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**COMMUNITY  
FOUNDATION**

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Safeguarding and  
Child Protection Policy  
2021 - 2022

Approved By: Phil Humphreys

Approved On: 31<sup>st</sup> January 2021

## **Introduction**

For the purposes of this policy 'the Company' means AFC Fylde Community Foundation.

This policy does not form part of a contract of employment. Although all staff and volunteers must comply with this policy, it does not in itself create contractual rights or obligations. The company reserves the right to amend this policy at any time.

This policy will be reviewed annually. It will also be reviewed when there is a change in safeguarding or child protection legislation, a safeguarding incident or any other substantial change that involves safeguarding.

This policy and related procedures apply to all activities, events, trips, residentials and any other work or activity undertaken by the company.

Safeguarding and child protection is everyone's responsibility. This policy and related procedures apply to all staff, permanent or casual, including volunteers, regardless of their role for or with the company.

This policy and linked procedures have been developed in partnership and consultation with the Local Safeguarding Children Board, Local Authority Designated Officer (LADO), the Child Protection in Sport Unit (CPSU), the Football Association (FA), Premier League and the English Football League (EFL).

This policy is intended to be used internally and externally. The policy is available on shared areas as well as on the company websites.

## **Purpose and Aim of this Policy**

This policy aims to:

1. Ensure all staff and volunteers are aware of, and understand fully, their responsibilities to safeguard children and young people.
2. Ensure that appropriate action is taken in a timely manner to safeguard and promote children's welfare.
3. Make it clear and easy for anyone to report a safeguarding concern.
4. Ensure staff, young people, parents and carers are fully aware of the safeguarding framework throughout the company, including safeguarding contacts and how to report a concern.
5. Provide guidance to ensure that every child and young person we engage with is protected from abuse and harm.
6. Promote and prioritise children and young people's rights and welfare in all that we do, ensuring their wellbeing is always the paramount consideration.

## **Use of Terminology**

Below are key terms and their definitions linked to safeguarding used throughout this policy:

### **1. Safeguarding**

Safeguarding is a set of policies, practices and procedures grounded in law, that aims to keep children, young people and adults safe from a wide range of potential harm. Safeguarding is also about being proactive and taking action when there is a concern.

### **2. Child, children, young person, young people**

For the purpose of this policy and all linked safeguarding processes, the above terms include anyone under the age of 18. As per the United Nations Convention on the Rights of the Child, a person is legally defined to be a child until the day of their 18<sup>th</sup> Birthday.

It is important to note that our duty of care under this safeguarding policy includes everyone we engage with under the age of 18. This includes participants, players, beneficiaries, fans, staff, volunteers and anyone else connected to the company. This includes all children and young people regardless of their age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socio-economic background or any other factor.

### **3. Child Protection**

This is part of the safeguarding process. It focuses on protecting individual children identified as suffering or likely to suffer significant harm. This includes child protection procedures which are followed by agencies such as social care when a child is identified as being at risk of harm.

### **4. Abuse**

This is a form of maltreatment of a child. Someone may abuse or neglect a child by inflicting harm or failing to act to prevent harm to them. Children may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others. Abuse can take place online or offline. Children may be abused by an adult or adults, or by another child or children.

*Please see the appendices for a full list of safeguarding terms including different types of abuse.*

## **We seek to safeguard children and young people by:**

1. Hearing, listening to and respecting them.
2. Adopting safeguarding legislation, guidelines and best practice through procedures and a code of conduct and ethics for all staff and volunteers.
3. Recruiting staff and volunteers through a safer recruitment and vetting process, ensuring all necessary checks are made to prevent the employment or deployment of unsuitable individuals.
4. Sharing information about safeguarding and best practice. This includes sharing information regarding safeguarding with the appropriate agencies (statutory agencies and affiliated football), in a confidential manner.
5. Providing effective management to staff and volunteers through inductions, supervision, support and ongoing training.

## **Safeguarding Legislation and Regulations**

This policy and associated practices have been developed in line with safeguarding legislation and relevant laws and acts in England. Details of this legislation and regulations are detailed further below. All staff and volunteers working in regulated activity (as defined in the Safeguarding

Vulnerable Groups Act 2006, referenced below) are required to ensure they are familiar with the following safeguarding legislation.

### **1. Keeping Children Safe in Education (KCSIE) 2020**

This is statutory guidance for all education providers on their responsibilities to safeguard children and on safer recruitment. <https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

### **2. Working Together to Safeguard Children 2018**

This is statutory guidance on the importance of inter-agency working to safeguard and promote the welfare of children. <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

### **3. The Sexual Offences Act 2003 (replacing the Sexual Offences Act 1956)**

The Sexual Offences Act 2003 is an Act of Parliament in the United Kingdom. It replaced older sexual offences laws with more specific and explicit wording.

This act made new provision about sexual offences, their prevention and the protection of children from harm from other sexual acts.

Sexual Offences include;

- Rape
- Assault by Penetration
- Sexual Assault
- Causing a person to engage in sexual activity without consent
- Rape of a child under 13
- Assault of a child under 13 by penetration
- Sexual assault of a child under 13
- Causing or inciting a child under 13 to engage in sexual activity
- Sexual activity with a child
- Causing or inciting a child to engage in sexual activity
- Engaging in sexual activity in the presence of a child
- Causing a child to watch a sexual act
- Child sex offences committed by children or young persons
- Arranging or facilitating commission of a child sex offence
- Meeting a child following sexual grooming etc.
- Abuse of position of trust: sexual activity with a child
- Abuse of position of trust: causing or inciting a child to engage in sexual activity
- Abuse of position of trust: sexual activity in the presence of a child
- Abuse of position of trust: causing a child to watch a sexual act.

