Safeguarding Policy

Children, young people and adults

WEBSITE COPY - FOR INFORMATION ONLY

Cheerleading • Tumble • Dance
Recreational and competition programmes

Everyone has the right to train safely.
Athlete welfare comes before performance, selection or winning. Concerns must be heard, recorded and acted on without delay.

Policy owner: Magic Allstars Ltd
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This edition incorporates the safeguarding review recommendations and replaces earlier editions on director adoption. It is written for Magic's operation in England, with requirements for activities elsewhere in the UK or overseas. This website copy is for information only. Adoption and acknowledgement signatures are retained in the main document.

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Directors

The directors are accountable for adopting this policy, funding appropriate safeguards, checking implementation, arranging independent handling where leaders are implicated, and ensuring any applicable legal or regulatory referrals are made. They must not place reputation or commercial interests before safeguarding.

Designated Safeguarding Lead and deputy

The lead coordinates reporting, agency liaison, case records, staff advice, safe information sharing, training needs and reviews. The deputy provides cover. Neither role replaces the police, social care or LADO, and neither is a gatekeeper who can prevent someone reporting externally. A conflicted person must not handle a concern about themselves or access its confidential record.

Coaches, staff, volunteers, parents and athletes

Everyone must follow the relevant conduct rules, raise concerns promptly and cooperate with safety arrangements. Staff must read this policy, know the contacts and reporting routes, and record concerns. Parents must supply accurate safety and collection information. Athletes will receive an accessible explanation of their rights and how to seek help.

1. Safeguarding contacts and urgent action

Immediate danger or urgent medical emergency: call 999.
Do not wait for a safeguarding lead, a form, an email reply or a scheduled session. Non-emergency police reporting: 101.

Magic Allstars

Designated Safeguarding Lead: Brenda Abraham
Deputy Safeguarding Lead: Scott Rowlinson
Safeguarding contact telephone: 07591 198508
Email: magic.allstars.cheerleading@gmail.com

If the concern is about Brenda, report to Scott and the appropriate external agency. If Scott, both leads or the owners are implicated, or the shared phone/inbox is unsafe for the disclosure, report directly to the statutory agency below. Do not send sensitive allegations to an inbox accessible to their subject. Directors must maintain a restricted, conflict-free alternative and display it to staff and families.

Kent children and allegations about adults working with children

Urgent Front Door: 03000 41 11 11.
Urgent out of hours: 03000 41 91 91.
Child welfare referrals: Kent Children's Portal, accessed through the KSCMP child concern page.
LADO/LESAS: use the professional LADO referral route in the Kent Children's Portal. Use the LESAS enquiry form for threshold advice. Follow up acknowledgement of submitted referrals.

KSCMP: worried about a child / referral portal

Kent LADO/LESAS: professional referral and enquiry routes

If portal access fails, contact Frontdoor@kent.gov.uk for access advice and use the urgent telephone routes if required. LESAS publishes lesasenquiries@kent.gov.uk for its parent/carer referral form; general enquiries and professional referrals must follow the routes on its current webpage. Do not substitute KSCMP's general inbox for a welfare referral.

Adults and independent advice

Kent adult safeguarding: 03000 41 61 61 (Monday-Friday, 9am-5pm); urgent out of hours 03000 41 91 91; social.services@kent.gov.uk.
NSPCC helpline: 0808 800 5000; help@nspcc.org.uk (check current hours).
Childline: 0800 1111.
NSPCC Sport: 0116 366 5580; sport@nspcc.org.uk.
Ann Craft Trust: 0115 951 5400; ann-craft-trust@nottingham.ac.uk.

Use the person's relevant local authority if outside Kent. Kent and Medway have separate referral arrangements. For activities elsewhere, the event lead must identify the appropriate local routes before the activity. Advice services are not substitutes for urgent police or social care referrals.

2. Purpose, scope and legal framework

Purpose and principles

Magic Allstars provides cheerleading, tumble and dance opportunities through recreational and competition programmes. This policy sets out how we prevent harm, respond to concerns and support safe participation. We will listen to athletes, act on concerns, support those affected by abuse and work with families and statutory agencies where appropriate. Athlete welfare is paramount and comes before results or reputation.

All participants must be treated with dignity, without discrimination. We recognise additional barriers to disclosure and protection, including disability, communication needs, isolation and unequal power. We will make reasonable adjustments, provide accessible reporting and challenge exclusion. No athlete will be disadvantaged for raising a concern in good faith.

Who and what it covers

This policy applies to directors, employees, freelance and guest coaches, volunteers, young helpers, contractors and others acting for Magic. It covers children under 18, adults, parents/carers and visitors during trials, classes, one-to-one sessions, competitions, displays, camps, travel, online activity and other programme events. Welfare concerns arising outside Magic must also be reported where they affect safety; they are not dismissed as someone else's responsibility.

