



Safeguarding Children Policy

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BURTON ALBION FOOTBALL CLUB STATEMENT

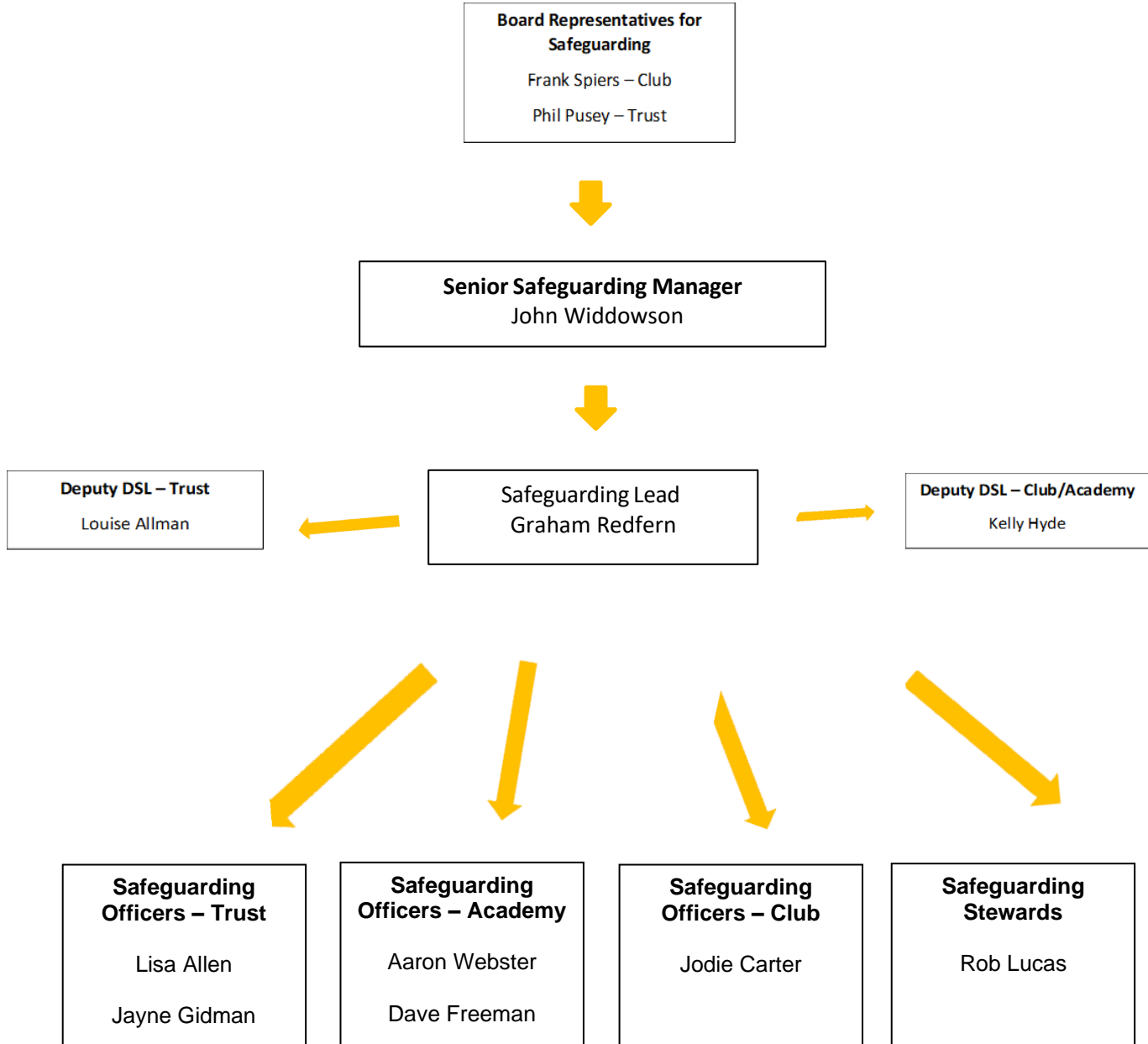
Burton Albion Football Club (BAFC) operates a child centred approach to safeguarding and where concerns about the welfare of a child exist, staff will always act in the best interests of the child.

BAFC fully acknowledges and accepts its responsibility for the well-being and safety of all children engaged in activities. It is the duty and responsibility of all staff working at BAFC to ensure they safeguard children by creating an environment that protects them from harm. We believe that the general wellbeing, welfare, and safety of all children engaged in activities is of the utmost importance. BAFC will fulfil its responsibilities by ensuring it displays best practice in safeguarding matters, carried out in a spirit of partnership and openness with the child, family and the relevant local authority.

Ben Robinson MBE DL
Chairman
On behalf of Burton Albion Board of Directors



BAFC SAFEGUARDING CONTACTS





INTRODUCTION

All children have the right to live their lives to the fullest potential, to be protected, to participate in and enjoy any activity, and to be treated with dignity and respect.