### **4. The Female Genital Mutilation (FGM) Act 2003**

This Act (with particular reference to Section 5) makes it clear that any person who works in a regulated profession in England and Wales **must** notify the police if during the course of their work in their profession, they discover or become aware that an act of FGM appears to have been

carried out on a girl who is aged under the age of 18. Please see the appendices for further information relating to FGM. <https://www.legislation.gov.uk/ukpga/2003/31/contents>

## **5. Safeguarding Vulnerable Groups Act 2006**

This act defines 'regulated activity' and what it means in relation to working with children. <https://www.legislation.gov.uk/ukpga/2006/47/contents>

## **6. Prevent Duty**

Statutory guidance which explains duties under the Counter Terrorism and Security Act 2015, with respect to responsibilities to protect people from the risk of radicalisation and extremism. <https://www.gov.uk/government/publications/prevent-duty-guidance>

## **7. The Rehabilitation of Offenders Act 1974**

This outlines the law with regards to people who have criminal convictions working with children. This law must be followed when organisations that recruit to roles that are eligible for a criminal record check. <https://www.legislation.gov.uk/ukpga/1974/53>

## **Responsibilities**

Trustees, staff and volunteers are responsible for ensuring the safety and wellbeing of children and young people. They are also responsible for taking appropriate steps (including those set out in this policy) to ensure that any safeguarding concerns, suspicions or allegations are taken seriously and reported immediately. This includes suspected safeguarding concerns.

All staff and volunteers are responsible for their own actions with regards to their behaviour and conduct when working with children and young people. The company staff code of conduct and ethics provides all staff and volunteers with full details on expectations on conduct and behaviour.

It is acknowledged that activities, projects and events vary across the company. Therefore, all staff and volunteers are expected to review this policy whenever there are any changes to, or any new, projects, events or activities that involve or impact children or young people. Some projects or events will require specific processes to supplement the safeguarding procedures detailed in this policy. In all cases, it is the responsibility of the lead member of staff to liaise with the safeguarding team to ensure that the necessary requirements are considered relating to the protection and welfare of children and young people.

## **Positions of Trust**

A position of trust is when one person has power and influence over another person due to the nature of their work or the nature of the activity. It is vital that staff are mindful that many of the roles within the company are considered to be one that is in a position of trust. It is therefore essential that those in such positions understand the power they may have over those in their care, and the responsibility they must exercise as a consequence.

This means that those in positions of trust should not:

1. Use their position to gain access to information for their own or others' advantage. Such information should only be used or shared to meet the needs of children and young people.

2. Use their power to intimidate, threaten, coerce, undermine or act in a negative or derogatory way towards children and young people. This includes allowing another person to act negatively to children and young people.
3. Use their status or standing to form or promote any inappropriate relationships with children and young people, either online or offline.

### **Responsible Officers**

The company have a team of staff who are responsible for managing safeguarding:

#### ***Senior Safeguarding Manager***

The Senior Safeguarding Manager (SSM) is the Chief Executive of AFC Fylde Football Club who is a Board member on the charity's boards. The Senior Safeguarding Manager has overall responsibility for safeguarding and promoting the welfare of children across the company.

#### ***Head of Safeguarding***

The Head of Safeguarding is the Foundation Director who has overall day to day responsibility for the safeguarding of children and for the Safeguarding Officer who works within the Foundation.

#### ***Safeguarding Officer***

The Safeguarding Officer works across the company and is responsible for ensuring appropriate safeguarding policies and procedures are in place and provides training and guidance on all aspects of safeguarding.

The Safeguarding Officer is the focal point for safeguarding children in their designated area. Any concerns about a child or young person must be directed to the Safeguarding Officer for advice in the first instance – contact details can be found at the end of this policy.

### **Training**

All new staff and volunteers, as part of their induction, will be made aware of the company safeguarding policies. In addition to this, an induction process including safeguarding, will be completed within the first week of a person starting work for the company and will include:

- Where required, completion of the FA Workshop on Safeguarding Children, which is renewed every three years. Details of how to complete this can be found here <http://www.thefa.com/football-rules-governance/safeguarding/safeguarding-children>
- Certified completion of the online E Learning Level 1 or Level 2 courses in safeguarding provided by Blackburn with Darwen Learning. This is accessed via [https://blackburn.melearning.university/course\\_centre](https://blackburn.melearning.university/course_centre)
- EFL Online Safeguarding Training – All staff employed by the group will be required to complete the EFL Online Safeguarding Training in their first week of their employment.
- All staff will complete an in-house safeguarding training session with a member of the safeguarding team as part of their induction.
- Other safeguarding training and workshops will be offered to staff and volunteers as and when available and required. Annual safeguarding training will be provided to staff.

- The above training will be reviewed and refreshed annually.

The Foundation Director will retain records for all safeguarding training.

### **Poor Practice**

Poor practice is when staff or volunteers fail to fulfil standards of care and support. Poor practice can go on to cause harm and can become abuse. Poor practice is unacceptable and will be treated seriously with appropriate action. Any incidences of poor practice will be managed in line with the company disciplinary policy and the poor practice referral guidance from affiliated football (where applicable.)

A person may not be aware that poor practice or abuse is taking place, as they may deem the behaviour as 'acceptable'.

Affiliated Football defines poor practice as:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players)
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match)
- Allowing hazing practices to go unreported (Examples of hazing practices include initiation practices that are likely to cause humiliation, harassment or abuse)
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. inappropriate use of social media with a young player(s))
- Not following health and safety guidelines
- Failing to adhere to a code of conduct
- Giving continued and unnecessary preferential treatment to any individual(s).

### **Concerns about Poor Practice**

Any suspicions or concerns relating to poor practice must be reported to the Safeguarding Officer or the Head of Safeguarding (who is required to report this to a member of the Safeguarding Officer immediately).

Information gathering will be completed by the Safeguarding Officer, who must consult with the Head of Safeguarding.

The Head of Safeguarding must be made aware of the outcome and must be provided with a completed cause for concern form (see appendices) at the point of notification. A failure to report poor practice concerns in a timely and appropriate manner may lead to disciplinary action.

