Safeguarding Children Policy

Ben Lavelle – Academy Head of Education, Safeguarding & Welfare
Matt Hilton – Director of Community Trust
Contents

PAGE:

3  CLUB COMMITMENT TO SAFEGUARDING

4  KEY SAFEGUARDING TERMINOLOGY AND DEFINITIONS

5  SAFEGUARDING CHILDREN POLICY

19  GUIDELINES IN THE EVENT OF CONCERN

22  OUR RESPONSIBILITIES IN 5 STEPS

23  RECOGNISE – TYPES, SIGNS AND SYMPTOMS OF ABUSE

32  RESPOND – RESPONDING TO A REPORT OR SUSPICION

37  REPORT – REPORTING POOR PRACTICE OR ABUSE

40  RECORD – RECORDING ALLEGATION OR SUSPICIONS

41  REFER – LOCAL AUTHORITY, FA AND FOOTBALL LEAGUE REFERRALS

49  APPENDICES

APPENDIX A:  STAFF PROCEDURE FOR REPORTING SAFEGUARDING CONCERNS

APPENDIX B:  RECORDING SAFEGUARDING CONCERNS FORM

APPENDIX C:  SAFEGUARDING BODY MAPS

APPENDIX D:  ACTION TAKEN WHEN A CHILD IS REFERRED TO LOCAL AUTHORITY CHILDREN’S SOCIAL SERVICES
Club Commitment to Safeguarding

Statement from Chief Executive:

Fleetwood Town Football Club, Academy and Community Trust is committed to safeguarding, as far as reasonably practicable, the welfare of children, young people its workforce and vulnerable groups. The Club expects all staff, players, volunteers, contractors, partners and guests to share this commitment and believes that all staff, players, volunteers, contractors and guests have a responsibility to report any concerns to the Club should they be concerned about the welfare of any child, young person or vulnerable adult. *Please note ‘Terms of reference’ in SG folder.*

The Club is committed to ensuring that:

- The safety and welfare of vulnerable groups, and the FTFC workforce under the care of the club is paramount;

- All vulnerable groups, workforce and volunteers that engage with the club, regardless of age, culture, social background, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to safety and protection from abuse or harm;

- All suspicions, reports and/or allegations of abuse will be taken seriously & investigated thoroughly which may involve the appropriate local authority teams where necessary;

- Appropriate action is taken if/when necessary following any investigation of reported poor practice;

As a measure of the Club’s commitment to Safeguarding, the club commits to employing a Safeguarding team which operates club wide and works towards implementing, maintaining and embedding best practice within every aspect of the club.

This Safeguarding policy will also be continually monitored and subject to review annually, or following any incident or near miss of a Safeguarding nature.

Signed on behalf of Fleetwood Town Football Club, Academy and Community Trust

Steve Curwood 2018
Key Safeguarding Terminology and Definitions:

**The Academy** – The club’s training headquarters at Poolfoot Farm (FY5 4HX) an independent site at which the nurturing, developing and administration of the club’s young players takes place.

**The Community Trust** - refers to Fleetwood Town Community Trust, its workforce and all activities it undertakes. In certain circumstances it may also refer to third parties with an entrusted responsibility for delivering club-supported activity. Also based at Poolfoot farm.

**Child/Children** – Defined by the Law as a person aged under 18 years of age. However, for the purpose of the Club’s Safeguarding policies and practices, when referring to a child, the policies refer to a person under 14 years of age. Please see the definition of ‘Young Person’ below for support information.

**The Club** – refers to Fleetwood Town Football Company Limited, Fleetwood Town Football Club, Highbury, (FY7 6TX) its workforce and all activities undertaken by the organisations or at these premises. Specifically the Highbury operation, Poolfoot Farm operations, the Academy, 1st team and Community Trust.

**The FA** – refers to the Football Association, the National Governing Body for Football in England.

**First team** – the players and management team attached to the 1st team based at Poolfoot Farm training ground.

**Harm** – The ill-treatment of an individual or impairment of their Welfare due to acts of Abuse or inappropriate behaviour including witnessing 3rd party abuse or inappropriate behaviour.

**Local Authority** – refers collectively or individually when named to the district, borough, city and county councils that are responsible for governance of the county of Lancashire in which the Club operates. Specifically, but not exclusively, these include Lancashire County Council.

**Local Authority Safeguarding Board** – refers to the department within each Local Authority responsible for providing guidance, training and governance on all Safeguarding matters within their area of governance.
**The NSPCC** – refers to the National Society for the Prevention of Cruelty to Children (NSPCC), a Community Trust that actively campaigns for and works within child protection in England, Wales, Northern Ireland and the Channel Islands.

**Poolfoot operations** – all staffing and public users at the training ground at Poolfoot farm, excluding Academy staff and 1st team operation.

**The English Football League** – refers to the organisation responsible for governance and administration of English Football’s 3rd ranked league, of which Fleetwood Town FC are current members.

**Safeguarding** – Preventative and reactional measures taken by the Club to ensure; the risk of harm or mistreatment of vulnerable groups is minimised; the health or wellbeing of vulnerable groups is not impaired whilst engaging in Club or Community Trust related activities; an environment exists that supports the best possible outcomes or life chances for vulnerable groups.

**Safeguarding Team** – The collective group of staff within the Club and Community Trust that have a professional responsibility for the Safeguarding of Vulnerable Groups. Specifically, this is made up of The Safeguarding Board, Designated Safeguarding Officers, Partner Safeguarding Officers and Additional Verifiers.

**Staff** – refers to persons employed by and receiving payment for services from the Club or Community Trust. This is irrespective of the length or nature of their contract.

**Terms of reference** – statement of operating terms for the Safeguarding board.

**The Training Ground** – The club’s external independent site at which the day to day training and administration of the Club’s First team & Development squad takes place.

**‘Tootoot’** – a software platform that FTFC has purchased to allow recording of safeguarding issues and management and reporting thereafter.

**Volunteers** – Persons who freely offer their skills and expertise or take part in a task, event or enterprise with the club or Community Trust at their own expense in terms of time and/or resources.

**Adult(s) at Risk** – An adult (person aged 18 or over) who is receiving one of the following services: health care; relevant personal care; social care work; assistance in relation to general household matters by reason of age, illness or disability; relevant assistance in the conduct of their own affairs or conveying (due to age, illness or disability in prescribed circumstances).
**Vulnerable Group(s)** – The collective term used when talking about or referring to Children, Young People and Vulnerable Adults as a whole.

**Welfare** – The health, happiness and fortunes of individuals and the humanitarian aspects of their life including personal needs, social interactions & physical or psychological development.

**Workforce** – refers to the combined entity created when staff, volunteers and/or third party contractors are deployed together to work on a Club, Academy, 1st team or Community Trust activity, event or enterprise.

**Young Person/People** – defined by the Club as a person aged between 14 and 18 years of age.

---

**Safeguarding Children Policy**

**Safeguarding Team Mission Statement:**

Fleetwood Town Football Club, Academy, 1st team, Poolfoot operations and Community Trust acknowledges and accepts a responsibility for the well-being and safety of all vulnerable groups, and its workforce, who come under their care whilst engaging with the club or utilising their facilities. The Safeguarding team are committed to delivering a Safeguarding programme that ensures the wellbeing of vulnerable groups and volunteers is maintained at all times through effective training, promotion and embedding of best practice amongst staff, volunteers and partner organisations.

**Introduction**

The Club acknowledges and accepts it has a responsibility for the well-being and safety of all vulnerable groups who are under The Club’s/Community Trust’s care or utilising The Club’s/Community Trust’s facilities. It is the duty of all adults representing the Club to safeguard the welfare of children and young people by creating an environment that protects them from harm.

The wellbeing of children and young people is paramount for all staff and accordingly, they must make themselves aware of the Club’s/Community Trust’s Safeguarding Children Policy. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance or policies.

**Rules, Regulations and Guidance**
The Club is governed by the rules and regulations set out by several key governing agencies including the Government, Football Association, Football League and the NSPCC Child protection in Sport Unit, amongst others. The content of this policy is underpinned by legislative and statutory documents and polices as presented by these key governing agencies.

Key documents underpinning this policy include:

- ‘Local safeguarding boards’ - [https://www.gov.uk/government/publications/local-safeguarding-children-boards]
The Club is fully committed to ensuring that the best practice recommended by these legislations, policies and guidelines is implemented, maintained and embedded within the day to day working practice of all staff at all times. The Club is also fully committed to a ‘continually improving’ approach to Safeguarding.