England and other jurisdictions

Magic's principal safeguarding framework is England's current Working Together to Safeguard Children guidance and local safeguarding procedures. Relevant legislation includes the Children Acts 1989 and 2004, Sexual Offences Act 2003, Safeguarding Vulnerable Groups Act 2006, Care Act 2014, Mental Capacity Act 2005, Equality Act 2010, Data Protection Act 2018, UK GDPR and applicable amendments. Directors must check the duties relevant to Magic's activities, including developments under the Crime and Policing Act 2026 and Data (Use and Access) Act 2025.

England's child and adult statutory frameworks are not UK-wide. Before delivering activities in Wales, Scotland or Northern Ireland, the directors must add the appropriate national guidance, local contacts and vetting arrangements. Overseas activities require destination-specific reporting, safety and emergency arrangements. This policy does not replace those duties.

Positions of trust and reporting changes

Sexual Offences Act positions of trust provisions, including section 22A, apply to qualifying regular sporting coaching relationships and protect 16- and 17-year-olds. This is distinct from Magic's stricter conduct rules for adult athletes. Staff must report suspected abuse immediately under this policy. Directors must check commencement, applicability and operational guidance for any new statutory reporting or information-sharing duty; an internal report must not replace a personal legal duty to notify the appropriate authority.

3. Recognising abuse and welfare concerns

Abuse may be committed by adults or children, online or in person, within or outside the programme. It can be a single event or a pattern. A person may disclose long after the event. No one needs proof before raising a concern; it is not a coach's role to determine whether abuse has occurred.

Child abuse

• **Physical abuse:** deliberate injury or harmful treatment, including hitting, shaking, poisoning or unsafe punishment. In sport this may include forced painful stretching, punitive exercise or making an injured athlete train.

• **Emotional abuse:** persistent humiliation, threats, rejection, intimidation or unrealistic pressure. Examples include body shaming, discriminatory insults, fear-based coaching and controlling an athlete through selection threats.

• **Sexual abuse:** contact or non-contact sexual activity involving a child, including grooming, exploitation, exposure to sexual material and online abuse. Children as well as adults can perpetrate abuse.

• **Neglect:** failure to meet physical or emotional needs or protect a child from harm. Examples include unsafe supervision, inadequate equipment, withholding water or ignoring medical needs.

Other risks requiring a response

Be alert to child-on-child bullying and sexual harassment; domestic abuse affecting children; online grooming and sexual extortion; sexual or criminal exploitation; trafficking and modern slavery; harmful sexual behaviour; discriminatory or hate-based harm; so-called honour-based abuse, forced marriage and female genital mutilation; radicalisation; self-harm, eating concerns and serious mental health risks. The lead must seek the relevant specialist/statutory advice and follow any applicable personal reporting duty.

Adults

Adult abuse may be physical, sexual, psychological, financial/material, discriminatory or organisational. It may include domestic abuse and coercive control, modern slavery, neglect or acts of omission, and self-neglect. Care and support needs, dependence or isolation can increase risk. Adult wishes and capacity must be considered under section 9.

Possible indicators

Signs can include unexplained injury, inconsistent explanations, fear of a person or place, marked behaviour changes, withdrawal, sexualised behaviour, distressed attendance, a sudden performance change, unkempt appearance, eating or weight changes, missing possessions, controlling relationships or an unexplained reluctance to go home. These may have other explanations and do not establish abuse. Record facts and refer concerns rather than diagnosing or investigating.

Bullying at school or elsewhere, non-recent allegations and welfare information about family members must be considered if they create a safety concern. Staff should not investigate school disputes, but must not refuse a disclosure or omit safeguarding action because it arose outside Magic.

4. Conduct and professional boundaries

Expected behaviour

• Work openly, communicate respectfully and put athlete welfare first. Explain expectations and give constructive, developmentally appropriate feedback.

• Respect privacy, identity, bodily autonomy and communication needs. Challenge bullying and discrimination. Keep agreed professional boundaries in person and online.

• Use approved programme channels and record safety-relevant decisions. Declare conflicts, close personal connections and boundary concerns to the lead.

• Follow the same standards when volunteering, travelling, coaching privately for Magic or attending programme social events. Report any accidental injury, distress or boundary incident promptly.

Prohibited behaviour

• Sexualised comments, flirting, grooming, sexual contact or romantic/sexual relationships between staff/volunteers and athletes they coach, supervise or have authority over. This Magic rule also covers adult athletes in those relationships, whether or not a criminal offence is involved.

• Physical punishment, humiliating or threatening coaching, discriminatory treatment, rough sexualised games, coercion, painful forced stretching, withholding necessities or pressure to train injured.

• Secret arrangements, excessive personal favouritism, inappropriate gifts, personal social-media contact with children, private/disappearing messages or requests that an athlete conceal contact.

