



# HUDDERSFIELD TOWN AFC SAFEGUARDING POLICY

v12 August 2022, Review Date August 2023

Huddersfield Town Association Football Club (This incorporates the Academy, Huddersfield Town Foundation, charity number 1146501 and Huddersfield Town Women and will be referred to throughout the document as the “Club”) endorses and promotes Affiliated Football’s Safeguarding Policy and Procedures and endorses and adopts the principles of the Policy statement contained in that document alongside any additional guidance provided by the Leagues

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## FOREWORD AND POLICY INTRODUCTION – CLUB SAFEGUARDING CHILDREN POLICY

Huddersfield Town Association Football Club Limited (This incorporates the Academy, Huddersfield Town Foundation, charity number 1146501 and Huddersfield Town Women and will be referred to throughout the document as the “Club”) endorses and promotes Affiliated Football’s Safeguarding Policy and Procedures and endorses and adopts the principles of the Policy statement contained in that document alongside any additional guidance provided by the Leagues.

### **Policy Statement**

The Club believes that the general wellbeing and welfare of all children, young people, and adults at risk who are involved with the Club in any way, are of paramount importance. Therefore, the Club will provide a safe setting for any child or young person under the age of 18, or adult at risk. The Club encourages best practice in all matters relating to safeguarding children and adults at risk, in a spirit of partnership and openness with all children, adults at risk, their families/carers, and local agencies.

The Club will promote good outcomes in terms of health, development and educational achievement alongside football and sporting excellence. It will encourage everyone working for the Club to recognise the significance and value of ethnic and cultural diversity.

Safeguarding is the responsibility of everyone who has contact with children, young people, and vulnerable groups; we are dedicated to providing a positive environment, enjoyable experiences, and to protect from harm. The Club safeguarding policy provides details of different types of abuse, guidance on identifying issues and procedures, and support for staff and volunteers.

Mandatory legislation and best practice underpin the activities that are available at the Club and this policy will help to ensure that responses to activities and issues are consistent, considering local authority guidance, relevant legislation, and individual needs across our community.

A child or young person is anyone who has not reached their 18<sup>th</sup> birthday.

A person is defined as an “adult at risk” if they are:

- 18 years or older
- In need of care and support (whether or not they receive any) because of their age, disability, illness, mental health needs, drug or alcohol misuse and
- As a result of their care and support needs are unable to protect themselves from harm.

### **Terriers Together**

Huddersfield Town AFC endorses the principles of promoting equality and celebrating diversity, and will strive to ensure that everyone who is involved with the Club whether as a player, match-day fan, member of staff, member of the Board, a participant in outreach programmes, or in any other capacity, has a genuine and equal opportunity to participate to the full extent of their own ambitions and abilities, without regard to any protected characteristic as defined in the Equality Act 2010 – age, disability, gender reassignment, marital or civil partnership status (including same sex marriage), pregnancy or maternity, race, religion and belief, sex, or sexual orientation. We will also ensure that everyone involved with the Club can be assured of an environment in which their rights, dignity, and individual worth are respected, and that they are able to enjoy their engagement with the Club without fear of discrimination, intimidation, victimisation, harassment, bullying and abuse.

## **Prevent**

The Counter-Terrorism and Security Act 2015 contains a duty on specified authorities to have due regard to the need to prevent people from being drawn into terrorism. This is also known as the Prevent duty.

In line with the requirements of Section 26(1) of the Counter-Terrorism and Security Act 2015 (“the Act”) Huddersfield Town FC recognise and promotes the fundamental British values – Democracy, Individual Liberty, Mutual Respect, The Rule of Law & Tolerance alongside Club core values.

These values are key to building resilience to radicalisation and are recognised at every level, they aim to stop people being drawn into supporting terrorism by safeguarding children, adults at risk and their families and any other vulnerable groups or individuals from violent extremism. They also seek to stop the development of a rigid and narrow ideology that is intolerant of diversity and British values, which may lead to vulnerabilities and the potential for future radicalisation.

All individuals who have contact with the above groups, must adhere to the provisions of preventing radicalisation.

Huddersfield Town FC is responsible for the welfare of all children, young people and adults at risk that participate in its activities, or who attend the Club to watch matches. The Club have therefore adopted the policy strategy laid down by the law to ensure the safeguarding of all. (Section 26 of the Counter Terrorism and Security Act 2015 – The Prevent Duty).

We are committed to maintaining a safe, welcoming, and inclusive environment for all members of our community, encouraging debate and discussion, and upholding freedom of speech, balanced with the legal obligations placed upon us.

## GLOSSARY

**HTAFC** – Huddersfield Town Association Football Club

**HTF** – Huddersfield Town Foundation – Charity Number 1146501

**“The Club”** – HTAFC, Academy, Huddersfield Town Foundation, Huddersfield Town Women

**Vulnerable groups defined below:**

**Child** – In the UK the United Nations defines a child as an individual below the age of 18 years.

**Vulnerable adult – replaced by the term “adult at risk”** – is anyone over 18 who may have an additional vulnerability which may be a disability, mental health condition, drug or alcohol issues, learning difficulty (this list is not restricted and can be added to at any time). These Adults DO NOT need to be in receipt of Local Authority Care to be considered vulnerable. Situations may also cause an adult to be vulnerable whilst in our care, illness, injury etc.

**DSO** – Designated safeguarding Officer

**CSO** – Children’s Safeguarding Officer

**HOS** – Head of Safeguarding

**SSM** – Senior Safeguarding Manager (Board)

**Staff/volunteers** – this refers to anyone attending activities or sessions whether paid or unpaid where children, young people and adults may attend.

**Abuse** – is a developing term which encompasses emotional, physical, sexual and neglect but also covers bullying, discrimination and financial.

**Harm** – covers harm which has or may have been caused and the risk of future harm, it refers to injury, ill treatment or abuse whether wilfully, neglectfully or accidentally which impacts on a health, development, social inclusion, education or participation.

**Activity/session** – this covers any matches, events, coaching or community activities for which The Club has responsibility for the care of attendees.

**Attendees** – this refers to anyone who attends an activity as either a participant or player at a match or activity, academy, or community event.

**Child Protection** – this is a statutory system through Local Authority which has identified a child to be a risk of significant harm under one of the four categories of Child Protection abuse: sexual, physical, emotional or Neglect. This is to offer support to families in a measured way to prevent ongoing harm.

**Parental Responsibility** – is the person legally responsible for the child, as a club we will take appropriate steps to ensure that consent is attained effectively.

**Duty of Care** – The Club has both a legal and moral responsibility when providing care to those attending activities. This includes people being vigilant and reporting issues and concerns appropriately and these concerns are taken seriously, and appropriate action taken.

**Consent** – is the agreement of a parent/legal guardian to allow someone under the age of 18 to take part in activities.

**CPSU** – Child Protection in Sport Unit

**SLA** – Service Level Agreement



# CLUB SAFEGUARDING CHILDREN POLICY v12

The Adult's at Risk policy is available as a separate document on request

Relationship of the Adult's at Risk policy to the Club's Safeguarding Children Policy.

The term "adult at risk" has been used in the Club's policy documents to replace "vulnerable adult". This is because the term "vulnerable adult" may wrongly imply that some of the fault for abuse lies with the adult abused. The term "adult at risk" is used as an exact replacement for "vulnerable adult" as used throughout existing government guidance to local authorities

The definition of 'Vulnerable Adult/adult at risk is always open to interpretation and individuals may be at risk at sometimes and not others

- Adults have a right to self-determination. They may not wish to have others intervene to safeguard them.
- Adults may consent to sexual activities and the issue of consent may affect the reporting and management of allegations.
- Local authorities are organised differently to receive and manage referrals. There is not a uniform approach by the various Local Safeguarding Boards.

## 1. THE KEY PRINCIPLES OF THE CLUB'S SAFEGUARDING CHILDREN POLICY

The Club is committed to protecting all children and adults at risk that are participants or beneficiaries or are otherwise connected to the Club.

The Club is committed to listening to children and adults at risk and will take account of their wishes and feelings both in individual decisions and the development of services.

The Club alongside affiliated football is committed to working in partnership with the Police, Social Care Departments, and Local Safeguarding Children's Partnerships (LSCP) in accordance with their procedures. This is essential to enable these organisations to carry out their statutory duties to investigate concerns and protect all children and young people.

### **SCOPE**

This policy applies to all members of staff (including volunteers) of Huddersfield Town Football Club, the Foundation and all partner organisations including commercial partners, licence holders, contractors, consultants, and Trustees. It also applies to individuals not included in this list who may be conducting related work that involves the children and adults at risk in our care. For the avoidance of doubt, staff includes the League definition of staff which is "any person employed or deployed by a Club or Club Community Organisation whether in a paid, voluntary, consultancy or third party capacity".

This policy has been prepared in accordance with Working Together to Safeguard Children July 2018 and other legislative requirements including, but without limitation, The Children's Act 1989 and 2004, Keeping Children Safe in Education (most recent version), The FA Premier League Rules (in particular Section S, the Safeguarding of Vulnerable Groups and Safer Recruitment) EFL Rules, Safeguarding Strategy, Standards and Guidance for EFL Member Clubs and The English Football Association (including The FA Safeguarding Children Rules) to ensure national standards for safeguarding are met and implemented throughout the Club.

## **PURPOSE OF THE POLICY**

By implementing this policy across all Club operations, all members of staff will understand that they have a responsibility to work together to safeguard children and adults at risk and that:

- **Children and adults at risk must be listened to** and taken seriously, consulted with when developing processes and reacted to appropriately when ideas, feelings and concern are raised, then addressed in a fair, effective, and timely manner.
- The individual's safety and welfare are of paramount importance, particularly where children are involved.
- All people, regardless of age, gender, racial origin, political or religious belief, sexual identity and or disability, have a right to enjoy sport and associated activities of Huddersfield Town Football Club, free from abuse and all forms of bullying, harassment, and discrimination.
- All individuals and organisations involved with Huddersfield Town Football Club have responsibilities for the welfare of children and adults at risk in our activities and are bound by this policy; and
- All individuals and organisations involved with Huddersfield Town Football Club must act in accordance with the law in relation to such matters.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- Working in partnership with other organisations, children and young people and their parents/carers is essential.

For Club operations, it also means supporting 'Safer Recruitment' processes through promoting good practice for those working amongst our staff; supporting them where necessary; ensuring staff are competent, well-managed and challenged when engaged in poor practice; and, finally, taking action where concerns arise.

## **OUR SAFEGUARDING VISION**

- To create a culture of vigilance where everyone understands that they have a responsibility for safeguarding
- To continually improve the Club's safeguarding practices and share and improve this practice with whom they have partnerships.
- Promoting safeguarding awareness, implementation of best practice and robust procedures are key to safeguarding within the club.
- HTAFC is committed to Recognise, Respond, Report, Record and Review all safeguarding concerns.

## **WHO DOES THIS POLICY APPLY TO?**

To illustrate the scope of this work, the list below provides extensive (though not exhaustive) examples or situations across the Club where we need to consider the welfare of people in our care:

- Players involved in Academy or associated development programmes.
- Under-18 players who are part of open age/senior squads.
- Children and adults at risk taking part in Foundation activities.
- Supporters with disabilities and other vulnerabilities contacting the Club, visiting the stadium on matchdays, or visiting for other pre-arranged activities (e.g. stadium tours).
- Young players on tour or living for significant time away from their families in Huddersfield-based accommodation;

- Any children or adults at risk visiting the “Clubs” stadium for matches, events, concerts, or tours; or involved in any Club activities
- Ball assistants, matchday mascots, player escorts and flag-bearers.
- Support for those who may be vulnerable to bullying or cyberbullying through their relationship with any of the Club’s activities.
- Participants on commercial football school-type programmes or similar.

The full policy can be found on the Club website, and associated procedures are available by request. Internally all documentation is available on X: & Y: drives. Posters are in all Club facilities and include contact details and reporting guidelines.