In keeping with these commitments, the Club, Academy, and Community Trust recognises its responsibility to maintain regular dialogue with the Lancashire Safeguarding Children Board in keeping with the presence of Club activities within these regions. Specifically, the relationship of the Club, Academy, Community Trust and these Local Authorities is centred upon supporting the club with; reporting/monitoring of Safeguarding incidents, sharing of best practice, sharing information/changes in legislation, sharing of important local area information, workforce best practice, training and development plus any other relevant appropriate Safeguarding support.

Scope

This policy recognises that children and young people are particularly vulnerable to harm due to their potential inability to self-determine, depending on their age and experiences, between what is legally, morally or ethically right or wrong. As a result this policy supports the Safeguarding Team in ensuring that the Club reacts to the occasions where proactive and preventative work has failed and where harm or abuse has occurred by acts of commission or omission as defined by statutory guidance, legislation and the law.

This policy also recognises that whilst children and/or young people may themselves consent to activities they undertake (inclusive of sexual activities) under the same considerations regarding the potential for a child or young person being unable to self determine between right and wrong, it is recognised that the Club will act upon and report any incidents/allegations involving a child or young person to the relevant agencies, regardless of consent being granted. In line with statutory, legislative and legal guidelines, a criminal offence may have been committed and the Club recognises its responsibilities for reporting such incidents.

A particular focus of the Safeguarding team is to ensure that safeguards are put in place to prevent any re-occurrence of harm occurring following a report or allegation, either to the same child or young person or to other vulnerable groups.

As part of this, this policy will be reviewed annually prior to the start of every season or whenever there is an organisational change, change in legislation or following any learning outcomes from safeguarding incidents, concerns or allegations.
Aims & Key Principles

Whilst it is hoped that proactive preventative work, including vetting, training and providing of clear policies and best practice guidelines to staff are sufficient to safeguard all children and young people, the Club recognises that it has a responsibility to embed a proactive approach into all aspects of its the daily working practice.

The aims of this policy are therefore:

- To safeguard all children and young people who interact with The Club.
- To demonstrate best practice in the area of safeguarding children and young people.
- To develop a positive and pro-active welfare programme that enable all children and young people to participate in an enjoyable, safe and welcoming environment.
- To outline and support a clear system that effectively prevents, intervenes and processes Safeguarding matters should they arise. To promote high ethical standards throughout all activities.

The key principles underpinning this policy are:

- The child or young person’s welfare is, and must always be, the paramount consideration.
- All vulnerable groups and the workforce have a right to be protected from bullying, discrimination, harassment, abuse and neglect.
- All vulnerable groups and the workforce should be protected from abuse (as physical, emotional, sexual, neglect, bullying or sexting ) regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity. Consideration also be given to peer on peer abuse, domestic abuse, child sexual exploitation and female genital mutilation.
- All allegations of abuse will be taken seriously and responded to efficiently and appropriately.
- To encourage parents and other members of a child or young person’s family to also be involved in a relationship with The Club.
- To ensure that coaches, parents and other adults who come into contact with children and young people provide good role models of behaviour.
Key Personnel

Safeguarding Board:

The Safeguarding Board is the governing panel for all Safeguarding issues within the Club. It consists of 5 members of staff, (the CEO and SSM for the whole Club, and 4 DSOs for the stadium, Academy, Community Trust and Poolfoot Farm operations) who meet regularly to discuss matters arising and how safeguarding should be taken forwards within each department of the Club. The board is also responsible for the handling and/or escalation of serious safeguarding issues where matters cannot be handled solely by the SSM. Members of the Safeguarding Board also report directly to the SSM of the Club and actively update the Club’s Safeguarding board and wider Heads of Department in matters arising, best practice and legislation changes when necessary. The group meets monthly at present and will review this schedule if required.

Senior Safeguarding Manager - SSM:

The Senior Safeguarding Manager oversees the Safeguarding Board and is ultimately responsible for maintaining the safety and wellbeing of all children, young people and vulnerable adults when engaged in activities with the Club and Community Trust, including on match days.

Day to day, the role of the SSM, and Head of Welfare and Equality is to strategically manage the Club’s overall Safeguarding provision.

The clubs lead safeguarding manager will oversee the handling of reported incidents within the stadium footprint that compromise the safety and wellbeing of any child, young person or vulnerable adult or member of the workforce or volunteers.

Designated Safeguarding Officers:

A number of Designated Safeguarding Officers work across various departments of the Club to support the SSM. Typically, Safeguarding Officers are the hands-on driving force within each department and have responsibilities to support the safeguarding of children and vulnerable adults within their nominated departments. More specifically they support the SSM, by embedding best practice within their relevant department(s), communicating any changes in legislation or best practice to the members of staff working with each department and playing an active role in the safer recruitment of staff for their relevant department, including operating as Disclosure and Barring Service Disclosure Managers.
The Academy, Stadium and Community Trust Designated Safeguarding Officers are also the Club’s Disclosure and Barring Service (DBS) Verifiers and, in conjunction with the Safeguarding Board, takes a lead role in the process of criminal record checking of staff and the hiring of ex-offenders. The SSM and the clubs Head of Equality & Diversity also actively seeks to work closely with Local Authorities, the English Football League and the FA to embed a vulnerable group safeguarding culture within the Club.

Meeting regularly, they also assist the SSM with record keeping, case/incident handling and policy/practice review where appropriate. This is supported by the purchase of the ‘Tootoot’ safeguarding issue recording and reporting system.

Additional Verifiers:

Additional Verifiers are appointed within each of the 3 departments of the Club (Club, Academy and Community Trust) to support the Safeguarding Officers with the processing of workforce DBS checks as part of the club’s effective ‘Safer Recruitment’.

Please note: Anybody with a concern about a child’s welfare should contact the relevant Designated Safeguarding Officer (DSO) for the relevant department for advice in the first instance via the contact details below (page 12).
Safeguarding Organisation Chart – Club Wide
### Safeguarding Board Contact Details

#### Senior Safeguarding Manager
Steve Curwood
E: [steve.curwood@fleetwoodtownfc.com](mailto:steve.curwood@fleetwoodtownfc.com)
T: 01253 208440
M: 07773027706

<table>
<thead>
<tr>
<th>DSO</th>
<th>DSO</th>
<th>DSO</th>
<th>DSO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Stadium</td>
<td>Academy</td>
<td>Community</td>
<td>Trust</td>
</tr>
<tr>
<td><strong>Steve Beane</strong></td>
<td><strong>Ben Lavelle</strong></td>
<td><strong>Matt Hilton</strong></td>
<td><strong>Geoff Kenyon</strong></td>
</tr>
<tr>
<td><strong>T:</strong> 01253 770742</td>
<td><strong>T:</strong> 01253 208440</td>
<td><strong>T:</strong> 01253 208440</td>
<td><strong>T:</strong> 01253 208440</td>
</tr>
<tr>
<td><strong>M:</strong> 07583 070581</td>
<td><strong>M:</strong> 07880 200724</td>
<td><strong>M:</strong> 07794941021</td>
<td><strong>M:</strong> 0738896084</td>
</tr>
</tbody>
</table>

#### Additional Disclosure Staffing

**Chris Morton**  
Community Trust Safeguarding Deputy  
07711258714 [chris.morton@fleetwoodtownfc.com](mailto:chris.morton@fleetwoodtownfc.com)

**Scott MacNeill**  
Academy Recruitment Manager  
01253 208440 / [scott.macneill@fleetwoodtownfc.com](mailto:scott.macneill@fleetwoodtownfc.com)

**Ryan Shorrock**  
Academy Head of Analysis  
01253 208440/ryan.shorrock@fleetwoodtownfc.com

**Jack Holroyd**  
Academy Head of Sports Science  
07800524642/Jack.Holroyd@fleetwoodtownfc.com
Who we aim to protect

Whilst the key principles of this policy centre on Safeguarding Children that engage with the Club it is important to recognise this policy will in reality also act to protect wider groups of people in the Club’s care. Included in this are:

Children and Young People:

- U18 players involved with the Club’s Academy and Development Programmes
- U18 Players involved in the U23 and Senior 1st team squads
- Children travelling away on tours/trips representing the club
- Children taking part in activities organised by the Community Trust
- Children attending First Team, U23 and Academy team matches as spectators
- Children visiting the Stadium and/or Academy and/or Training Ground for events/tours
- Match day ball boys/girls, mascots and flag bearers
- Children living away from home in order to represent the club as a player

The workforce:

- Permanent, temporary, fixed term, contract and/or voluntary staff
- Community Trust programme delivery staff (Administration staff, coaches, tutors and managers)
- Coaches and Managers (Academy, U23 and First Team)
- Medical staff
- Education, Administration and Analysis staff
- Players (Seniors)
- Scouts and external Football staff
- Crossbar staffing
- Hospitality and event staff
- Security Staff and Stewards
- Volunteers not contracted to the club but involved in say Community Trust work.
- Staff employed by external delivery agencies/contractors to deliver services on half of the club, academy and community trust.
The club will also, as far as deemed reasonable by the Club, support:

- Those vulnerable to cyber bullying through their association with the Club
- Children and young people travelling to away games to support the Club’s teams

How we aim to protect them

The Club recognises the importance of having in place a series of additional policies and best practices guidelines to support to implementation of the aims and key principles of this policy. It is also recognised that, for the implementation of Safeguarding to be most effective, these policies and practices must be supported by a Club-wide Safeguarding culture and ‘striving to improve’ attitude.