• Taking a child to a private home, routine lone transport, sharing a bedroom with an unrelated child in care, or unobserved one-to-one activity contrary to section 6.

• Alcohol or drug impairment when responsible for athletes; smoking or vaping during supervision; supplying alcohol, illicit substances or inappropriate medication to children.

• Retaliation, exclusion or selection disadvantage because a person raises a safeguarding concern or cooperates with an enquiry.

Relationships, gifts and exceptions

Staff must declare pre-existing family or personal connections so that the directors can agree safe role boundaries. Such a declaration does not authorise a prohibited relationship or unlawful conduct. Any necessary emergency departure from normal arrangements must prioritise safety, be proportionate and be recorded and reported immediately. An emergency cannot be used to justify repeated unsafe practice.

Complaints and behaviour management

Legitimate criticism, reporting and whistleblowing must be distinguished from bullying or harassment. Complaints must receive fair handling and a safeguarding screen. Safeguarding concerns go through this policy even if also raised as a complaint. Behaviour measures must be proportionate, explained and recorded; exclusion must not be used to avoid investigating a concern or protecting other participants.

5. Physical contact and safe coaching

Spotting and physical correction

Physical contact is permitted only when necessary and appropriate for safe skill development, immediate rescue, first aid or agreed support. It must benefit the athlete, never satisfy an adult's personal needs. It must take place in an open, observable environment, using the least contact needed.

• Explain what skill or support is intended, why contact is needed and where contact will occur. Seek the athlete's agreement before contact unless urgent rescue makes this impracticable.

• Parent/carer consent does not replace the child's current agreement. If the athlete refuses, freezes or appears uncomfortable, stop, discuss alternatives and adapt or defer the skill.

• Do not use intimate or unnecessary contact, or claim an unwelcome touch is required for success. Choose techniques, equipment and support appropriate to the athlete's development.

• Respond sensitively to individual needs without assuming that a same-gender coach alone makes contact appropriate. Do not carry out private touch out of sight of others.

• Record and promptly report accidental inappropriate contact, injury, significant distress or a concern about a coach's handling. Notify parents only where safe and appropriate, following safeguarding advice.

Competence, progression and equipment

Coaches must work within verified competence and qualifications and use planned progressions appropriate to age, ability and wellbeing. Assess stunts, tumble, spotting arrangements, floor/equipment condition and space before sessions. Do not attempt a skill where competent supervision or safe equipment is unavailable. Young helpers must not be used as substitutes for competent adult supervision.

Injury, medical needs and body image

Allow water, rest and toilet breaks. Do not punish through exercise, shame body shape/weight or impose coercive weight-loss practices. Seek appropriate advice about eating, mental health or self-harm concerns. Maintain relevant medical, allergy and emergency information securely. Medication support must follow written arrangements, competence and applicable consent/capacity requirements.

Stop activity after a suspected concussion or serious injury, arrange appropriate medical advice and follow the relevant clinical/sport return guidance. Do not diagnose, conceal injuries or allow selection pressures to override safety. Keep an injury/treatment record and obtain appropriate clearance before return where required. Emergency help must not be delayed because a consent form is missing.

Personal care and intimate support

Only provide agreed assistance where needed, with privacy, consent and a written individual support plan. Do not do tasks an athlete can safely do themselves. Staff must receive appropriate guidance and any role-specific checks. Unplanned support must be proportionate, respectful, recorded and reported.

6. Sessions, supervision and collection

Before each session

The session lead must record attendance, identify responsible coaches and check emergency contacts, relevant medical/support needs, photo permissions and safe venue access. Use an activity-specific staffing assessment considering ages, numbers, skills, disability/support needs, changing arrangements and the ability to deal with an incident without leaving others unsupervised. There must be at least two suitable adults available for children's group activities as Magic's normal operating standard; do not run a session if assessed safe cover cannot be provided.

Under-18 helpers remain children for safeguarding purposes. They must not be left in sole charge, counted as suitable adult cover or made responsible for referrals. Visitors and contractors must be identified, supervised where required and prevented from unauthorised access to children.

One-to-one sessions

One-to-one coaching must be approved and recorded through the programme booking system. For children, confirm parental consent, athlete agreement, medical information and collection plans. Use an observable training area; another suitable adult must be available on site and aware of the session. Offer a parent/carer an appropriate observation arrangement. Avoid closed or isolated rooms, private transport and personal messaging. Record session start/end, staff present and any incident. If safe arrangements cannot be met, reschedule or change the session.

Changing rooms and toilets

Protect privacy and prevent adult-child changing together except appropriate family/support arrangements. No photography, filming or phones used for recording in toilets or changing rooms. Plan discreet supervision and agreed assistance for athletes who need support. Use two adults for necessary checks where practicable without invading privacy. No athlete should be left without safe access to a toilet or appropriate support.