BAFC has both a moral and legal obligation to ensure a duty of care for children across its services. We are committed to ensuring that all children are protected and kept safe from harm whilst engaged in services organised and provided by BAFC.

This policy is for use throughout BAFC and is to be observed by all those working with children whether employed by the BAFC or not. The application of this policy and its procedures is not discretionary. All the requirements are obligatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of abuse or poor practice.

It is through the application of this policy and procedures that BAFC will seek to develop a positive and proactive welfare programme for all children to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with and responsible for the activities involving children.

All staff (the term 'staff' is used to refer to employees, trustees and volunteers and anyone working on behalf of, delivering a service for or representing BAFC) must make themselves aware of BAFC's Safeguarding Children Policy and where appropriate their work with children will be supported by a safeguarding training programme. The Safeguarding Manager (SM) and the Designated Safeguarding Officer (DSL) is Graham Redfern and Senior Safeguarding Manager (SSM) for BAFC is John Widdowson. Frank Spiers is the board member responsible for safeguarding.

This policy has regard to the statutory guidance 'Working Together to Safeguard Children' 2018 and the policy is in keeping with Staffordshire Safeguarding Board's (SSCB) policies and procedures and reflects what the SSCB considers to be safe and professional practice. Child protection must be considered within professionals' wider "safeguarding" responsibilities that include a duty to co-operate under the Children Act 2004 and takes account of the need for children to 'be healthy' and to 'stay safe'.

Activities included under the remit of this policy include:

- The Academy (please see Burton Albion Football Club's Safeguarding Children Policy)
- Match Day Ball Boys / Girls and Mascots
- All other activities associated with BAFC in which children are engaged.

**STATUTORY GUIDANCE DEFINES A CHILD AS ANYONE WHO HAS NOT YET
REACHED THEIR 18TH BIRTHDAY!**

AIMS AND KEY PRINCIPLES

BAFC will aim to comply with its duties by:

- Respecting and promoting the rights, wishes and feelings of children.
- Raising the awareness of the duty of care responsibilities relating to children throughout BAFC
- Promoting and implementing appropriate procedures to safeguard the well-being of children to protect them from harm.
- Creating a safe and healthy environment within all our services, to protect all parties and reduce the risk of abuse or allegations of abuse from occurring.
- Recruiting, training, supporting and supervising staff to adopt best practice to safeguard and protect children from abuse and to also minimise any risks to themselves.
- Responding promptly to any suspicions or allegations of misconduct or abuse of children in line with the Staffordshire Safeguarding Children Board (SSCB)
- Reviewing and evaluating this policy and procedures on an annual basis or in line with best practice, changing legislation, organisational requirements and service delivery
- Ensuring representatives of BAFC who have contact with children, young people are subject to safer recruitment procedures. This is also applicable for when BAFC is working in partnership with other private, voluntary or contracted organisations and employees.

This policy and supporting procedures are based on the following principles:

- The welfare of children is the primary concern.
- All children irrespective of their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and / or sexual orientation have the right to protection from abuse and harm.
- Each child has a right to be consulted about actions taken by others on his / her behalf in an age-appropriate way. The concerns of children and their families should be listened to and consideration given to their understanding and wishes and feelings. However, it may not always be possible to respect a child / carer's request for confidentiality. If a child may be at risk of significant harm, there is a duty on BAFC to share this with Children's Social Care (via First Response Team (FRT)). This will be explained to the child or family member and appropriate reassurance given.
- Personal information is usually confidential. It should only be shared with the permission of the individual concerned (and / or those with parental responsibility) unless the disclosure of confidential personal information is necessary to protect a child or promote their welfare. In all instances, information must be confined to those people directly involved in the professional network of each individual child and on a strict 'need to know' basis.
- Communication with children, young people or their families should be jargon free. Unavoidable technical language should be explained as simply as possible.
- It is everyone's responsibility to report any concerns about abuse in order that prompt action be taken if required.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of the Data Protection Act 1998



- Parents of children involved with BAFC will be advised about this safeguarding policy by publishing it on our website at <https://www.burtonalbionfc.co.uk/>

SCOPE OF POLICY

BAFC Staff and Volunteers

This policy is for the use of all employees and volunteers of BAFC operating at all levels of responsibility throughout the organisation. All staff and volunteers have access to this policy and receive on-going training on their safeguarding responsibilities in relation to their job role.



KEY LEGISLATION

**Please note this is not an exhaustive list.*

Working Together to Safeguard Children (2018)
Keeping Children Safe in Education (KCSIE) 2021
The Children Act (1989 & 2004)
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)
Female Genital Mutilation Act (2013)
Sexual Offences Act (2003)
UN Convention on the Rights of the Child (1998)
The Equality Act (2010)
General Data Protection Regulations (2018)
The Care Act (2014)
Special Educational Needs and Disabilities Code of Practice: 0 – 25 years
The Mental Capacity Act (2005) (over 16's)
Children & Social Work Act 2017
Children & Families Act 2014
Education Act 2002
Digital Economy Act 2017
Children & Adoption Act 2006
Children & Young Persons Act 2008
Borders, Citizenship & Immigration Act (2009)
Apprenticeships, Skills, Children & Learning Act (2009)
Education Act (2001)



PROCEDURE GUIDE

This set of procedures and guidelines sets out how BAFC will implement the Safeguarding Children Policy. It is to be used by all staff that come into direct contact with those who fall under the definition of the procedure, or those who are responsible for managing services that affect these individuals or groups.