The following support policies have been/are implemented to support this policy:

- Safeguarding Vulnerable Adults policy;
- Safer Working Practice Policy;
- Engaging with Vulnerable Groups on Club Premises Policy;
- Equality and Diversity policy;
- Health and Safety policy;
- Prevent strategy
- Staff Anti-Bullying policy;
- Staff Harassment policy;
- Safer Recruitment policy;
- Whistleblowing policy;
- Secure Record Keeping and Data Storage;
- Data Protection policy;
- Use of Photography and Images policy;
- Social Media and Safer Internet policy;
- Spectator Safety policy;
- Dealing with false allegations policy
- Complaints policy and Club-wide Disciplinary procedure;
- Trips, Tours & Travelling Away with U18’s policy;
- Providing accommodation for children & young people staying away from home policy;
- Club wide Code of Ethics
- Prevent strategy
- Various departmental Codes of Conduct
- Sexting policy
Best Practice Procedures and Guidelines

As part of the embedding process, the Club will also support the above policies through incorporating numerous best practice procedures and guidelines in, but not limited to, the following areas;

Recruitment:

As part of the Club’s safer recruitment and selection process, all positions of employment are subject to assessment to ascertain whether the position involves working with children or young people. This will be carried out pre-employment by the Club’s Human Resources department. Where positions have been identified as working with children or young people, subsequent offers of employment are subject to a satisfactory Disclosure and Barring Service disclosure and appropriate references.

Disclosures and DBS Checking:

The Club is registered with the Disclosure and Barring Service (“DBS”) who provide a disclosure service for organisations. Disclosures enable employers to undertake more thorough recruitment and selection procedures for positions which involve working with children and young people.

DBS disclosures are processed for the Club by the online company GBG Online Disclosures. Through their service there are 3 levels of checks staff can be asked to undertake; a Basic Disclosure, Standard Disclosure and an Enhanced Disclosure. The level of check staff undertake will be dependent on their role and the level of contact they will have with children or young people for the purpose of their job role. The level of DBS disclosure is outlined for staff in the Club’s Safeguarding Workforce Development Plan.

The process for DBS disclosures is;

New Appointments:

Each different job role within the Club will, by nature, involve different levels of contact and engagement with children and young people. All staff who are offered a position which involves working within regulated activity with children for significant amounts of time or alone will be required to undertake an Enhanced Disclosure check. All employment offers are subject to the outcome of this screening process and where applicable, this is set out in their offer of employment. Until such time as their Disclosure certificate has been seen/sanctioned by the Head of HR and/or the Head of
Safeguarding, Welfare and Equality and/or the Safeguarding Officer and/or a DBS Verifier, the new member of staff will not be allowed to commence employment or, if deemed appropriate, will not be left unsupervised with children or young persons.

The Club is committed to the equal opportunities of its staff and therefore if a positive Disclosure is not received it will not result in an instant dismissal from employment.

Should a negative Disclosure be received, the Club’s ‘Safer Recruitment Policy’ will be applied.

It is important to note, in respect to this process, each case will be treated individually and any action required will be subject to the details of this investigative procedure only.

**New Appointments who already have a Disclosure certificate:**

If a new member of staff has been checked by their previous employer, regardless of the age of the disclosure they are still required to undertake another check whilst working at FTFC.

**Existing Staff:**

All staff who have responsibilities for leading activities, or who spend a significant part of their job in contact with children have been checked by the Club. In accordance with the best practice guidelines offered by DBS, all staff complete a Disclosure check every 3 years.

**Volunteers:**

Volunteers play an important role within the activities of the Club and their contribution is valued and significant. However, the Club recognises that there is still a requirement to criminal record check volunteers in the same capacity as if they were employed members of staff. **Volunteers will not be allowed direct supervision of children without a full time member of staff being present. DSOs at FTFC will be responsible for agreeing to volunteers being allowed to gain experience at FTFC.**

Volunteer Disclosures are offered as free of charge by the Online Disclosure service and as a result the club will endeavour to ensure every volunteer is DBS checked accordingly.

It should be outlined that, in order to accommodate the administration costs of this process, a volunteer disclosure will only be undertaken if a commitment is made by the
volunteer to undertake work on any given programme for a period lasting more than six weeks or more. **If volunteering for less than this six weeks the volunteer will not require a DBS disclosure.** As best practice a Risk Assessment for their involvement will be undertaken by the programme or activity leader and all involvement of the volunteer will be supervised at all times by an employed member of staff with the agreed level of DBS Disclosure.

For volunteers undertaking ‘work experience’, a DBS disclosure will not be undertaken due to the length of the placement being typically less than 6 weeks. In this situation the same Risk Assessment and supervision procedures outlined above should be applied. Should the ‘work experience’ last for the duration of more than six consecutive weeks, an assessment will be made to whether a DBS disclosure should be undertaken.

**Temporary Staff and External Consultants:**

In the event of temporary staff or external consultants being required a self-declaration form must be fully completed and signed and they will not have unsupervised access to children and young persons during their time with the Club. All temporary staff such as interns working in Sports Science, Recruitment or Analysis, Community Trust or Poolfoot operations, will require DBS checking by their DBS verifier in that department and through the Academy DSO.

**Staff Induction:**

During the induction process of new staff this policy and specific guidance is given out and talked through. Key to this process is staff understanding the expectations of them from a Club perspective and to familiarise themselves with the policies and procedures expected. At induction stage, staff will also be aligned to the Club Safeguarding Workforce Development Plan with training needs identified.

**Staff Training:**

All staff working in direct contact with children and/or young people shall be required to complete a degree of Safeguarding training. However the level and depth of such training is dependent on the level of contact with children their job role requires. The Club take a personalised approach to this and apply a needs specific approach to all staff members in the Club. This approach identifies the level of training each staff member requires and is presented in the Club’s Safeguarding Workforce Development Plan.
Typically the training courses staff will undertake will include, but are not limited to, the FA’s Safeguarding Children Workshop, and the English Football League’s Safeguarding workshops and training courses. Other more specialised courses may also be identified and included as part of the individualised approach of the Safeguarding Workforce Development Plan.

Details of those satisfactorily completing these courses are retained by the SSM or SDOs.

**Health and Safety:**

The Club’s Health and Safety Policy gives guidance about ensuring the safety of children and young people to those whose roles involve working with them on a regular basis. Where a child or young person is involved in an activity, a risk assessment must take account of their particular vulnerabilities whilst they are in the Club’s care. The risk assessment should set out what arrangements are in place for their care and supervision, examples of such risk assessments are kept with the designated H&S officers Head of Safeguarding, Welfare and Equality, Health and Safety Officer and/or relevant Heads of Department.

**Confidentiality and Data Protection:**

The Club takes the protection of data seriously. Often, if a Safeguarding incident has taken place, ‘Sensitive Data’ is generated which must be treated accordingly. As part of the Club’s Data Protection policy, staff understand the importance of confidentiality and how to record, process and store sensitive data and the further processes surrounding effective data handling. The Club’s Confidentiality and Data Protection Policy is in line with current legislation and available as one of the support policies aforementioned. Sensitive safeguarding information will largely be held on the ‘Tootoot’ recording system.

**Parental Consent:**

For all relevant activities the Club will make every effort to obtain parental consent for children and young people’s participation using the FTFC template for parental consent form. However, whilst every effort will be made to obtain such consent, it should be noted that in some circumstances, due to the nature of the work carried out or the time scales involved, obtaining parental consent for activities may not always possible, despite a willingness to do so. In such circumstances the Club will act in accordance with best practice, statutory, legislative legal guidance.
If a child or young person is deemed at Risk of Harm, the Club reserves the right to act in the best interests of the child or young person without prior parental consent although if attaining consent is possible and deemed external to the risk posed, it is considered best practice.

**Activities for Disabled Persons:**

All activities carried out for disabled persons are carried out under the guidelines of the Equality Act (2010).

**Working with partner organisations:**

**Working in Educational Institutions:**

The Club are committed to using the power of football to encourage children and young people to enjoy the benefits of sport and healthy living and will frequently run coaching sessions within local schools, colleges and education centres.