Arrival and collection

Parents must know when Magic assumes and hands back supervision. Record authorised collectors and any relevant court/order or custody information. Children leave only with an authorised person or under recorded permission for independent travel. A QR scan or app status alone must not substitute for safe physical handover. Resolve uncertainty before release and seek statutory advice where safety or custody is disputed.

Late collection or missing child

Keep a late-collected child supervised in an observable area with suitable adult cover. Contact authorised carers and backup contacts; if a safe handover cannot be arranged or there is a welfare concern, seek social care/police advice. Do not leave a child alone or routinely take them home yourself. For a missing child, secure the remaining group, establish last known whereabouts, initiate a proportionate safe search and contact police immediately where danger is suspected. Notify the lead, record times/actions and inform carers where safe.

7. Responding, recording and referring

Protect first, then record and refer.
A concern does not require proof. Anyone can contact statutory agencies directly. Internal processes must not cause avoidable delay.

Receiving a disclosure

Stay calm and listen. Reassure the person they were right to tell and are not to blame. Do not promise secrecy; explain that relevant people may need to know to help keep them safe. Ask only minimal, non-leading clarification. Do not investigate, confront the alleged perpetrator, repeatedly question the person or ask them to demonstrate injuries/acts. Arrange urgent medical help and police protection when needed.

Record promptly

Make a dated and signed factual record as soon as possible, preferably the same day, using Appendix A. Include the person's own words, what was observed, times/locations, witnesses and immediate action. Distinguish facts, information received and interpretation. Do not alter the original account; add a dated correction or later information. Lack of a form must never delay a referral.

Referral routes

Inform the lead immediately, or the deputy/conflict-free external route where appropriate. The lead must promptly assess immediate safety, obtain appropriate statutory advice and refer suspected harm to children's social care or adult safeguarding without avoidable delay. Report suspected crimes to police as appropriate. Allegations about adults working with children also follow section 8. Any personal statutory duty to report must be met by the individual as required; telling a lead alone may not satisfy it.

Use the child's or adult's relevant local authority and the activity's local procedure. Notify the programme owner only if unconflicted and disclosure is necessary. Do not approach the alleged perpetrator or notify parents automatically where this could increase risk or prejudice enquiries. Follow social care/police/LADO advice on communication.

Follow-up and escalation

Record recipient, time, referral reference, acknowledgement, advice and next action. Check that the referral was received. If there is no response, risk increases or action appears inadequate, contact the agency again and use its escalation/professional challenge route. The reporter may refer directly if they remain concerned. Keep safety arrangements under review; lack of a criminal charge does not end welfare responsibilities.

Support and concerns outside Magic

Provide a named safe contact, reasonable training adjustments and access to appropriate support. Consider other children/adults who may be at risk. Use the same reporting process for non-recent abuse or harm arising at home, school or online. For additional support without suspected harm, work with the family/adult and appropriate early-help services; re-evaluate if circumstances change. Do not make the athlete repeat their disclosure unnecessarily.

8. Allegations, whistleblowing and DBS referrals

Allegation thresholds

An allegation about a staff member, volunteer, guest coach, contractor or other person working with children requires statutory advice where they may have:

• Harmed a child, or behaved in a way that may have harmed a child.

• Committed a criminal offence against or related to a child.

• Behaved towards children in a way suggesting a risk of harm.

• Behaved in a way suggesting they may be unsuitable to work with children, including relevant behaviour outside work.

Report immediately to an unconflicted senior person. Inform LADO within **one working day** when the allegation threshold is met; act immediately for urgent protection. Seek LADO advice if the threshold is uncertain. Police and children's social care referrals may also be required. An internal investigation must not precede or compromise statutory enquiries.

Conflicts and whistleblowing

Use the deputy and external agencies for a concern about the lead. If both leads/owners are implicated, contact the external agency directly. Directors must arrange an independent case manager and restricted records. Staff and families may report externally without permission. No retaliation, intimidation, confidentiality agreement or settlement may obstruct lawful safeguarding reporting.

Lower-level concerns

Record boundary breaches, inappropriate language, favouritism and other concerns below the allegation threshold. The lead must review them promptly, consider repeated patterns and escalate as required. "Low-level" describes a referral threshold, not the importance of the concern. Keep a factual confidential log; seek LADO advice when uncertainty or patterns suggest suitability risk.

Protective measures and fair handling

Record a risk assessment considering removal from duties, supervision or temporary suspension, with statutory advice and a fair process. Suspension is a protective measure, not a finding of guilt. Support both the affected person and the subject appropriately while keeping their contacts and case access safe. Reinstatement requires a documented safeguarding suitability assessment; acquittal or no further police action alone is insufficient. Conclude cases where possible even if the person leaves.

DBS and other reporting

Directors must assess the legal duty to refer to DBS when a person is removed from regulated activity for relevant harm/risk reasons, or would have been removed had they not left. Refer when the conditions are met. A police/LADO referral, resignation, dismissal or settlement does not replace this duty. Record the assessment and decision. Make any applicable governing-body or professional-regulator notification, without assuming a body has statutory powers or that Magic is affiliated.

