



HUDDERSFIELD TOWN AFC SAFEGUARDING POLICY

v11 August 2020, Review Date August 2021

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

Karen Crosland
Karen.crosland@htaafc.com

Contents

FOREWORD AND POLICY INTRODUCTION – CLUB SAFEGUARDING CHILDREN POLICY	5
GLOSSARY.....	6
CLUB SAFEGUARDING CHILDREN POLICY v11.....	7
1. THE KEY PRINCIPLES OF THE CLUB’S SAFEGUARDING CHILDREN POLICY	7
1.1 Position of Trust.....	9
2. SAFEGUARDING MANAGEMENT.....	9
2.1 Children in Need	9
2.2 Support for Staff.....	10
2.3 Escalation Process.....	10
2.4 Media Protocols	11
2.5 Partnerships And Commissioned Services	11
3. RECRUITMENT.....	11
3.1 New Appointments who already have a Disclosure Certificate.....	12
3.2 Existing Staff.....	12
3.3 Temporary Staff, External Consultants and Partner Agencies.....	12
3.4 Staff Training	12
3.5 Good Practice Code of Conduct	13
4. HEALTH & SAFETY	14
5. DATA PROTECTION, RECORDING AND INFORMATION SHARING PROCEDURES	14
5.1 The seven golden rules to sharing information will be followed.....	14
5.2 Who to share information with	15
5.3 Storage of Safeguarding Data	15
5.4 Club Internal System for Storage of Safeguarding Data	16
5.5 Retention Periods for Storage of Safeguarding Data.....	16
6. INFORMATION AND COMMUNICATION TECHNOLOGY (ICT)	16
7. CLUB PROCEDURES	17
7.1 Parental Consent.....	17
7.2 Consent and Best Interests	17
7.3 Children.....	17
7.4 Adults	17
7.5 Best Interests	17
7.6 Use of Photography and Film Image.....	17
7.6.1 Premier League guidance.....	18
7.6.2 Designated Club photographers	18

7.6.3 Professional Photographers/Filming/Video Operators	19
7.6.4 Students or Amateur Photographers/Film/Video Operators	19
7.6.5 Videoing as a Coaching Aid	19
7.6.6 Ground regulations	19
7.7 Trips, Tours, Tournaments, Events & Activities – Residential Stays	19
7.8 Residential Accommodation	20
7.9 Transport.....	20
7.10 Youth Loans, Trials & Work Experience (Academy Players)	20
7.11 Procedure for U18 playing within the B Team/First Team Squad (Academy Players)	21
7.12 Procedure for First Registration and International Transfer of Minors.....	21
7.13 Looked after Children	21
7.14 Children who are not picked up on time	22
7.15 Ratio of Adults to Children.....	22
7.16 Coaching/Activities in Schools	22
7.17 Activities for Disabled Persons.....	22
7.18 Activities for those with Special Educational Needs.....	22
7.19 Complaints Procedure.....	23
7.20 Restraint Procedure	23
8.GUIDELINES IN THE EVENT OF A SAFEGUARDING CONCERN	23
8.1 Highlighting Concern.....	23
8.2 Recognition – Signs of Abuse	23
8.3 Types of Abuse	23
8.3.1 Physical Abuse.....	23
8.3.2 Sexual Abuse	24
8.3.3 Neglect	24
8.3.4 Emotional Abuse	24
8.3.5 Bullying.....	24
8.4 Additional Safeguarding Issues	25
8.4.1 Female Genital Mutilation (FGM)	25
8.4.2 Forced marriage	25
8.4.3 Honour based violence	26
8.4.4 Domestic violence	26
8.4.5 Supporting lesbian, gay, bisexual and transgender young people	26
8.4.6 Children and young people who take on leadership roles	26
8.4.7 Additional Vulnerabilities for Those Taking Part in Elite Sport.....	26
8.4.8 Hazing.....	27