The procedure guide is intended to be used in conjunction with the policy document, and other supporting individual service procedures. See [Appendix A](#) for the procedure guide.

Definitions used within the Procedure are as follows:

- The term children or young person is used to refer to anyone under the age of 18 years in accordance with the Children Act 1989.
- The term 'staff' is used to refer to employees, trustees and volunteers and anyone working on behalf of, delivering a service for or representing BAFC.

ROLES AND RESPONSIBILITIES

Designated Safeguarding Lead (DSL)

The DSL **Club Safeguarding Officer** will carry out her roles in accordance with Keeping Children Safe in Education 2021.

The SM and SSM will undergo appropriate Safeguarding Training to provide them with the knowledge and skills to carry out their role. This training should be updated at least every 2 years, in line with Staffordshire Safeguarding Children Board requirements. In addition to the formal training, their knowledge and skills should be refreshed at regular intervals, at least annually i.e., through training, emails, briefing and reading statutory guidance.

- The DSL will refer cases of suspected abuse to the local authority children's social care as required. They will represent BAFC at child protection conferences and core group meetings.
- The DSL will be the expert within BAFC to support staff in liaising with other agencies, making assessments and referrals. Any staff member maybe required to be part of strategy discussions with other interagency meetings and contribute to the assessment of children.
- The DSL will support staff that make referrals to First Response.
- The DSL will refer cases to the Channel programme where there is a radicalisation concern as required, and support staff that make referrals to the Channel programme.
- The DSL will refer cases where a person is dismissed or left due to risk / harm to a child to the Disclosure and Barring Service as required.
- The DSL will refer cases where a crime may have been committed to the Police as required.
- The DSL will maintain robust systems to monitor and record training of all staff, volunteers. Training will include bulletins, briefings and face to face CPD training.
- The DSL will ensure all staff receive training on how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information accurately. Staff will not make promises to any child and will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose to a member of staff.



- The DSL monitors the case management system set up to record cause for concerns about children to ensure the quality of information is accurate, proportionate, timely and assessment / referrals are made appropriately. The recording and storing of information are kept in-line with the General Data Protection Act.
- The DSL will share risks and resilience of children proportionately with staff on a “need to know and in the child’s best interest” basis. This is recorded and monitored to ensure risks/progress of the child is understood. The DSL will clearly state reasons for sharing this information and that this is carried out in strict confidence.
- The DSL ensures each member of staff has access to and understands BAFC’s child protection policy and procedures, especially new and part time staff.
- The DSL understands and supports BAFC with regards to the requirements of the Prevent duty and is can provide advice and support to staff on protecting children from the risk of radicalisation. Prior to commencement of duties staff are also required to undertake Prevent online training.
- Children who have access to BAFC’s IT equipment are expected to sign an Acceptable use of IT Agreement.
- The SM, SSM and the Board encourages a culture of listening to children and takes into account their wishes and feelings. The has DSL has developed systems to record these and ensures through case reviews at the Safeguarding Operating Committee held in partnership with Burton Albion Community Trust.
- The DSL will liaise with the SSM and inform them of any enquiries under section 47 of the Children Act 1989 and police investigations.
- The DSL will liaise with the FA case management team and the Local Authority Designated Officer (LADO) for child protection concerns which involve a member of staff. Further information about the LADO is referenced in the Managing Allegations Against Staff section in this policy.
- The DSL ensures the Children’s Safeguarding policy and other related policies are available publicly and parents / carers are aware that referrals about suspected abuse or neglect may be made.
- The DSL is available during working hours for staff to discuss any safeguarding concerns. The SSM, BAFC’s or BACT’s Deputy DSL will cover in the absence of the DSL. For immediate concern out of hours call 999. Details of BAFC’s safeguarding staff can be found in the first few pages of this policy. Staff are aware of the procedure to follow if a concern arises during ‘out of hours’ activities.
- The DSL will source the assistance from interpreters if required to support a child.

Leadership

The SSM and Board is accountable for ensuring the effectiveness of this policy and BAFC compliance. The Board of Trustees has a named champion for Safeguarding, this is **Frank Spiers**.

The DSL ensures the policies and procedure in place are robust and monitored and non-compliance is shared with the SSM and the Board.

The SSM has appointed **Club Safeguarding Officer** as the Designated Safeguarding Officer (DSL).

The SSM ensures the post holder has the time and resources required to fulfil the duty.





The duties of the DSL are outlined in the Keeping Children Safe in Education 2021 (DfE) and have been added to the Job description. The SSM and Board are confident that the DSL and Trustee responsible for safeguarding have the knowledge, understanding to carry out their roles appropriately.