Child-on-child harm

Protect and support the affected child and the child displaying harmful behaviour. Seek statutory advice for sexual or serious harm, record the response and assess separation/supervision needs. Do not minimise abuse as banter, insist on forced mediation or require the children to train together. Include parents only where safe and appropriate.

9. Safeguarding adults

Adults at risk: England

An adult is someone aged 18 or over. The Care Act section 42 safeguarding threshold concerns an adult who has care and support needs, is experiencing or at risk of abuse or neglect, and cannot protect themselves because of those needs. The local authority determines its enquiry duty. Magic must raise concerns where indicated and seek advice rather than trying to make a final statutory eligibility decision.

All adult athletes have a right to safe, respectful participation whether or not this threshold is met. Having a disability, training with a coach or being over 18 does not automatically establish adult-at-risk status. Adults may also be victims of crime or domestic abuse requiring police or specialist support.

Person-led response and capacity

Speak with the adult in an accessible, private and safe way. Ask what they want to happen, what outcomes matter to them and whether they agree to referral/sharing. Presume capacity unless there is evidence otherwise; capacity concerns must relate to the specific decision at the time. Support communication and informed choices. Do not assume a parent, partner or carer can consent or receive confidential information for an adult.

Where there may be impaired capacity, coercion or serious risk, seek appropriate professional advice. Staff must not conduct informal diagnostic assessments. Where a lawful best-interests decision is required, ensure appropriate decision-makers and safeguards are involved under the Mental Capacity Act. Keep the adult involved as far as possible.

Sharing without consent

Consent should be sought where safe and appropriate, but refusal does not always prevent safeguarding sharing. There may be a legal requirement, serious risk to others, coercion, a serious crime or another lawful and proportionate reason. Seek urgent agency advice where uncertain, share only relevant information, and record the legal basis, risk, adult's wishes and reasons. An immediate emergency requires immediate action.

Responding and support

Follow sections 1 and 7 for urgent protection, factual recording, referral and follow-up. Use the adult's relevant local authority adult safeguarding route and police where appropriate. Do not automatically notify parents/carers. Agree safe contact and training arrangements and avoid the alleged abuser controlling communications. Concerns about an adult worker who may also pose a risk to children require consideration of LADO/DBS routes as well.

Professional boundaries

Magic's prohibition on sexual/romantic relationships within coach-athlete authority relationships applies to adult athletes too. It is a programme conduct safeguard and must not be described as meaning every such relationship is a criminal position-of-trust offence. Adult allegations require fair handling and appropriate protective measures.

10. Recruitment, vetting and training

Safer recruitment

Before appointment, define the role, safeguarding responsibilities, required competence and check eligibility. Obtain an application, assess employment/history gaps, verify identity and qualifications, interview for suitability and obtain two references, including relevant work with children where available. Verify references directly. For a young helper, appropriate school/other references may be used; they remain subject to safe adult supervision.

Use lawful, role-appropriate criminal-record self-disclosure questions, respecting filtering/protected-record rules. Assess overseas history and obtain appropriate overseas checks/references where needed; DBS does not cover every overseas record. Document a suitability decision and any restrictions. A DBS result is one safeguard, not a certificate of overall suitability.

DBS checks and access to children

Assess actual duties and frequency, not job title. Obtain enhanced DBS and children's barred-list information where the role is legally eligible and in regulated activity. Do not request barred-list checks for ineligible roles. Current rules must be used: day-to-day supervision alone must not be treated as removing a qualifying role from regulated activity. Adult-workforce eligibility has separate criteria and is not established merely because adult athletes attend.

A barred person must not undertake relevant regulated activity. Magic will not permit a person to begin a children's coaching/supervision role until required checks, references, induction and suitability decisions are completed. Pending-check arrangements for any other eligible role require documented restrictions; no unsupervised child access or regulated activity contrary to this policy. Apply safe controls to visiting coaches, volunteers and contractors too.

Ongoing oversight

Keep a restricted check register recording role, workforce/check level, certificate date/reference, verification, decision and review date. Use an agreed recheck/Update Service process with appropriate consent and eligibility. Reassess on role changes, new concerns or guidance changes. Staff must disclose relevant suitability changes promptly. Do not routinely retain full DBS certificates; follow current DBS handling rules and justified retention requirements.

Induction and training

Before duties, staff must understand conduct boundaries, disclosure handling, emergency routes, the lead/deputy, conflicts, physical contact, digital rules and safeguarding records. Provide appropriate safeguarding training for role and responsibility, with suitable enhanced training for lead/deputy. Record completion and competence; home study alone must not be assumed sufficient.