As per the affiliated football safeguarding and poor practices guidelines, professional clubs must send a referral to The FA Safeguarding Team where repeated poor practice incidents occur. To avoid doubt this means a referral must be made where there are three incidents of poor practice

by the same individual. This is whether these incidents are for the same type of poor practice, or for different forms of poor practice, and there is not a specified time frame for the incidents. Contact information for the FA Safeguarding team can be found in the appendices.

### **Peer on Peer Abuse (A young person abusing another young person)**

We recognise that children are capable of abusing each other. This must never be tolerated or passed off as “banter” or “part of growing up”.

This policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

1. Is serious, and potentially a criminal offence;
2. Could put young people at risk;
3. Is violent, for example an assault;
4. Involves young people being forced/ coerced into drugs or alcohol;
5. Involves any type of sexual offence(s) (as detailed in the Sexual Offences Act 2003);
6. Involves sexual harassment. Sexual harassment means ‘unwanted conduct of a sexual nature’ that can occur online and offline. Sexual harassment is likely to violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment; non-consensual sharing of sexual images and videos;
- Sexualised online bullying;
- Unwanted sexual comments and messages, including, on social media;
- And sexual exploitation; coercion and threat.

All staff are expected to be clear and not to tolerate or dismiss sexual harassment as “banter”, “part of growing up” or “just having a laugh”. Challenging behaviours such as this (and potentially criminal in nature) rather than dismissing or normalising them is a crucial responsibility on all staff to ensure that we create a safe environment for children and young people.

If a young person makes an allegation of abuse against another young person, staff should follow the below procedure:

1. You must tell the Safeguarding Officer and make a record of the allegation immediately;
2. You do not need to investigate it; a member of the Safeguarding Officer will advise on what action is required;

3. Do not view or destroy any imagery or evidence unless absolutely necessary to safeguard those involved.

The Safeguarding Officer will:

1. Collaborate with the Head of Safeguarding to decide whether immediate action or further information is required. If this is necessary and appropriate the Safeguarding Officer should arrange meetings with the appropriate staff and young people and interview all those involved;
2. Contact should be made with the local authority children's social care team for advice. The police should also be informed if the allegation involves a criminal offence;
3. An immediate referral to the police and Children's Social Care should be made if:
  - The incident involves an adult as the alleged perpetrator, and the victim/s a child or young person;
  - There is reason to believe someone has been coerced or blackmailed or groomed;
  - Any imagery involves anyone under the age of 18;
  - You have reason to believe the young person or anyone else linked to the case is at immediate risk of harm.
4. If the abuse has happened online or electronically, in collaboration with the Head of Safeguarding, a decision will be made as to whether action is required to delete or remove images from platforms or services;
5. Contact should be made with school, college or other setting; if appropriate, in consultation with the Head of Safeguarding or Safeguarding Officer, to inform or update them of the incident(s);
6. Decide whether to contact parent/carers. In most cases they should be involved in the process, unless there is sufficient reason, to believe involving them would put the young person at risk of harm;
7. If police and/or social care are not involved, a risk assessment and investigation may be completed in line with the relevant disciplinary policy;
8. The Safeguarding Officer and Head of Safeguarding, will put a risk assessment and support plan into place for all children involved and – if applicable - both the victim(s) and the child(ren) against whom the allegation has been made – will be assigned a named person within the company that they can contact throughout the process.

Please note, allegations involving young people creating, sharing or possessing sexually inappropriate pictures or videos is dealt with under a specific policy. Please refer to the Youth Produced Sexual Imagery Policy.

### **What to do if you have a concern**

Working Together to Safeguard Children 2018 states that everyone who works with children has a responsibility to keep them safe. This means that everyone working for the company must

recognise their own role in identifying concerns regarding children. This includes effectively sharing information and taking timely action to safeguard a child.

We must acknowledge that that no single person, professional or agency can have a full picture of a child's needs or circumstances and the aim is always to ensure children and families receive the right help at the right time.

It is not the responsibility of individual members of staff to investigate or make judgments on suspected instances of risks of harm to the welfare of a child. That is a matter for the relevant external agencies, or, in appropriate cases, a member of the safeguarding team.

All complaints, allegations or concerns will be taken seriously and anyone with a concern is encouraged to report it at the earliest opportunity.

Staff and volunteers must follow the procedures set out below in the event of a safeguarding concern.

If someone is in immediate danger:

1. Contact the police **immediately** if a child, or anyone else, is at immediate risk of harm. Use your professional judgement - You must contact the Police on 999 if you feel there is immediate danger to a child.
2. If the child lives in another Local Authority area then the relevant Children's Services Duty Team should be contacted, this can be checked via <https://www.gov.uk/report-child-abuse-to-local-council>. **Anyone can make a referral.**
3. Tell your Safeguarding Officer as soon as possible. The Safeguarding Officer will also support with the required next steps.
4. Where the child already has a social worker, any information should also go immediately to the social worker involved, or in their absence to their team manager.
5. Make a record of all details and actions.

If a child makes a disclosure to you:

If a child discloses a safeguarding issue to you (and they are not in immediate danger), you should:

1. Listen to and believe them.
2. Allow them time to talk freely and do not ask leading questions.
3. Stay calm and do not show that you are shocked or upset; tell them that they have done the right thing in telling you.
4. Explain what will happen next and that you will have to pass this information on to the Safeguarding Officer.
5. Wherever possible, it is important to speak to a Safeguarding Officer first to agree a course of action.
6. You can also contact the charity NSPCC on 0808 800 5000 (24 hours) if you need advice on the appropriate action.
7. If it is decided that it is appropriate to refer the case to local authority children's social care, the police or any other agency, the Safeguarding Officer will make the referral.
8. Contact should be made with the Head of Safeguarding if contact with a Safeguarding Officer is unsuccessful.

9. The Safeguarding Officer will support with the completion of a record of all actions which have been taken, this must be sent to the Head of Safeguarding.