It is the responsibility of the school, college or education centre to obtain parental consent for activities and carry out the relevant ‘site based’ risk assessments before an activity takes place and each school, college or education centre is expected to carry its own Public Liability Insurance. The Club will produce an ‘Activity’ based risk assessment for each activity undertaken at the site and will produce a further pre-session spot check of activity immediately prior to the event taking place. The Club will also carry its own, separate, Public Liability Insurance.

The Club expects schools, colleges and education centres to have their own Safeguarding personnel, policies and best practice in place in line with Government Legislation and OFSTED guidelines. As best practice, the school may also be requested to share their policies and practices with the Club as means of evidencing/sharing their best practice procedures and further ensuring the safety of the participants involved. The above information is set out in a written Service Level Agreement with the school which is sent to the school prior to the event taking place.

If, for any reason, a School cannot meet the above requirements, it is also written into all relevant agreements that the school will, for the purpose and duration of their engagement with the Club only, adopt the policies and practices of Fleetwood Town Club, Academy and Community Trust.
Working in the Community:

The scope and nature of the Club’s work will also engage with children from the local communities and quite often, organised events of such kind will be based externally to the club and will require access to local facilities and assistance from staff.

Where events take place at external community venues it is the responsibility of the venue management to carry out the relevant ‘site based’ risk assessments. The Club accepts responsibility for undertaking ‘activity based’ risk assessments and pre – session checks. In terms of Safeguarding, where external venues have Safeguarding policies and procedures in place, it is requested that these venues share such information and best practice.

If venues do not have any, or as robust Safeguarding systems in place, the Club will request the adoption of their own Safeguarding policies and procedures for the duration of the event or work being undertaken.

Working with funders, sponsors and other external partners:

The Club will always act as the lead Safeguarding ‘driver’ in any situations which require working with partner organisation in a lead capacity. However, the Club is always open to sharing and adopting other partners ‘Best Practice’ if it is demonstrably more appropriate or simply better than the provision in place.

More specifically, when working with funders, sponsor and other external partner organisations the Club is committed to establishing an agreed set of Safeguarding standards for all co-operative work. Unless it is demonstrably evident that a funder’s, sponsor’s or partner organisation’s Safeguarding practices are better than those of the Club, this process will involve using the Club’s working practices as the minimum standards to be adopted by all.

Guidelines in the Event of Concern

Although we are committed to doing the utmost to safeguard children and young people 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 or young people as well as cases where the standard of care does not adequately support the child or young person’s health or development. Children or young people may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Harm may occur anywhere in a Club activity or can be reported
to a Safeguarding Officer or representative of the Safeguarding Team when it has occurred outside a Club activity. For example, abuse can occur in a family or an institutional or community setting and the perpetrator may or may not be known to the child or young person.

There are complex scenarios associated with the potential for harm. These include:

- Children or young people playing within or spectating a variety of activities at the Club. Children or young people may be at risk of harm or abuse from other children or young people who may be involved in the Club activity or elsewhere in the child or young person’s network. Harm may be deliberate or result from not understanding the child or young person’s needs or feelings.

- Children or young people may be at risk of harming others in Club activities either by deliberate behaviours or by failing to understand their responsibilities to others. On these occasions the child or young person may need help and support to manage his or her behaviour in a suitable way or may need to have certain responsibilities removed from them. Safeguards and/or Risk Assessments may need to be put in place to protect others.

- Coaches/Parents/Guardians may also risk harming children or young people through failing to highlight information about or provide support for children or young people who have additional or different support needs to those of their peers when participating in Club.

**Our Responsibilities in 5 Steps**

All members of staff employed by the Club must acknowledge the Club has a Safeguarding responsibility towards protecting all children it engages with. This responsibility can be summarised by the following 5 step process.

- **RECOGNISE**
- **RESPOND**
- **REPORT**
- **RECORD**
- **REFER**
Recognise – Types, Signs and Symptoms of Abuse

Types of Abuse:

Abusive behaviour can be assessed on a scale from poor practice, to bad practice to abuse. Abuse cannot be easily measured as an action alone. Its severity will partly be defined by the:

- Vulnerability of the victim and the power differential
- Nature and extent of the abuse
- Length of time it has been occurring
- Impact on the individual or group
- Risk of it being repeated or becoming increasingly serious

At one end of the scale, there may be obvious signs and symptoms of abuse, but at the opposite end, the indicators may be very difficult to detect. Combinations of factors which individually might not give cause for concern could be much more worrying when considered together. The abuse may be committed by one individual against another or be institutional in that the whole organisation colludes in abusive practices either through ignorance or choice.

‘Every Child Matters – Change for Children’ (2003) identifies five main forms of abuse as follows; should you have any concern that abuse is occurring you should contact a Safeguarding Officer immediately.

Physical Abuse:

Physical abuse may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or young person. 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.

Emotional Abuse:

Emotional abuse is the persistent emotional maltreatment of a child or young person such as to cause severe and persistent adverse effects on the child or young person’s emotional development. It may involve conveying to children or young people that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.
It may feature age or developmentally inappropriate expectations being imposed on children or young people. These include interactions that are beyond the child or young person’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or young person participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may also involve serious bullying, causing children or young people to frequently feel frightened or in danger, or the exploitation and corruption of children or young people. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

**Sexual Abuse:**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, including prostitution, whether or not the child or young person is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving children or young people in looking at, or in the production of, sexual online images, watching sexual activities, or encouraging children or young people to behave in sexually inappropriate ways.

**Neglect:**

Neglect is the persistent failure to meet a child or young person’s basic physical and/or psychological needs, likely to result in the serious impairment of the child or young person’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born it may involve a parent 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)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to a child or young person’s basic emotional needs.
Due to the nature of the work the Club undertakes, this policy recognises that when engaging in such activities those leading the activities will adopt a position of caring for children and/or young people for the duration of the activities. In such circumstances, neglect may take a sport specific form and may include staff, amongst other things, failing to:

- Provide adequate time for refreshments
- Failing to ensure participants are wearing appropriate clothing and protective equipment, are free from jewellery and are provided with appropriate, safe equipment.
- Undertaking sessions in inappropriate weather conditions
- Failing to ensure participant adhere to participation guidelines in terms of age and sex, player coach ratios and ability.

Other types of abuse we recognise

Whilst not defined in ‘Every Child Matters – Change for Children’ (2003), the Club also consider the following as types of abuse that, must be acted upon if suspected as taking place;

**Bullying:**

Bullying is not always easy to identify as no legal definition of bullying exists. However, for the purpose of this policy, it can be characterised as behaviour that is repeated with the intention of hurting someone either physically and emotionally often, but not exclusively, because of their race, religion, gender, or sexual orientation. Bullying can take many forms and includes physical assault, teasing, making threats, name calling cyberbullying (bullying via mobile phones or online using social media, networks and instant messengers). Institutional bullying can also take place which involves that above behaviours being demonstrated by several members of one particular institution to target specific individuals or groups of individuals. Further guidance on Bullying can be found in the Club Anti-Bullying Policy.

**Financial:**

The nature of the industry the Club operates in and the associated wealth some young people may be able to earn/accumulate, particularly in relation to their friends and peers, the potential for these players to be financially abused must be considered.
A definition of financial abuse in Child Safeguarding legislative and statutory guidance is difficult to find, however ‘No Secrets’ (2000) defines financial abuse as;

‘Financial or material abuse includes theft, fraud, exploitation, pressure in connection with wills, property or inheritance or financial transaction, or the misuse or misappropriation of property, possessions or benefits.’

Wider Considerations:

Considering the role and status of the Club within the local community, it is considered that the Club must also maintain a position whereby they stay informed in terms of up-to-date guidance and practical support on specific safeguarding issues. Examples of such issues are listed below and in support of this, staff are encouraged to access the associated websites in order to gain an understanding of the issues themselves and how they may affect their own job roles and responsibilities.

- Child missing from education
- Child missing from home or care
- Child sexual exploitation (CSE)
- Bullying including cyberbullying
- Domestic violence
- Drugs
  [https://www.gov.uk/government/publications/drugs-advice-for-schools](https://www.gov.uk/government/publications/drugs-advice-for-schools)
- Fabricated or induced illness
https://www.gov.uk/government/publications/safeguarding-children-inwhom-illness-is-fabricated-or-induced

• Faith abuse

• Female genital mutilation (FGM)

• Forced marriage
  https://www.gov.uk/guidance/forced-marriage

• Gangs and youth violence

• Gender-based violence/violence against women and girls (VAWG)
  https://www.gov.uk/government/policies/violence-against-women-and-girls

• Mental health
  https://www.gov.uk/government/publications/the-mental-health-strategy-for-england

• Private fostering

• Preventing radicalisation
  https://www.gov.uk/government/publications/channel-guidance

• Sexting
Signs and Symptoms of Abuse

In many cases, the signs and symptoms of abuse can be very difficult to spot. Abusers, by nature, often act to conceal their actions which makes abuse difficult to identify and victims of abuse are often too ashamed, embarrassed, frightened or intimidated to disclose abuse is taking place. They are also sometimes unaware of abuse taking place.

