



CM Sports Safeguarding and child protection policy	
This version Date	September 2025
Review Date	September 2026
Review by	JG

CM Sports (UK) Ltd acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and the Football Association and Sports Coach UK requirements.

In addition, our policy is informed by the latest updates from Keeping Children Safe in Education (KCSIE) 2024/2025, Working Together to Safeguard Children (2023), and guidance from the NSPCC Child Protection in Sport Unit (CPSU). The policy reflects that safeguarding includes both offline and online harm, and acknowledges that harm can also result from exposure to domestic abuse, exploitation, or persistent absence from education. The policy recognises that the welfare and interests of children 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 children:

- have a positive and enjoyable experience of sport at CM Sports (UK) Ltd in a safe and child-centred environment
- are protected from abuse whilst participating in any activities provided by CM Sports (UK) Ltd or outside of the activity.

‘Abuse’ now includes emotional, physical, sexual, neglect, and also exploitation, including criminal exploitation and witnessing domestic abuse.

CM Sports (UK) Ltd 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.

We also recognise that children in kinship care, those frequently absent from education, and those exposed to online harms or misinformation, may be at greater risk of harm and must be monitored accordingly.

As part of our safeguarding policy, CM Sports (UK) Ltd 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
- ensure early help and intervention are considered when children show signs of vulnerability (e.g. persistent absence, at risk of exclusion)
- keep records of all safeguarding decisions, including rationale when not making a referral
- regularly assess the safety of any external providers or alternative provision, including full address and safeguarding arrangements

The policy and procedures will be widely promoted and are mandatory for everyone involved in CM Sports (UK) Ltd. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

All staff must read and understand Part 1 of the most recent Keeping Children Safe in Education guidance. Safeguarding now also includes responsibility for ensuring children are not exposed to harmful online content, misinformation, or disinformation.

Use of Electronic Devices with Media Capture

CM Sports (UK) Ltd recognises that electronic devices capable of capturing, storing, or sharing images/video or audio (e.g., smartphones, tablets, smartwatches, action cameras) present specific safeguarding risks.

To protect children and staff, the following measures and expectations apply:

1. Protection of Children

- Only CM Sports company-owned devices may be used to capture images or videos of children. Personal devices must never be used for photography, filming, or audio recording in any CM Sports environment.
- Media capture must only occur with verified parental consent.
- All images must be appropriate, respectful, and free from any risk of embarrassment or harm.
- Images must be downloaded to a secure location and deleted from the device immediately.
- Children may not bring electronic devices with media capture to any CM Sports session. If brought accidentally, devices will be stored safely and returned to parents/carers on collection.

2. Protection of Staff

- Staff personal devices may not be used for media capture under any circumstances.
- Staff must keep their personal devices on silent and stored away during sessions.
- Staff should not communicate with children via personal devices or social media.
- All media capture must be visible and transparent.
- Company devices must be password protected.
- Lost, stolen, or damaged devices must be reported immediately.

3. Visitors and External Agencies

- Visitors may not use any device with media capture unless essential to their role and agreed in advance.
- Visitors who must use such devices will be supervised at all times.
- Parents and participants are strictly prohibited from capturing images or recordings during sessions.

4. How These Measures Protect Everyone

Protection for Children:

- Prevents unauthorised or inappropriate image capture
- Reduces risk of grooming, exploitation, and online misuse
- Ensures images are used safely and only with consent
- Ensures privacy and dignity
- Minimises exposure to online harm

Protection for Staff:

- Reduces risk of allegations
- Ensures transparency
- Reinforces professional boundaries
- Protects data integrity
- Supports compliance with KCSIE, EYFS, and CPSU standards

Staff Safeguarding Training and Development

The setting is committed to ensuring that all staff are appropriately trained, knowledgeable, and confident in carrying out their safeguarding duties in line with the EYFS 2024 and KCSIE 2024.

Induction Training

All new staff members undertake safeguarding training as part of induction, covering:

- The Safeguarding and Child Protection Policy
- Recognising abuse
- Reporting and recording concerns
- Roles of the DSL and Deputy DSLs

All staff must:

- Hold a valid enhanced DBS

- Maintain up-to-date First Aid qualifications

Ongoing CPD

- Staff training evenings
- Morning coaching workshops
- Online refreshers
- Use of Google Forms/shared docs to assess understanding

Monitoring and Record Keeping

The DSL maintains detailed records of staff training, reviews compliance, and identifies training needs.

Safeguarding Thresholds and Levels of Need

CM Sports (UK) Ltd follows the most up-to-date local safeguarding partnership “Thresholds of Need” guidance, Working Together to Safeguard Children (2023), and KCSIE 2024/2025. These thresholds support early identification of concerns and ensure children receive the right support at the right time.

Safeguarding is a continuum and needs may change rapidly. Staff must be alert, record accurately, and escalate promptly.

Level 1 – Universal Needs

Children with no identified concerns.

Staff Responsibilities:

- Continue general monitoring
- Maintain professional curiosity

Level 2 – Additional Needs (Early Help)

Children with emerging vulnerabilities, early attendance issues, family stress, or low-level concerns.