If you have any other safeguarding concern:

1. In the first instance, any other safeguarding concern should be discussed with the Safeguarding Officer. The Safeguarding Officer is usually the first point of contact for any safeguarding concerns within their designated area.
2. If the Safeguarding Officer is unavailable the Head of Safeguarding should be contacted.

The welfare of the child is of paramount concern and it is everyone's responsibility to act promptly. – Make sure you tell the Safeguarding Officer as soon as possible; they will know how what steps to take and where to go for further advice.

### **Safeguarding concerns within partner settings**

It is expected that when a safeguarding incident occurs within a third-party organisation that the third party is responsible for implementing its own safeguarding procedures, including referrals to external agencies where appropriate.

The safeguarding lead for the organisation should inform a member of the company safeguarding team immediately so that parallel action can be completed, where required and deemed necessary, by the company safeguarding team. Any safeguarding incidents or concerns that take place within a third-party organisation or facility must be reported to the Head of Safeguarding.

### **Notifying Parents or Carers**

Where appropriate and safe to do so any concerns about a child will be discussed with the child's parents or carers. The Safeguarding Officer will normally do this in the event of any concern or disclosure.

Other staff will only talk to parents about any such concerns following consultation with a Safeguarding Officer.

If it is believed that notifying the parents would increase the risk to the child, staff should discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, parents/carers of all the children involved will be contacted.

### **Early Help**

Early help means providing support as soon as a problem emerges, at any point in a child's life. Providing early help is more effective in promoting the welfare of children than reacting later.

All local authorities have developed an early help programme to meet children's needs, this involves professionals working with families to identify strengths and areas that they need to develop. Following an assessment, an action plan is developed which is reviewed on a regular basis until outcomes have been achieved.

If early help is considered to be appropriate, a Safeguarding Officer will support in liaising with other agencies and setting up an early help assessment.

## **Further Actions**

If a referral has been made to children's social care then the local authority must action the referral within 1 working day of a referral and advise on what course of action to take. The Safeguarding Officer (or the person who made the referral) must follow up with the local authority if this information is not made available and to ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after referrals are made, the Safeguarding Officer (or person who made the referral) must contact the local authority (or the relevant agency) and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

The Safeguarding Officer will ensure that referrals or signposting to other agencies have been actioned appropriately, for example, by following this up with the individual concerned or relevant department. The Safeguarding Officer will keep cases within their designated area under constant review and will consider a referral to local authority children's social care (or another appropriate agency) if the situation does not seem to be improving or any new information becomes available.

Timelines of interventions will be monitored and reviewed by the Safeguarding Officer.

## **Referrals to external agencies**

The company is required to report to a range of external bodies should a staff member leave, for example, through reasons that involve unsuitability to work with children or young people. Where this is the case, the Head of Safeguarding or Safeguarding Officer will refer to the Disclosure and Barring Service (DBS) and other relevant professional bodies including affiliated football.

## **Non-Recent Abuse**

In 2016 Clive Sheldon QC was asked to lead an independent review into allegations of non-recent child abuse in football.

Non-recent abuse (also known as historical abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years old. Any allegations of this nature should be reported in line with the Foundation's reporting procedure.

## **Allegations against Staff**

Where there is a safeguarding complaint against a member of staff or volunteer, 3 types of investigation can be opened:

1. A criminal investigation led by the Police.
2. An investigation led in a multi-agency approach by the Local Authority.
3. A disciplinary or misconduct investigation led by the company, which may also involve Affiliated Football.

Depending on the nature of the complaint, these investigations may take place simultaneously. The results of a Police investigation (1) and/or Multi agency investigation (2) may influence the disciplinary or misconduct investigation (3).

As detailed in Working Together to Safeguard Children 2018, the company will notify the Local Authority Designated Officer (LADO) within one working day where there is a safeguarding allegation made about anyone who works with children who may have:

1. Behaved in a way that has harmed, or may have harmed a child;
2. Possibly committed a criminal offence against or related to a child;
3. Or behaved towards a child or children in a way that indicates they may pose a risk of harm to children.

If a member of staff has any concern about another member of staff these concerns must be communicated directly to the Head of Safeguarding immediately.

If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the Foundation Chair of Trustees, who will duly notify the relevant statutory agencies.

The company recognises that an allegation of abuse made against a member of staff may be for a variety of reasons and the facts of the allegation may or may not be true. This can only be determined by a thorough investigation. It is imperative that those dealing with any allegation remain impartial throughout the investigation.

All investigations must be thorough and not subject to delay.

Upon being made aware of a safeguarding allegation about a member of staff the Head of Safeguarding (or Safeguarding Officer) will:

1. Seek advice from the Local Authority Designated Officer.
2. Consider if it is necessary to involve the Police.
3. Consider whether the threshold for a referral to the Football Association Safeguarding Team has been met.
4. Advise the EFL Safeguarding Manager.
5. Obtain written details in the form of a report of the allegation from the person making the allegation and ensure these are signed and dated. These written details should be countersigned and dated by the designated officer.
6. Record information about times, dates, locations and names of potential witnesses.

### **Making a record of a concern**

The Head of Safeguarding/Safeguarding Officer will ask for a written factual statement from the person making the report. This must be in the format of the Cause for Concern form – see Appendix B.

If the report involves an allegation about another member of staff, that person will also be asked to write a brief report, sign and date it. Any statement made by the child or young person should be reported in their own words, signed and dated.

These reports should be confined to facts and should not include any opinion, interpretation or judgement.

Staff should ensure that any child concerned is immediately removed from any possible risk of harm and that support is given.

The Safeguarding Officer's role is to support staff with the process and also provide initial guidance and support in response to the concern.

### **Confidentiality and Information Sharing**

When there are safeguarding concerns all staff have a duty to share information. Staff should be aware of the following with regards to confidentiality and safeguarding:

- Numerous serious case reviews have established that timely information sharing with other relevant professionals and agencies is essential and critical to effective safeguarding;
- You do not need consent to share information if a child or young person is suffering, or is believed to at risk of harm;
- Staff should never promise a child that they will not tell anyone about a concern, as this may not be in the child's best interests.
- Information is only to be shared on a 'need-to-know' basis; i.e. Before sharing any information, staff must consider whether it is essential for that person to be aware.