8.4.9 Infatuations	27
8.4.10 Child Sexual Exploitation.....	27
8.4.11 Historical/Non Recent Abuse In The Professional Game	27
8.4.12 Grooming	28
8.4.13 Fabricate or induced illness:	28
8.4.14 Peer on Peer abuse	28
8.4.15 County Lines and Child Criminal Exploitation	29
8.4.16 Cyberbullying	29
8.4.17 Online Abuse.....	29
8.4.18 Private fostering.....	29
8.4.19 Poor practice.....	30
9. RESPONDING TO A REPORT OR SUSPICION	30
9.1 Contact Details: Club.....	31
9.2 Contact Details: External - Local	32
9.3 Recording & Reporting Allegations or Suspicions Including Allegations Against Staff.	34
9.3.1 Timescales.....	34
9.4 Whistle Blowing	34
9.5 Confidentiality.....	36
9.6 Safeguarding Code of Conduct	36
9.7 Codes of Conduct – Various.....	37
10. COUNTER-TERRORISM AND SECURITY ACT 2015 – PREVENT DUTY OF CARE.....	37
10.1 Kirklees Prevent referral pathway	38
11. FURTHER ADVICE ON SAFEGUARDING MATTERS CAN BE OBTAINED FROM:	39
11.1 Internal.....	39
11.2 External	39
12. ADDITIONAL GOVERNMENT GUIDANCE CAN BE OBTAINED VIA THE FOLLOWING WEB LINKS.....	40
13. APPENDICES	41
14. LINKED DOCUMENTS	42
15. REFERENCES.....	43
16. POLICY REVISION.....	44
17. POLICY REVISION HISTORY.....	45

FOREWORD AND POLICY INTRODUCTION – CLUB SAFEGUARDING CHILDREN POLICY

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.

Policy Statement

The Club believes that the general well-being and welfare of all children, young persons and adults at risk who are involved with the Club in any way, is 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. It encourages best practice in safeguarding children and adults at risk matters in a spirit of partnership and openness with all children, adults at risk, their families, 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 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 use by staff and volunteers. Mandatory legislation and best practice underpin the activities which are available at the Club and this policy will help to ensure that responses to activities and issues are consistent considering local authority guidance, law and individual needs across our community.

A child or young person is anyone who has not reached their 18th 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 get 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.

Equality

Huddersfield Town AFC endorses the principles of promoting equality and celebrating diversity, and will strive to ensure that everyone who is involved in 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; and,
- Can be assured of an environment in which their rights, dignity and individual worth are respected, and in particular that they are able to enjoy their engagement at the Club without the threat of discrimination, intimidation, victimisation, harassment, bullying and abuse.

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 v11

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 2020, 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 located in all Club facilities and include contact details and reporting guidelines. Individual information cards with contact details of who to report concerns to are available to all activity participants.

1.1 Position of Trust

The Club recognise and share the view that affiliated football holds with the principle that there are some roles within sport where adults have responsibility for, authority and influence over young people and therefore have an ethical obligation to safeguard and protect young people from exploitation. Whilst legally young people aged 16 and 17 have reached the age of consent for sexual activity, any inappropriate sexual relations with young people aged 16 or 17 will be considered a breach of a ‘Position of Trust’ and will be referred to the appropriate football regulatory authorities and may also be referred to the statutory agencies.

We acknowledge that every child, young person or adult at risk who plays or participates in Club activities should be able to take part in an enjoyable and safe environment and be protected from poor practice and abuse. (Physical, sexual or emotional harm, neglect or bullying). The Club recognises that safeguarding is everyone’s responsibility. For the avoidance of doubt, that it is the responsibility of every adult involved in the Club whether in a paid or voluntary capacity.

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 a number of Child Safeguarding Officers/Designated Safeguarding Officers who work within departments throughout the Club. 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 Workshop 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 CSO/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 CSO/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, in particular, 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 are in need of support, they should discuss this with their Line Manager, HR department or the Club's safeguarding department.