Staff Responsibilities:

- Report to DSL
- DSL liaises with school / Early Help services

Level 3 – Targeted Support / Children in Need

Significant concerns requiring multi-agency involvement.

Examples:

- Persistent absence
- Mental health concerns
- Domestic abuse in family
- Parental substance misuse

Staff Responsibilities:

- Report immediately
- DSL to liaise with children's social care
- Maintain accurate records

Level 4 – Child Protection / Significant Harm

A child is suffering or likely to suffer significant harm.

Examples:

- Physical, sexual, emotional abuse or neglect
- Criminal/sexual exploitation
- Serious online harm
- Witnessing domestic abuse

Staff Responsibilities:

- Act immediately
- Follow CPSU flowcharts
- Do not promise confidentiality
- Contact statutory services where required

Safer Eating and Food-Related Safeguarding

CM Sports recognises that safe eating practices form part of safeguarding and that poor nutrition, allergies, unsafe supervision, or food insecurity can indicate wider safeguarding concerns.

Allergy and Dietary Management

- Maintain up-to-date allergy and dietary registers
- Staff must check registers before any food activity
- No sharing of food at any time
- Follow venue-specific allergy protocols

Safe Eating Practices

- Children must be seated while eating
- Supervision is required at all times
- No hot food/drinks near children
- Food must be age-appropriate

- Check packaging and expiry dates

Hygiene and Cross-Contamination

- Handwashing before and after eating
- Clean/disinfect surfaces
- Gloves worn if handling food where required
- No shared water bottles

Food-Related Safeguarding Indicators

Staff must be alert to:

- A child arriving hungry or malnourished
- Disclosure of lack of food at home
- Hoarding or hiding food
- Inadequate packed lunches
- Extreme overeating or refusal to eat

These concerns must be recorded and escalated to the DSL.

Staff Responsibilities

- Follow safer eating procedures
- Ensure food provided meets allergy/dietary needs
- Report any food-related incidents (choking, allergic reactions)
- Maintain relevant First Aid qualifications

Whistleblowing and Speaking Up About Safeguarding Concerns

CM Sports (UK) Ltd is committed to maintaining a culture of openness, transparency and accountability. All staff, volunteers, parents/carers and partners should feel confident that they can raise concerns about poor or unsafe practice or potential failures in the organisation's safeguarding and child protection arrangements without fear of reprisal.

Whistleblowing is the reporting of concerns about wrongdoing, malpractice or unsafe practice in the workplace that affects others and is in the public interest. It is protected by law under the Public Interest Disclosure Act 1998 and the Employment Rights Act 1996. This protection means that workers raising genuine concerns in good faith will not suffer detriment or be dismissed as a result of raising those concerns.

What Whistleblowing Covers

A whistleblowing concern may include, but is not limited to, concerns that:

- A child's safety or wellbeing is being put at risk.
- Safeguarding policies or procedures are not being followed.
- There is failure to comply with legal or statutory obligations.

- There is criminal activity, unethical conduct, malpractice or concealment of any such issues.
- There is a cover-up of wrongdoing that affects the welfare or safety of children or staff.
- There are serious breaches of organisational policy, including repeated or systemic poor practice.

This is distinct from a grievance, which relates to concerns about an individual's own employment circumstances or personal grievances (e.g., employment rights issues, personal disputes). Those should be addressed through the organisation's grievance procedure, not via whistleblowing.

Raising a Whistleblowing Concern

Staff and volunteers are encouraged to raise concerns at the earliest possible stage. Where a concern relates to safeguarding practice, poor culture, or unsafe procedures, you should normally raise this with:

The Designated Safeguarding Lead (DSL);

Or, if the concern involves the DSL, with a senior manager or the Director.

Where a concern cannot be raised internally—for example, because the person believes that doing so may be unsafe, ineffective, or involve the person they are reporting—concerns can be raised externally with an appropriate prescribed body such as:

- The NSPCC Whistleblowing Advice Line (confidential support for child protection concerns) on 0800 028 0285 or email .

NSPCC

- Ofsted or other regulators where relevant (e.g., if concerns relate to children's social care services).

The organisation will support those making disclosures and will ensure, wherever possible, that the person making the disclosure is protected from any form of retaliation or detriment.

Confidentiality and Anonymity

Whistleblowers can raise concerns anonymously, although this may limit the organisation's ability to investigate fully. We will respect confidentiality wherever possible and will only disclose identity where required by law or for the purposes of a fair and effective investigation.

Investigation and Response

All whistleblowing disclosures will be taken seriously and investigated appropriately and fairly. The organisation will:

- Acknowledge receipt of the concern promptly.
- Assess the nature and seriousness of the concern.
- Advise the whistleblower of how the matter will be handled and expected timescales.
- Take action as needed, which may include internal investigation, referral to statutory agencies, or disciplinary action.

- Provide feedback to the whistleblower where appropriate and permitted.

Protection from Detriment

No individual who raises a concern reasonably and in good faith will be subject to any detriment, discrimination or dismissal as a result of speaking up. Any such retaliatory behaviour will itself be treated as a serious disciplinary matter.

