



Safeguarding Children and Young People Policy

Introduction

- 1.1 The Club acknowledges and accepts it has a statutory obligation and responsibility for the wellbeing and safety of all children and young people who are under the Club's care or utilising the Club's facilities. Everyone working at the Club has a "duty of care" to safeguard the welfare of children and young people by creating an environment that protects them from harm.
- 1.2 The wellbeing of children is paramount, and all staff must make themselves aware of the Club's Safeguarding Children Policy. The following guidelines will be supplemented by in-service training and additional guidance accordingly.

Definitions

- 1.3 A "Child" (collectively referred to as "Children") is defined as anyone under the age of 18.
- 1.4 An "Activity" means any activity or series of activities arranged for a Child or Children by or in the name of a Club. These are deemed to be regulated and therefore activate the required levels of Criminal Record Checks that are associated.

Rules and Regulations

- 1.5 In the management of its programmes, the discharge of its functions, and in implementing this policy and procedure, The Club will remain mindful of its' duty of care and other legal obligations such as those set out in the Health and Safety at Work Act 1974, Data Protection Act 2018, Equality Act 2010 and Protection of Freedoms Act 2012.
- 1.6 In the case of children, the Club is also mindful of its responsibilities under the following legislation and guidance; 1989 and 2004 Children Act, Working Together to Safeguard Children 2018, Keeping Children Safe in Education 2020, FA Safeguarding Children Rules, Premier League and English Football League Rules and guidance. The Club is fully committed to ensuring that the best practice recommended by these bodies is employed throughout the Club.
- 1.7 The Club recognises the definition, and follows the guidance relating to "Position of Trust" as defined in the Sexual Offences Act 2003.
- 1.8 The Club also recognises its responsibility to work with other agencies, including Local Safeguarding Boards to protect vulnerable young people from harm and to respond to safeguarding concerns.
- 1.9 In the event that a force majeure (such as a pandemic) results in a national or local area lockdown, the Club will amend this policy to include specific measures necessary at that time to ensure the wellbeing and safety of all children and young people who are under the Club's care.

Review

- 1.10 This policy will be reviewed annually or if there is a statutory legislative or organisational change, or following a safeguarding incident, concern or allegation whereby the policy is found to be in need of revision to ensure the aims



and key principles are met. All policy documents and reviews will be submitted to the Board for approval.

Aims and Key Principles

1.11 The aims of the Club's Safeguarding Children Policy are:

- To safeguard all children and young people who interact with the Club;
- To demonstrate best practice in the area of safeguarding children;
- To positively reflect and promote the club values in regard to safeguarding children;
- To develop a positive and pro-active welfare programme to enable all children and young people to participate in an enjoyable and safe environment;
- To encourage parents and other members of the child or young person's family to be involved in a relationship with the Club;
- To ensure that coaches, parents and other adults who come in to contact with children and young people provide good role models of behaviour;
- To promote high ethical standards throughout the Club.

1.12 The key principles underpinning this policy are:

- The child's welfare is, and must always be, the paramount consideration;
- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity;
- All allegations of abuse or poor practice will be taken seriously and responded to efficiently and proportionately.

1.13 Designated Safeguarding Senior Manager

The Designated Safeguarding Senior Manager (DSM) has overall responsibility for the safeguarding of children at the Club. The DSM will;

- Report to the Board on recommendations for changes to the Safeguarding Policy and Procedures taking into account legislative changes;
- Undertake regular monitoring and risk assessments of activities involving children (or will designate this task to a trained activity lead, the Head of Safety & Stadium Operations, or an external assessor as appropriate);
- Ensure they undertake regular and appropriate training for the role.

1.14 Designated Safeguarding Officer

The Club has a Designated Safeguarding Officer (DSO) who has responsibility for the safeguarding of children at the Club and the Academy. The DSO will;

- Make the decision to investigate any allegations or concerns of abuse;
- Address any immediate protection issues;



- Make the decision to refer to an appropriate statutory agency (Police or Social Services);
- Liaise with local Safeguarding Boards;
- Ensure staff are trained on Club safeguarding procedures;
- Ensure they undertake regular and appropriate training for the role;
- Source appropriate external training for safeguarding;
- Undertake regular monitoring and risk assessments of activities involving children (or will designate this task to a trained activity lead, the Safety Operations Manager, or an external assessor as appropriate).