The company will share information with other agencies when it is legally required to do so to safeguard children, this will always be in line with local safeguarding procedures and legislation.

The Head of Safeguarding or Safeguarding Officer will provide staff with guidance on how to handle any concerns or questions surrounding confidentiality and safeguarding.

### **Record Keeping**

Accurate and up to date record keeping of concerns and action taken is essential in safeguarding for three reasons:

1. It assists the company to identify safeguarding concerns at an early stage.
2. It helps the company monitor and manage safeguarding concerns.
3. It helps to review details of cases and consider any lessons learned for future practices.

Furthermore, in any audit or investigation, it will be important to provide evidence of effective safeguarding practice. A record of concern, suspicion or allegation should be made at the time or as soon as possible after the event. All records of welfare, safeguarding or child protection concerns, disclosures or allegations are to be treated as sensitive information and will be managed in accordance with the data protection and retention policies. The information will only be shared with relevant parties as required, whether to enable them to take appropriate steps to safeguard a child, adult at risk or to enable them to carry out their own duties.

### **Lone Working**

Where possible all staff and volunteers should avoid working alone when sessions involve children and young people. If an activity or project requires periods of lone working, each staff member must follow the listed measures:

- All activity and project planning that includes lone working must be approved by a Senior Manager and Head of Safeguarding.
- All lone working activities or project must have a detailed risk assessment.
- All locations should be in a public space and must be approved by a Senior Manager, Head of Safeguarding and the Project Lead.
- The staff involved must feel comfortable to lone work. If the member of staff has any concerns, they should speak to the Project Lead or Head of Safeguarding.
- Parental consent of the participant must be obtained.
- Parents and Project Managers to be informed of the location of each session.
- All lone working sessions should be displayed in the staff members Outlook calendar and shared with the Project lead.
- Staff must text or call the Project Manager when arriving, giving them an estimated time of departure. The staff member should then inform the Project Manager when the session has concluded.
- If Project Managers do not receive either call, they should attempt to contact the staff in question.
- If contact isn't made Project Managers should contact a Senior Manager and Head of Safeguarding.
- All staff should maintain professional standards and follow the reporting procedure for any concerns.

## Activities and Events

It is the responsibility of the lead coach, project coordinator or manager to satisfy the following for **all** activities or events that involve children and young people:

Consideration	Details	Additional Guidance
Supervision of children and young people	Any activity that involves work with children and young people will usually require those involved to hold an in-date criminal record check (if eligible.) HR and Safeguarding Team holds the records of all staff/volunteers who hold a current criminal record check and can provide guidance on the required processes.	Consider level of safeguarding training amongst staff/volunteers supervising children and young people. As a minimum they should be aware of who the contact is for any safeguarding queries and how to access the safeguarding policy.
Consent (including image/video consent) and other important information	For any activity involving a child or young people, appropriate informed consent should be obtained from parents or carers and the young person for all aspects of the activity. This should also include consent to capture, store	Ensure there is a process for if consent is not given. For example, consider sourcing wristbands for those who don't consent for photographs, then they can be identified and their image(s) not used. It is important to ensure the young person and parent/carer are clear what they are being asked to consent to and

	<p>and use photographs or images.</p> <p>If a child is to be the focal point of any imagery specific consent must be sought for this use.</p> <p>Specific consent forms are available that can be used/adapted.</p> <p>It is the responsibility of the lead coach/manager to confirm pick up and drop off arrangements as well as emergency contacts and medical information. This must be reviewed for all children and young people prior to any activity commencing.</p>	<p>that they are able to change their mind at any time.</p> <p>If it not clear or consent is not given or obtained then the activity must not take place or alternative arrangements made.</p>
<p>Adult to Children Ratios</p>	<p>Consider the advised ratios for the age group, activity, ability, level of training and location.</p>	<p>The NSPCC recommend at least 2 adults present when working with children and young people. They recommend the following ratios as a minimum to help keep children safe:</p> <ul style="list-style-type: none"> <li>• Age 0 - 2 years 1 adult: 3 children</li> <li>• 2 - 3 years 1 adult: 4 children</li> <li>• 4 - 8 years 1 adult: 6 children</li> <li>• 9 - 12 years 1 adult: 8 children</li> <li>• 13 - 18 years 1 adult: 10 children</li> <li>• This is a guide and ratios should consider all factors related to that event/activity/group.</li> </ul> <p>More information can be obtained from:</p> <p><a href="https://learning.nspcc.org.uk/research-resources/briefings/recommended-adult-child-ratios-working-with-children">https://learning.nspcc.org.uk/research-resources/briefings/recommended-adult-child-ratios-working-with-children</a></p>
<p>Contractors/Suppliers/Providers</p>	<p>As an organisation committed to safeguarding it is important that this</p>	<p>Consider Partnership Checklist, Service Level Agreements and appropriate Risk Assessments.</p>

	<p>commitment is extended to the agreements made with companies and suppliers who will have contact with children and young people. Staff must consider how external staff/volunteers are going to be supervised and confirm safe recruitment. Consider a partnership agreement checklist and also service level agreements for more regular arrangements.</p>	
<p>Suitability of Setting</p>	<p>Consider use of toilets, changing rooms. Will it be open to spectators/visitors? Do certain areas need to be restricted or no access? Who is responsible for this? Age groups will need to be grouped appropriately when using facilities such as changing rooms.</p>	<p>Ensure risk assessments have been satisfied.</p>

## Appendices

<b>Reference</b>	<b>Title</b>
A	Glossary of Terms
B	Safeguarding Contacts – Internal and External
C	Safeguarding Action Chart
D	Safeguarding Cause for Concern Form

## **Appendix A: Glossary of Terms**

### **Categories of abuse**

#### ***Physical Abuse***

Physical abuse may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces illness in a child.