## 1.1 Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people’s experiences of extra-familial abuse can undermine parent-child relationships. Therefore, children’s social care practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

*Firmin Nov 2017 Contextual Safeguarding Briefing*

Staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the Club (including Foundation & Academy) and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding officers should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence

## 1.2 Position of Trust

### What is a Position of Trust

Someone in a position of trust is a person in a position of authority or responsibility over another person. Those in positions of trust have a considerable amount of power and influence on a young persons’ life. For example, a young person may be dependent on their coach, mentor or other adult for their sporting development, success, or position in a club, representative or national team.

### What the Law Says

As of 28 June 2022 the law in England and Wales states that those in a position of trust in sports organisations, such as a coach, cannot legally have a sexual relationship with young people they look after, under 18 years old.

Coaches, officials, and volunteers working with young people must all help to promote responsible relationships within sport and prevent the manipulation and exploitation of young people. Although young people aged 16 and 17 have reached the age of consent for sexual activity according to UK law, they could be vulnerable to sexual abuse and exploitation in certain situations. This includes sexual activity and manipulation by adults who hold a position of trust, responsibility, or authority in relation to them, and, as a result, have a considerable amount of power and influence on their lives.

Those in authority positions in sport can have a positive influence on the welfare of a young person, by providing role models or someone to turn to if they have a concern. But it is important to have clear boundaries in place for the safety of both the young people and the staff, to ensure exploitation cannot take place.

More info:

<https://www.gov.uk/government/publications/police-crime-sentencing-and-courts-bill-2021-factsheets/police-crime-sentencing-and-courts-bill-2021-positions-of-trust-factsheet>

## 2. SAFEGUARDING MANAGEMENT

The Club has appointed a Senior Safeguarding Manager who has total responsibility for the safeguarding of children in the Club, also a Head of Safeguarding and several Designated Safeguarding Officers who work within departments throughout the Club. The Foundation has appointed a Designated Safeguarding Manager. These Officers have special responsibilities and are the focal point for safeguarding children/adults at risk in their nominated area. They are appointed in line with the Club's role profile and are required to complete The FA Safeguarding Children Course and Welfare Officers Workshops as a minimum. The post holders will also be involved with Welfare Officer training provided by The FA, PL and/or County FA. Post holders will require an enhanced DBS CRC with barred list check. (*See Appendix (vii)*).

The DSO is the first point of contact for all Club members regarding concerns about the welfare of any child, young person, or adult at risk. The DSO will liaise directly with the Head of Safeguarding and will be familiar with the procedures for referring any concerns. They will also play a proactive role in increasing an awareness of poor practice and abuse amongst Club members.

### 2.1 Children in Need

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

Early help can also prevent further problems arising; for example, if it is provided as part of a support plan where a child has returned home to their family from care, or in families where there are emerging parental mental health issues or drug and alcohol misuse. Effective early help relies upon local organisations and agencies working together to:

- Identify children and families who would benefit from early help
- Undertake an assessment of the need for early help
- Provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to improve the outcomes for the child

Staff should be alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer
- Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking, or exploitation
- Is at risk of being radicalised or exploited

- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is a privately fostered child

Anyone who has concerns about a child's welfare should make an immediate referral to the designated safeguarding officer or if there is a concern that the child is suffering significant harm (or is likely to do so) the local authority Duty & Advice Team.

Practitioners who make a referral should always follow up their concerns if they are not satisfied with the response.

## 2.2 Support for Staff

Dealing with safeguarding concerns can result in an impact on the emotions and well-being of staff involved. It is important that anyone affected seeks help if they feel that they need support. If staff need support, they should discuss this with their Line Manager, HR department or the Club's safeguarding department.

The Club have several trained Mental Health First Aiders who are deployed across the business in various departments.

## 2.3 Escalation Process

At times there will be professional disagreement between agencies. Whilst this is accepted, it is vital that such disagreements are not allowed to adversely affect the outcomes for children and young people. Professional disagreement is only dysfunctional if it is not resolved in a constructive and timely way.

Disagreements can arise in a number of areas of multi-agency working, as well as within single agency working, but are most commonly seen in relation to:

- Criteria for referrals.
- Outcomes of assessments.
- Service provision
- Information sharing and communication.

Disagreements can relate both to decisions about individual children and/or specific processes. Please refer to Appendices (xiv) for the protocol for resolving professional disagreements between agencies in the Kirklees area.

Protocols for other areas can be located on the relevant Safeguarding Children Partnership websites.

## 2.4 Media Protocols

All media enquiries and communication with the Club from a safeguarding point of view should be directed to the Head of Marketing & Communications and the Head of Safeguarding.

## 2.5 Partnerships And Commissioned Services

The Club will actively promote safeguarding within all partnership working and commissioned services involving children and adults at risk and will seek to establish minimum safeguarding standards by assessing the partner or external provider's suitability, ensuring that they have appropriate safeguarding policies and procedures in place and determining how to manage any safeguarding concerns that may subsequently arise. Such considerations shall be made explicit in any contract or service level agreement with any partners or external providers.

### 3. RECRUITMENT

The Club aims to ensure that no job applicant receives less favourable treatment on any of the unlawful grounds listed in the Club's Equality Policy. Our recruitment procedures are reviewed regularly to ensure that individuals are treated based on their relevant merits and abilities. Job selection criteria are regularly reviewed to ensure that they are essential for the effective performance of the job and therefore justified on non-discriminatory grounds.

The Club has a *Safeguarding & Safer Recruitment & Selection Policy* and a *Student Placement and Volunteering Policy* which apply for all staff, volunteers, board members and trustees who are part of the children's (and adults at risk) workforce (available on request).

As part of the Club's safer recruitment and selection process, offers of work to positions which involve working with children (and adults at risk) are subject to the Clubs procedure for recruitment (Page 7 Safeguarding & Safer Recruitment & Selection Policy Club recruitment policy, p5 Student Placement & Volunteering Policy) which includes a satisfactory FACRC with barred list check through the umbrella disclosure service FACRB, two satisfactory references and face to face interviews.

All requests for CRC's are applied for online via First Advantage Online Disclosures (FADV) and facilitated by a Club CRC verification officer.

All offers of work are subject to the outcome of the screening process and until such time as a satisfactory CRC certificate has been confirmed as clear, the member of staff will not be allowed to work unsupervised with children.

Should an individual's CRC Disclosure reveal any convictions the Club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children. In such circumstances, when the nature of any disclosure must be considered, a risk assessment will be carried out by the Disclosure Panel *Refer Appendix (viii)* in line with the process detailed in the *CRC Policy* (available on request).

#### 3.1 New Appointments who already have a Disclosure Certificate

If a new member of staff has had a disclosure check with their previous employer, the original disclosure certificate must be shown to the HR Manager or Lead Disclosure Officer, it must be dated within six months of the employee's start date at the Club and it must be for a similar role of that which the person has been appointed. The Club will ask the individual to apply immediately for an FACRC check through FADV and it is at the discretion of the Disclosure panel whether the employee can start work before receipt of the disclosure certificate.

If the member of staff has subscribed to the update service, they will be asked to sign an information sharing agreement with the Club to allow the Lead Disclosure Officer to perform a check on the status of their CRC.

If there are changes to the status of the CRC the Club will immediately ask the individual to apply for CRC check through FACRB/FADV and it is at the discretion of the Disclosure panel whether the employee can start work before receipt of the disclosure certificate. Until the conclusion of a satisfactory outcome the member of staff will not be allowed to work unsupervised with children. Further details are available in the *CRC Policy*, available by request.

## 3.2 Existing Staff

Priority is given to those who come into contact with children, young people, and adults at risk. All staff that have one to one contact with children and young people have received a CRC and for those undertaking regulated activity this includes a barred list check.

All employees, workers, or volunteers in a position of trust are required to complete a self-declaration form on an annual basis.

Staff are required to renew their check every three years. (Unless otherwise requested by the Club).

If any member of staff already in the Club's employment is issued with a caution, warning, or conviction in accordance with UK or other laws or becomes involved with a protection agency (i.e. becomes the subject of an investigation) they must disclose the details in full to a member of the Disclosure Panel – (Lead Disclosure Officer, HR Manager, Senior Safeguarding Manager and the appropriate Line Manager) to enable the Club to assess any implications for the employment relationship. In some cases, particularly in relation to safeguarding concerns, the Club may be obliged to make a referral to the Disclosure and Barring Service (DBS).

## 3.3 Temporary Staff, External Consultants and Partner Agencies

The Club will ensure that all temporary staff and external consultants sign a Self-Declaration form and will not have unsupervised access to children and young persons during their time with the Club.

The Club will at times work with partner agencies to provide activities, all providers will provide suitable DBS information and demonstrate their own safeguarding policies and procedures, through Service Level Agreements (SLA's). This will be the responsibility of each department head and will be overseen by the Head of Safeguarding.

## 3.4 Staff Training

All staff working in direct contact with children shall be required to complete as minimum

1. Club induction to Safeguarding and safer working practices within 2 weeks of commencement of employment.
2. EFL online safeguarding training within 1 month of commencement of employment.
3. All elements of the current Club Safeguarding Training Plan within 1 month commencement of employment.
4. DSO's will be required to complete the 8 x EFL core safeguarding training modules within two football seasons from the commencement of their employment (Academy) and any additional training as required by the relevant regulatory body (In the case of the Foundation Designated Safeguarding Officer this is The EFL Trust)
5. Additional training relevant to job role as identified from time to time.

Further details are available in the Safeguarding Training Plan.

Staff safeguarding training updates will take place on an annual basis (minimum) or as deemed necessary by the HOS (for example after a change in legislation, major incident or in accordance with league guidance).

Six minute briefing documents will be used to circulate relevant information on an interim basis as required.

Details of those satisfactorily completing safeguarding training are retained by the Club and recorded on the individuals personnel file through the electronic HR system "YoumanageHR" and "StaffSafe". Those completing the FA Safeguarding Children Course are registered on the FA Whole

Game System which the Club uses in addition to the Single Central Record and above systems as an additional compliance check.

Additionally staff are also asked to make themselves familiar with the document “What to do if you’re worried a child is being abused” This document contains excellent examples of the different types of safeguarding issues.

[http://www.safeguardingschools.co.uk/wp-content/uploads/2015/03/What-to-do-if-you\\_re-worried-a-child-is-being-abused.pdf](http://www.safeguardingschools.co.uk/wp-content/uploads/2015/03/What-to-do-if-you_re-worried-a-child-is-being-abused.pdf)

### 3.5 Good Practice Code of Conduct

All employees, workers, consultants, agency staff and volunteers working with children, young people or adults at risk should adhere to the following principles:

- Always work in an open environment. Avoid private or unobserved situations and encourage open communication with no secrets.
- Make the experience of the sporting activity fun and enjoyable, promote fairness, confront, and deal with bullying.
- Treat all children, young people, and adults at risk equally, with respect and dignity.
- Always put the welfare of the child or adult at risk first.
- Maintain a safe and appropriate distance with children, young people and adults at risk and avoid unnecessary physical contact.
- Where any form of manual/physical support is required it should be provided openly and with the consent of the child, young person, or adult at risk. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child, young person or adult at risk has consented.
- If groups have to be supervised in changing rooms always ensure activity leaders/coaches etc. work in pairs.
- Request written parental consent if Club officials are required to transport children and young people.
- Gain written parental consent for any significant travel arrangements e.g. overnight stays
- Activity leaders/coaches are qualified, and a qualified first aider is in attendance.
- Ensure that at away events adults should not enter a child, young person or adult at risk’s room or invite children, young people, or an adult at risk to their rooms.
- Be a good role model, this includes not smoking, drinking alcohol or use foul language in the Club of children, young people, or adults at risk.
- Always give enthusiastic and constructive feedback rather than negative criticism.
- Secure written parental consent for the Club to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises.
- Keep a written record of any injury that occurs, along with details of any treatment given.
- All other good practice/common sense principles given the varying situations.