Anybody with a concern about a child or young person's welfare should contact the DSM or DSO direct, or their line manager for advice in the first instance. Contact details can be found at the end of this policy.

1.15 All employees, contractors and volunteers are expected to;

- Be alert to signs of abuse and radicalisation and take responsibility for referring concerns to the Designated Safeguarding Officer;
- Be prepared to listen to and take seriously the concerns of children;
- Abide by the codes of conduct for employees and volunteers;
- Promote the health, safety and welfare of children;
- Maintain records as necessary;
- Set a good example to children by their own behaviour.



2. Safer Recruitment

- 2.1. As part of the Clubs recruitment and selection process, offers of work for positions which involve working with children are subject to Safer Recruitment practices.

The purpose of this policy is to clearly define the recruitment and selection procedures that the Club follows to ensure, as far as is reasonably practical, that it only recruits individuals that are deemed suitable to work with children and young people.

2.2. Planning and Advertising

All posts must have a Job Description/Person Specification which defines the duties, skills, qualifications and experience of the role. It will also clearly state whether a Disclosure and Barring Service (DBS) Criminal Record Check (CRC) will be required.

All posts will be advertised by the HR Department. Candidate applications will be submitted via the Recruitment email address and will be managed by a member of the HR Department. Candidates will be shortlisted by the recruiting manager and a member of the HR Department against the Job Description/Person Specification. Shortlisted candidates will be required to complete an Application Form prior to interview, and will also be required to provide proof of identification at Interview Stage.

2.3. Interview Stage

Shortlisted candidates will be invited to attend an interview with the recruiting manager and another member of staff (this will be either a member of the HR Department or another manager) whereby at least one interviewer will have completed Safer Recruitment Training. The interview will assess the candidate's competency for the role based on experience, relevant technical qualifications and skills. The Selection process may also include a micro coach, presentation or practical assessment dependent on the role.

2.4. References

Two references, at least one of which will be from the most recent employer, will be sought prior to confirmation of the post.

2.5. Social Media

Social Media checks on the individual will be carried out prior to confirmation of the post. Social Media checks are reasonable, proportionate and lawful measures when undertaken within a transparent safer recruitment process about which applicants are fully informed. Checks will be undertaken on "public" platforms (whereby no password is required for access).



2.6. Disclosure and Barring Service (DBS) Criminal Record Checks (CRC)

DBS CRC checks will be carried out for all relevant postholders. New staff will not be allowed unsupervised access to children and young people until a satisfactory DBS CRC check has been received by the Club. The Club Designated Safeguarding Officer is responsible for ensuring all checks are carried out in the required timescales. The Club processes all DBS CRC checks via the FA Online Application System. Should a check highlight a criminal record on the individual that would deem them unsuitable to work with children and young people, the FA will confidentially liaise directly with the applicant. The FA will only inform the Club if the individual is considered unsuitable to work with children or young people but will not disclose the reason.

2.7. Post Appointment

Offers of employment are conditional upon the following;

- Proof of relevant qualifications
- Proof of right to work in the UK
- Supervised Probationary Period
- Satisfactory written references

2.8. Probationary Period

During the Probationary Period, all employees will be required to complete an Induction programme which includes Safeguarding training to the level appropriate for the post.



3. Process for Disclosure and Barring Service (DBS) Checks

3.1. New Appointments

All staff who are offered a position which involves working with children will be required to complete a Self-Declaration Form and also undertake an Enhanced DBS CRC with a barred list check where appropriate. All offers of work are subject to the outcome of the screening process and where applicable, this is set out in the initial job advertisement and the applicant's offer of work. Until such time as a satisfactory CRC has been received, the member of staff will not be permitted to work with children.

Should a positive CRC be received, a risk assessment will be carried out by the Safeguarding Senior Manager, or relevant Head of Department, with the Chief People Officer and, where applicable the Designated Safeguarding Officer, to assess the information contained within the CRC. The member of staff may also be asked to attend an interview prior to a recruitment decision being made. The Rehabilitation of Offenders Act and Protection of Freedoms Act should be considered in all cases before a final decision is made.

3.2. New Appointments who already have a CRC

If a new member of staff has been subject to a CRC check by their previous employer the club will still require a further check.

3.3. Temporary Staff and External Consultants

The Club will ensure that all temporary staff and external consultants sign a Self-Declaration Form where appropriate and, in any case, will not have unsupervised access to children during their time with the Club.