Physical Abuse indicators can include:

- An explanation which is inconsistent with an injury such as several different explanations provided by a parent/carer or the young person themselves for an injury.
- Unexplained delay in seeking treatment or reluctance to give information or mention previous injuries by a parent/carer or young person themselves.
- Bruising. Children can often have accidental bruising, but repeated or multiple bruising on areas such as the head or on sites unlikely to be injured accidentally such as round the face or repeat bruising on the same site which indicates the injuries were caused at different times must be considered as non- accidental unless there is evidence or an adequate explanation provided.
- Fractures – if the history provided by parent/carers or the young person is vague.
- Burns & Scalds
- Bite Marks

#### ***Sexual Abuse***

Sexual Abuse is when adults, or other children, use children to meet their own sexual needs. It involves forcing or enticing a child to take part in sexual activities, including prostitution, whether or not the child is aware of what is happening. The activities may involve contact including penetrative acts or non-penetrative acts. They may include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways.

Recognition of sexual abuse can be difficult, unless the child actually discloses. There may be no physical signs and indications are more likely to be emotional/behavioural.

Some behavioural indicators to be aware of that are associated with sexual abuse are:

- Inappropriate sexualised conduct
- Sexually explicit behaviour, play or conversation, inappropriate to the child's age
- Continual and inappropriate or excessive masturbation
- Self-harm (including eating disorder), self- mutilation and suicide attempts
- Involvement in prostitution or indiscriminate choice of sexual partners
- An anxious unwillingness to remove clothes, for example, for sports events (but this may also be related to cultural norms or physical difficulties)

Some physical indicators associated with sexual abuse are:

- Pain or itching of genital area
- Blood on underclothes

- Pregnancy in a younger girl where the identity of the father is not disclosed
- Physical symptoms such as reference to injuries to the genital or anal area, bruising to buttocks, abdomen and thighs, sexually transmitted disease, presence of semen on vagina, anus, external genitalia or clothing.

### ***Neglect and acts of omission***

This is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health and development. Neglect may also occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent/carer failing to:

- Provide adequate food, clothing, shelter (including exclusion from home or abandonment)
- Protect a child from physical/emotional harm or danger
- Ensure adequate supervision (this also includes the use of inadequate care-givers)
- Ensure access to appropriate medical care/treatment
- It may also include neglect or unresponsiveness to a child's basic emotional needs.

### ***Emotional Abuse***

This is the persistent emotional ill treatment of a child which is likely to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only so far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as over protection and limitation of exploring and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may also occur alone.

### ***Domestic Abuse***

Domestic abuse is an incident or pattern of incidents of controlling, coercive, threatening, degrading and/or violent behaviour, including sexual violence. The perpetrator can be a partner or ex-partner, but also by a family member or carer. It is important to note that men and women can both be victims and perpetrators of domestic abuse.

Domestic abuse is an important indication of risk of harm to children, whom may suffer directly or indirectly if they live in households where there is domestic abuse taking place. Domestic abuse is very likely to have a damaging effect on the health and development of any child(ren) involved or living in a household where domestic abuse of any kind is occurring. Domestic abuse can take many forms including physical, financial and emotional abuse.

Families affected by domestic abuse should be offered appropriate support to try to keep them safe from harm. Many cases of domestic abuse start or escalates within a relationship during pregnancy, following childbirth, during separation and if mental health and/or substance misuse is present. Staff must be alert to information on these risk factors within a child or family home and report any concerns that they have to the Safeguarding Officer who will advise on appropriate actions.

## ***Bullying***

Bullying is behaviour that is intended to hurt someone physically or emotionally, is often repeated and is commonly aimed at certain groups (for example, because of disability, gender, gender reassignment, religion and/or sexual orientation).

Bullying can result in pain and distress to the victim and may be:

- Discriminatory - racial taunts, graffiti, gestures, homophobic comments, jokes about disabled people, sexist comments.
- Emotional - being unfriendly, excluding (emotionally and physically), sending hurtful text messages, tormenting, (e.g. hiding football boots/ shin guards, threatening gestures)
- Physical - pushing, kicking, hitting, punching or any use of violence.
- Sexual - unwanted physical contact or sexually abusive comments.
- Verbal - name-calling, sarcasm, spreading rumours, teasing.

## **Responding to bullying**

The company has a responsibility to respond promptly and effectively to issues of bullying. Any bullying concerns which present safeguarding concerns will be dealt with by the processes detailed in this policy. Further details can be found in the company policy for Anti-Harassment and Bullying.

## ***Grooming***

Grooming is when someone builds an emotional connection with a child or young person to gain the trust for the purposes of abuse, exploitation or trafficking

Many children don't understand that they have been groomed. Groomers will hide their true intentions and may spend a long time gaining a child's trust. They may also try to gain the trust of the whole family so they can be alone with the child.

Children and young people can be groomed online, in person or both – by a stranger or someone they know. This could be a family member, a friend or someone who has targeted them – like a teacher, faith group leader or sports coach. When a child is groomed online, groomers may hide who they are by sending photos or videos of other people. Sometimes this'll be of someone younger than them to gain the trust of a "peer". They might target one child online or contact lots of children very quickly and wait for them to respond.

The relationship a groomer builds can take different forms. This could be:

- a romantic relationship
- as a mentor
- an authority figure
- a dominant and persistent figure.

A groomer can use the same sites, games and apps as young people, spending time learning about a young person's interests and use this to build a relationship with them. Children can be groomed online through:

- social media networks
- text messages and messaging apps, like Whatsapp
- email
- text, voice and video chats in forums, games and apps.

Whether online or in person, groomers can use tactics like:

- pretending to be younger
- giving advice or showing understanding
- buying gifts
- giving attention
- taking them on trips, outings or holidays.