The SSM ensures that the DSL understands they have the responsibility in leading safeguarding and child protection across BAFC. This individual has the appropriate status, authority, funding, resources, training, and support to provide advice and guidance to all staff members within BAFC on child welfare and child protection. The DSL receives appropriate training and regular supervision.

The SSM and board ensures that any areas of concern in safeguarding are identified, and an action plan or risk assessment is developed. The DSL ensures BAFC contributes to inter-agency working in-line with Working Together to Safeguard Children (2018).

SAFER RECRUITMENT AND DISCLOSURE

BAFC has a duty to comply with the Keeping Children Safe in Education September 2021 government guidance. Safer Recruitment practice includes scrutinising applicants, verifying identity, academic or vocational qualifications, obtaining professional and character references, checking previous employment history, and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and appropriate checks including criminal record checks (DBS checks), barred list checks and prohibition checks. Evidence of these checks must be recorded on our Single Central Record and copies of DBS certificates kept on file during the term of employment/volunteering.

All recruitment materials will include reference to BAFC's commitment to safeguarding and promoting the wellbeing of children.

The DSL, Senior Management Team and all relevant staff have undertaken appropriate training in Safer Recruitment. One of the above will be involved in **all** staff / volunteer recruitment processes and sit on the recruitment panel which consists of at least three people. The board member responsible for safeguarding has also received Safer Recruitment training.

As part of BAFC's safer recruitment process, offers of work in positions which involve working with adults at risk are subject to a satisfactory and appropriate level of an Enhanced DBS check, in line with government practice, two appropriate references and appropriate qualifications being verified. All requests for DBS clearances are routed via the Football Association (FA) who are an umbrella body registered with the DBS. All offers of work are subject to the outcome of the screening process and until a satisfactory Disclosure Certificate has been received and produced when requested, the member of staff will not commence employment.

Should an individual's DBS Disclosure reveal any relevant convictions (in line with the latest legislation Protection of Freedoms Act 2012) BAFC must consider whether the nature of the offence / offences renders the person concerned unsuitable for working with adults at risk. In such circumstances a risk assessment will be carried out by the Head of Community (SSM) and DSL to assess the information contained within the disclosure certificate. The applicant will also be asked to attend a face-to-face interview prior to a recruitment decision being made.

All new staff who will be working with adults at risk at BAFC will be required to complete a self-declaration on commencement of duties and are required to inform BAFC of any changes in circumstances that may relate to their DBS status.

BAFC's Safer Recruitment Policy is available upon request from hr@burtonalbionfc.co.uk





Induction

All staff must be aware of systems within BAFC which support safeguarding, and these should be explained to them as part of staff induction. This should include:

- The child protection policy.
- The behaviour policy.
- The staff behaviour policy (sometimes called a code of conduct).
- The role of the DSL (including the identity of the DSL and any deputies).
- At least part one of KCSIE 2021.

If staff, supply staff, visitors, volunteers, or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in BAFC, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open. No visitors, volunteers or parent helpers are ever to be left unsupervised with children or out of sight of the teacher or member of staff in charge. It is the responsibility of the member of staff to ensure this is the case.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers during induction. These are sensible steps that every adult should take in their daily professional conduct with children. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Staff Support

We recognise the stressful and traumatic nature of safeguarding and child protection work. We will support staff by providing an opportunity to talk through their anxieties with the DSL and to signpost and seek further support as appropriate.

Regular supervision will be offered to the DSL within BAFC and may be extended to other members of staff, as deemed appropriate by BAFC.

Use of reasonable force

There are circumstances when it is appropriate for staff in BAFC to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between young people or blocking a young person's path, or active physical contact such as leading a young person by the arm out of the classroom/teaching environment.

When using reasonable force in response to risks presented by incidents involving children including any with SEN or disabilities, or with medical conditions, staff should consider the risks carefully.

By planning positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children and agreeing them with parents and carers, we will reduce the occurrence of challenging behaviour and the need to use reasonable force.