As Magic's internal standard, provide an annual safeguarding briefing and refresh relevant training at least every three years or sooner if provider/governing-body requirements, law or role changes demand it. Leads must maintain current local-procedure knowledge. Keep first-aid and activity qualifications appropriate to duties. Require signed policy/code acknowledgements and supervise new personnel.

11. Digital communication and social media

Approved channels

Use approved programme accounts, email, portal or booking tools for communication. Keep exchanges professional, relevant and auditable. For children, communicate through parents/carers or approved group arrangements with appropriate adult oversight. A child's unexpected private message must be moved to a safe approved route; preserve/report any safeguarding disclosure rather than simply blocking it.

• Do not friend/follow under-18 athletes through personal accounts or privately message them using personal accounts or disappearing-message services.

• No sexualised communication, intimate images, secret contact, late-night unnecessary messaging, private livestreams or pressure to share personal information.

• Use at least two authorised adult administrators for programme groups where feasible, parental awareness, age-appropriate apps, clear conduct rules and a route to report content.

• Prevent disclosure of personal contact details, live locations, travel/room plans or identifying information that could place athletes at risk.

• Do not treat a legitimate safeguarding complaint, negative experience or external disclosure as disloyalty. Prohibit threats and harassment while protecting reporting rights.

Online harm and response

Report grooming, sexual extortion, sexual abuse imagery, exploitation, bullying, discriminatory abuse and other harmful content to the lead and appropriate agencies. CEOP is a specialist route for online child sexual abuse/exploitation, not a universal service for every online dispute. Use police/social care where indicated and platform reporting where safe. Follow section 12 for evidence handling. Do not forward suspected illegal images to prove a concern.

Accounts and records

Use strong access controls and restrict administrator rights. Maintain safe handovers when staff leave. Do not store safeguarding case records in routine group chats or general parent-accessible systems. Retain incident-related records securely under section 14. Check privacy settings and platform age terms before use; obtain relevant privacy/consent arrangements without making marketing participation a condition of training.

AI and automated systems

Identifiable disclosures, allegations, medical/support information and safeguarding records must not be entered into general-purpose AI tools without a documented, approved lawful basis and appropriate safeguards. Automated alerts may support staff, but must not make final referral, allegation, risk, suitability or case-closure decisions. A responsible human safeguarding lead must review and record decisions. System outages must not stop telephone or direct statutory reporting.

12. Photography, evidence and CCTV

Image permissions and dignity

Explain why images/film are being taken, who will use them, where they will appear, storage and retention. Obtain appropriate informed permissions from the child and parent/carer for under-18s, and from adults as appropriate. Keep training footage permissions separate from publicity. Check permission at each relevant use and respect an athlete's refusal. Refusing publicity must not exclude them from participation.

Use appropriate clothing, angles and positive sporting context. Do not publish humiliating, intimate or sexualised images. Avoid names, location tags or identifying details alongside children's images; exceptional use requires a specific justified permission and safety assessment. Do not presume Magic owns every image because it contains its name/logo. Apply lawful copyright and data-protection arrangements.

Withdrawal and storage

Explain how to withdraw permission. Stop new use, remove material within Magic's control where appropriate and seek removal from others where practicable, while explaining that all third-party copies cannot be guaranteed deleted. Use approved equipment and secure storage with limited access. Personal-device use requires a documented exceptional approval, secure transfer and removal of local copies when lawful and no evidence hold applies. Set a retention/end-use review date.

Parents, athletes and hired photographers

Explain event photography rules and check arrangements for children who must not be photographed. No filming in toilets/changing rooms or intrusion into private support. Parents/athletes must respect others' privacy and obtain relevant permission before sharing images of others. Hired photographers need a written brief, identification, supervision/access limits, secure handling terms and permission controls. No unsupervised child access or private sessions at homes.

Suspicious filming and evidence

Protect the athlete and preserve evidence. Challenge or stop unsafe filming only where safe. Alert the lead and police when appropriate. Staff must not seize/search devices or demand deletion of potential evidence. Do not copy, forward, download or ask to view suspected child sexual abuse imagery. Record account details, times and locations without reproducing the imagery; follow police advice.

Venue CCTV

Before activity, agree with each venue who controls CCTV, whether relevant areas are covered, privacy/signage arrangements, contact for urgent preservation and how police/lawful requests are handled. Magic must not assume a venue system is working or that it can access recordings. No surveillance in toilets/changing facilities. If Magic operates CCTV, directors must establish appropriate privacy, access, retention and risk assessment arrangements. Preserve relevant footage promptly after an incident, avoiding automatic overwrite while an authorised hold is in place.

13. Transport, events and overnight travel

Planning and responsibility

Each competition, display, camp or trip requires a documented safeguarding assessment, named event/trip lead, safeguarding cover and emergency plan. Explain supervision boundaries and responsibility handovers to parents and athletes. Use Appendix B and a fuller trip plan where required. Consent alone does not remove duty of care or replace safe arrangements.