However, that said, there are still signs and symptoms that, if witnessed or acknowledged, are a cause for concern.

Typically, there are two categories of signs and symptoms of abuse that staff should be aware of; behaviour of adults that causes concern and signs and symptoms of abuse amongst victims. The recognition of the signs and symptoms associated with either category could act to Safeguard a child and prevent abuse taking place and staff are expected to be aware of such behaviours, signs and symptoms and act accordingly if they have suspicions about a child or adult they work with.

The most identifiable signs and symptoms of abuse in children are:

- Unexplained bruising and injuries to uncommon injury sites (such as fleshy, meaty parts of the body such as biceps) or in a particular shape or pattern (such as a grasp mark)
- Sudden changes in behaviour such as being withdrawn
- Loss of weight for no apparent reason
- A change observed over a long period of time
- Use of sexually explicit or inappropriate language
- Something a child has said
- Overly rough play or interactions with other children
Of course, there are other signs and symptoms of abuse and the list above is not exhaustive. If staff have any concerns about a child, they must respond to and report their concerns or suspicions.

In terms of behaviours that cause concern, staff must be aware it can be very difficult to identify behaviours that are outright abusive and as a result staff should exercise caution when deciding whether to report a person’s behaviour as suspicious. However this policy supports staff fully who, after careful consideration, are concerned about the behaviour of another individual and encourages them to report their concerns with conviction in line with the responding and reporting procedures outlined below.

Behaviours that may cause concern include:

- Excessive contact with or over friendliness or familiarity towards a child or children
- Persistent and unnecessary creation of opportunities to spend time alone with a child or children
- Inappropriate physical contact with a child or children
- Cagey, suspicious behaviour and an unwillingness to share information about themselves that is consistent with everyday interactions
- Something a person says regarding the person who’s behaviour is questionable
- Persistent disregard or manipulation of rules, particularly Safeguarding rules and regulations, to account or justify behaviours

As with the signs and symptoms of abuse outlined above, there are other behaviours that would cause concern the list above is not exhaustive. If staff have any concerns about a person’s behaviour, they must respond to and report their concerns or suspicions in line with the reporting procedures outlined below.

Additional Vulnerabilities:

Whilst it is noted that all children you engage with the Club are vulnerable to abuse, as previously described in this policy, it is important to note that for some children there are additional factors that will make children even more vulnerable to abuse. Such additional factors are consider ‘additional vulnerabilities’.

Particular additional vulnerabilities that those working with children should look out for include:

- Disabilities
- Race and racism
• Young carers
• Children who take on leadership roles

It is important for all adults working with children to recognise and in turn be mindful of the implications when children have additional vulnerabilities.

**Children with Disabilities:**

Children with disabilities may be additionally vulnerable to abuse for several reasons and may be dependent on the nature of their disability. Reasons for children being additionally vulnerable include:

• Not being able to communicate effectively what has happened to them
• Being disbelieved because of their disability
• Not having friends or a peer group to talk to
• Not being able to read and/or use the internet to get help and support
• Not being able to relate to identify with stories, dramas, films or TV programmes written to help children explore what is right and wrong
• Having injuries or behaviours explained away by illness or disability
• Being frightened to tell someone about an experience or incident particularly if they rely on the abuser for support or help

Any adult who engages with a child with physical or mental disabilities must ensure they understand the implications of such disabilities are particularly alert in regards to spotting the signs and symptoms of abuse.

**Race and Racism:**

Where children are from black and minority ethnic backgrounds, it is likely that they are more vulnerable to experiencing harassment, racial discrimination and institutional racism. Failure to acknowledge and consider the effects of such harassment or racism acts only to undermine efforts to protect children from harm.

In particular, children from minority ethnic groups (and their families) may be additionally vulnerable because they may be:

• Experiencing racism and racist attitudes
• Experiencing racism through being ignored by people in authority
• Afraid of further abuse if they challenge others
• Subjected to myths or stereotypes: e.g. all people their culture hit their children
• Wanting to fit in and not make a fuss
Using or learning English as a second or third language

It should be stressed that the Club has a clear Equality policy by which all members of staff, partners and participants are expected to abide. Whilst it is hoping that the adoption of such a policy will support the prevention of racism, it is important for adults to still recognise race as an additional vulnerability within children.

Young Carers:

For some children, their personal home lives and circumstances may act to make them additionally vulnerable to abuse of harm. This is particularly the case for children who adopt the role of young carers for older family members or for children who are living in care.

For young carers, the increased pressure and stress placed upon them can itself negatively impact upon their health and wellbeing and recognising a young carer struggling to cope with their circumstances is an important consideration for adults engaging with that child.

However it should also be noted that a young carer may:

- Put the welfare of the adult for whom they care ahead of their own welfare
- Be afraid to speak out about abuse because of fear of the consequences and the impact they may have on the adult for whom they care
- Have no one to talk to about abuse by virtue of the demand placed upon them

Staff and partners associated with the Club or Community Trust who work with young carers should seek the advice of their department Safeguarding Officer in order to ensure they appropriately support the young carers needs.

Children who take on leadership roles:

There are many examples whereby children may adopt a leadership role whilst engaging with the Club or Community Trust. For example, amongst other things, a person under the age of 18 may act as a coach, referee, parent, team captain and first aider and as result it is important this is consider by adult members of staff or partners with whom they may work or engage.

It can be easy for adults associated with children in leadership roles to lose sight of the fact that they are still children legally and as a consequence treat them differently or deem it acceptable to subject them to abusive behaviour verbally, emotionally and
physically. This is not acceptable, should be deemed abuse in all circumstances and will not be tolerated.

Respond - Responding to a Report or Suspicion

Where a member of staff suspects or witnesses abuse taking place, or a report/allegation of abuse has been disclosed to them, where possible a Safeguarding Officer should be contacted as early as possible. However it is recognised that an individual may need to respond to a situation immediately and prior to such contact if the nature of the suspicion or report is putting the child or young person concerned in immediate danger.

With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse:

Staff should:

- *Stay calm and try not to any signs show of shock*
- *Be aware of the possibility that medical or criminal evidence might be required*
- *Treat any allegations extremely seriously and act at all times towards the child or young person as if they believe what they are saying*
- *Listen carefully rather than question the child or young person directly, be sympathetic and offer reassurance*
- *Tell the child or young person:*
  - They are right to disclose the information
  - They are treating the information seriously
  - It was not their fault
  - What they are doing, when & keep them up to date with what is happening
  - They must inform the Safeguarding Officer and/or the Head of Safeguarding, Welfare and Equality of the information or another Safeguarding team member if these are not available. They may also need to tell the Child they must inform the police depending on circumstances.
- *Take further action – they may be the only person in a position to prevent future abuse*
• Write down everything said (in their words as far as possible) and what was done – accuracy and detail is important
• Seek medical attention if necessary
• Report to their Manager in addition to the Designated Safeguarding Officer/Manager, for their area of employment, as soon as possible
• Where appropriate, record on a body map (sample attached as Appendix C) the location of any bruises, cuts or abrasions

Staff should not:

• Make any promises to the child or young person as they may not able to be upheld due to the nature of the circumstances.
• Interrogate the child or young person – it is not their job to carry out an investigation – this will be up to the police and/or social services, who have experience in this
• Cast doubt on what the child or young person has told them – they shouldn’t interrupt or change the subject
• Say anything that makes the child or young person feel responsible for the abuse

DOING NOTHING IS NOT AN OPTION – STAFF HAVE A RESPONSIBILITY TO ACT

Ensuring the individual is in or is moved to a place of safety

It is essential that, whatever the nature of the abuse, the child concerned is separated from the person who is or is thought to be producing the threat. It is important that disruption to the life of the victim is kept to a minimum, therefore, if it is possible for the alleged perpetrator to leave the scene, this should be the preferred option. However if it is not achievable, an alternative place of safety should be sought as the immediate safety of the victim is the highest priority

How to get help urgently

Emergency services should be summoned whenever a situation is felt to be beyond the control of members of staff. In addition staff should have, readily available, the contact numbers of all Departmental Safeguarding Officers, the Head of Safeguarding, Welfare and Equality, wider members of the Safeguarding Team or other services which can assist in an emergency or urgent situation.
Role of staff supporting the alleged victim

Members of staff involved in supporting the alleged victim have a key role to play in making sure the correct procedures are followed and that the victim is properly advised and supported. If a number of staff are involved, it may be convenient for one person to take the lead. This is entirely a matter for the staff and Safeguarding Officer or Head of Safeguarding, Welfare and Equality to decide in the light of the individual circumstances. **Staff should record the incident on ‘tootoot’ as soon as possible after it was reported to them.**

The role of the staff supporting the alleged victim includes the following:

- Ensuring the continued safety of and support to the abused child
- Liaising with immediate colleagues who have been involved in order to gather all the available information together
- Ensuring that evidence has been preserved
- Collating and completing all written material relating to the incident
- Reporting the matter to the Safeguarding Officer at the earliest opportunity

**IT IS NOT PART OF THE ROLE OF THE STAFF SUPPORTING THE VICTIM TO COMMENCE AN INVESTIGATION INTO THE INCIDENT – this should be done by the DSO for that Department of the club.**

Criminal evidence

Preserving evidence

When obvious cases of abuse have taken place, the first concern for staff is the safety and welfare of the abused child or young person. However, efforts to preserve evidence may be vital as potentially a criminal offence may have taken place. In all cases, but especially when police involvement is required, preservation of evidence is crucial if a police investigation is to be effective. What staff do or do not do in the time whilst they are waiting for the police to arrive may make all the difference.