3.4. Equal Opportunities

The Club is committed to providing equal opportunities for all staff, players and supporters. The Club's policy on equal opportunities can be found in this Employee Handbook.



4. Training and Awareness for Employees, Third Parties and Contractors

4.1. The Safeguarding Policy is issued to club employees and casual workers who come into contact with children at induction and is also available to all employees on Sharepoint. The DSO holds a specific Safeguarding & Safer Working Practice Induction with all new fixed-term, permanent starters and volunteers during which the key elements of the Club's Safeguarding Children Policy are discussed in more detail and specifically to the individuals' role.

4.2. All staff working in direct contact with children are required to complete the FA's 3-hour Safeguarding Children Awareness workshop and undertake a refresher course, as advised by the FA, at least once every 3 years. Details of training and qualifications are retained by the Human Resources Department.

Safeguarding Awareness courses are also offered by the Club to develop knowledge which are department specific.

4.3. Work Experience

The Club may from time to time offer work experience placements to young people. The club has a central work experience scheme which provides forwardly planned and structured work experience placements. Whilst undertaking work for the Club, those on work experience will not have unsupervised access to children.

For those undertaking work experience who are under the age of 18, more detailed guidelines can be found in the policy regarding the employment/engagement of workers under the age of 18.

4.4. Contractors

All external contractors engaged by the Club undergo a suitability test prior to commencing work. This will include evidencing the contractor's Safety Record, Safety Policy, Liability Insurance, Risk Assessment/Method Statement and details of Competent Person.

On arrival at the Club the contractor will receive a site induction from a member of the Facilities team which covers Safeguarding Children and give details of the Club's expected code of behaviour. Contractors are subject to regular inspection from Club personnel. In the event of a Contractor carrying out work on an area that is usually occupied by children, this work where possible, will be undertaken when children are not present.

4.5. Service Level Agreements/Partnership Agreements

The Club's commitment to Safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to children.

4.6. Disclosure and Barring Service

The Club is registered with DBS to carry out Criminal Records Check (CRC)s on individuals who work for the club, including the Derby County Football Club Community Trust. Enhanced CRCs, plus barred list check where appropriate, enable the Club to undertake more thorough recruitment and selection procedures for positions which involve working with children.



5. Ratios and the Supervision of Children

5.1. Any activity undertaken by the Club will always be given full consideration to the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision.

5.2. Regardless of these ratios a minimum of 2 members of staff or delivery partner will always be available to supervise an activity. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).

- For children under 5 the recommended ratio should be no more than 1:6.
- For children under 8 the recommended ratio should be no more than 1:8.
- For children over 8 the recommended ratio should be no more than 1:10, but this varies depending on the activity. Advice should be sought from the Safeguarding Lead or Officer if unsure.
- For Academy activities, the Premier League's Youth Development Rules prescribe a ratio of 1 Coach to 8 Players (over 8s).
- For organised groups of children attending a match day at the Pride Park Stadium, the minimum ratio is 2 responsible adults to 20 children.

Where the club is taking responsibility for the care of the children, parents/carers should **not** be included in supervision calculations.

These ratios are partially based on Ofsted's guidelines which are as follows:

Child's Age	Ratio of adults to children:
0-2	1:3
2-3	1:4
4-8	1:6
9-12	1:8
13-18	1:10

5.3 Lone Working Guidance

Working 1:1 with children should only occur in exceptional circumstances, and if it does, the staff member must seek and follow the specific guidance from the Designated Safeguarding Officer.



5.4 Scouts

References are sought for all Scouts and, on registration with The Club, Scouts identifying players under the age of 18 are issued with a copy of the Premier League's Premier Practice booklet on Player Recruitment, a Club Code of Conduct and the Club's Safeguarding Children Policy.

The Club only permits scouts from other clubs to attend its Academy Games Programme matches in accordance with the provisions of the Premier League Youth Development Rules.



6. Gifts and Favouritism

Staff should take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment. All staff are expected to adhere to the Club's Anti-Corruption and Bribery policies which can be found in the Employee Handbook.

The Club recognises that there are occasions when children or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a "thank you", and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others. Staff should report any gifts received to their line manager and they should be dealt with appropriately.

