict guidelines on sharing information, which we adhere to (see appendix 6).

The specific details on how complaints, allegations, or suspicions are reported is detailed in the appendix 3.

Whistle Blowing

Activate has a separate Whistle Blowing procedure on which staff have access to and in which are contained separate whistle blowing procedures.

Staff are made aware of their statutory requirements for safeguarding and the requirement to report all safeguarding concerns. As a result, this policy and procedures take precedent over all other procedures in the event of a safeguarding concern or disclosure.

DBS Referrals

Activate recognises its responsibilities surrounding the legal requirement and best practice advice to make referrals to the DBS if the recognised conditions are met.

Activate uses the government provided information on how to make referrals as well as using the online referral form as and when required. This information can be found at <https://www.gov.uk/guidance/barring-referrals>

All safeguarding staff at Activate are aware of these responsibilities and the process which must be followed. The process used and further details are contained as an appendix at the end of this policy.

Referrals will only be made in line with the guidance provided by the UK Government including the specific advice of whether to make a referral when an allegation is made, or when someone is suspended. Referrals will be made by one central contact at Activate (Normally the General Manager or Directors).

Further details can be found in appendix 11

Safeguarding Responsibilities for Staff

All Activate Staff are directly responsible for ensuring that all participants are safe from abuse, danger or harm, including neglect and exploitation - or the risk of this occurring.

Recognise, Respond, Report, Record (See appendix 2 for more detail)

All people working with participants – whether engaged directly by Activate or in Partnership, must, therefore:

- Immediately report any concerns to their line manager or, in their absence, the 'Designated Safeguarding Officer', if abuse against participants may have taken place in the workplace or may be taking place outside the workplace or is likely to take place in either location.
- All Staff should know who their Designated Safeguarding Officer (DSO) is and how to contact them. Staff may also use the 24 hour (residential only, 8am to 8pm otherwise) on call safeguarding line operated during peak programme times, this number is on their lanyard and available in the Staff Hub.
- Be vigilant for any signs of significant harm and avoidable danger potentially coming to participants from any source.
- Participants who have an additional need which covers Special Educational Need and Disability (SEND) could be more susceptible to abuse or harm due to their level of understanding or awareness to what may be taking place, and their possible inability to express or disclose. Staff will need to be more vigilant to potential signs of harm.

Watch out for evidence of the following being presented by any participant:

- If participants are frequently missing/goes missing from activities – this may support the inclusion of Early Help (KCSIE 2025)

- Any unlawful victimisation due to 'protected characteristics' see the Equality & Diversity policy for details of protected characteristics.
- Exploitation including financial abuse, sexual exploitation, forced marriage, radicalisation, Modern Slavery.
- Being subjected to emotional abuse.
- Being the victim of crime or the fear or tangible threat of crime.
- Being prone to accidents, where this leads to suspicion that these may not genuinely be accidents.
- Being in a potentially unsafe physical environment, rough sleeping or in the case of a young person, being missing from care or home.
- Being subject to sexual and/or physical abuse, including domestic violence.
- Any reference to historical abuse (that is to be treated the same as if the Incident alert refers to current abuse taking place).
- Bullying.
- Cyber-bullying or any other form of on-line abuse
- Referencing Female Genital Mutilation (FGM). Under the Serious Crime Act 2015, FGM is a now a criminal offence in the UK for anyone involved in carrying this out. FGM is a form of abuse and needs to be reported as a safeguarding concern if disclosed. This will be reported via the local contacts and where necessary to the police.
- Self-harm.
- Self-neglect.
- Neglect, by person (s) formally responsible for the care of the individual.
- Reporting that they are being bullied, exploited, harassed or harmed by other children, otherwise known as Child on Child abuse. This could take the form of inappropriate touching, initiation violence, grooming, sexual violence / harassment, physical abuse, or sexting. It can take place as part of domestic abuse, child sexual exploitation, harmful sexual behaviour or serious youth crime or violence
- Regularly arriving and then going 'missing' from the programme, or leaving without permission / agreement to do so – this may be a signal for the inclusion of 'Early Help'
- Domestic abuse where control and coercion are prevalent, and can take the form of physical, psychological/emotional, financial or sexual abuse. The Serious Crime Act 2015 now makes it a criminal offence for controlling or coercive behaviour to be committed within an intimate or family relationship. Appendix 12 gives more detail about Coercive control.

External partners, and providers of activities to participants

All external partners, providers, and guest speakers on programmes will be assessed to ensure that they are suitable for delivery on Activate programmes.

Activate will make our safeguarding policy and procedures available to all contractors and will make staff aware of our ongoing safeguarding responsibilities even when contractors are running activities. We also request any contractor safeguarding policies, DBS, Insurance certificates and procedures where relevant.

Activate has the following in place which support our procedures and ensure that all subcontractors or hire venues are assessed and receive and understand the information required to maintain the safety of our staff and participants.

- External Providers Policy
- Contractor hire letter and checks
- Venue hire letter
- Transport providers checklist

All visitors to Activate activities will be supervised by Activate staff as we maintain our duty of care to participants and recognise that this duty cannot be passed over to any third party.



Appendix 13: Activate Safeguarding Flow chart