The following checklist aims to help staff ensure that vital evidence is not destroyed:

In situations of physical and/or sexual assault:

- *In the case of a person who has been physically abused who wishes to show staff an injury, staff should only observe what they consent to show them and what*
is appropriate. Where possible, this should also be done in the presence of another member of staff.

- **Staff should not touch what they do not have to.** Wherever possible leave things as they are. Staff should not clean up, wash anything or in any way remove fibres, blood etc. If they do have to handle anything at the scene they should keep it to a minimum.

- **Staff should not touch any weapons unless they are handed directly to them.** If this happens, they should keep handling to a minimum. They should place the items/weapons in a clean dry place until the police collect them.

- **Staff should preserve anything that was used to comfort the abused person, for example a blanket.**

- **Staff should secure the room and deny entry to anyone unless strictly necessary to support them or the abused person and/or the alleged perpetrator, until the police arrive.**

- **The Police may organise a medical examination urgently.**

Prior to the arrival of the police and medical examination:

- **Staff should record the incident on ‘tootoot’ as soon as possible after being informed of the incident.**

- **Staff should ensure that no one has physical contact with both the abused person and the alleged perpetrator as cross-contamination can destroy evidence.** It is acknowledged that if staff are working alone in the situation, they may have to comfort both the abused person and the alleged perpetrator e.g. where the alleged perpetrator is also a Club service-user. They need to be aware that cross-contamination can easily occur.

- **Staff should preserve any bloodied items.**

- **Staff should encourage the victim not to shower.**

- **Staff should encourage the victim not to change clothing.**

- **Even when the victim says they do not want police involvement, staff should preserve items anyway as they may change their mind later.**

- **Staff should encourage the person not to eat or drink if there is a possibility that evidence may be obtained from the mouth.**

**Methods of Preservation**

- For most things staff should use clean brown paper, if available, or a clean brown paper bag or a clean envelope. If staff use an envelope, they should not lick it to seal. They should avoid using plastic bags as they can produce moisture.

- For liquids staff should use clean glassware.
- Staff should not handle items unless necessary to move and make safe. If there are latex gloves available staff should use them.

It is acknowledged that completion of all of the above tasks may not be possible in a traumatic situation. Staff are urged to do the best that they can.

Allegations against Staff Members and Volunteers:

Due to the nature of a lot of the work undertaken by many of the Club’s staff (and the fact it often involves close proximity to children) there is a raised potential for allegations of poor practice or abuse to be made against staff members and volunteers.

Should an allegation be made against a staff member a full investigation will be conducted in accordance with the Club’s Misconduct/Disciplinary Procedure. As part of this procedure, staff may face suspension and disciplinary action which could result in dismissal should their behaviour be found to be unacceptable.

Report - Reporting Poor Practice or Abuse

Where a Safeguarding incident has been brought to the attention of a member of staff, either by virtue of a third party or through their handling of an issue themselves, it is very important they make sure they tell a Designated Safeguarding Officer (DSO for that department) or the Head of Safeguarding, Welfare and Equality as soon as possible.

Staff should record the incident on ‘tootoot’ as soon as possible after it was reported to them.

In such circumstances, the Designated Safeguarding Officer or Head of Safeguarding, Welfare and Equality will know how to follow this up and where to go for further advice. Appendix A, shows a flow chart for the process of reporting concerns however staff should also be issued with department specific copies which should be referred to if and when necessary.

It is important to acknowledge that there are strict guidelines in place for staff to follow when reporting concerns which may be interpreted as barriers to reporting by some members of staff. Staff should feel confident that the Club has considered such barriers and guidelines in their relevant supporting policies and procedures.
Typically the following may be of concern to staff:

**Confidentiality:**

There is always tension and caution around issues of confidentiality. The advice for all staff is that no guarantee of confidentiality can be given to a child or young person (although this does not necessarily mean that the parents of the young person have to be told) or their parent and/or carers, other individuals involved or indeed to other members of staff.

A child or young person 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.**

It should be noted that in some circumstances there are actions which staff are obliged to take once they are aware of a problem. Typically this includes where a disclosure of abuse has been made to them or a physical act of abuse has been witnessed. Undertakings of confidentiality in these circumstance should not be given to either the person making the allegations or to the person being interviewed (where an investigation is taking place).

Staff should always remember that a matter is confidential on a need to know basis meaning staff must exercise their professional judgement about who they share information with. However, nobody should have any reservations about referring a safeguarding children issue to a Safeguarding Officer or the Head of Safeguarding, Welfare and Equality. The key issue is that the welfare of the child or young person is protected.

**Whistle Blowing:**

Members of the workforce should not feel any discomfort towards reporting concerns or incidents surrounding the conduct or practice or fellow club/workforce members particularly if the details of the poor practice contravenes law, club policy or protocol and especially if it endangers fellow employees or participants.

In line with the Club whistleblowing policy, failure to act upon information or suspicions could lead to disciplinary or criminal action.

It is advisable all staff members read the Club’s Whistleblowing Policy in full to familiarise themselves with its content and to give them confidence that their actions in respect to whistleblowing will be supported full by the Club.
Data Protection and Data Sharing Protocols:

Data sharing is vital if Safeguarding policies and procedures are to be effective. The Data Protection Act (1998) is a Parliamentary act that was passed to protect people’s personal information but is often misinterpreted as a barrier to sharing any information at all. Staff should remember that sharing information is essential in enabling early intervention and preventative work within Safeguarding and therefore it is important that staff can share information appropriately as part of their day-to-day practice.

It is important to remember there can be significant consequences to not sharing information just as there can be to sharing information. You must use your professional judgement to decide whether to share information or not and what level of information is appropriate.

Staff should remember that the Data Protection Act (1998) is not a barrier to sharing information but instead provides a framework to ensure that personal information is not misused. Data protection law reinforces common sense rule of information handling and it is there to ensure personal information is managed in a sensible way. It actually helps us strike a balance between the many benefits of organisations sharing information and maintaining and strengthening safeguards and privacy of individuals. It also helps us preserve trust in relationships and between organisations.

To help, there are seven golden rules for information sharing:

1. Remember that the Data Protection Act is not a barrier to sharing information
2. Be open and honest with the person (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
3. Seek advice if you are in any doubt, without disclosing the identity of the person where possible
4. Share with 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 professional judgement, that lack of consent can be overridden in the public interest. You will need to base your judgement of the facts of the case.
5. Consider safety and wellbeing at all times and base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
6. Ensure the information shared is **Necessary, Proportionate, Relevant, Accurate, Timely** and **Secure**. This means, ensure the information you share is necessary
for the purpose for which you are sharing, is shared only with those people who need to have it, is accurate and up to date, is shared in a timely fashion and is shared securely.

7. Keep a record of your decision and the reasons for it – whether it is to share information or now. If you decide to share, then record what you have shared, with who and for what purpose.

For further information regarding data sharing, please refer to the Club’s Data Protection Policy.

Record - Recording Allegations or Suspicions

On reporting an allegation or suspicion, the Designated Safeguarding Officer or Head of Safeguarding, Welfare and Equality will ask for a written factual statement from the person making the report. It is important staff have kept accurate and detailed records about all aspects of the allegation or suspicion. The templates provided in Appendix B and C should be used to assist with this process.

In summary, the information staff will need to record includes:

Staff should record the incident on ‘tootoot’ as soon as possible after it was reported to them.