## 4. HEALTH & SAFETY

The Club uses an external consultant for all Health & Safety matters, all activities are fully risk assessed.

The Club’s SSM and Head of Safeguarding give guidance to those whose roles involve working with children and young persons. Where a child or young person is involved, a risk assessment must take account of their particular vulnerabilities which will include the safeguarding of children. The risk assessment should set out what arrangements are in place for their care and supervision.

Accident prevention guidance in line with the Accident Prevention Policy is delivered at induction.



The Club has a separate Residential Stays Policy

## 5. DATA PROTECTION, RECORDING AND INFORMATION SHARING PROCEDURES

The Club takes the matter of data protection very seriously and particularly the data collected in respect of children and adults at risk. The Club will apply the principles set out in the General Data Protection Regulation (GDPR) and other current relevant data protection legislation including the Data Protection Act 2018 in respect of our data collection activities. Where data is collected (in writing or electronically) relating to children, or children are asked for personal details, we will make every effort to obtain agreement for its use from those with parental responsibility. We will seek parental consent if the collection or use of information about a child is likely to result in:

- Disclosure of a child's name and address to a third party, for example as part of the terms and conditions of a competition entry or partnership activation.
- Use of a child's contact details for marketing purposes.
- Publication of a child's image on a website that the public can view (subject at all times to the Club's terms and conditions relating to access to The John Smith Stadium on matchdays)
- The collection of personal data about third parties, for example where a child is asked to provide information about his or her family members or friends.

Staff and volunteers should ensure that confidentiality protocols are followed, and information is shared appropriately. All staff and volunteers must understand that they have a professional responsibility to share information with other agencies to safeguard children. All staff and volunteers must be clear with children and adult at risks that they cannot promise to keep secrets. Refer to section 5.2 Consent & Best Interests

### 5.1 The seven golden rules to sharing information will be followed

**(i) Remember that the Data Protection Act 2018 and human rights law are not barriers** to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.

**(ii) Be open and honest with the individual** (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

**(ii) Seek advice from other practitioners** if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

**(iv) Share with informed consent where appropriate** and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.

**(v) Consider safety and well-being:** Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

**(vi) Necessary, proportionate, relevant, adequate, accurate, timely and secure:** Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.

**(vii) Keep a record of your decision and the reasons for it** – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

## 5.2 Who to share information with

Part of the decision-making process will include consideration about who to share information with. This could include:

- **Statutory organisations** – the Police and/or Children’s Services must be informed about safeguarding concerns; Designated Officers should be consulted where there are concerns about someone in a position of trust.
- **Disclosure & Barring Service** – must be informed of any concerns about someone in regulated activity who is suspended or expelled from the organisation.
- **Other clubs and other sports organisations** – informing other organisations needs to be considered according to the principles below in order that they can safeguard children in their care who may be at risk of harm.
- **Individuals within the organisation** – this will be decided based on who needs to know what information in order to keep children safe according to the principles below.

There are further details in the following policies available on request

HTAFC Club Privacy Policy

Employee Data Protection Policy

Data security breach and management policy

HM Government – Information Sharing, advice for practitioners providing safeguarding services to children, young people, parents, and carers. July 2018

## 5.3 Storage of Safeguarding Data

HTAFC follows the principles and guidelines issued by the NSPCC regarding the retention and storage of safeguarding records.

<https://learning.nspcc.org.uk/media/1442/child-protection-records-retention-and-storage-guidelines-april-2019.pdf>

According to Data Protection principles, records containing personal information should be:

- Adequate, relevant, and not excessive for the purpose(s) for which they are held
- Accurate and up to date
- Only kept for as long as is necessary (Information Commissioner’s Office 2019)

The introduction of the GDPR in 2018 does not change the way child protection/safeguarding records should be stored and retained.

## 5.4 Club Internal System for Storage of Safeguarding Data

The Club uses “CPOMS and “StaffSafe”, both are League approved cloud based electronic storage systems for the collection and retention of data relating to all safeguarding incidents be they involving staff, adults at risk or U18’s.

Low Level Concerns are recorded on the “StaffSafe” system

These are secure password protected systems with strictly controlled access.

Chronological records are kept for each incident using a defensible decision making process (Information, Assessment, Policies & Procedures, Options, Actions)

Individuals have separate records.

## 5.5 Retention Periods for Storage of Safeguarding Data

### **CHILD PROTECTION RECORDS**

Will be passed on to any new Club a child attends.

The file will be kept until the child is 25

### **CONCERNS ABOUT ADULTS**

If concerns have been raised about an adult's behaviour around children records will be kept in their personnel file either until they reach the age of 65 or for 10 years, whichever is the longer.

#### Example

If someone is 60 years old when the investigation into the allegation is concluded keep the records until their 70<sup>th</sup> Birthday

If someone is 30 years old when the investigation into the allegation is concluded, keep the records until they are aged 65.

Records will be kept for the same amount of time regardless of whether the allegations were unfounded. However, in the case of malicious allegations the record will be destroyed immediately

## 6. INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)

ICT is used across the Club in many and varied ways. Its use will continue to grow and change with new developments in technology and fashion. It is used to communicate with supporters, customers, players, and the media.

The Club has a comprehensive "Online Safety Policy" which gives guidance on suitable and appropriate use of the internet, email, SMS, and responsible use of social media.

The Policy raises awareness regarding appropriate use of such media and the importance of both professional and personal online activity.

The Club will:

- Ensure that consent of parents is obtained if staff use SMS, email, or other electronic means of communication with a child for programme-related reasons.
- Raise awareness amongst young participants (especially Academy players) and participants involved via the Foundation regarding safer internet/social media use in respect of their position.
- Raise awareness through training and internal communications with staff regarding appropriate use of such media and the importance of both professional and personal online activity.
- Have a zero-tolerance approach to 'cyberbullying', sexting, grooming, exploitation, and activities which are against the law.
- Respond quickly and appropriately if there is any inappropriate use of the internet and social media by players, participants, or members of staff.

## 7. CLUB PROCEDURES

### 7.1 Parental Consent

The Club will make every effort to obtain parental consent for all activities using a signed parental consent form. (This may be in a digital format). When obtaining consent the parent/legal guardian will be required to provide contact details of TWO people who can be contacted in the event of an emergency.

The Club will do everything it can to safeguard children and adults at risk in its care but recognise that in some circumstances, due to the nature of the work carried out, obtaining parental consent for activities is not always possible.

### 7.2 Consent and Best Interests

The Club recognises the importance of approaching the individual needs of children and adults at risk in the appropriate way and according to the law and statutory guidance. Where a child is at risk of harm, consent to act on concerns is not normally required in law although consent from and

consultation with those with Parental Responsibility is considered good practice unless this would put the child at greater risk of harm.

### 7.3 Children

We will always respect the right of a child to have their say when a decision that affects them is being taken. We will take their views into account and always act in their best interests when a decision is made, especially when a child is at risk of harm or may have come to harm. A child's parent or legal guardian will also be consulted, and consent obtained as a matter of course before any action is taken unless this may put the child at increased risk of harm. Care should be taken to seek and establish the consent of all those with parental responsibility for that child. Where a parent or legal guardian cannot give consent at a point where it may be required, staff will always act in the best interests of the child.

### 7.4 Adults

If an adult who may be at risk of abuse has the capacity to consent, then they must have the opportunity to consent before a decision is made that affects them – e.g. passing on a concern to statutory agencies. Club staff will assume that an adult has the capacity to consent unless it is established that they lack this capacity. **A seemingly unwise decision should not be mistaken as lacking capacity.** We will always act swiftly (and possibly without consent) where the individual is put at immediate and significant risk of harm and will always act in their best interests. When dealing with adults at risk the Club follows guidance from the “No Secrets 2000” Code of Practice” (Government Guidance document) and the principle of “No decision about me, without me”

### 7.5 Best Interests

Any decisions taken on behalf of someone who is deemed, at the point where a decision must be made, to lack capacity or unable to give consent, will be taken in his or her best interests. Where possible, Club staff will consider (known) past or future wishes and religious or moral beliefs.

### 7.6 Use of Photography and Film Image

HTAFC uses guidance from The FA and the CPSU. All images are taken by HTAFC officials who have been briefed by a Club Safeguarding Officer or by a member of the Marketing & Communications Department responsible for the activity being photographed or filmed.

Before taking images of children or young people, parental consent is sought in writing, and this could be at the start of the season or prior to the event. (See consent form Appendix (xii)).

Parents, carers, guardians are responsible for informing HTAFC of any change of circumstances within the season which may affect consent. HTAFC will inform parents, carers, guardians of how the image will be used, and they will not allow an image to be used for something other than that for which it was initially agreed. The Club will follow the guidelines below:

- Staff must only use official Club resources for taking images and not personal devices.
- All children or young people featured in HTAFC 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.
- HTAFC will take steps to ensure that children who are subject of a court order will not have their images published in any HTAFC document.

- No images of children featured in HTAFC publications will be accompanied by personal details such as their home address.
- Recordings of children for the purposes of legitimate coaching aids are only filmed by HTAFC officials and are stored safely and securely at HTAFC's premises.
- Mobile cameras are not to be used in changing rooms.
- Any instances of inappropriate images in football should be reported to the Head of Safeguarding.
- HTAFC does not put young player profiles with images and personal information on its website.
- HTAFC does not condone inappropriate unauthorised photographs to be taken with players, staff or at HTAFC facilities and will actively take measures to prevent this. Such measures include appropriate signage, security and stewarding as well as making all staff and parents aware of the policy on taking photos or other recording of images at our sites, matches or training sessions.
- The Club will report potentially unlawful materials on the internet to The Internet Watch Foundation. [report@iwf.org.uk](mailto:report@iwf.org.uk)

### 7.6.1 Premier League guidance

Although no longer in the Premier League and in the absence of any alternative guidance the principles continue to be applicable where relevant (for example in the event of a high profile cup run or when hosting an International Game).

At the request of the Premier League's broadcast partners, every club now must submit its filming requests for internal club channels – including social media – to the Premier League for approval 10 days ahead of every game, home and away.

This includes any filming of anything on a match day that takes place inside the Stadium walls. If anyone from the Club tries to film anything without consent, it will be denied.

This is designed to prevent club channels impacting negatively on the live broadcast of our games (e.g. our staff getting in the way of the broadcasters, crashing shots etc).

This will be collated and submitted on behalf of the Club by a designated person in the Marketing and Communications and Team for every game, advice must be sought if you have any content which requires filming, this includes social media.

### 7.6.2 Designated Club photographers

Designated HTAFC photographers will, where applicable, undertake an FACRC/DBS check and undertake a Club Safeguarding Induction and complete EFL and Club Mandatory Safeguarding Training and will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies from the League. HTAFC identification will be always worn.

### 7.6.3 Professional Photographers/Filming/Video Operators

Any professionals wishing to record an event must be registered with the League and Club's Media Manager by producing their professional identification for the details to be recorded. This request should take place at least 5 working days before the event. Professional photographers should always wear identification during the event.

They may be requested to comply with the Visiting Speakers and Events Policy (available on request).

#### 7.6.4 Students or Amateur Photographers/Film/Video Operators

Any students or amateurs wishing to record an event should seek registration with the Club's Media Manager by producing their student or club registration card and a letter from the club/educational establishment outlining their motive for attending the event and planned use of the material. They should also complete the Club's registration form.

A clear brief will be given to both professional and amateur photographers about what is considered appropriate in terms of content and behaviour, including a list of any areas where photographic and recording equipment is forbidden under all circumstances (e.g. changing rooms, toilet areas).

They may be requested to comply with the Visiting Speakers and Events Policy (available on request).

#### 7.6.5 Videoing as a Coaching Aid

On occasions the Club may wish to digitally record a game or training session using digital equipment as a legitimate coaching aid. Young people and their parents/carers will be made aware that this is part of the coaching programme and their consent obtained, and that such footage will be stored safely. Parents/carers and young people should be aware of the procedures to follow if they have concern about images being used inappropriately (i.e. inform Head of Player Care or a Designated Safeguarding Officer).