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 or specific processes. Please refer to Appendices (xiv) & (xv) 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 on the basis of 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 Recruitment Policy (in addition to a Club Recruitment & Selection Policy)* 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 (Section 3 Club recruitment 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 GB Group Plc (GBG) 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 left unsupervised with children.

All employees, workers or volunteers in a position of trust are required to sign up to the Update Service and annual checks will be carried out by the Club.

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 has to 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 GBG 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 current status of their CRC.

In the event that there are changes to the status the Club will immediately ask the individual to apply for CRC check through the FACRB/GBG 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 being 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 sign up to the DBS Update Service and annual checks will be carried out by the Club.

Staff who are not signed to the update service 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. FA Safeguarding Children workshop or equivalent FA Safeguarding Course for 16-18 year olds within 3 months of commencement of employment.
3. EFL online safeguarding training within 1 month of commencement of employment.
4. EFL Online Safety & Sexting Course within 1 month of commencement of employment.
5. EFL Level 1 Online Safeguarding Training
6. 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.
7. 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". Those completing the FA Safeguarding Children Workshop are registered on the FA Whole Game System which the Club uses in addition to the Single Central Record 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

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 in order 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. Refer to *Appendix (xvi) Information Sharing Flow Chart*

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 need 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 on the basis of 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 with regard to 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 “Tootoot” a League approved cloud based electronic storage system for the collection and retention of data relating to all safeguarding incidents be they involving staff, adults at risk or U18’s.

This is a secure password protected system 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.

Tootoot data protection policy attached as appendix (xiii)

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 when the investigation into the allegation is concluded keep the records until their 70th Birthday

If someone is 30 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 will:

- Develop and maintain clear policies on suitable and appropriate use of the internet, email, SMS, and social media.
- 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). 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.

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 take into account (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

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)

At the request of the Premier League's broadcast partners, every club now has to 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 anything you'd like to film, this includes social media.

7.6.2 Designated Club photographers

Designated HTAFC photographers will, where applicable, undertake an FACRC/DBS check and attend a FA Safeguarding Children workshop 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 worn at all times.

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 wear identification at all times during the event.

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).

7.6.5 Videoing as a Coaching Aid

On occasions the Club may wish to video a game or training session using video 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 films 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 Education & Welfare or CSO/DSO).

7.6.6 Ground regulations

Attention is drawn to this excerpt from the ground regulations

24. *By entering the Ground, all persons are acknowledging that photographic images and/or video recordings (and/or stills taken from video recordings) may be taken of them and may also be used in televised coverage of the game or by the Club or any Football Authority for marketing or promotional purposes. Entry into the Ground is confirmation that all persons have consented to such use of their image. If these images should feature an individual prominently the Club will make reasonable efforts to gain the consent of that person before publishing such images, however, if this is not possible, then entry into the Ground shall be deemed consent unless the Club is notified in writing to the contrary.*

25. *Further to paragraph 24, 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 with regard to 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 one drive folder which allows access to relevant information. Information sharing protocols are applied.

Best practice is for tour staff to download the folder contents, so they are accessible in the event of poor/no internet access

7.8 Residential Accommodation

The Club may in the course of 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 and good practice (from that host country) is applied to any of the above settings and that any relevant authorities are 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 additional 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.

HTAFC will request parental consent, full medical history and injury disclaimer prior to any trial or work experience for any player under 18 joining the Club. Should accommodation be required during a trial period a host family will be provided or 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)

Separate document available - *Loan Strategy v5*

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

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 development and 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 the development squad and First Team, the Club will continue to ensure that they fulfil their obligation of duty of care towards the players and safeguard the welfare of children and young people by taking all reasonable steps to ensure they are protected from harm. *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 as a result 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.

In order 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 and Senior Safeguarding Manager should have details of the child's social worker and the name of the virtual 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 communication with the office to seek alternative numbers if necessary.

In the event that 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 would make every effort to contact the parents and make alternative arrangements with the consent of the parent or legal guardian. In the event that the parent/carers remains non-contactable then the staff will report to their Head of Department/Children's 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 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

Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or young person.