- Name, date of birth, address of the alleged victim
- Name, date of birth, address of the alleged perpetrator (if available)
- Who you are and how you are involved
- What happened, where and when (including any lead-up)
- Any action taken
- The current position including any concerns about safety of the alleged victim and any other person
- Who else is involved?
- How aware of the referral is/are the victim, perpetrator, carers or relatives
- Any known view of the alleged victim regarding how they wish the matter to be dealt with
- Any other background information that is likely to be helpful.

If the report involves an allegation about another member of staff, that person will also be asked to write a brief report. Any statement made by the child or young person should be reported in their own words. These reports should be confined to facts and should not include any opinion, interpretation or judgement.
The Club will ensure that any child or young person concerned is immediately removed from any possible risk of harm.

**Investigations into possible abuse will require careful management.** The Head of Safeguarding, Welfare and Equality will seek the advice of The Football Association Safeguarding Children & Adults Team, Local Safeguarding Children Board, LADO or the Police before setting up an internal inquiry and take their advice on informing the child or young person’s parents. In any case of suspected abuse, as soon as the local Social Services Department has been informed, a report must be provided to the PL/FA Head of Safeguarding.

**Refer – Local Authority, FA & English Football League Referrals.**

In many cases, on handling a report/allegation of abuse, the Head of Safeguarding, Welfare and Equality and other members of the Safeguarding Board, will refer the incident to the Local Authority Safeguarding Children Board, the Football Association and The English Football League.

It should be noted, for reporting/referral purposes, the location of activities or individuals may impact on which Local Authority Safeguarding Children’s Board the Club works with. For example, due to the Club’s Training Ground being located in a different district to that of the Club’s home, Highbury, any Safeguarding incidences occurring on this site may need to be referred to a different Local Authority Safeguarding Board. **That means contacting the relevant LADO for Blackpool or Lancashire County Council, depending on the location of the incident.**

For all other purposes, the Football Club, Academy & Community Trust will, assume advice/guidance from the Lancashire Safeguarding Children Board as this is the Local Authority Safeguarding Board for the Club’s home and base, at Highbury.

The importance of referring incidents to the Local Authority should not be understated. Through the actions of the Club, a referral of an incident or allegation may significantly support the work the Local Authority is doing towards stopping incidents of abuse occurring or bringing individual perpetrators of abuse to justice. It is often the case that the information referred to the Local Authority by the Club is one of several pieces of a much larger jigsaw puzzle of information the Local Authority is gathering surrounding those involved in an incident or allegation and as a result the Club’s support is invaluable.

Similarly, it is also important to recognise that similar positive actions can result from referring incidents to the FA and Football League respectively.
Football League Rules state that the Club, on making any referral of an allegation or incident of **suspected abuse or unsuitable behaviour towards a child** is required to additionally report the information to both the FA and The English Football League. Specifically rule S.21 of The English Football League Rules states:

“The Club shall notify the League and the Football Association in Form 23 of, and give the League and the Football Association such further information as they may require in respect of:

S.21.1 any referral it has made to any external agency (as described in Rule S. 20); and

S.21.2 any investigation by such an external agency into suspected abuse of or unsuitable behaviour to a Child or Adult at Risk involved in an Activity by or in the name of the Club of which the Club becomes aware, whether such investigation results from a referral made pursuant to Rule S.21.1 or otherwise”

In accordance with this, this policy recognised the Club’s commitment to report all incidents, allegations or concerns that fit such a description for The English Football League and FA within 24 hours of a Safeguarding Officer or the Head of Safeguarding, Welfare and Equality being notified of the incident, allegation or concern.

Working together with the Football Association and The English Football League strengthens Safeguarding in Football by supporting the notion that the game only wants the Right People, demonstrating the Right Behaviours and implementing the Right Actions involved. Through this combined approach, supported by the effective information sharing protocol outlined in Rule S.21, it is hoped that those involved in football for the wrong reasons can be identified and removed from their positions within game which will, in turn, act to reduce the risk of abuse posed to children and young people participating.

Further information regarding the Football Association and The English Football League’s approach to Safeguarding can be found in the each organisations Safeguarding Policies respectively and via the following website:

http://www.thefa.com/football-rules-governance/safeguarding

An electronic copy of the Football Association’s Safeguarding Policy can be found at:
Where allegations or referrals involved staff members, this policy acknowledges the Club may also have a commitment to inform the Disclosure and Barring Service of information surrounding the staff member involved, depending on circumstances. It may also be the case that the external organisations discussed above will take on this task and this will be agreed with the Club on a case by case basis.

**External Contact Details**

In Fleetwood and Lancashire, organisations work together to make sure that children and young people are safe from abuse and neglect.

Making sure that our children and young people are safe is everyone’s responsibility. All children and young people have a right to be safe from harm and as a community we have a duty to care for our children and young people. All professionals and members of the public have a very important part to play. This includes situations where the Club works with external organisations in partnership to provide a service or event for children.

**Lancashire County Safeguarding Children Board**

In addition, The Local Authority in Lancashire works to ensure that all organisations work closely together, using the same policies and procedures, to protect and prevent the abuse of children.

Most often, the work of the Local Authority centres around guidance on ‘Best Practice’, provision of training and assistance in the handling of Safeguarding incidents and allegations. For the Club it also includes reviewing this Policy yearly as part of the Club’s annual/seasonal review process with the intention of ensuring the policy adopts and endorses the ‘Best Practice’ guidance Safeguarding Children Team promotes.

From a practical perspective, if you think a child or young person is being abused you can access guidance from the Lancashire
http://www.lancashire safeguarding.org.uk/online-safeguarding.aspx

You can also contact Children's Social Care where your concerns will be treated seriously. If you tell Children's Social Care that you are concerned about a child or
young person, social workers need to find out more. The law says that social workers must ask questions to find out if a child or young person is at risk of harm.

If the matter needs to be referred, in the absence of the Safeguarding Officer or Manager you can also download and complete a Referral and Initial Information Record Form.

There are also procedures on the Local authority Safeguarding website which set out the process, in accordance with Appendix 5 of statutory guidance ‘Working Together (2006)’ and ‘Safeguarding Children in Education: Dealing with Allegations of Abuse against Teachers and Other Staff (2005)’ for how allegations of abuse made against a person who works with children will be handled by the Local Authority’s. Information sharing and recording processes are underpinned by the Data Protection Act 1998.

The aim of these procedures is to ensure that allegations are dealt with speedily, consistently and in a fair manner. Lancashire Safeguarding Children Board statutory members must review internal procedures to ensure that they are compliant with the requirements of this document. All other organisations, including voluntary and independent sector organisations, are strongly encouraged to ensure internal procedures are compliant with this document.

The term ‘employer’ is used throughout these procedures to refer to organisations that have a working relationship with the individual against whom the allegation is made.

The term includes organisations that use the services of volunteers, people who are self-employed, service providers, voluntary organisations, employment agencies, contractors and fostering services. In the case of child-minders, and others that may not have a direct employment relationship with the individual, regulatory bodies such as Ofsted will need to consider whether to continue to use the person’s services, or to provide the person for work with children in future, or to deregister the individual.

In some circumstances, the term 'employer' for these purposes will encompass more than one organisation. For example, where staff providing services for children or young people in an organisation are employed by a contractor, or where temporary staff are provided by an agency. In those circumstances both the contractor or agency, and the organisation in which the accused individual works will need to be involved in dealing with the allegation.

The procedures must be applied when there is an allegation made which suggests a person who works with children has:
• Behaved in a way that has harmed a child or young person, or may have harmed a child or young person
• Possibly committed a criminal offence against or involving a child or young person
• Behaved towards a child or young person in a way that indicates s/he is unsuitable to work with children or young people in connection with his/her employment or voluntary activity

These procedures can also be applied if a complaint or an allegation is made against a person in relation to:

• Concerns which arise about the person’s behaviour with regard to his/her own children
• His/her work with adult service users, which cause concern about the welfare of an adult service user’s children

There may be up to 3 strands in considering a concern or an allegation:

• A police investigation of a criminal offence
• Enquiries and assessment by Children’s Social Care about whether a child or young person is in need of protection or support of services
• Consideration by an employer of disciplinary action in respect of the individual (or other appropriate action if the individual is not an employee)

If an allegation relating to a child or young person is made about a person who undertakes paid or unpaid care of Adults at Risk, consideration must be given to the possible need to alert those who manage them in that role. Specifically there are two streams to reporting abuse to the Lancashire Safeguarding Children Board.