#### 7.6.6 Ground regulations

Attention is drawn to this excerpt from the ground regulations

**26.** *By entering the Ground, all persons are acknowledging that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom) may be taken of them and may also be used, by way of example and without limitation, in televised coverage of the game and/or for promotional, training, editorial or marketing purposes by the Club, the EFL or others (including commercial partners and accredited media organisations) and entry into the Ground constitutes consent to such use. You further acknowledge that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom) may be used (by the Club or by a third party, such as a law enforcement body) to identify you as an individual, where permitted by data protection laws, for the purposes of preventing or detecting crime, or any breach of these Ground Regulations. Information about the Club's use of your personal data will be brought to your attention by the Club (see for example any applicable privacy policy, signage and/or other forms of announcement in or around the ground). For further information please contact the Club.*

**27.** *All ticket holders agree that the Matches for which the tickets have been purchased are public, and that their appearance and actions inside and in the perimeter of the Ground where a Match occurs are public in nature, and that they shall have no expectation of privacy with regard to their actions or conduct at Matches.*

**28.** *Further to paragraph 26, if such person is under 18 years of age, the parent, guardian, or responsible adult who is accompanying them into the Ground shall be deemed to have provided consent on their behalf.*

### 7.7 Trips, Tours, Tournaments, Events & Activities – Residential Stays

The Club follows the guidance issued by the League regarding Trips, Tours and Tournaments and uses the documentation and processes recommended in line with this guidance. Including consent

forms and risk assessment/management processes. *Separate documentation available. (Residential Stays Policy – available on request)*

All relevant Tour information is available electronically via the use of a secure SharePoint folder which allows staff access to relevant information. Information sharing protocols are applied.

Best practice is for tour staff to download the contents of the folder to their own devices, so they have access to the documents if they experience poor/no internet access.

Hard copies of the Emergency Procedures form are to be held by the Tour Co-ordinator for the duration of the Event.

## 7.8 Residential Accommodation

The Club may during its activities be required to provide both short and long term accommodation for young participants under 18. This may occur in a range of settings and may be arranged by or involve Club staff, such as:

- Trips and tours involving overnight stays for children or players under 18.
- Academy players living in Club facilities or in domestic settings with approved host families.
- Young players on trial with Academy teams.
- Children and/or adults at risk participating in Foundation programmes or projects.
- Commercial activities delivered in partnership with third party operators responsible for the provision of accommodation.

It is vital that wherever such situations arise, the highest level of diligence is given to the arrangements. Managers must ensure that all applicable legislation & regulation (from the host country) are met, and good practice is applied to any of the above settings. All relevant authorities must be consulted with throughout the planning and operation of these provisions.

The same level of diligence is required where a third party is responsible for making accommodation arrangements for children and adults at risk in our care. It is the responsibility of our staff to ensure that third party operators maintain our high standards of care.

A separate *Residential Stays Policy* is available upon request.

A Separate *Accommodation Policy* has been developed in line with League Guidance (PL Substitute Accommodation for Young Players, Care & Accommodation Arrangements for Academy Players for EFL Member Clubs).

### **SELECTION OF CARERS**

The appointment of any staff or carers (including host families and/or host parents) with responsibility for the supervision of children overnight in residential settings and/or Club accommodation must be carried out in accordance with the Accommodation policy and must apply Safer Recruitment principles to ensure suitable appointments are made. As a minimum these staff must:

- Undertake the appropriate criminal record check (e.g. Enhanced with Barred list DBS in the UK).
- Supply at least two references.
- Have their qualifications, identity and references checked.
- Have completed appropriate safeguarding training and/or residential care training.

## 7.9 Transport

The Club has developed a transport policy in line with the Guidance issued by the League and uses the documentation and processes recommended in line with this guidance. Including consent forms and risk assessment/management processes. Separate *Transport Policy Document* available

## 7.10 Youth Loans, Trials & Work Experience (Academy Players)

Should an HTAFC Academy player or young professional, under the age of 18, join another Club on trial, work experience or a Premier League Youth Loan, the Academy will seek written parental consent. This will be in addition to the parental consent sought prior to the start of every season. Consideration will also be given to the player's educational programme, travel, and accommodation arrangements. If the new Club is not located within a reasonable travelling distance from the player's current address HTAFC will insist that, where possible, players are placed in host family accommodation during their time away from the Club and not in hotel accommodation unless their parents are accompanying them during their stay.

A check & challenge tool and SLA must be completed with the host club

Separate document available - *Loan Strategy v5*

In the event of an U18 trialist attending the Club HTAFC will request parental consent, full medical history and injury disclaimer prior to any trial or work experience for any player joining the Club. Should accommodation be required during a trial period a host family will be provided. If the player's parent/guardian is also travelling with the player, then a local hotel may be used as an alternative. Separate *Accommodation Policy* available developed in line with League Guidance Document (PL Substitute Accommodation for Young Players, Care & Accommodation Arrangements for Academy Players for EFL Member Clubs).

## 7.11 Procedure for U18 playing within the B Team/First Team Squad (Academy Players)

One of the foremost aims of HTAFC is to develop players to become part of the senior squads at the Club. HTAFC acknowledges its responsibility to safeguard the welfare of every player who has been entrusted to its care and is committed to working to provide a safe environment for all.

The Club recognises that as players progress through to the development programme to senior squads', specific guidance and consideration are to be given to areas off field and are needed to ensure that they are given equal opportunity to develop their footballing talent. Whilst players under the age of 18 are taking part in activities relating to their development, the Club will continue to ensure that they fulfil their obligation of duty of care towards the young players and safeguard their welfare by taking all reasonable steps to ensure they are protected from harm. The Club has a designated "Head of Player Care" in addition to a nominated Designated Safeguarding Officer in the First Team Squad.

Separate policy available - *Senior Appearances for U18's v4*

## 7.12 Procedure for First Registration and International Transfer of Minors

The club will follow the guidance issued by FIFA – Regulations on the Status and Transfer of players 2020.



### 7.13 Looked after Children

The most common reason for children becoming looked after is because of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding necessary to keep looked after children safe.

To fulfil this responsibility, the Club must ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

The Head of Safeguarding, Senior Safeguarding Manager, (or Foundation Designated Safeguarding Manager) should have details of the child's social worker and the name of the school head in the authority that looks after the child.

### 7.14 Children who are not picked up on time

The Club has procedures in place for children whose parents do not collect them from an activity at a specified time. All parents/carers are made aware that their children should be met no later than 30 minutes after an activity has finished. This is made clear to parents/guardians as part of their agreement to attend activities. Should the child not be collected within 15 minutes, coaching/activity staff have emergency contact numbers and can communicate with the office to seek alternative numbers if necessary.

If a child is not collected on time, a minimum of 2 activity staff will wait at the venue until the parent/carer arrives. Should the child not be picked up at all and the coaching/activity staff will make every effort to contact the parents and make alternative arrangements with the consent of the parent or legal guardian. If the parent/carer remains non-contactable then the staff will report to their Head of Department/Designated Safeguarding Officer who would contact Children's Services and the Police.

### 7.15 Ratio of Adults to Children

The Club adopts best practise regulations laid down by the FA/NSPCC and other National Governing Bodies in relation to the supervision of adults to children/adults at risk. Procedures are in place to fully risk assess the types of activity and participant ability to ensure appropriate ratio of staff/coaches to participants.

Best practice is a minimum of 2 staff at all times even if the numbers are less than the FA or other NGB's current staffing ratios. This provides cover for if a child is injured, or a member of staff/coach is taken ill.

### 7.16 Coaching/Activities in Schools

The Club is committed to using the power of football and other activities to encourage children and young people to enjoy the benefits of sport and healthy living and will frequently run coaching/activity sessions within local schools and education centres.

It is the responsibility of the school to obtain parental consent and carry out the relevant risk assessments before an activity takes place and the Club will carry Public Liability Insurance. For After School Clubs, it will be the responsibility of the Club to gain parental consent and carry out the risk

assessments of the site. The above information is set out in a service level agreement with the school or education provider which is signed prior to the event taking place.

### 7.17 Activities for Disabled Persons

The Club carries out all activities for disabled persons under the guidelines of the Disability Discrimination Act and in accordance with the HTAFC Equality Policy. *Separate policy available.*

### 7.18 Activities for those with Special Educational Needs

HTAFC Recognises 'four broad areas of special educational need and support identified in the 0-25 years SEND code of practice 2015 and will ensure staff working with participants of this category are aware of their duties and responsibilities under this guidance.

The areas are:

- Communication and interaction
- Cognition and learning
- Social, emotional, and mental health
- Sensory and/or physical needs.

Further guidance is available

<https://www.ascl.org.uk/download.E808B657-D080-4DE5-A3445A3F5751A309.html>

### 7.19 Complaints Procedure

The Club will follow basic principles when dealing with complaints, further comprehensive details are available in the *Complaints Procedure Guidance* document available on request.

### 7.20 Restraint Procedure

Physical intervention should be avoided unless absolutely necessary and only as a last resort. Interventions should be proportionate both to the behaviour of the individual and the nature of the harm they may cause. Any physical intervention should ensure that the safety and dignity of all are maintained. Staff must operate within the law – inappropriate use of physical interventions could lead to criminal charges. Where any physical intervention has taken place the incident should be reported to the Designated Safeguarding Officer.

Club Stewards are externally sourced, they only carry out physical intervention on a match day should it be absolutely necessary. It is always carried out by fully trained personnel who hold an SIA qualification as well as the physical intervention qualification.

If there is a doubt about the age of the person requiring to be restrained a Steward Supervisor would be called along with the police. Police are always present on site for every home fixture.

## 8. GUIDELINES IN THE EVENT OF A SAFEGUARDING CONCERN

Reporting concerns about the welfare of a child, young person or adult at risk is **everyone's responsibility** if you are worried about a child it is important that you report your concerns – no action is not an option. Refer to Separate Standalone **Remote Reporting Guidance Document** for quick reference guidance.

### 8.1 Highlighting Concern

Although the Club is committed to doing the utmost to safeguard children from harm, there may be an occasion 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.

## 8.2 Recognition – Signs of Abuse

There are five main forms of abuse identified as follows, should you have any concern that abuse is occurring you should contact the HOS/DSO immediately.

## 8.3 Types of Abuse

### 8.3.1 Physical Abuse

Is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or 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.

### 8.3.2 Sexual Abuse

Is perpetrated by both men and women. Children can also abuse other children (Peer on Peer Abuse). Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse.

### 8.3.3 Neglect

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 or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing, and shelter (including exclusion from home or abandonment)
- protect a child from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate caregivers)
- ensure access to appropriate medical care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs

In an Activity setting, it may involve failing to ensure that children and/or adults at risk are safe and adequately supervised or exposing them to unnecessary risks.

### 8.3.4 Emotional Abuse

Is the persistent emotional maltreatment of a child such as 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 insofar 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 a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### 8.3.5 Bullying

Is the use of aggression with the intention of hurting another person this may be by an adult towards a child or peer on peer abuse. Bullying results in pain and distress to the victim. Bullying can be:

- 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.
- Discriminatory comments, jokes about or targeted abuse aimed towards disabled children, homophobic, transphobic, sexist, gendered, racist or faith based comments.
- Verbal name-calling, sarcasm, spreading rumours, teasing.

Cyber-bullying is when a person uses technology i.e., mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets), to deliberately upset someone. This could take the form of posting derogatory abusive comments, videos, or images on social media. Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.

<http://www.thefa.com/football-rules-governance/safeguarding/introduction-to-safeguarding-children>

The information above has been taken from this source.

<http://www.thefa.com/football-rules-governance/safeguarding/dealing-with-concerns>

*A separate Anti-Bullying Policy is available on request*

## 8.4 Additional Safeguarding Issues

Staff are required to have an understanding of the following safeguarding issues as detailed in the Keep Children Safe In Education, Statutory Guidance for Schools, and Colleges Document. Further categories have been added for completeness.