8.3.2 Sexual Abuse

Any act which results in the exploitation of children and adults at risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This may be by an adult or by a young person who is intellectually, emotionally, physically or sexually more mature than the victim. This includes non-contact activities, such as indecent exposure, involving children or adults at risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally Children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children and young people.

8.3.3 Neglect

Ongoing failure to meet the basic needs of children and/or adults at risk. Neglect may involve; failing to provide adequate food, shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger, or the failing to ensure access to appropriate medical care or treatment. It may also include neglect of or unresponsiveness to, basic emotional needs.

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

Neglect may occur during pregnancy as a result 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 or young person from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers);
- Or ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's or young person's basic emotional needs.

8.3.4 Emotional Abuse

Any act or other treatment which may cause emotional damage and undermine a person's sense of well-being, including persistent criticism, denigration or putting unrealistic expectations on vulnerable groups, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

8.3.5 Bullying

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

Bullying as a result of any form of discrimination:

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

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

For more detailed information on the main forms of abuse refer to:

<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 September 2020. Further categories have been added for completeness.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550511/Keeping_children_safe_in_education.pdf

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.

If you wish to find out more about FGM then you can access the NSPCC's fact sheet via this link – 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 fmufco.gov.uk. For more information on forced marriages go to 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 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. This can encompass but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence

8.4.5 Supporting lesbian, gay, bisexual and transgender young people

Lesbian, gay, bisexual and transgender (LGB&T) 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.

LGB&T people remain largely invisible across sports this lack of visibility, as well as the misapprehensions about LGB&T 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 or transgender 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, 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. As a consequence, 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 Vulnerable Groups

8.4.9 Infatuations

Vulnerable Groups 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 Club Designated Safeguarding Officer (or the Club Senior Safeguarding Manager in his/her absence).

8.4.10 Child Sexual Exploitation

The NSPCC define Child Sexual Exploitation (CSE) “as a type of sexual abuse in which children are sexually exploited for money, power or status”. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may be sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place 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.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (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

8.4.11 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

8.4.12 Grooming

Grooming is defined as developing the trust of an individual for the purpose of sexual abuse, sexual exploitation or trafficking. Grooming can happen both online and in person.

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

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, including serious bullying (including cyberbullying), relationship abuse, domestic violence, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour, and/or gender-based violence.

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

8.4.15 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 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.

Child Criminal Exploitation 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. 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

The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among children. When an adult is the victim, it may meet the definition of cyber harassment or cyber stalking.

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.

Where a situation may include a vulnerable group 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.

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

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.

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 Designated Safeguarding Officers (DSO's) based in the Academy and Foundation (The HOS fulfils the role of general Club DSO) whose purpose it 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:

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”

- treat any allegations extremely seriously and act at all times 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

INACTION IS NOT AN OPTION – Safeguarding is Everyone's responsibility

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

There are contact details of the various Club officials with Safeguarding responsibility 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.

9.1 Contact Details: Club

Senior Safeguarding Manager:

Ann Hough

T: 01484 960619,

M: 07712 839999

E: Ann.hough@htafc.com

Head of Safeguarding:

Karen Crosland

M: 07891 552085

E: Karen.crosland@htafc.com

Designated Safeguarding Officer – Academy – Adam Powell:

M: 07432 087768

E: adam.powell@htafc.com

Designated Safeguarding Officer – Foundation – Katie Suttron:

M: 07947 564331

E: katie.suttron@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

01484 456848 Office hours 9am – 5pm – For children or 0800 111 Childline – calls are free

Kirklees Local Authority Designated Officer (DO) 01484 221 126

All referrals to be sent to LADO.cases@kirklees.gov.uk

See *Appendix (v)* for LADO referral form

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

Member of staff, coach or volunteer made aware of concerns about child's welfare or safety.

(e.g. suspicions of bullying, allegations of abuse within the family etc.)