RECRUITMENT OF EX-OFFENDERS

- BAFC assesses applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks which are processed through the Disclosure and Barring Service (DBS). BAFC complies fully with the code of practice and undertakes to treat all applicants for positions fairly.
- BAFC undertakes not to discriminate unfairly against any subject of a criminal record check based on a conviction or other information revealed.
- BAFC can only ask an individual to provide details of convictions and cautions that BAFC are legally entitled to know about. Where a DBS certificate at either standard or enhanced level can legally be requested (where the position is one that is included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 as amended, and where appropriate Police Act Regulations as amended).
- BAFC can only ask an individual about convictions and cautions that are not protected.
- BAFC is committed to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, responsibilities for dependents, age, physical / mental disability or offending background.
- BAFC actively promotes equality of opportunity for all with the right mix of talent, skills and potential and welcome applications from a wide range of candidates, including those with criminal records.
- BAFC select all candidates for interview based on their skills, qualifications, and experience.
- An application for a criminal record check is only submitted to DBS after a thorough risk assessment has indicated that one is both proportionate and relevant to the position concerned. For those positions where a criminal record check is identified as necessary, all application forms, job adverts, and recruitment briefs will contain a statement that an application for a DBS certificate will be submitted in the event of the individual being offered the position.
- BAFC ensures all those who are involved in the recruitment process have been suitably trained to identify and assess the relevance and circumstances of offences.
- BAFC also ensures that they have received appropriate guidance and training in the relevant legislation relating to the employment of ex-offenders, e.g., the Rehabilitation of Offenders Act 1974.
- At interview, or in a separate discussion, BAFC ensures that an open and measured discussion takes place about any offences or other matter that might be relevant to the position. Failure to reveal information that is directly relevant to the position sought could lead to withdrawal of an offer of employment.
- BAFC makes every individual who is subject of a criminal record check aware of the existence of the code of practice and makes a copy available on request.
- BAFC undertakes to discuss any matter revealed on a DBS certificate with the individual seeking the position before withdrawing a conditional offer of employment

<https://www.gov.uk/government/publications/dbs-filtering-guidance/dbs-filtering-guide>





EQUALITY AND DIVERSITY

It is the policy of BAFC that no person, whether job applicant, staff member, participant or customer, shall be discriminated against. BAFC opposes all forms of unlawful and unfair discrimination, either direct or indirect, or harassment, on the grounds of the following: Age, Disability, Gender Reassignment, Marriage & Civil Partnership, Pregnancy & Maternity Race, Religion or Belief, Sex and Sexual Orientation.

A copy of BAFC's Equality and Diversity Policy is available from hr@burtonalbionfc.co.uk

SINGLE CENTRAL REGISTER

BAFC shall maintain a Single Central Register of all safe recruitment checks carried out in line with statutory requirements. The DSL will check the Single Central Register on a regular basis and report accuracy and actions to BAFC and the Board. The Single Central Register is a confidential document, but may be partially submitted to relevant bodies upon request.

PARTNERSHIP AGREEMENTS

Delivery partners will follow their own safeguarding procedures and are aware of the safeguarding procedure of their partner organisation.

Where safeguarding concerns are raised the appointed DSL of the relevant organisation will inform the DSL at the partner organisation of developments.

Partner organisation will review each other's safeguarding policies and procedures and should be satisfied that they are fit for purpose.

WORKING WITH PARENTS / CARERS

At BAFC we are committed to working in partnership with parents/carers to safeguard and promote the welfare of children, and to support them to understand our statutory responsibilities in this area. BAFC follows legislation that aims to act in the best interests of the child.

When new students join our organisation, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the BAFC website. Parents and carers will be informed of our legal duty to assist our staff in other agencies with child protection enquiries and what happens should we have cause to make a referral to Families First Services or other agencies.

We are committed to working with parents positively, openly, and honestly. We ensure that all parents are treated with respect, dignity, and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or if it is necessary to do so, to safeguard a child from harm.

We will seek to share with parents any concerns we may have about their child before making a referral, unless to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns BAFC has about a child will not prevent the DSL making a referral to Families First in those circumstances where it is appropriate to do so.

To keep children safe and provide appropriate care for them, BAFC requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives.



- Full names and contact details of all persons with parental responsibility (if different from above).
- Emergency contact details (if different from above) and at least two contacts.
- Full details of any other adult authorised by the parent to collect the child from BAFC (if different from the above).
- Any legal or criminal changes which effects parental responsibility e.g., bail condition, court orders, Multi Agency Risk Assessment Conference (MARAC).

BAFC will retain this information on the student's file. BAFC will only share information about students with adults who have parental responsibility for a student or where a parent has given permission and BAFC has been supplied with the adult's full details in writing.

EMPLOYEE TRAINING

All staff delivering a 'regulated activity' (working in direct contact with children) shall be required to complete the following training as a minimum requirement:

- The FA workshop on Safeguarding Children in Football (coaches only)

Dependent upon the role, BAFC may require an employee to undertake the following training:

- The Staffordshire Safeguarding Children's Board Awareness of Abuse and Neglect E-Learning Training
- The Home Office E-Learning Prevent Training.
- Recognising and Preventing Female Genital Mutilation (FGM) Training

Details of those satisfactorily completing these courses are retained on the individual personal file.

Staff will also receive regular training appropriate to their position.

The DSL shall deliver safeguarding training to staff during the induction period and when identified needs arise.

Safeguarding is an item on all internal meeting agendas and form's part and the supervision process.

Relevant safeguarding training is delivered through CPD sessions and awareness is also raised through campaigns i.e., Child Sexual Exploitation (CSE) in conjunction with Burton Albion Football Club.

POSITION OF TRUST

Those in authoritative positions within BAFC have a positive contribution to make to a young person's welfare providing that appropriate, positive relationships are maintained.

A position of trust involves a person in a position of authority over another person. There is a need to protect young people aged 16 and 17 who, despite reaching the age of consent for sexual activity are vulnerable to sexual abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with adults who hold a position of trust, responsibility, or authority in relation to them and, as a result, have a considerable amount of power and influence in their lives.