### 8.4.1 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 girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country

It is a form of child abuse common to some African, Asian, and Middle Eastern communities in the UK. This illegal and life-threatening initiation ritual can leave young victims in agony and with physical and psychological problems that can continue into adulthood. Carried out in secret and

often without anaesthetic it involves the partial or total removal of the external female genital organs.

The NSPCC Female Genital Mutilation (FGM) helpline offers specialist advice, information, and support to anyone concerned that a child's welfare is at risk because of female genital mutilation. If you are worried that a child may be at risk of FGM, you can contact the 24-hour helpline anonymously on **0800 028 3550** or email [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk).

If you wish to find out more about FGM then you can access the NSPCC's fact sheet via this link – [www.nspcc.org](http://www.nspcc.org).

#### 8.4.2 Forced marriage

A marriage in which one or both spouses do not (or in the case of some adults with learning or physical disabilities or children), cannot consent to the marriage and duress is involved. Duress can include physical, psychological, financial, and sexual pressure. A Forced Marriage is different from an arranged marriage, which is a marriage entered into freely by both parties, although their families take a leading role in the choice of partner. It is recognised in the UK as a form of violence against women and men, domestic/child abuse, and a serious abuse of human rights. The Anti-social Behaviour, Crime and Policing Act 2014 made it a criminal offence (which can result in a sentence of up to 7 years in prison) to force someone to marry.

The Forced Marriage Unit (FMU) operates a public helpline to provide advice and support to victims and those being pressurised into forced marriages. If you are worried that a child may be at risk of forced marriage, you can contact FMU via the helpline on 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk). For more information on forced marriages go to [www.gov.uk/forced-marriage](http://www.gov.uk/forced-marriage)

#### 8.4.3 Honour based violence

The term 'Honour Based Violence' (HBV) is the internationally recognised term describing cultural justifications for violence and abuse. It justifies the use of certain types of violence and abuse against women, men, and children.

HBV cuts across all cultures, nationalities, faith groups and communities and transcends national and international boundaries. HBV is also a Domestic Abuse issue, a Child Abuse concern, and a crime. If you are worried that a child may be at risk of HBV contact Children's Social Care for further advice and guidance or speak with the Club Designated Safeguarding Officer.

#### 8.4.4 Domestic abuse/violence

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.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional or so called "honour" based violence. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.'

#### 8.4.5 Supporting lesbian, gay, bisexual, transgender & questioning young people

Lesbian, gay, bisexual, transgender and questioning (LGBTQ+) young people come from all socio-economic backgrounds, religions, faiths, ethnicities, and cultures. It is estimated that six per cent of

the population is lesbian, gay, or bisexual, so there's a good chance that in a group of 30 young people, at least two will be or will grow up to be lesbian, gay or bisexual.

LGBTQ+ people remain largely invisible across sports this lack of visibility, as well as the misapprehensions about LGBTQ+ people, contributes to an environment of homophobia and transphobia in sport.

Challenging homophobia and transphobia when they occur and creating a football environment where everyone feels included is critical.

Every young person has the right to be treated with dignity and respect; this includes all young people who are openly lesbian, gay, bisexual, transgender or questioning, or are thought to be.

Much of this information has been taken from materials developed by Stonewall. For further information visit [www.stonewall.org.uk](http://www.stonewall.org.uk), or to speak with someone call **0800 050 2020**

#### 8.4.6 Children and young people who take on leadership roles

Coaches, club officials, players, parents/spectators in both adult and junior football often lose sight of the fact that an individual in a leadership role who is under 18 is still legally a child. Therefore, young referees are open to experiencing abusive behaviour verbally, physically and emotionally. This behaviour is not acceptable in football everyone should be treated with respect.

#### 8.4.7 Additional Vulnerabilities for Those Taking Part in Elite Sport

HTAFC recognises that moving through the talent pathway offers fantastic experiences and rewards for those taking part in elite sports. However, there are specific factors in elite sport that can make talented athletes/players more vulnerable to abuse.

Media reports and anecdotal evidence from a range of sports has led to questions about whether the welfare and safety of elite athletes are being given the priority they deserve.

HTAFC recognises that athletes/players at all levels of sport deserve to train and compete in a safe, healthy, and stimulating environment. Responsibility for creating a safe, athlete-focused environment lies with those who work with these talented individuals at HTAFC.

There are factors that can make some talented athletes/players more vulnerable to harmful behaviours, either from themselves, their coaches or parents, or members of their entourage.

These factors include:

- a win at all costs approach
- intense coach–athlete/player relationships
- a self-image that is linked closely with performance excellence
- child athlete/players operating in an adult-focused environment
- being away from family and support networks
- fear of losing funding or a place on the programme if they speak out

#### 8.4.8 Hazing

Any rituals, initiation activities, action, or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of Children, Young People and Adults at Risk.

#### 8.4.9 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. Staff should

therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child or Adult at Risk may be infatuated with him/ her, or with a colleague, should discuss this at the earliest opportunity with the Head of Safeguarding / Designated Safeguarding Officer (or the Club Senior Safeguarding Manager).

#### 8.4.10 Child Sexual Exploitation

(CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) 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 does not always involve physical contact; it can also occur through the use of technology.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs. It can be very difficult to identify; warning signs can easily be mistaken for 'normal' teenage behaviour. Sexual exploitation can take many forms ranging from seemingly consensual relationships where sex is exchanged for affections or gifts, or seriously organised crime from groups or gangs.

Affiliated Football recognises that any sexual abuse of children or young people is exploitation. Any concerns relating to CSE should be referred to the statutory agencies.

(Staff working in the Foundation are most likely to identify and work with or support children at risk of CSE.)

Further information on CSE can be found on [www.nspcc.org](http://www.nspcc.org)

#### 8.4.11a Historical/Non Recent Abuse In The Professional Game

The occurrences of historical/non recent abuse in the pro-game are widely reported.

The NSPCC have a designated 24 hour helpline for anyone wishing to make a report and or receive support/advice

0800 169 1863 Ext 809

[safeguarding@thefa.com](mailto:safeguarding@thefa.com)

#### 8.4.11b Sex Offenders

Huddersfield Town Association Football Club work closely with the police and local authorities including the Local Safeguarding Children Partnership in relation to child protection. When concerns are raised HTAFC takes advice from the police and local safeguarding partnership as to the level of risk of any known sex offender who may have connections with HTAFC as a supporter or visitor. HTAFC reserves the right in conjunction with the police and other authorities to ban or suspend supporters who have been charged or convicted of any sexual offence or are on the sex offenders register.

#### 8.4.12 Grooming

Very commonly plays a key part in the sexual abuse of children. It refers to a process by which an individual manipulates those around them – typically (but not only) the child – to provide opportunities to abuse. It can involve communication with a child where this is an intention to commit a sex offence in person and/or online.

#### 8.4.13 Fabricate or induced illness:

Fabricated or Induced Illness is easiest understood as illness in a child which is fabricated by a parent or person in loco parentis. The child is often presented for medical assessment and care, usually persistently, often resulting in multiple medical procedures. Acute symptoms and signs of illness cease when the child is separated from the perpetrator.

#### 8.4.14 Peer on Peer abuse

Now referred to (KCSIE 2022) as Child on Child abuse.

Children can be taken advantage of or harmed by adults and by other children. Peer on peer abuse is any form of physical, sexual, emotional, and financial abuse and coercive control, exercised between children and within children's relationships (both intimate and non-intimate). Peer on peer abuse may also occur between and within adults at risk relationships.

Peer on peer abuse can take various forms, it is likely to include, but may not be limited to:

- Bullying (including cyberbullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence, such as rape and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- 'Upskirting', which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Sexting (also known as youth produced sexual imagery); and
- Initiation/hazing type violence and rituals.

The Club will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of peer-on-peer abuse.

Staff should continue to act on any concerns they have immediately by contacting and reporting all concerns to the HOS/DSO.

*The Club has a separate Youth Produced Sexual Imagery Policy available on request which is in line with the UKCCIS Guidance. Additionally there is a Stand Alone "Online Safety Policy"*

*All relevant staff receive training around dealing with instances of YPSI*

#### 8.4.15a County Lines and Child Criminal Exploitation

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children (disabled children are particularly vulnerable) and adults at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.



#### 8.4.1.5b Child Criminal Exploitation

(CCE) is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into criminal activity. (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual.

Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Criminal exploitation of children is broader than just county lines and includes for instance children forced to work on cannabis farms or to commit theft.

#### 8.4.16 Cyberbullying

Is when a person uses technology i.e., mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets), to deliberately upset someone. This could take the form of posting derogatory abusive comments, videos, or images on social media. Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.

#### 8.4.17 Online Abuse

Reporting concerns about possible online abuse.

All staff and volunteers should be familiar with reporting concerns to the IT helpdesk in line with the *Clubs Online Safety Policy* (Available on Request).

Where a situation may include Children, Young People and Adults at Risk or be a breach in safer working practice, the Safeguarding reporting procedures must be followed. In addition to referring concerns to the Safeguarding Team, you should immediately report online concerns to the Child Exploitation and Online Protection Centre (CEOP) or the police. The Safeguarding Team can support you with this.

It is important that if you have in your possession indecent images of a child, these must not be forwarded on regardless. In the UK, you should report illegal sexual child abuse images to the Internet Watch Foundation at [www.iwf.org](http://www.iwf.org).

Reports about suspicious behaviour towards children and young people in an online environment should be made to the Child Exploitation and Online Protection Centre at [www.ceop.uk](http://www.ceop.uk)

Where a child or young person may be in immediate danger, always dial 999 for police assistance.

*The Club has a separate Youth Produced Sexual Imagery Policy available on request which is in line with the UKCCIS Guidance.*

*All relevant staff receive training around dealing with instances of YPSI*

#### 8.4.18 Private fostering

A privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent or close relative where the child is to be cared for in that home for 28 days or more. Close relative is defined as "a grandparent, brother, sister, uncle or aunt (whether of the full blood or half blood or by marriage or civil partnership) or step-parent". A child who is Looked After by a

local authority or placed in a children's home, hospital or school is excluded from the definition. In a private fostering arrangement, the parent still holds Parental Responsibility and agrees the arrangement with the private foster carer. A child (as per definition above) placed with a host family for 28 days or more is in a private fostering arrangement and therefore Clubs with host families should inform and work with their local authority ensuring that they meet legislative and local procedural requirements. This is a mandatory duty.

#### 8.4.19 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 the child and/or adult at risk are not afforded the necessary priority compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing them in potentially compromising and uncomfortable situations, failing to ensure their safety, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals. Incidents of poor practice are recorded in the "StaffSafe" management system and are dealt with as Low Level Concerns.

#### 8.4.20 Harmful Sexual Behaviour

Harmful sexual behaviour (HSB) is an umbrella term that describes a range of sexual behaviours. Hackett et al. (2016; p.12)<sup>1</sup> define HSB as "sexual behaviours expressed by children and young people under the age of 18 years old that are developmentally inappropriate, that may be harmful towards self or others, or be abusive towards another child, young person or adult". This definition captures a range of behaviours, both offline and online, such as sexualised, gendered, or sexist name calling, sexual image sharing without consent, unwanted sexual touching, sexual assault and rape. Sexual behaviours are seen across a continuum ranging from normal and appropriate sexual behaviours that are expected from people of a certain developmental age through to sexual behaviours that are inappropriate, problematic, abusive, or violent.

Ofsted have reinforced the key message from a recent executive summary into sexual abuse in schools and colleges that organisations should assume that sexual harassment and sexual violence/abuse including online is happening within their setting even when there are no specific reports and should put in place a whole school/college (organisation) approach to respond to the issues. There is a need to ensure any gendered comments or behaviours are challenged.