If child requires immediate medical attention arrange this and ensure that medic is informed that there may be a child protection concern or allegation. If after consideration it is felt there is an immediate risk of harm contact should be made with the Police on 999 or

Kirklees Emergency Duty Service 01484 414960 (24 hours)



Member of staff, coach or volunteer reports to Designated Safeguarding Officer, and completes an incident report form/Tootoot incident report (as appropriate).

Head of Safeguarding informed



Head of Safeguarding makes decision on immediate referral to, or consultation with Children's Social Care or Police; records actions taken / agreed (including who will inform parents and if it is appropriate).



Head of Safeguarding sends written safeguarding referral to Children's Social Care within 24 hours and considers need for support or advice for original referrer or others involved.

Club SSM informed.

Copy of report sent to FA Case Management

9.3 Recording & Reporting Allegations or Suspicions Including Allegations Against Staff.

- The Children's 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 cases of low level poor practice, The Football Association Safeguarding Children & Vulnerable Adults Case Management Team should be informed (before setting up an internal inquiry). 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 Leagues Head of Safeguarding.
- Referral forms are available from the Head of Safeguarding/Children's Safeguarding Officer. (see Appendix (iv))

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 72 hours of the referral to the LADO. A copy of the referral 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 adult 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 any and all who are deemed appropriate when it has been fully collated and examined.

The Club accepts that whistle-blowing 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, 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 Box1966 London, SW1P 9EQ,

by emailing 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 have to 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 respected at all times.

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 CSO/DSO, HOS 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 absolutely 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, CSO/DSO 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 Appendices (ix & 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.

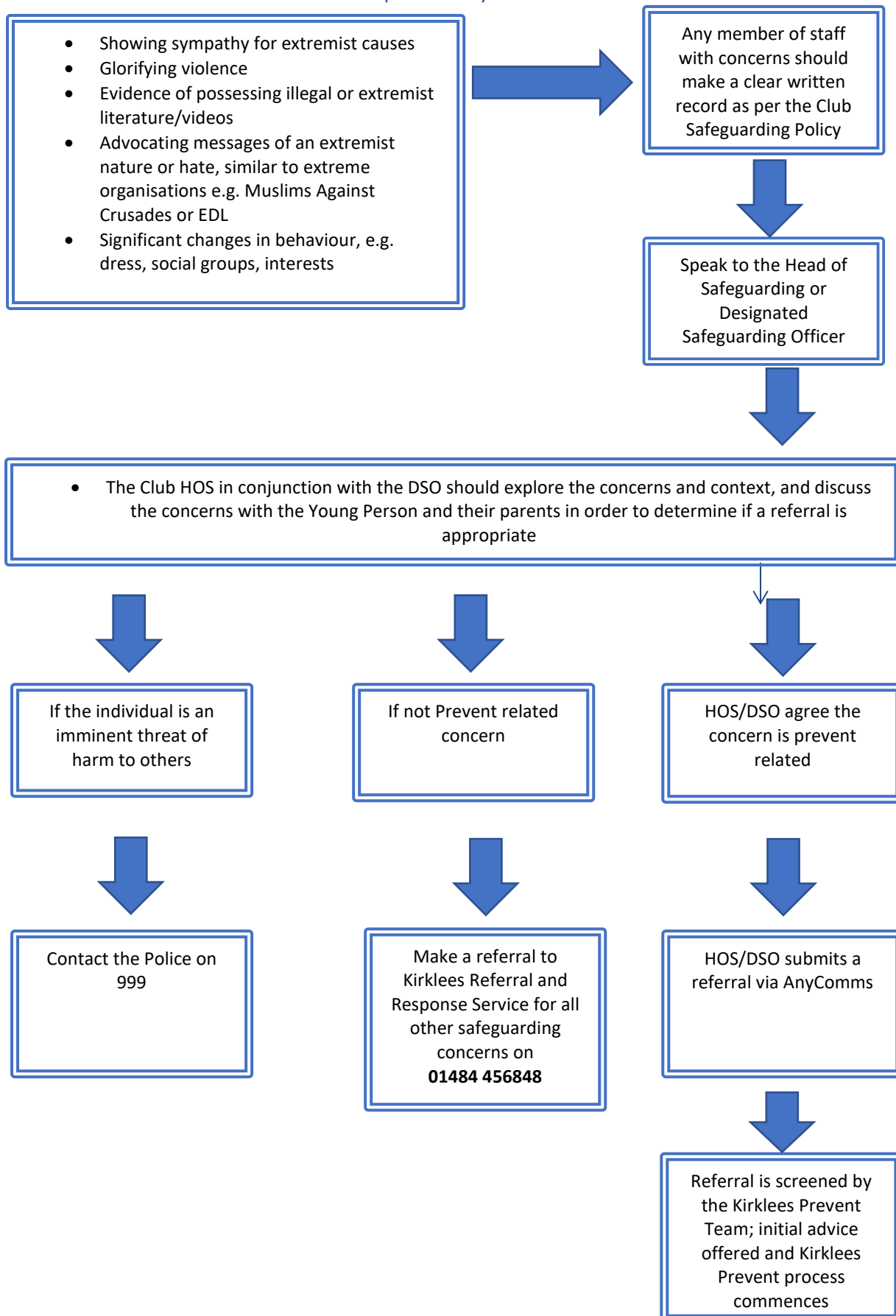
The Prevent Duty is not about preventing participants from having political and religious views and concerns but about supporting young people to use those concerns or act on them in non-extremist ways. As a Club, we will be addressing our responsibilities under the strategy in commitment to keeping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