If staff have concerns/allegations about an adult who may have contact with children or young people, and there are no members of the Club’s Safeguarding team available to contact, staff can contact:

**Ben Lavelle (Academy)**  
Tel: 07748577793  
**Matt Hilton (Community Trust)**  
Tel: 07794941021

Staff should record the incident on ‘tootoot’ as soon as possible after it was reported to them.
Any contact outside of office hours must be directed to the:

**Out of Hours Social Care Service** Any contact outside of office hours must be directed to the:

If there are immediate safeguarding concerns to the child contact Children's Customer Care on **0300 123 6720** (8am - 8pm) or out of hours **0300 123 6722** (8pm - 8am).

If staff have concerns about the welfare of a child and there are no members of the Club’s Safeguarding team available to contact, staff can contact:

**Local authority designated officer re safeguarding – LADO** = Mr Tim Booth – Poolfoot & Highbury incidents

*Safeguarding Unit, Room B16, County Hall, Fishergate Hill, Preston, PR1 8RJ*

Tel : 01772 536694  E: tim.booth@lancashire.gov.uk

**Local authority designated officer re safeguarding – LADO** = Mr Peter Charlesworth – The Lodge incidents

*Blackpool Local authority*

Tel: 01253 477541 (do not make public)

For further information as to how a referral is handled once it has been passed to the Local Authority Safeguarding Board, please refer to Appendix D of this Policy.

**The Football Association and Lancashire FA:**

As the governing body of football in this country, The FA wants to do everything it can to create a sustainable safe and enjoyable framework around the game we all love.

Anyone who has a concern about the welfare of a child or the behaviour of an adult towards a child or young person under 18 years of age in football is required to take action.

On very rare occasions it may be the case that a member of staff finds themselves in a situation whereby they require urgent Safeguarding support but cannot access such support from the Club Safeguarding team. In such a situation, it is important that members of FTFC staff continue to feel confident that support is still available to them.
In the circumstances where a member of Fleetwood Town’s Safeguarding Team cannot be contacted, staff may contact the FA’s Safeguarding team for advice and support.

The FA Safeguarding team is based centrally at FA headquarters and it staffed by professionals who are experienced in dealing with child welfare. You can contact the FA’s centrally based Safeguarding Team directly on **0808 800 5000** (Help for adults concerned about a child) or via a Textphone service is available on **0800 056 0566** if you are a Deaf user.

Referring a concern can also be done via the more locally based County FA, who for our region is Lancashire County FA. In addition to the FA’s centrally based Safeguarding Team, Lancashire FA have a County Welfare Officer (CWO) and Designated Safeguarding Officer (DSO), who is trained by The FA and who can be contacted directly.

For Lancashire FA, the County Welfare Officer is:

Neil Yates & Chris Doherty
01772 624000
E mail: CountyWO@LancashireFA.com

The FA Safeguarding Case Management Team have a new direct telephone number which you can contact them on Monday to Friday 9am till 5pm:

0800 0835 902

This number is for urgent matters.

For non-urgent enquiries please email:

safeguarding@thefa.com

**The English Football League**

The English Football League is the highest level of competitive Club Football in England and plays host to the country’s top 18 sides. Fixtures from The English Football League are viewed worldwide and the fan base that follows the league and its clubs is truly global.
As a result of such status, the League takes its responsibility towards its member Clubs very seriously and endeavours to ensure that all Club’s within the league operate at the forefront of Football and with ‘best practices’ procedures. Included within this is the Safeguarding of Children Vulnerable Adults.

To ensure Safeguarding support is offered appropriately to all member Club’s The English Football League has its own specialised Safeguarding Department within which trained Professionals operate and support Clubs with training, feedback and the handling of any Safeguarding incidents or concerns. They also quality assure the Safeguarding provision within clubs by means of yearly audits and timely compliance visits.

As is the case with the Club’s relationship with the Football Association, it is important that staff understand that The English Football League is available to them as a support organisation should the Club’s Safeguarding Team, for whatever reason, be unavailable. If necessary, staff may contact:

- The English Football League Head of Safeguarding  
  Tel: 0207 8649173  
  Email: safeguarding@premierleague.com

Alexandra Richards  
Safeguarding Manager  
EFL T: 01772 325940 M: 07792284740  
arichards@efl.com

**Wider Support and Advice:**

For allegations/reports that occur outside the district of Fleetwood, the Head of Safeguarding, Welfare and Equality will contact the relevant Local Authority Safeguarding Board. Should they be unavailable, the Lancashire Safeguarding Children Board will assist with any signposting that is required. Depending on the nature of the incident or concern, staff may also need further support if members of the Club’s Safeguarding team are not available:

If staff think that a crime has been committed against a child or young person, they should contact:

- The Police  
  Tel: 999 (in the event of an emergency)  
  Tel: 101 (ask for your local police station in the event of non-
If the matter is not a crime but staff need urgent advice and cannot contact their club or County FA Designated Safeguarding Officer, or if they simply wish to seek further advice regarding any concerns they may have, they can also call:

- **NSPCC 24-hour helpline** Tel: 0808 800 5000

- **Childline**
  Tel: 0800 1111

Further advice and information on the FA Safeguarding Children & Adults Guidelines can also be sought via [www.thefa.com/football-rules-governance/safeguarding](http://www.thefa.com/football-rules-governance/safeguarding)
APPENDICES
Appendix A

Staff procedure for reporting Safeguarding concerns

Member of Staff has a concern about a Child/Adult at Risk

Phone the emergency services immediately and preserve any evidence if possible

Is the Child/Adult at Risk in immediate danger or in need of medical attention?

Yes *  
No *

Incident recorded on ‘tootoot’

Phone the parents/guardians/carers of the child/adult unless advised otherwise

Preserve any evidence if possible crime and contact department Safeguarding Officer

Contact Head of Safeguarding, Welfare & Equality

Contact Safeguarding Board

Possible outcomes include:
- Referral to Children’s/Adults Social Care
- Police enquiry
- Criminal proceedings
- Referral to Independent Safeguarding Authority (ISA)
- Staff disciplinary action
- No further action

Appropriate action will be taken dependent on circumstances. Possible actions include:
- Referral to Children’s/Adults Social Care
- Referral to Police
- Referral to FA Case Management
- Referral to NSPCC 24 hour helpline
- Instigate Disciplinary procedures (with HR) or training for staff member
- No further action

*NOTE: If the concern involves a member of the Safeguarding team, that person should be omitted from the reporting process accordingly and the next most senior member of the Safeguarding team should instead be alerted as your first point of contact.
Appendix B

Recording Safeguarding Incident Form

Staff, volunteers and regular visitors are required to complete this form and pass it to their departmental Safeguarding Officer if they have a safeguarding concern about a Child or Adult at Risk they have come into contact with.

<table>
<thead>
<tr>
<th>Full name of child</th>
<th>Date of Birth</th>
<th>School/Team/Session</th>
<th>Your name and position</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**Nature of incident:**

Please include where you were when a disclosure was made, what you saw, who else was there, what did the child/adult say or do and what you said.

<table>
<thead>
<tr>
<th>Was there an injury?</th>
<th>Yes / No</th>
<th>Did you see it?</th>
<th>Yes / No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Describe the injury:

Have you filled in a body map to show where the injury is and its approximate size?

Yes / No

Was anyone else with you? Who? Their position?
<table>
<thead>
<tr>
<th>Who are you passing this information to?</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Position:</td>
</tr>
<tr>
<td>Date:</td>
</tr>
<tr>
<td>Time:</td>
</tr>
<tr>
<td>Your signature:</td>
</tr>
<tr>
<td>Date:</td>
</tr>
</tbody>
</table>
Action taken by Safeguarding Officer:

☐

Safeguarding Officer Signature:

Date referred to Head of Safeguarding, Welfare and Equality:

Action taken by Head of Safeguarding, Welfare and Equality:

Report/referral made to...?

☐ Local Authority
☐ Police
☐ Football League
☐ The FA
☐ School/Team
☐ Parents
☐ Other

Appendix C Parents informed? Yes / No (If No, state reason)

Body Map’s

Feedback given to...?

☐ Safeguarding Officer
☐ Safeguarding Board
☐ Club
☐ Person who recorded disclosure
☐ Other
Head of Safeguarding, Welfare & Equality name:

Head of Safeguarding, Welfare & Equality Signature:

Date:
Action taken when a child is referred to local authority children’s social care services

CHILD’S CASE IS REFERRED TO LOCAL AUTHORITY (LA) CHILDREN’S SOCIAL CARE

Social Worker, with their manager acknowledges receipt of referral and decides on next course of action within **one working day**

- Assessment required – section 17 or section 47 of the Children Act 1989
- Concerns about child’s immediate safety
  - Immediate protection procedures and actions
  - Strategy discussions, procedures and actions

Feedback to referrer on next course of action

- No further LA children’s social care involvement at this stage: other action may be necessary e.g. onward referral, early help assessment / services
  - Provide help to child and family from universal and targeted services