Copy of review can be found here:

<https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges>

Any incidents relating to Harmful Sexual Behaviour must be reported to the Designated Safeguarding Officer, all staff are tasked with challenging any gendered comments and or behaviours.

#### 8.4.21 Extra Familial Harms

This is harm that occurs to children outside of their family and often occurs during adolescence. The Club recognises the impact of witnessing ill treatment of others. Intra-familial harm is also recognised and the need for support for any siblings.

All staff, but especially DSO/DSM should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse

(including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

## 9. RESPONDING TO A REPORT OR SUSPICION

*The Club employs a Head of Safeguarding to provide effective Club-wide strategic leadership and management with a clear sense of direction and purpose that assists the Club to deliver its safeguarding strategy, vision, values, priorities, policies and aims to promote and protect the welfare of vulnerable groups.*

*To assist the Head of Safeguarding the Club has a Designated Safeguarding Officer based in the Academy. The Foundation has a part-time Designated Safeguarding Manager. (The HOS fulfils the role of general Club DSO) The role of the Academy DSO and Foundation DSM is to support the Head of Safeguarding to pro-actively promote and raise safeguarding awareness and assist with responding appropriately to safeguarding incidents, concerns, and allegations.*

### ACTION TO TAKE IN THE EVENT OF A REPORT OR SUSPICION

The Designated Safeguarding Officer or Head of Safeguarding should be contacted as early as possible; 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 (Refer to Appendix (i)).

#### DO

If the child is hurt or ill seek immediate medical attention as required (Call 111 or an ambulance)  
If the child is immediately at risk of significant harm call the Police 999 or Local Authority Duty & Assessment Team and ask their advice.

If you are unsure what to do you may also contact the NSPCC Helpline **0800 800 5000**

#### **But remember “inaction is not an option”**

- Always treat any allegations extremely seriously and act towards the child to show you believe what they are saying - **LISTEN**
- Tell the child they are right to tell you
- Reassure them 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
- **3R's Respond, Record, Refer** (Report on to the appropriate person)
- Write down everything said and what was done as soon as you can - Use the child's words – not your own opinion or what you think they said
- Use the following open questions tell, explain, describe
- Inform parents/carers unless there is suspicion of their involvement – if this is the case ensure you make this clear to the designated safeguarding officer who will inform the Head of Safeguarding for further advice
- Head of Safeguarding will seek guidance from the Duty & Assessment Team

#### DON'T

- Make promises you cannot keep

- Interrogate the child or ask leading questions – it is not your job to carry out an investigation/interview – this will be up to the police and local authority professional staff, who have experience and are trained specifically to sensitively manage the disclosure – ask the most basic questions (USE Tell, Describe, Explain) and then let the child talk, you **LISTEN** and ensure that you do not jeopardise any potential criminal investigations
- 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
- Promise to keep secrets or keep the information confidential

**IN ACTION IS NOT AN OPTION – Safeguarding is Everyone's responsibility**

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

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened this could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSO if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

Contact details of the various Club officials with Safeguarding responsibility are included in the Club Induction and Safer Working Practices Induction, they are displayed around all Club premises and printed contact details are available to all staff, participants and beneficiaries at the various Club locations and activities.

**A standalone Remote Reporting Guidance Document is available to all staff and can be found in the safeguarding folders on the X:\ & Y:\ drives.**

X:\SAFEGUARDING\Safeguarding\A Safeguarding Policies\HTAFC Policies

## 9.1 Contact Details: Club

Senior Safeguarding Manager:

Ann Hough

T: 01484 960619,

M: 07712 839999

E: [Ann.hough@htafc.com](mailto:Ann.hough@htafc.com)

Head of Safeguarding:

Karen Crosland

M: 07891 552085

E: [Karen.crosland@htafc.com](mailto:Karen.crosland@htafc.com)

Designated Safeguarding Officer – Academy – Adam Powell:

M: 07432 087768

E: [adam.powell@htafc.com](mailto:adam.powell@htafc.com)

Designated Safeguarding Manager – Foundation – Maureen Quinn:

M: 07741 671066

E: [maureen.quinn@htafcfoundation.com](mailto:maureen.quinn@htafcfoundation.com)

## 9.2 Contact Details: External – Local

Police: 999 (in an emergency)

Children’s Services Duty & Advice Team

01484 414960 - 24 hours Safeguarding Professionals

01484 456848 Office hours 9am – 5pm – Members of the Public

Members of the Public Out of Office hours – Please call the relevant emergency services

For Children:

01484 456848 Office hours 9am – 5pm or

0800 111 Childline – calls are free

Kirklees Local Authority Designated Officer (LADO) 01484 221 126

See *Appendix (v) for LADO referral details*

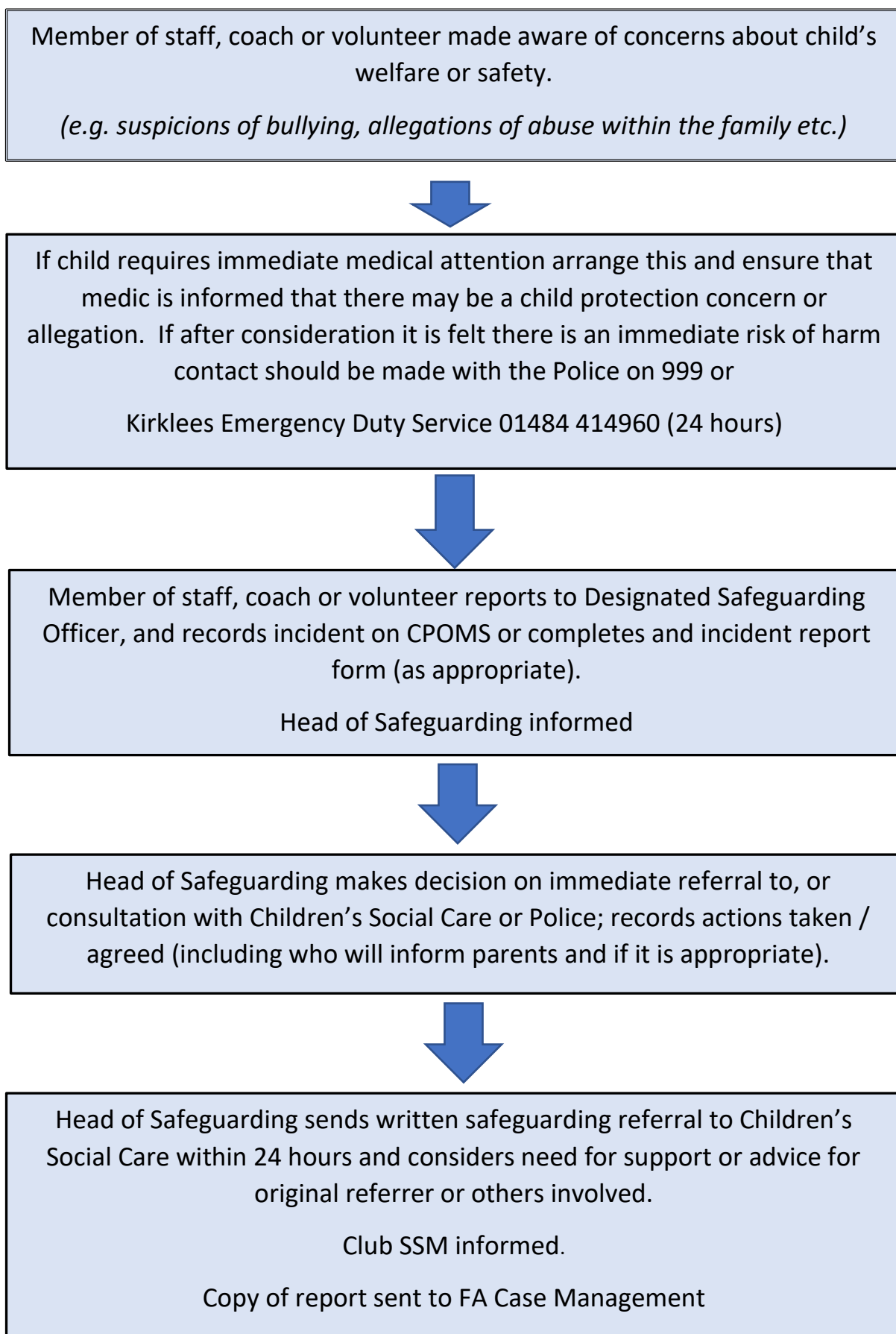
Further information for Kirklees can be found on the Kirklees Safeguarding Partnership website

<https://www.kirkleessafeguardingchildren.co.uk>

Contact details for other Local Authorities are available from the Club Designated Safeguarding Officer or by searching the internet for safeguarding + name of local authority.

*A more comprehensive list of contact details can be found in section 11*

## Reporting Safeguarding Concerns Appendix (i)



## 9.3 Recording & Reporting Allegations or Suspicions Including Allegations Against Staff & Low Level Concerns

- The HOS will inform the SSM and in consultation determine who will be involved in the investigatory meetings. Consultation with HR Manager will take place as appropriate.
- The Club has a Crisis Management Plan which provides guidance for the most serious cases, particularly those which may attract media interest.
- All details will be recorded on the electronic case management system CPOMS and additionally on the StaffSafe system as relevant (low level concerns).
- Disciplinary actions and sanctions will be recorded on the individuals file on the Club HR Management system YouManageHR
- The Designated Safeguarding Officer will ask for a written factual statement from the person making the report. If the report involves an allegation about another member of staff or volunteer, that person will also be asked to write a brief report.
- The Club will ensure that any child (or adult at risk) concerned is immediately removed from any possible risk of harm.
- Investigations into possible abuse will require careful management.
- The Head of Safeguarding should seek the advice of the relevant Local Authority Children's Services Team or the Police if a child is in immediate danger of harm and take their advice on informing the child or young person's parents if it is safe to do so.
- In the case of an allegation against a member of staff or volunteer then the LADO should be informed (before setting up an internal inquiry) (see additional flow chart Appendix (iii))
- In all cases, advice should be sought from the FA Safeguarding Investigations Manager for the Professional Game (David Gregson) before setting up an internal inquiry. Referrals are submitted via an electronic referral form which is then automatically sent to the League Safeguarding Manager. (Appendix (xvi)).
- The Club will provide the FA and EFL information as they may require in relation to the submission (As mandated in the EFL Safeguarding Standard 5.1)
- In cases of low level concerns the Club are required to complete and electronic referral from which must be submitted to the FA Safeguarding Investigations Manager. (Appendix (xvii)) Appendix (xviii) FA Thresholds Low Level Concerns
- In any case of suspected abuse involving an allegation against a staff member or volunteer as soon as the Local Authority Designated Officer has been informed, The Club must provide a report to the League Head of Safeguarding.
- The Head of Safeguarding must be consulted prior to any referrals to the FA or other external bodies. Referral forms are available from the Head of Safeguarding/Designated Safeguarding Officer.
- Managing Low level Concerns
- It has been recognised by the Club there is a need to manage issues that fall under the umbrella of safeguarding, yet which are of a minor nature. These matters are classified as 'Low Level Concerns'.
- Handling such concerns appropriately and proportionately will strengthen confidence of staff and volunteers in the Club.
- Where Low Level concerns are shared with a designated safeguarding officer or another member of staff, in accordance with the Clubs' safeguarding policy, these must be recorded as per the normal process for managing Safeguarding issues (i.e. recorded on CPOMS/StaffSafe).

- What is a Low Level Concern?
- A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that a person may have acted in a manner inconsistent with the Club's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to their behaviour.
- Low Level Concerns where no emergency actions are required, should be managed internally, and recorded within the electronic safeguarding management system and entitled 'Low Level Concern' in the title.
- Low Level Concerns do not in any way override or replace the Clubs 'Whistle Blowing Policy' but compliment and work alongside that process.
- Two Examples of Low level Concerns:
- Physical - Staff error causing no/little harm, e.g. skin friction mark due to ill-fitting bib during football/PE session.
- Psychological – This could be an isolated incident where an adult, adult at risk or child is spoken to in a rude or inappropriate way – respect is undermined but little or no distress caused.
- This list is not limited to the above but is extensive and any uncertainty should be discussed with the Head of Safeguarding or Club Safeguarding Officers.