This briefing focuses on relationships between adults in authority positions and young people aged 16 or 17 years old in a sport context. These young people may be dependent on coaches or other adult





staff for their development, success, or position in a team. Relationships should be supportive, positive, and aimed at improving the young person's skills and progress. The staff-participant relationship should focus on the activity and (as with teachers and their pupils) romantic or sexual relationships between the adult and young person may be unlawful and is clearly defined as a breach of BAFC's Staff Handbook.

Individuals can use their authority and influence over young people to groom and establish a sexual relationship with them. Such a relationship may not be a breach of the criminal law, and the young person involved may not always view it as abusive or exploitative. However, the existence of a significant power differential between an adult with authority, control or influence over a significant aspect of the young person's life always raises the possibility that the relationship is unequal and constitutes an abuse of the adult's position of trust.

The sexual offences legislation (Sexual Offences Act 2003) in the UK already provides that any sexual activity between adults and with children under 16 is illegal and constitutes abuse. The primary motivation for legislation which addresses the abuse of positions of trust is the need to protect young people aged 16 and 17 who, despite reaching the age of consent for sexual activity, are vulnerable to sexual abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with adults who hold a position of trust, responsibility, or authority in relation to them and, as a result, have a considerable amount of power and influence in their lives. The law defines specific roles and settings where sexual activity between 16- and 17-year-olds and those in positions of BAFC, responsibility or authority constitutes a criminal offence.

This legislation does not include sports roles (e.g., coaches, instructors, or helpers) or sports organisations and settings (e.g., clubs, leisure facilities or events) within these definitions. Thus, at present, an abuse of a position of trust within most sport contexts will not be illegal, although there may be circumstances in which the law does apply.

However, BAFC's view is that staff within the organisation are to work to the principles behind the legislation.

The Staff Handbook provides details of ethics and conduct to which staff must comply with. This document defines acceptable and unacceptable behaviour and clearly includes any abuse of positions of BAFC as described above.

Breaches of the Code of Conduct contained within the Staff Handbook will be robustly addressed through safeguarding, complaints, and disciplinary procedures. It is important to also acknowledge that under the Safeguarding Vulnerable Groups Act / Order there are already relevant provisions to consider.

BAFC is deemed to provide regulated activity for the purposes of the legislation and must refer an individual to the Disclosure and Barring Service (DBS) if BAFC:

- a) Withdraws permission for an individual to engage in regulated activity or would have done so had that individual not resigned, retired, been made redundant or been transferred to a position which is not regulated activity.
- b) Decides that the individual has:
 - engaged in relevant conduct.
 - satisfied the Harm Test.
 - received a caution or conviction for a relevant offence.



BAFC will take disciplinary action in situations where an adult in a position of authority has abused their position of trust by having sexual contact with a young person under the age of 18 years old.

The FA and Staffordshire Local Authority Designated Officer (LADO) will also be informed. More information is provided in Managing Allegations Against Staff section in this policy.

MANAGING ALLEGATIONS AGAINST STAFF

BAFC ensures there are procedures in place to manage allegations of abuse against staff.

BAFC's aim is to provide a safe and supportive environment which secures the wellbeing and very best outcomes for children. BAFC recognises that sometimes the behaviour of adults may lead to an allegation of abuse being made.

BAFC will take all possible steps to safeguard our children and to ensure that the adults in our organisation are safe to work with children. BAFC will ensure that the procedures outlined in *Staffordshire Safeguarding Children's Board Protocol: Managing Allegations of abuse Against Persons who work with Children and role of LADO* and Part 4 of 'Keeping Children Safe in Education', DfE (2018) are adhered to and will seek appropriate advice from the Local Authority Designated Officer (LADO). **The LADO can be contacted on 0800 1313126.**

Responding to allegations against Staff

It is essential that any concerns for the welfare of a child arising from abuse or harassment by a member of staff or a volunteer should be reported **IMMEDIATELY** to the DSL or in their absence to the SSM. Details for key safeguarding contacts are displayed earlier in this policy.

If a child or children have suffered or be at risk of suffering significant harm the DSL will contact First Response and speak to the Local Authority Designated Officer (LADO).

If the matter does not meet the threshold for significant harm the DSL or in their absence the SSM will contact First Response and speak to the LADO within 24 hours.

The LADO is a statutory role in relation to allegations against children. They provide an 'Initial Discussion' which allows for the giving of advice and guidance relating to the most appropriate way of managing the allegation or concern, and most importantly will help establish what the 'next steps' should be in terms of investigating the matter further.

The LADO will help ensure that, where appropriate, specific activities are initiated (e.g., Child Protection / Police processes) and consideration is given to issues such as – notifying the child's parents / carers; suspending the adult; risks to other children; communication with relevant other organizations / bodies; supporting the adult and possible media interest. The LADO will also monitor the progress of an investigation and assist an employer in the taking of any difficult judgments about a person's suitability to remain in the children's workforce.