Similarly, it is not permitted for staff to give personal gifts to children. This could be misinterpreted as a gesture either to bribe, or to single out the child. It might also be perceived that a "favour" of some kind is expected in return.

Any reward given to a child must first be agreed with the staff member's line manager as part of a structured reward system in line with the departmental policy and not based on favouritism.



7. Use of Images

The Club takes its guidance on the use of images from guidelines issued by the FA, Premier League and Local Safeguarding Board. All images are taken by Club officials who have been briefed by the member of staff (and where possible a Club Safeguarding Officer) responsible for the activity being photographed / filmed as follows:

- Before taking images of children, parental consent is sought in writing at the start of each football season or prior to the event. Parents/Legal Guardians are responsible for informing the club of any change of circumstances within the season which may affect consent;
- Parents/Legal Guardians will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed;
- All children featured in Club publications will be appropriately dressed;
- Where possible, the image will focus on the activity taking place and not a specific child;
- Where appropriate, images represent the broad range of people participating safely in the event;
- Designated Club photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by the Club, the Local Safeguarding Board and by the Premier League from time to time;
- Children who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any Club document;
- No images of children featured in Club publications will be accompanied by personal details such as their school or home address;
- Recordings of children for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises;
- Any instances of inappropriate images in football should be reported to the Clubs Head of Media, and the Safeguarding Lead immediately;
- The Club does not put young player profiles with images and personal information on its website.



8. Match day

8.1 Unaccompanied Children

In accordance with the Club's ticketing terms & conditions, the minimum age that a child is permitted to attend a match at the Club unaccompanied is 14 years old.

8.2 Mascots & Ball Persons

The Club will only allow children to be match day mascots or ball persons once parental consent has been obtained. A signed image consent form is also required before any images are published in the Club's match day programme.

No photographs of mascots or ball persons featured in Club publications will be accompanied by personal information about the child, such as their school, home address or local sports team.

Whilst at the Pride Park Stadium, mascots and ball persons are accompanied at all times by at least 2 members of staff who have a valid DBS Check. Staff who are responsible for mascots and ball persons on a match day are also required to have a good level of understanding and awareness of safeguarding children.

9. Academy – Communication via Social Media

9.1 The Club's Academy is committed to the welfare and safety of all children, both within the Academy and at the Club as a whole. The Academy also realises the importance of communication and works closely with parents, carers, host families, schools and local authorities to ensure that the wellbeing of all children is paramount.

9.2 In the interests of ensuring professional boundaries are maintained employees must not become friends with, add to their social media network or otherwise communicate via personal devices with any potential, current, or former young people (under the age of 19) or parents unless a clear reason exists, for example, they are a relative or family friend. Entering into such a relationship may lead to abuse of an employee's position of trust and breach the standards of professional behaviour and conduct expected by the Club.



10. Transport

- 10.1 The Club has Player Care Administrator who is responsible for overseeing transport arrangements across the Academy, including registered Academy players and players attending the Club on trial. The Player Care Administrator attends weekly meetings with the Designated Safeguarding Officer in order to report on the Academy's transport programme and other relevant matters.
- 10.2 When children are being transported on behalf of the Derby County FC Academy they shall, where possible, be accompanied by their team Manager, a coach or a designated tour leader.
- 10.3 In some cases, where children need to be transported unaccompanied, this will be with an approved travel company (who have signed up to relevant Academy Policies), or by a member of Club staff who has a satisfactory DBS check and has been issued with (and received training on) the Academy Transport Policy. In either case a child will only be transported under these circumstances with the specific prior consent of their parent or guardian. Although outside of the sphere of responsibility for local education authorities, the Club also provides a duty of care for young persons when travelling on behalf of the Club.
- 10.4 Derby County Community Trust has a Transport Policy that should be followed when children are being transported on behalf of the Trust. Children shall be accompanied at all times by the Activity Leader. Only vehicles and drivers approved under the Trust's Transport Policy will be used to transport children. Under no circumstances will a member of staff use a private vehicle to convey children engaged in an Activity being delivered by the Trust.