### 9.3.1 Timescales

In any case of suspected abuse, the Local Authority Designated Officer must be informed within 1 day.

The Club's Head of Safeguarding must provide a report to the FA Case Management Team via the electronic referral form within 24 hours of the referral, if this is not possible then contact must be made with the Professional Game Safeguarding Manager.

A copy of the electronic referral form submitted to the FA is automatically sent to the League Safeguarding Manager.

The SSM will also provide a verbal report to the board with due respect to confidentiality.

*Management of Allegations against Staff and Volunteers Policy* is available on request

## 9.4 Whistle Blowing

The Club does not tolerate poor or unsafe practice and welcomes notification of concerns in order that actions can be taken to safeguard the children and adult at risk to whom we offer courses and activities.

The Club acknowledges that 'Whistle-Blowing' is a difficult issue for people for many reasons, and that it has often been the case that people have been reluctant to share concerns about a colleague for fear of the repercussions for themselves or the colleague. All people must hold in mind that safeguarding children and adults at risk is their statutory duty and that being willing to share a concern with the Safeguarding Officer is an important part of that duty.

The Club believes that it is not the responsibility of children and adults at risk to raise concerns about the poor or unsafe practice of professionals. All adults working for the Club have a responsibility to raise concerns about the practice of colleagues where necessary, in the knowledge that their concerns will be dealt with in a sensitive, appropriate, and timely manner. This may result in a colleague being given guidance and training to support their practice or it may result in the Head of Safeguarding seeking advice from the appropriate agency about how to proceed.

The Club will seek to keep information confidential to protect the whistle-blower and those who may be criticised during any investigation. Information will be shared with all who are deemed appropriate when it has been fully collated and examined.



The Club accepts that whistleblowing may cause distress to a person and will therefore ensure that impartial support will be made available to them.

Any person who has a concern about the way The Club carries out its work should raise this with the Designated Safeguarding Officer. If a person feels unable to raise their concern openly then they should know that they have the right, free from discrimination, to speak to the Head of Safeguarding, Senior Safeguarding Manager, HR Manager, a trustee, or a member of the board.

Any allegations must be taken seriously and properly investigated. Immediate action must be taken where required by the named Designated Safeguarding Officer or Head of Safeguarding.

If there is information that a child or adult at risk is vulnerable or at risk, The Club will follow the guidelines laid down in this safeguarding children policy and the managing allegations against staff and volunteers as appropriate.

If an allegation is made against a Designated Safeguarding Officer, it should be reported to the Head of Safeguarding. If an allegation is made against the HOS it should be reported to the SSM.

If there is an allegation against the SSM it must be reported to the Chief Executive.

If a person believes that no action has been taken in response to their allegation or concern, it is the duty of the individual to contact the appropriate agency to report their concern

The Club supports The FA's whistle blowing policy.

Any adult or young person with concerns about a colleague can 'whistle blow' by contacting

The FA Safeguarding Team on 0800 169 1863, by writing to:

The FA Case Manager at The Football Association, Wembley Stadium, PO Box 1966 London, SW1P 9EQ,

by emailing [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com) or alternatively by going direct to the police, social services, or the NSPCC.

FA NSPCC 24hr helpline on **0808 800 5000**

FA NSPCC helpline for calls in relation to historical concerns in football can be contacted via **0800 023 2642**.

The Club encourages everyone to know about the FA's Whistle Blowing Policy and to utilise if necessary.

**INACTION  
IS NOT AN OPTION**

—

**Safeguarding is  
Everyone's  
responsibility**

## 9.5 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 young person or adult at risk (although this does not necessarily mean that the parents/carer of the young person/adult at risk must be told).

You cannot promise to keep their disclosure a secret or that you will not have to speak to someone else about the issue – reassure them that it will be on a ‘need to know’ basis and that their dignity and privacy will be always respected.

A child, young person or adult at risk 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.**

There are actions which staff must 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 a safeguarding children or adult at risk issue to the HOS/DSO/DSM or SSM. The key issue is that the welfare of the child or adult at risk is protected.

## 9.6 Safeguarding Code of Conduct

Everyone plays a role in safeguarding the welfare and development of children and young people. As an individual responsible for children, young people or adults at risk taking part in a Club activity you have a duty to:

- **Ensure that the safety and welfare of all participants is your first priority** and ensure that any planning, preparation, delivery or review reflects this duty, and all actions are in the best interests of those in your care.
- **Treat children, young people, and adults at risk with respect**, regardless of their gender, ethnic or social background, language, religious or other beliefs, disability, sexual orientation or other status and encourage them to treat others the same way. Always consider the age, maturity, understanding and emotional condition of participants when working with them.
- **Listen carefully to children, young people, and adults at risk** about their needs, wishes, ideas and concerns and take them seriously.
- **Reward effort as well as performance**
- **Only use physical contact with participants where necessary.** If contact is necessary, (e.g. for the purposes of coaching or first aid), then explain to the individual what the contact is for and change your approach if he or she appears uncomfortable and conduct this in an open and transparent way.
- **Establish clear codes of conduct for participants and apply disciplinary policies equally and fairly** in respect of poor behaviour. Physical punishment or discipline or use of aggressive physical force of any kind towards any participant in your care is prohibited.
- **Always use language or behaviour towards participants and others that is appropriate** and do not use language or behaviour that is or could be considered harassment, abuse, sexually provocative or demeaning. You are a role model to both participants and other members of the workforce, your appearance, attitude, behaviour, and language has a direct effect on your role.
- **Not supervise or care for others whilst under the influence of alcohol or illegal drugs** or any medication that may impair your ability to ensure an individual’s welfare.
- **Not appear to favour one individual or show interest in one individual more than another.**

- **Wherever possible, ensure that more than one member of the workforce is present** when working in the proximity of children or other vulnerable people. It is inappropriate to spend excessive time alone with those children or adults at risk who you supervise or care for or to take them to your home.
- **Always maintain professional boundaries in person and online.** Do not engage in physical 'horseplay' with any participants and where possible avoid personal involvement in the activity you are responsible for. Be careful when engaging participants in 'banter' as this can easily be misunderstood. Recognise the danger to self and others when online.
- **Not engage in any form of sexual activity with or involving a child or adult at risk in your care.** Such activity is prohibited regardless of the legal age of consent and is considered a breach of this Policy.
- **Report any concerns you have over a person in your care or the actions of a member of the workforce.** If you witness or are told about any incident or issue that may put a vulnerable person at risk or harm, or may breach this policy, you have a duty to report it to the appropriate person (and only share the information with those who need to know). This may be your line manager, DSO/DSM, or HOS.

## 9.7 Codes of Conduct – Various

There are roles and activities which carry their own specific code of conduct and should be used in conjunction with the safeguarding general code of conduct. All staff must ensure that they receive, read, and comply with the code of conduct for the activity they are engaged in prior to commencing that role or activity. *See Appendix (x)*

## 10. COUNTER-TERRORISM AND SECURITY ACT 2015 – PREVENT DUTY OF CARE

The Prevent Strategy identifies a statutory duty for some agencies including schools, colleges, and education providers to support the Government's Anti-Terrorist agenda. The Club recognises its responsibility to support our partner schools and colleges in working with them to assisting them in meeting this duty under the Prevent Strategy.

The Prevent Duty is not about preventing participants from having political and religious views and concerns but about supporting young people to use those concerns or act on them in non-extremist ways. As a Club, we will be addressing our responsibilities under the strategy in commitment to keeping children and vulnerable adults safe.

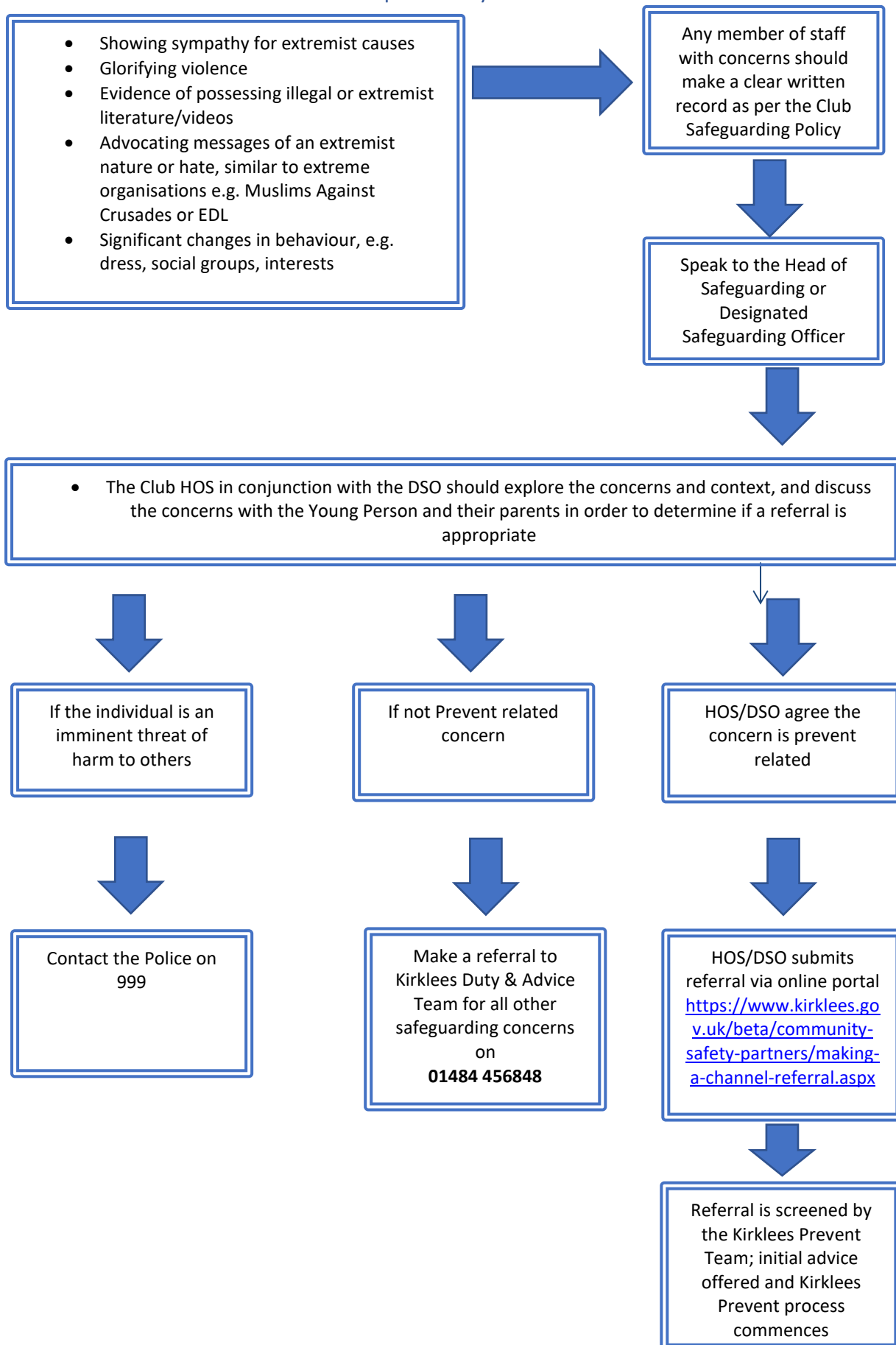
The Club will work with partner schools to address the risk factors for participants in producing a procedure for referral to the local Channel Panel if any young person is identified as being a risk of radicalisation.

The Club will, if required, work with schools and the Channel Panel to support any young person identified.