Support for the Referrer

BAFC will fully support and protect all staff who, in good faith (without malicious intent), make a referral about a colleague who may be abusing a child and report his or her concern about a colleague's practice.

This support may take the form of counselling through BAFC's designated service, moving the person reporting the abuse / potential abuse to another workplace temporarily whilst the incident is investigated. However, all staff have a duty to safeguard and promote the welfare of children and to



investigate concerns robustly it may not be possible to maintain complete anonymity, but the interests of the referrer will be protected when concerns are raised.

Types of Investigation

There may be several strands to a child protection investigation e.g., professionals' strategy meetings, child protection conferences and core groups, criminal investigations joint evaluation meetings (under Staffordshire LADO procedures) as well as disciplinary investigations. Staff may need to be involved as witnesses, holders of key information, or about ongoing processes around protection and welfare.

ROLE OF THE LADO

The Local Authority has a DSL (**LADO**) to:

- Provide advice and guidance to employers and voluntary organisations
- Liaise with the police and other agencies
- Monitor the progress of cases to ensure that they are dealt with as quickly as possible, consistent with a thorough and fair process.
- The role of the LADO is to coordinate all allegations and concerns made against a person who works with children within the Staffordshire. As such, all allegations and concerns must be reported to the LADO.
- The LADO will maintain a database of all allegations and concerns received.
- The LADO will advise, in discussion with the DSL and SSM on what action should be taken by the employer and whether the matter should be referred to Children's Social Care and the Police for a decision on whether to convene a strategy meeting or an initial evaluation meeting.

If an allegation is made or information is received about an adult who works at BAFC, indicates that they may be unsuitable to work with children, the member of staff receiving the information should inform the DSL immediately. Should an allegation be made against the DSL this will be reported to the SSM. If the allegation is against the SSM, this will be reported to the Chair of the Board and DSL. If an allegation is made about the Chair of the Board, this will be reported the SSM, the Vice-Chair of the Board and DSL.

If the DSL, SSM, or Chair of the Board is not contactable on the day, the information must be passed to and dealt with BAFC's Deputy DSL and Chair or Vice-Chair of the Board.

Advice from the LADO will be sought within one working day. No member of staff or board member will undertake further investigations before receiving advice from the LADO.

Any allegations made about a member of staff or a Board Member will be reported to the FA Case Management Team within one working day.

Any member of staff who does not feel confident to raise their concerns internally they should contact **the LADO directly on 0800 1313126.**

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Staff can call: 0800 028 0285 – line is open from 8:00 am to 8:00 pm, Monday to Friday or Email: help@nspcc.org.uk.





BAFC has a legal duty to refer to the Disclosure and Barring Service anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left.

The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and FA Case Management Team. The DSL has a responsibility to inform Barring service.

Clear and comprehensive records of all allegations made against adults working with children who:

- behaved in a way that has harmed, or may have harmed, a child.
- committed a criminal offence against, or related to, a child; or
- behaved in a way that indicates they are unsuitable to work with young people.

The records will state:

- what the allegations were.
- how the allegations were followed up.
- how things were resolved.
- any action taken.
- decisions reached about the person's suitability to work with children.

These records will be stored securely by the DSL or SSM if the allegation is about the DSL to give accurate information if asked for it.

For example:

- in response to future requests for a reference.
- if a future employer asks for clarification about information disclosed as part of a vetting and barring check; or
- if allegations resurface at a future date.

DBS REFERRALS

BAFC is under **legal** obligation to make a safeguarding referral to the Disclosure and Barring Service (DBS) if person is dismissed or removed from regulated activity (or may have been had they not left) because they have harmed or posed a risk of harm to a child. The DBS's role is to make barring decisions about people who are referred to it (usually following an employer's disciplinary process), with the possible consequence of the person being barred from working or volunteering with children. The DBS uses a fair, thorough and consistent process that ensures that the decision it reaches is both proportionate and appropriate to the risk the person poses to children. The DBS's website is www.homeoffice.gov.uk/DBS and provides a range of materials to help when considering or making a referral. This includes a Referral Form, Referral Guidance, FAQs and a series of Fact Sheets. Information and advice about making a referral can also be found by contacting the DBS Helpline on 01325 953795.



Referral to the DBS will be considered by the DSL and SSM.

Referrals to the DBS will be made by the DSL.

WHISTLEBLOWING

Whistleblowing is when someone raises a concern about a dangerous or illegal activity or any wrongdoing. Raising a concern is known as "blowing the whistle" and is a vital process for identifying risks to children's safety.

The board should ensure there is a current whistleblowing policy in place and that staff have received a copy and have had the opportunity to raise concerns. There is a culture evident in BAFC to raise concerns about poor or unsafe practice and such concerns are addressed professionally and sensitively in accordance with the agreed whistleblowing procedure which is to be developed in accordance with the recommendations contained within this policy.