11. Medical

- 11.1 There will be occasions where medical treatment is necessary during training sessions and weekend fixtures and unfortunately, due to staffing numbers, the Club is unable to guarantee that two members of staff are present during treatment sessions.
- 11.2 All members of the medical department have a valid DBS check and are required to attend the FA's Safeguarding Children awareness workshop and internal Safer Working Practice training. The Club is fully committed to equal opportunities for all individuals and, as such, the Club employs both male and female staff to work within the medical department.
- 11.3 The Club is more than happy for parents and carers to attend pre booked medical treatments if required. If, due to the first team's schedule, this is not possible an alternative appointment may need to be arranged.
- 11.4 The Medical Department has a separate Code of Conduct for use when dealing with children and young people that is issued to all staff within the Medical Department.
- 11.5 There may be occasions where medical treatment is necessary during an Activity or event that is run by Derby County Community Trust. The Trust will ensure a level of medical cover is available at all its activities including at least one suitably trained Emergency First Aider. All relevant and necessary medical information of participants will be treated in confidence but provided to the Event Lead if necessary, e.g. asthmatic participants. Specialist medical advice and further information will be sought when working with children who have additional needs or disability.



12. Host Families

- 12.1 Prior to the commencement of an agreement between the Academy and a host family an Enhanced DBS plus barred list check is carried out on the designated house parent along with an enhanced check on any other person residing at the house who is over 16 years of age.
- 12.2 At present the Academy does not have any accommodation arrangements that fall within the regulations of Private Fostering, however in the event that a such a situation did occur then the Club would ensure that suitable dialogue takes place with the relevant Local Authority to ensure that all statutory requirements are met.
- 12.3 References from previous employers and local authorities (where applicable) are also sought. House visits and full Health & Safety risk assessment are also conducted by the Designated Safeguarding Officer and a guidance manual is issued.
- 12.4 A Host Family Induction Evening is held at the Academy on an annual basis which includes a Safeguarding Children briefing, and the Designated Safeguarding Officer maintains constant dialogue with all Host Families throughout the season.



13. Youth Loans, Trials & Work Experience

- 13.1 If an Academy Player or young Professional under the age of 18 joins another club on trial, work experience, or a Football League Youth Loan, the Academy will seek written parental consent (additional to the standard consent sought at the start of every season) prior to the activity taking place. Consideration will also be given to the player's education programme, travel and accommodation arrangements. If the new club is not located within a reasonable travelling distance from the player's current address, Derby County Football Club will insist that, where possible, players are placed in host family accommodation during their time away from the Club and not in hotel accommodation, and as good practice the Club should designate a member of Academy Staff who will be nominated by the Designated Safeguarding Officer, to check on the players on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience.
- 13.2 For players under the age of 18 who are joining the Club on trial, parental consent will be sought prior to the trial taking place, along with suitable checks e.g. medical forms. Where accommodation is required during the trial period, this will be in designated host family accommodation or, if the player's parent/guardian is also travelling with the player then a local hotel may be used as an alternative. Transportation will be arranged during the trial period via the Academy and agreed with parents/guardians.



14. U18, 21 & First Team Progression

- 14.1 As players progress through the Academy system they may have the opportunity to train and play with the adult provisions of the Club. This may raise concerns for the individual and/or their parent/guardians as they will be entering an adult provision and as such may witness adult behaviours and language. The Club will support the player(s) during this transition, and ensure that the welfare of the player concerned is paramount. Parents will be included and consent sought.



15. Guidelines in the event of a concern

Highlighting Concern

Although the Club is committed to doing the utmost to safeguard children from harm there may be occasions when concern is raised over the treatment of a child.

“Child abuse” and “neglect” are generic terms encompassing all ill treatment of children as well as cases where the standard of care does not adequately support the child’s health or development. Children may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child and may be of the same or opposite sex. There is often a common misconception that only a certain type of person can abuse children but this is simply not the case – abuse can take place in any setting, by someone of either sex, of any sexual orientation and of any age.

Recognition – Types of Abuse

Definitions of types of abuse are provided below. Should you have any concern that abuse is occurring you should contact the Designated Safeguarding Lead or Designated Safeguarding Officer immediately.

Physical abuse: Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.

Emotional abuse: Any act or other treatment which may cause emotional damage and undermine a person’s sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Children, Young People and Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Sexual abuse: Any act which results in the exploitation of Children, Young People and Adults at Risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This includes non-contact activities, such as indecent exposure, involving Children, Young People and Adults at Risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst the age of consent (the age at which a person is considered to be legally competent to consent to sexual acts) is sixteen, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.

Child sexual exploitation: A form of Child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child or Young Person into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.