The Club will follow the referral pathway of the relevant Local Authority, by means of example below are the details for the Clubs Local Authority – Kirklees

Guidance on completing the online Channel referral form can be found in Appendix (xix)

## 10.1 Kirklees Prevent referral pathway



## 11. FURTHER ADVICE ON SAFEGUARDING MATTERS CAN BE OBTAINED FROM:

### 11.1 Internal

#### **HTAFC**

Senior Safeguarding Manager: Ann Hough T: 01484 960619, M: 07712 839999

E: [Ann.hough@htafc.com](mailto:Ann.hough@htafc.com)

Head of Safeguarding: Karen Crosland M: 07891 552085

E: [Karen.crosland@htafc.com](mailto:Karen.crosland@htafc.com)

Designated Safeguarding Officer – Academy – Adam Powell: M: 07432 087768

E: [adam.powell@htafc.com](mailto:adam.powell@htafc.com)

Designated Safeguarding Manager – Foundation – Maureen Quinn: M: 07741 671066

E: [maureen.quinn@htafcfoundation.com](mailto:maureen.quinn@htafcfoundation.com)

### 11.2 External

#### **LOCAL**

Police: 999 (in an emergency)

Children's Services Duty & Advice Team

01484 414960 - 24 hours Safeguarding Professionals

01484 456848 Office hours 9am – 5pm – Members of the Public

Members of the Public Out of Office hours – Please call the relevant emergency services

For Children:

01484 456848 Office hours 9am – 5pm or

0800 111 Childline – calls are free

Kirklees Local Authority Designated Officer (LADO) 01484 221 126

See *Appendix (v)* for LADO referral details

Further information for Kirklees can be found on the Kirklees Safeguarding Partnership website

<https://www.kirkleessafeguardingchildren.co.uk>

Contact details for other Local Authorities are available from the Club Designated Safeguarding Officer or by searching the internet for safeguarding + name of local authority.

#### **REGIONAL**

##### **EFL Safeguarding Manager**

Alex Richards

T: 01772 325940

M: 07792284740

E: [arichards@efl.com](mailto:arichards@efl.com)

**EFL Regional Safeguarding Officer (North Region)**

Debbie Lyons-Treadell

M: 07583 186279

E: [dtreadell@efl.com](mailto:dtreadell@efl.com)

**NATIONAL**

**FA Safeguarding Team**

0800 169 1863 #6300

[Safeguarding@thefa.com](mailto:Safeguarding@thefa.com)

**FA Case Management**

**Case Officer for EFL Clubs**

David Gregson

E: [david.gregson@thefa.com](mailto:david.gregson@thefa.com)

**EFL Trust**

Tara Lawson

Safeguarding and Incident Manager

E: [tara.lawson@efltrust.com](mailto:tara.lawson@efltrust.com)

**PL Trust**

E: [Ejoussemet@premierleague.com](mailto:Ejoussemet@premierleague.com)

**Childline** – calls are free

0800 1111

<https://www.childline.org.uk/>

**NSPCC Child Protection Helpline** – calls are free

0808 800 5000.

**Reporting of non-recent sexual abuse in football**

NSPCC helpline 24 hours a day

0800 023 2642.

**Police:** 101 or 999 (in an emergency)

## 12. ADDITIONAL GOVERNMENT GUIDANCE CAN BE OBTAINED VIA THE FOLLOWING WEB LINKS

**Position of Trust**

<https://www.gov.uk/government/publications/police-crime-sentencing-and-courts-bill-2021-factsheets/police-crime-sentencing-and-courts-bill-2021-positions-of-trust-factsheet>

**Child Sexual Exploitation (CSE)**

<https://www.gov.uk/government/publications/what-to-do-if-you-suspect-a-child-is-being-sexually-exploited>

**Bullying including cyberbullying**

<https://www.gov.uk/government/publications/preventing-and-tackling-bullying>

**Domestic violence**

<https://www.gov.uk/domestic-violence-and-abuse>

**Drugs**

<https://www.gov.uk/government/publications/drugs-advice-for-schools>

**Fabricated or induced illness**

<https://www.gov.uk/government/publications/safeguarding-children-in-whom-illness-is-fabricated-or-induced>

**Faith abuse**

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

**Female Genital Mutilation (FGM)**

<https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation>

**Forced marriage**

<https://www.gov.uk/forced-marriage>

**Gangs and youth violence**

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/226293/Advice\\_to\\_Schools\\_and\\_Colleges\\_on\\_Gangs.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/226293/Advice_to_Schools_and_Colleges_on_Gangs.pdf)

**Violence against women and girls (VAWG)**

<https://www.gov.uk/government/policies/ending-violence-against-women-and-girls-in-the-uk>

**Radicalisation**

<https://www.gov.uk/government/publications/channel-guidance>

<https://www.kirklees.gov.uk/beta/community-safety-partners/prevent.aspx>

**Sexting**

<http://ceop.police.uk/>

**Teenage relationship abuse**

<https://www.gov.uk/government/collections/this-is-abuse-campaign>

**Trafficking**

<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>



## 13. APPENDICES

- Appendix (i) Reporting Safeguarding Concerns Flow Chart – General
- Appendix (ii) Flow Chart for advice
- Appendix (iii) Flow Chart Reporting Concerns for Staff & Volunteers
- Appendix (v) LADO Referral Form
- Appendix (vi) Internal Incident Reporting Form
- Appendix (vii) Club Safeguarding Structure – Meet the Safeguarding Team
- Appendix (viii) Disclosure Panel
- Appendix (x) Code of Conduct for Staff
- Appendix (xi) Role guidance for Designated Safeguarding Officers
- Appendix (xii) Image Consent Form
- Appendix (xiv) Escalation Process (Professional Disagreement between agencies)
- Appendix (xvi) Pro Game Online SG Referral Process
- Appendix (xvii) Pro Game Online SG Referral Process Low Level Concerns
- Appendix (xviii) FA Thresholds Low Level Concerns
- Appendix (xix) Guidance for Completion of Channel Referral

## 14. LINKED DOCUMENTS

- Adults at Risk Policy
- Safeguarding and Safer Recruitment & Selection Policy
- Student Placement and Volunteering Policy
- Recruitment and Retention of Ex-Offenders
- CRC Policy
- Health & Safety Policy
- Management of Allegation against Staff & Volunteers Policy
- Use and Publication of Images
- Anti-Bullying Policy
- Complaints Procedure & Guidance
- FIFA the status and regulation of players
- Online Safety Policy
- Residential Stays Policy

Transport Policy  
HTAFC Senior Appearances U18  
SSM Job Description  
Head of Education Job Description  
CPO Job Responsibilities/role guidance  
Shower & Changing Rooms Policy  
Youth Produced Sexual Imagery Policy  
Accommodation Policy  
Loan Strategy v4  
Remote Reporting Guidance Document  
Crisis Management Plan

## 15. REFERENCES

The following Guidance, frameworks and documents have been used as references in the writing of this policy.

### **Legislation and Statutory Guidance**

Working Together to Safeguard Children (2018)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/779401/Working\\_Together\\_to\\_Safeguard-Children.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf)

The Children Act (1989 and 2004)

Keeping Children Safe in Education 2022 (KCSIE)

What to do if you are worried about a child being abused 2015

Health & Safety at Work Act 1974

Management of Health & Safety at Work Regulations 1999

Modern Slavery Act 2015

Counter Terrorism and Security Act 2015

Private Fostering Regulations 2005

Female Genital Mutilation Act (2003)

GDPR Data Protection Act (2018)

SEN Code of practice guidance 2015

Education Act 2002

What to do if you're worried a child is being abused: Advice for Practitioners (2015)

Safeguarding Vulnerable Groups Act (2006)

Protection of Freedoms Act (POFA) (2012)

Sexual Offences Act (2003)

UN Convention on the Rights of The Child (1989)

The Equality Act (2010)

### **Documents**

PL Codes of Ethics and Conduct Guidance

PL Guidance for Safer Working Practices Jan 2018

PL Safer Recruitment & CRC Check/Disclosure Eligibility.

PL Substitute Accommodation for Young Players.

EFL Safeguarding Children and Young People: Guidance to Member Clubs and Trusts 2018

EFL Safeguarding Strategy, Standards and Guidance for EFL Member Clubs 2019-20

EFL Safeguarding Children Policy Check List (Season 18/19)

Affiliated Football Policy & Procedures

Standards for Safeguarding and Protecting Children in Sport – NSPCC Child Protection in Sport Unit (CPSU)

FIFA International Regulations on the Status and Transfer of Players 2020 (In particular Annex 2 -First Registration and International Transfer of Minors)

Guidance from Kirklees Safeguarding Children Partnership

EFL Guidance Operating Trips, Tours and Tournaments v3 March 2018

EFL Guidance Six Steps for Developing a Club Transport Policy March 2018

EFL Guide to Accommodation for Clubs 2019 v3

EFL Guidance Document & Toolkit, First Team Appearances U18 EFL Dec 2016

The lists of linked documents and references is not exclusive.

**Copies of this policy can be found on the Club and Foundation websites, on the Club X: drive and the Foundation SharePoint.**

**Copies of supporting procedures are available by request**

## 16. POLICY REVISION

The Safeguarding Policy and its accompanying procedures will be reviewed, approved and adopted by or on behalf of the Board at least once annually and whenever:

- a) There is a change in Safeguarding legislation.
- b) The Club or CCO implements a new activity or service which involves contact with children and/or adults at risk.
- c) There is a safeguarding incident within the Club or CCO or which directly concerns or affects the CCO or
- d) Following significant organisational change.

## 17. POLICY REVISION HISTORY

01/05/2018	v8 Policy reviewed, no changes, Karen Crosland
01/11/2018	v9 Policy reviewed, changes made to reflect Club promotion to Premier League and PLCF requirements, Karen Crosland
01/08/2019	v10 Policy developed, amendments and additions in line with external review by: NSPCC Barnardo's external audit PLCF capability recommendations EFL Safeguarding Policy Checklist Addition of equality statement updated contact details, Karen Crosland
12/09/2019	KCSIE 2018 updated
24/08/2020	v11 Policy developed, amendments and addition in line with guidance from EFL, KCSIE 2020 and various minor amendments to guidance documents Updated abstract, policy statement and glossary to include Huddersfield Town Women under the term "Club" Minor amendment to section on "who this policy applies to" p8 to cover all "Club" activities – which now include Huddersfield Town Ladies. References to "Community Trust" replaced with "Foundation" Updated contact details to reflect new Head of Education & Player Care
11/03/21	Updated definitions of abuse, prevent referral details, changes to referral process and appointment of FA Case Manager for EFL Clubs and electronic referral form. Minor amendments to appendices re contact details Karen Crosland
25/07/2022	Addition of new policy statement & section on contextual safeguarding, legislative changes regarding position of trust added, reference made to trained Mental Health First Aiders, recruitment section updated to reflect combined safeguarding and safer recruitment and selection policy and student placement and volunteering policy. FADV added as new provider for DBS checks, removal of requirement for staff to join update service included. Staff training section updated. Details of new electronic case management systems CPOMS added. Requirement for x2 emergency contact details to be provided on all consent forms included. Club designated photographer requirements updated. Current ground regulations updated and referenced. References to "Development Team" removed. Types of abuse section further updated to reflect current guidance including updated section on domestic abuse/violence. Guidance on peer on peer abuse, (now referred to as Child on Child abuse) new section added. Information on LGBTQ+ added. 8.4.1b Statement re Sex Offenders added, Section on Harmful Sexual Behaviour added (8.14.20) in line with Ofsted/KCSIE guidance. All contact details updated. New appointment of Foundation Designated Safeguarding Manager referenced. Section 9 Responding to a Report or Suspicion, further guidance from KCSIE added. Additional wording added to section 9.3 Recording and Recording of Allegations involving staff and volunteers. LADO reporting process updated. FA Case Management Processes and Low Level Concerns reporting included, with addition of new appendices. Requirement to provide FA & EFL of information relating to any referrals included. Prevent Duty – Channel referral process updated and appendices with guidance notes for completion added.