Responsibilities of All Staff

- Know the whistleblowing procedure and contribute to an open culture that encourages concerns to be raised.
- Recognise and act on concerns relating to safeguarding, child protection, culture, practice and compliance.
- Support others who raise legitimate concerns and not dismiss or deter them.

Monitoring

The policy will be reviewed annually and every three years formally, or sooner if:

- Legislation changes (e.g., annual KCSIE update)
- Required by LSCB, UK Sport, sports councils, FA, or Sports Coach UK
- Significant incidents occur
- Online safety risks increase

Reporting Concerns

Any concerns should be reported immediately to the school the child attends if the concern is raised or noted during school hours or a School Club.

Outside of these circumstances you must follow the CPSU procedure flowchart (Appendix 19).

Staff must also be alert to online risks (e.g. grooming, radicalisation, conspiracy theories), and report these in the same way.

Concerns for children in kinship care, persistent absence, or risk of exclusion must be escalated as safeguarding issues.

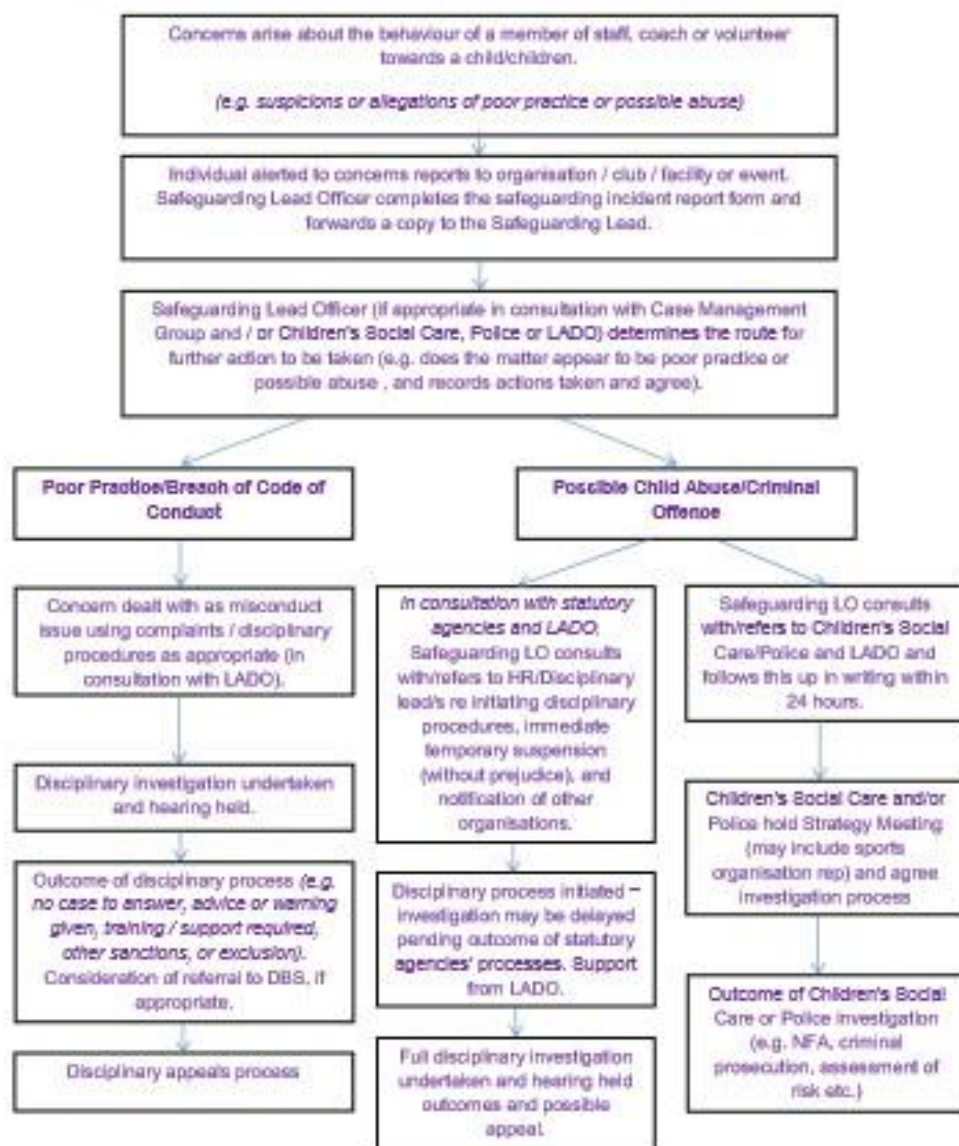
APPENDIX 19

CPSU procedure flowcharts



Outline safeguarding reporting procedure concerns

1. About the behaviour of the organisation's staff member or volunteer (e.g. allegation about a coach or officer's behaviour towards a child)



CPSU procedure flowcharts



Outline safeguarding reporting procedure concerns

2. About the behaviour of another organisation's staff member or volunteer (e.g. allegations reported about an individual working for a partner organisation)



CPSU procedure flowcharts



Outline safeguarding reporting procedure concerns

3. About children and young people arising out of sport (e.g. at home, school or in the community)