County lines: The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children, Young People and Adults at Risk. Gangs recruit Children, Young People and Adults at Risk through deception, intimidation, violence, debt, bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult



at Risk who is unable to challenge them. County line gangs pose a significant threat to Children, Young People and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

Cuckooing: Cuckooing is a term often linked to county lines. Cuckooing is when gangs establish a base in the location they are targeting for drug dealing and to operate their criminal activity from, often taking over the homes of adults at risk by force or coercion. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health problems, female sex workers, single mums and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism.

Neglect: Ongoing failure to meet the basic needs of Children, Young People and Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that Children, Young People and Adults at Risk are safe and adequately supervised or exposing them to unnecessary risks. **Grooming:** The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person.

Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of Children, Young People and Adults at Risk for the purposes of involvement in extremist activity is a serious safeguarding issue. 5

Female genital mutilation ("FGM"): Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

Bullying: Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

Cyberbullying: The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among Children and Young People. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.

Discriminatory abuse: Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and



'banter'. Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

Poor practice: This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of Children, Young People and Adults at Risk are not afforded the necessary priority, compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Children, Young People and Adults at Risk in potentially compromising and uncomfortable situations, failing to ensure the safety of Children, Young People and Adults at Risk, ignoring health and safety guidelines, or giving continued and unnecessary preferential treatment to individuals.

Hazing: Any rituals, initiation activities, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of Children, Young People and Adults at Risk.

Peer-on-peer abuse: Children, Young People and Adults at Risk can be taken advantage of or harmed by their peers. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).

Infatuations: Children, Young People and Adults at Risk may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. They should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child, Young Person or Adult at Risk may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with the Safeguarding Team.

Domestic violence or abuse: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass, but is not limited to: psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.



16. The concept of significant harm

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children, and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

A court may make a care order (committing the child to the care of the local authority) or supervision order (putting the child under the supervision of a social worker or a probation officer) in respect of a child if it is satisfied that:

- the child is suffering, or is likely to suffer, significant harm; and
- the harm, or likelihood of harm, is attributable to a lack of adequate parental care or control.

There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements. Each of these elements has been associated with more severe effects on the child, and/or relatively greater difficulty in helping the child overcome the adverse impact of the maltreatment. Sometimes, a single traumatic event may constitute significant harm, for example, a violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the child's physical and psychological development. Some children live in family and social circumstances where their health and development are neglected.

For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the child's own assessment of his or her safety and welfare, the family's strengths and supports, as well as an assessment of the likelihood and capacity for change and improvements in parenting and the care of children and young people.



17. Responding to a Report or Suspicion

A Designated Safeguarding Officer or the Designated Safeguarding Lead should be contacted as early as possible and within 24 hours in any circumstance, however it is recognised that an individual may need to respond to a situation immediately. With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice.

Do:

- Ensure the child or young person's safety;
- Treat any allegations extremely seriously and act at all times towards the child as if you believe what they are saying, although do not directly say the words "I believe you";
- Tell the child they are right to tell you;
- Reassure the child that they are not to blame;
- Be honest about your own position, who you have to tell and why;
- Tell the child what you are doing and when, and keep them up to date with what is happening;
- Take further action – you may be the only person in a position to prevent future abuse;
- Write down everything said and what was done (handwritten is preferable) and sign and date the notes. An Incident Report Form should be used where possible and, in any case, a referral must be made to the Club within 24 hours of the incident taking place;
- Seek medical advice if necessary.

Don't:

- Make promises you cannot keep or to keep secrets;
- Interrogate the child – it is not your job to carry out an investigation – this will be up to the Police and Children's Services who have experience in this;
- Cast doubt on what the child has told you, don't interrupt or change the subject;
- Say anything that makes the child feel responsible for the abuse;
- Inform parents/carers – the Designated Safeguarding Lead or Officer will make this decision based on whether there is suspicion of their involvement.

DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.

Make sure you tell a Designated Safeguarding Officer immediately, they will know how to follow this up and where to go for further advice.



18. Recording Allegations or Suspicions

The Designated Safeguarding Officer will immediately report any allegation to the Designated Safeguarding Lead, who will ask for a written factual statement from the person making the report. An Incident Report Form must be completed and submitted within 24 hours to the Designated Safeguarding Officer and Designated Safeguarding Lead.