Confirm participants, staff competence/checks, medical/support needs, staffing and contingency cover, accommodation, transport, safeguarding reporting, emergency contacts, insurance, permissions, accessibility, lost/missing-person response and communication. Identify local statutory routes; for overseas trips add destination laws, healthcare, consular/emergency support and any host-family checks.

Transport

Programme-arranged vehicles/drivers must be suitable, legally authorised, insured for the purpose and equipped with appropriate restraints. Assess check eligibility for drivers/helpers. Avoid lone adult-child journeys; use safe adult cover and agreed collection/drop-off points. Do not allow ad hoc lifts or changes without approval and recorded handover. Private parent-arranged travel must be clearly distinguished from Magic-arranged transport.

If an exceptional emergency makes lone transport necessary to avoid greater danger, seek approval where practicable, inform the appropriate carer/lead where safe, use the safest option and record why, who, route, times and handover. Emergency exceptions must not become routine.

Accommodation and overnight supervision

Plan rooming according to ages, privacy, support needs and safeguarding risk. Staff must not share a bedroom with an unrelated child in their care. Maintain appropriate adult-child separation and safe arrangements for adult athletes travelling with children. Parents sharing with their own children is a separate family arrangement. Avoid private visits to rooms; necessary welfare checks should involve suitable adult cover and respectful procedures.

Keep clear supervision rotas, checks, curfews and rules on visitors, alcohol, digital use and changing privacy. Ensure overnight staff roles and checks are appropriate. A staff rooming or personal relationship must not compromise safeguarding cover. Never leave children dependent on a single unavailable or impaired adult.

Families booking independently

Where families arrange their own flights, hotels or journeys, record when Magic becomes responsible for coaching, rehearsals, events and supervision, and when responsibility returns to carers. Attendance at an event does not automatically make Magic responsible for all family travel, but ambiguity must be resolved in advance. Record safe handovers and maintain emergency arrangements during Magic-supervised periods.

Review

The trip lead must brief everyone, provide contacts, document incidents and review safety after the event. Stop or alter activities where conditions become unsafe. Report concerns under the same policy, regardless of whether they occur abroad, at a hotel, during travel or through another organisation.

14. Confidentiality, sharing and records

Lawful information sharing

Share relevant information with the appropriate people to protect children/adults, using an applicable lawful basis and any required special-category/criminal-offence-data condition. Do not assume consent is always required or that data protection prevents a necessary referral. Consider transparency, but do not notify a person where it may increase risk or prejudice enquiries. Record recipients, purpose, basis, timing and reasons for sharing or not sharing. Comply with any statutory sharing duty applicable to Magic's role.

Security and case management

Keep individual safeguarding case files separate from routine membership records, with restricted access, secure storage/transfer, backups and an access/change log. Use reference numbers in management summaries; avoid identifiable case detail in ordinary portals, group chats or automated reports. Restrict a conflicted person's access. Assign a records custodian and formal handover when roles change. Requests for access/correction/deletion must be handled lawfully, considering third parties and safeguarding exemptions where applicable.

Retention control

Directors must maintain an approved, justified retention schedule by record type. It must state purpose, legal/insurer requirements, retention trigger/period, review date, responsible custodian and secure destruction method. Do not apply a school-specific rule as a universal legal requirement for Magic. Obtain appropriate safeguarding/data-protection/insurer advice for the schedule and review it at least annually.

• **Child/adult safeguarding case files:** retain through case management; at closure record a justified retention end/review date, considering age, ongoing risk, non-recent abuse, claims and agency advice.

• **Allegations and lower-level concern records:** retain for a justified period supporting suitability decisions and pattern review, including after a person leaves; distinguish outcome and any required corrections.

• **Recruitment/check/training records:** retain evidence needed for suitability and audit. Record DBS verification and decision rather than routinely keeping certificate copies; follow current DBS requirements.

• **Image/consent, training film and venue CCTV:** set purpose-based retention with the relevant controller, end-use review and incident preservation arrangements.

• **Routine attendance, injury and medical records:** use the appropriate operational schedule and flag related safeguarding evidence for a preservation hold.

Pending an approved numerical schedule, a director must document a case-specific retention decision before any safeguarding record is destroyed. This is an interim safeguard, not permission to retain everything indefinitely. Review at least annually for continuing necessity. Do not destroy material subject to police/social-care enquiries, an official inquiry, a complaint, anticipated/ongoing litigation or other preservation instruction. Mark the reason for an extension and seek advice before lifting a hold.

Disposal and continuity

Authorise destruction, securely shred paper and erase electronic copies/backups as appropriate when the lawful period/hold ends; keep a minimal disposal audit. If Magic closes or a service ends, arrange lawful ongoing custody and management rather than abandoning or automatically deleting safeguarding records.