Groomers might also try and isolate children from their friends and family, making them feel dependent on them and giving the groomer power and control over them. They might use blackmail to make a child feel guilt and shame or introduce the idea of 'secrets' to control, frighten and intimidate.

It's important to remember that children and young people may not understand they've been groomed. They may have complicated feelings, like loyalty, admiration, love, as well as fear, distress and confusion.

## **Additional Categories of Abuse**

### ***Radicalisation and Prevent***

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

The company, in consultation with the local authority, will undertake Prevent awareness training and ensure that all staff members have access to appropriate training to equip them to identify children at risk of this radicalisation.

If a child is not at immediate risk of harm, where possible, staff must speak to the Safeguarding Officer first to agree a course of action.

The Safeguarding Officer will discuss the case with the Head of Safeguarding to consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline (020 7340 7264) that staff can call to raise concerns about extremism with respect to a young person. You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Please note that this is **not** for use in emergency situations.

Staff must call 999 or the confidential anti-terrorist hotline on 0800 789 321 if they:

- Think someone is in immediate danger;

- Think someone may be planning to travel to join an extremist group;
- See or hear something that may be terrorist-related.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff must be alert to changes in young people's behaviour and take appropriate action outlined above in such instances.

The government's website Educate against Hate <https://educateagainsthate.com> and charity NSPCC have detailed some indicators and signs that a young person is being radicalised. The list is not exhaustive but may include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- Rejecting activities that they used to enjoy
- Converting to a new religion
- Isolating themselves from family and friends
- Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others
- Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on social media
- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice from the Safeguarding Officer if something feels wrong.

### ***Honour Based Abuse***

#### ***Forced Marriage***

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage.

Threats can be physical or emotional and psychological and can come from parents and other family members or elders in a particular religion.

There is much research around the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a young person is being forced into marriage, they will speak to them about their concerns in a secure and private place. They will then report this to the Safeguarding Officer as soon as possible.

The Safeguarding Officer will:

1. Seek advice from the Head of Safeguarding as soon as possible;
2. Activate local safeguarding procedures and refer the case to the local authority's designated officer;
3. Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

### ***Female Genital Mutilation (FGM)***

FGM involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act, 2003 makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

It also makes it illegal to aid, abet, counsel or procure the carrying out of FGM abroad. There are no health benefits to FGM and it is likely to cause severe immediate medical effects (such as bleeding, shock, wound infections, severe pain) as well as long term medical complications (such as abnormal periods, damage to the reproductive system including infertility, complications in pregnancy and new born deaths).

Longer term consequences also include psychological damage such as low libido, depression and anxiety. FGM is a very complex issue and should be dealt with sensitively. Issues will likely involve a number of agencies working together including specialist police officers, health, social care and education.

Any member of staff who is in regulated activity must be aware that under the Female Genital Mutilation Act 2003 they have a mandatory professional responsibility to notify the police if during the course of their work in their profession, they discover or become aware that an act of female genital mutilation appears to have been carried out on a girl who is aged under the age of 18. Staff members who are in any doubt must seek advice from the Safeguarding Officer.

### ***Child Sexual Exploitation***

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

If a member of staff suspects CSE, they must discuss this with the Safeguarding Officer. The Safeguarding Officer will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Staff should be aware of the following indicators of sexual exploitation if a child is:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education or other activities.

**Staff must always act if they are worried or concerned that any of the above forms of abuse are taking place.**

## Appendix B: Safeguarding Contacts – Internal and External

### Internal

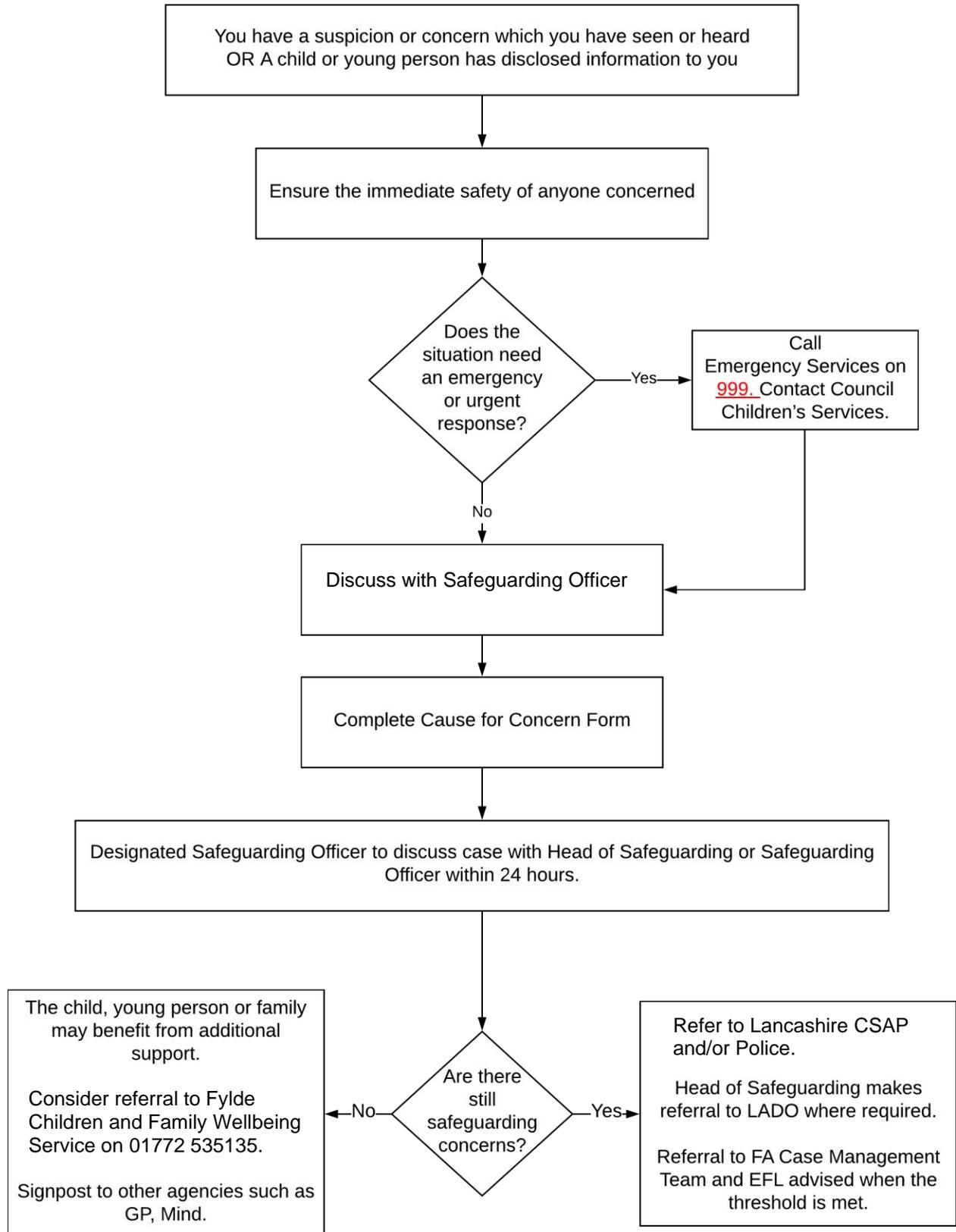
<b>Chief Executive and Senior Safeguarding Manager</b>	Jonty Castle 01772 598855 07538 257298 <a href="mailto:Jonty.Castle@afcylde.co.uk">Jonty.Castle@afcylde.co.uk</a>
<b>Head of Safeguarding</b>	Wesley Partington 01772 598856 07739 796101 <a href="mailto:Wesley.Partington@afcylde.co.uk">Wesley.Partington@afcylde.co.uk</a>
<b>Safeguarding Officer</b>	Chris McNally 07702 496349 <a href="mailto:chris.mcnally@afcylde.co.uk">chris.mcnally@afcylde.co.uk</a>