Any statement made by the child should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, questions kept to a minimum, and where used, they should be of an open format. No suggestion of who the perpetrator was or how any concern or incident happened should be suggested.

The Club will ensure that any child concerned is immediately removed from any possible risk of harm.

Investigations into possible abuse will require careful management. In these cases, the Designated Safeguarding Officer or Designated Safeguarding Lead will first seek the advice of the Safeguarding Children Team, Children's Social Care, a Local Authority Designated Officer (LADO), the Police, or the Premier League/Football Association Safeguarding Children Team, before setting up an internal inquiry and take their advice on informing the child's parents.

In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, the Club must provide a report to the FA Head of Safeguarding Children, the Premier League Head of Safeguarding Children and inform the Club's Chief Executive Officer. Any external local authority provision will naturally take the lead on any case.

Providing it is appropriate to do so the Designated Safeguarding Lead will maintain constant dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from the external agency. Escalation to inform Board level will take place at the Designated Safeguarding Lead's earliest opportunity.

Specific information regarding allegations against members of staff

If the report involves an allegation about any member of the Club staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc.) and the Club believes that the report could demonstrate that the member of staff in question has:

- behaved in a way that has harmed a child, or may have harmed a child;
- possibly committed a criminal offence against or related to a child; or
- behaved towards a child or children in a way that indicates he or she is unsuitable to work with children,

then the Designated Safeguarding Lead or Designated Safeguarding Officer shall immediately inform the Local Authority Designated Officer (LADO) where the alleged incident took place so that he or she can consult with the Police and Local Authority Children's Social Care colleagues as appropriate. Where the Designated Safeguarding Lead or Safeguarding Officers are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.

The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation. The member of staff



in question will be asked to stay away from activities pending the conclusion of any investigation. This process would only be carried out once the advice of the above mentioned external bodies had been sought and only then in consultation with the Designated Safeguarding Lead or Designated Safeguarding Officer. Providing it does not contradict with any advice received from the LADO, any internal investigation will be carried out in line with the Club's Management and Human Resource Policies and either general or department-specific Grievance Procedures as they are applicable.

Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all staff at the Club is that no guarantee of confidentiality can be given to a child (although this does not necessarily mean that the parents/carers have to be told).

A child should never be pressured to give information or show physical marks unless they do so willingly. If they choose to show markings, two members of staff should be present and any marks raising concern should be recorded on the incident and report form.

There are actions which staff have to, and are obliged to take, once they are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring any issue to the Designated Safeguarding Lead or any Designated Safeguarding Officer. The key issue is that the welfare of the child is protected.



External Resources

FA Safeguarding Children Guidelines:

<https://www.thefa.com/football-rules-governance/safeguarding/section-11-the-complete-downloads-directory>

Working Together to Safeguard Children 2018:

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Information Sharing Guidance for Managers and Practitioners:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Sources of further information and advice:

[Health & Safety at Work Act 1974](#)

[Data Protection Act 2018](#)

[Safeguarding Vulnerable Groups Act 2006](#)

[Equality Act 2010](#)

[Sexual Offences Act 2003](#)

[Protection of Freedoms Act 2012](#)

[Keeping Children Safe in Education](#)

[Children Act 1989](#)

[Children Act 2004](#)

[Education Act 2002](#)

<https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty>

[DBS barring referral guidance](#)

[Police Act 1997](#)

[Protection of Freedoms Act 2012](#)

[Counter-Terrorism and Security Act 2015](#)

[Counter-Terrorism and Security Act 2015 - Part 5](#)

[Department for Education: Child sexual exploitation](#)

[Home Office: Criminal Exploitation of children and vulnerable adults](#)

[Female Genital Mutilation Act 2003](#)

[Home Office: Mandatory Reporting of FGM](#)

[The Right to Choose: Statutory guidance for dealing with forced marriage](#)



[Department for Education: Preventing and tackling bullying](#)

[Department for Education: Cyberbullying](#)

[Sexting in schools and colleges: responding to incidents and safeguarding young people](#)

[Indecent images of children: guidance for young people](#)

<https://thecpsu.org.uk/help-advice/topics/safer-recruitment/>

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

<http://www.nhs.uk/conditions/social-care-and-support-guide/pages/vulnerable-people-abuse-safeguarding.aspx>

<http://www.forwarduk.org.uk/>

<https://www.ceop.police.uk/>

<http://www.karmanirvana.org.uk/>