15. Implementation, approval and review

Supporting procedures and evidence

Directors must maintain and test: conduct codes; safer recruitment/check and training registers; the concern form and allegation/DBS referral procedure; session/venue risk assessments; authorised collection, missing-child and one-to-one arrangements; injury/medical and emergency procedures; digital/image permissions; travel plans; privacy/retention controls; and insurance/affiliation arrangements where applicable. Assign owners and review dates. This policy sets requirements; it does not certify that every control is already operating.

Making the policy usable

Brief staff and volunteers before duties and on revisions. Obtain acknowledgements, provide accessible athlete/parent guidance and display reporting contacts in venues and programme channels. Keep printed/emergency access when systems fail. Test disclosure, leadership-conflict, missing-child and unsafe-coaching scenarios. Record lessons and corrective actions. Ensure insurance includes the actual activities and relevant risks; directors must confirm exclusions and notification duties with the broker.

Monitoring and review

The lead reports safeguarding implementation and anonymised themes to the directors at least each term and promptly after serious incidents. Review lower-level patterns, training/check gaps, referral handling and outstanding actions without circulating unnecessary identifiable detail. Review this policy at least annually and sooner after an incident, important guidance/legislative change, new activity/venue, staffing change or evidence that a procedure is ineffective.

Original policy created: 29 July 2025.
Recorded review date: July 2026, supplied by the programme owner.
Consolidated revision: 11 October 2026, version 2.0.
Next scheduled review: July 2027, subject to earlier triggers.

Website copy - for information only.
Director adoption and staff acknowledgement/signature sections are retained in the main document and omitted from this public information copy.

16. Guidance and reference links

Public reporting/guidance pages checked during the October 2026 revision. Open the current publication page for the latest document, contact details and opening hours. Directors must check legal commencement/applicability where new duties are introduced. Links do not replace urgent calls.

Working Together to Safeguard Children - England

Kent: child concern guidance and referral portal

Kent: LADO/LESAS advice and allegations referrals

Kent Children's Portal: access and fallback information

Kent: adult safeguarding reporting

NSPCC Sport: dealing with a concern

NSPCC Sport: current contact details and helplines

Ann Craft Trust: adult safeguarding advice and contacts

CEOP Safety Centre: online sexual abuse/exploitation

DBS: checks in sport - working with children

DBS: regulated activity with children and referral information

Positions of trust: government explanation of the 2022 extension

DfE: information sharing to safeguard children

ICO: safeguarding information-sharing guidance

NSPCC: current records retention and storage guidance

Government: Crime and Policing Act 2026 safeguarding measures

NSPCC: mandatory reporting implementation updates

NSPCC Sport: staffing and supervision guidance

NSPCC Sport: safe away trips and hosting

Additional statutory references include Sexual Offences Act 2003 section 22A and Care Act 2014 section 42. National guidance and vetting requirements for Wales, Scotland, Northern Ireland and destination countries must be added to the plan for relevant activities.

Appendix A. Concern recording form

Confidential safeguarding record. Call 999 for immediate danger. Complete promptly, but do not delay referral while filling the form. Use continuation sheets where required, labelled with the case reference, author and date.

Case reference / date and time received / reporter name, role and safe contact
Child/adult name, age/DOB, relevant support needs and safe contact / carer details
Incident date, time, location / subject of concern / witnesses / any leadership conflict
Exact words disclosed and factual observations (separate interpretation; use continuation)
Immediate safety and medical action / police or social care contacted / time and reference
Agency advice, lead notified, acknowledgement and follow-up / next action, owner and deadline
Consent, capacity and information sharing decisions / parental notification safety / evidence hold
Reporter signature and date / receiving lead / secure filing and next review date

Store only in the restricted safeguarding file. Do not put identifying disclosures in general group chats, routine athlete notes or an unapproved AI system. Complete outcome, support plan and retention decisions in the continuing case record.

Appendix B. Session and trip checklist

Use this checklist with a proportionate written risk assessment. An overnight/overseas trip requires a fuller plan; a checklist alone is insufficient. Record each control, responsible person and unresolved action. Do not proceed if essential safety cover is missing.

Activity / group / venue or destination / dates / lead / safeguarding contact
Participants, ages and individual support/medical needs / approved supervision and backup
Coach/driver/helper competence, suitability and checks / young-helper restrictions
Emergency plan, local police/social care/LADO routes / first aid and missing-child response
Venue, equipment, privacy/changing, one-to-one observation and visitor controls
Authorised arrival/collection and responsibility handovers / travel permissions
Trip transport/insurance, accommodation/rooming, overnight rota and overseas arrangements
Digital/image permissions and storage / incident reporting and evidence preservation
Outstanding risks, action owner/deadline / decision to proceed / approver and actual date

After the activity: record incidents and near misses, complete safe handovers, return or secure relevant records and review learning. The lead must ensure referrals and outstanding actions have been followed through.