### External

<b>EFL Safeguarding Manager</b>	Alexandra Richards 07792 284740 <a href="mailto:arichards@efl.com">arichards@efl.com</a>
<p><b>Blackburn with Darwen, Blackpool and Lancashire Children's Safeguarding Assurance Partnership (CSAP).</b></p> <p>CSAP must be alerted to all cases in which it is alleged that a person who works with children has:</p> <p>Behaved in a way that has harmed, or may have harmed, a child</p> <p>Possibly committed a criminal offence against or related to a child</p> <p>Behaved towards a child in a way that indicates they may pose a risk of harm to children.</p>	<p>Concerns about a child should be reported on:</p> <p>0300 1236720</p> <p>or out of hours</p> <p>0300 1236722 (5pm - 8am)</p>
<b>FA Safeguarding Team</b>	0800 169 1863 ext. 4809 <a href="mailto:safeguarding@thefa.com">safeguarding@thefa.com</a>
<b>NSPCC Helpline</b>	0808 800 5000 (24 hours)

<b>Police</b>	<a href="#"><u>Emergency 999</u></a> <a href="#"><u>Non-emergency 101</u></a>
<b>CEOP</b> Reporting mechanism for inappropriate behaviour/grooming in an online environment.	<a href="http://www.ceop.police.uk/safety-centre"><u>www.ceop.police.uk/safety-centre</u></a>

## Appendix C – Safeguarding Action Chart



## Appendix D: Cause for Concern Form

### Cause for Concern Form

#### Private and Confidential (once completed)

This form is to be used for reporting any safeguarding concerns. Not all sections may be appropriate. Please complete as much information as possible and ensure the form is updated when any further action is taken to enable evidence of actions taken.

This information will be treated in the strictest confidence and stored in line with the relevant retention and data protection policy by the HR and Safeguarding Team.

The cause for concern form must be completed as soon as possible after a concern is raised. The form should be shared directly with the Head of Safeguarding and/or Safeguarding Officer. All updates to the cause for concern form must also be shared with the Head of Safeguarding and Safeguarding Officer.

Date of concern	
Name of person completing this form	
Job Title	
Contact Number(s)	
Email Address	

Name of Child(ren)/Young Person(s) you have concerns about	
Date of Birth	
Home Address	
School/College Name and contact details (Where applicable)	
Parent/Carers Contact details (include full name, address and telephone number)	

<p>Details of any other family members. Please include anyone else living in the same household.</p>	
<p>Families First Language</p>	

<p>How is the child, young person or family known to you?</p>	
<p>What is your concern?</p> <p>Please only provide relevant and factual information. Ensure you include what has been seen, said or witnessed, the time and date of any incident(s), any witnesses and anyone else who may be involved.</p> <p>Continue on a separate sheet if necessary.</p>	
<p>Please detail what actions you have taken so far, including dates, times and the name/s of people you have spoken to.</p> <p>Please ensure you use this section to make relevant and accurate notes of all actions taken regarding this case.</p>	

Continue on a separate sheet, if necessary.	
<p>Is the child/young person or family involved working with any other agencies?</p> <p>If yes, please give details of agencies including names and contact information for key workers, if this is known.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>Details of alleged perpetrator. Include name, DOB, address and job title/position (If known and applicable)</p>	

	Sign	Date
Person reporting the concern		
Safeguarding Officer		

Please complete this form as fully as possible and return it via email as soon as possible to the Safeguarding Officer. The form does not need to be completed in full but should be completed with as much information that is available. To ensure accurate record keeping please ensure that any updates to the case are recorded and also shared with the safeguarding team.

If you have any questions about completing this form please speak to any member of the safeguarding team.

Version	1
Date of Review	January 2021
Next Review Date	Annual Review (or earlier if there is a change in legislation)
Lead	Wesley Partington
Approved on	31 <sup>st</sup> January 2021
Approved by	Phil Humphreys
Published (where the policy is available)	Company website
Date of Equality Analysis	
Equality Analysis Review	
Version History:	