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

Head of Safeguarding: Karen Crosland M: 07891 552085

E: Karen.crosland@htafc.com

Children's Safeguarding Officer – Academy – Adam Powell: M: 07432 087768

E: adam.powell@htafc.com

Children's Safeguarding Officer – Foundation - Katie Suttron: T: 01484 503764, M: 07947 564331

E: katie.suttron@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

01484 456848 Office hours 9am – 5pm – For children or 0800 111 Childline – calls are free

Kirklees Local Authority Designated Officer (DO) 01484 221 126

All referrals to be sent to LADO.cases@kirklees.gov.uk

See *Appendix (v) for LADO referral form*

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

EFL Regional Safeguarding Officer (North Region)

Debbie Lyons-Treadell

M: 07583 186279

E: dtreadell@efl.com

NATIONAL

FA Safeguarding Team

0800 169 1863 #6300

Safeguarding@thefa.com

FA Case Management

Case Officer for EFL Clubs

David Gregson

E: david.gregson@thefa.com

EFL Trust

Tara Lawson

Safeguarding and Incident Manager

E: tara.lawson@efltrust.com

PL Trust

E: 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

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

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>

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) Flow Chart – General
- Appendix (ii) Flow Chart- Advice
- Appendix (iii) Flow Chart Managing Allegations against Staff
- Appendix (iv) FA Online Referral Details – Pro Club
- Appendix (v) LADO Referral Form
- Appendix (vi) Internal Incident Form
- Appendix (vii) Club Safeguarding Structure
- Appendix (viii) Disclosure Panel
- Appendix (ix) Code of Conduct for Staff, Volunteers and Trustees

- Appendix (x) Code of Conduct for Academy Staff
- Appendix (xi) Role guidance for Child Protection Officers/DSO's
- Appendix (xii) Image Consent Form
- Appendix (xiii) Tootoot Data Protection Policy
- Appendix (xiv) Escalation Process
- Appendix (xv) Escalation Process Flow Chart
- Appendix (xvi) Information Sharing Flow Chart

14. LINKED DOCUMENTS

Adults at Risk Policy

Staff Handbook

Recruitment 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

Social Media Policy *Update*

Residential Stays Policy

Transport Policy *Update*

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

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

The Children Act (1989 and 2004)

Keeping Children Safe in Education (KCSIE) (2020)

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 and on the Club & Foundation X:\ & Y:\ drives respectively.

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