BAFC has a Whistleblowing policy which staff can follow if there are reasons why the standard procedures for dealing with allegations make them feel particularly vulnerable, or if they consider their concerns are not being acted upon appropriately, this policy is available upon request from hr@burtonalbionfc.co.uk and contained within the company handbook.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – this line is available from 8:00 AM to 8:00 PM, Monday to Friday or alternatively can email: help@nspcc.org.uk

When to call

Concerns about a child should be raised with the DSL in the first instance.

The Whistleblowing Advice Line can be called if:

- BAFC doesn't have clear safeguarding procedures to follow.
- if a concern won't be dealt with properly or may be covered-up
- a concern has been raised but it hasn't been acted upon
- if there is a worry about being treated unfairly

Calls can be made about an incident that happened in the past, is happening now or there is a belief it may happen in the future.

What to expect when you call

A call handler will connect the caller with a trained practitioner.

- Concerns will be discussed
- talk through the whistleblowing process.
- take details of the concern.
- explain the protection available if required.
- get relevant agencies and authorities to act about the concern.



You can remain anonymous, but if you do give us your name and contact details you can ask us not to share these with other agencies.

INFORMATION SHARING AND CONFIDENTIALITY

It's important to ensure a child or young person understands their personal information will be treated respectfully and confidentially. This provides a safe space for them to be open and honest with the people caring for them. Establishing this form of BAFC is fundamental for the provision of safe and effective care. But when working with children and young people, it's important to keep in mind two essential factors:

- Timely information sharing is key to safeguarding and promoting the welfare of children. It enables intervention that crucially tackles problems at an early stage.
- If a child is at risk or suffering significant harm, the law supports you to share information without consent.

Case reviews have evidenced that a lack of appropriate and timely information sharing is a key issue. Sharing information will help other professionals who have contact with the family to better understand the risks faced by the child.

For example, staff could have information about issues related to a parent or other adult which may be impacting negatively on the child's wellbeing. This information should be shared with the DSL as it will contribute to building a clear picture of the child's life. The better the picture, the more quickly appropriate action can be taken to protect a child.

Further advice on sharing information for providing safeguarding services to children, young people, parents and carers is found in the documents by using the following links.

<https://www.nspcc.org.uk/globalassets/documents/information-service/information-sharing-confidentiality-practitioners.pdf>

DATA PROTECTION

BAFC's Data Protection Policy is currently undergoing a review to reflect recent changes to legislation.

A copy is available on request from hr@burtonalbionfc.co.uk

CHILD PROTECTION RECORDS - RETENTION AND STORAGE

Information about child protection concerns and referrals will be kept in a separate child protection file for each child, rather than in one 'concern log'. The child protection file is started as soon as the DSL becomes aware of any concerns.

Retention Period

The guidance for on record keeping and management of child protection information states that:

Child protection files should be passed on to any new provider the child attends for the purpose of education and kept until their 26th birthday (this is 7 years after they reach the school leaving age) (IRMS, 2016). In the voluntary and community sector, records relating to child protection should be kept for 7 years after your organisation's last contact with the child and their family. If a



decision not to share your concerns about a child's welfare with the police or social services is made, a record of the issues that were raised will still be kept.

Exceptions

In some cases, records can be kept for longer periods of time. For example, if:

- The records provide information about a child's personal history, which they might want to access in the future.
- The records have been maintained for the purposes of research.
- The information in the records is relevant to legal action that has been started but not finished; or
- The records have been archived for historical purposes (for example if the records are relevant to legal proceedings involving the organisation).

Where there are legal proceedings, legal advice will be sought about how long to retain records.

Some records are subject to statutory requirements and have a specific retention period. This includes records relating to:

- children who have been 'looked after' by the local authority.
- adopted children.
- registered foster carers.
- residential children's homes.

Further Information

Links to the legislation in each of the UK nations is available below.

NCVO provides further guidance on data protection for the voluntary sector:

<https://www.ncvo.org.uk/practical-support/information/data-protection>

Key legislation affecting the retention and storage of child protection records includes:

UK

The General Data Protection Regulation (GDPR) came into force on 25 May 2018. The Information Commissioner's Office provides a guide to the GDPR to help organisations comply with its requirements (Information Commissioner's Office, 2017b).

England

- Data Protection Act 1998
- The Fostering Services (England) Regulations 2011
- The Children's Homes (England) Regulations 2015
- Statutory Guidance on Adoption for local authorities, voluntary adoption agencies and adoption support agencies



Disclosure and Barring Checks

A copy of the Certificate will be kept on file for the duration of the employment/volunteering period.

The Single Central Record will also be kept and shall record:

- The date the check was completed.
- The level and type of check (standard / enhanced / barred list check and the relevant workforce).
- The reference number of the certificate; and
- The decision made about whether the person was employed (with reasons).

Destruction of Child Protection Records

When the retention period finishes, confidential records will be shredded in the presence of the SSM member of the organisation. At the same time any electronic versions of the record must be purged. If not shredded immediately, all confidential records will be held in a secured plastic bag, labelled as confidential and locked in a cupboard or other secure place; or placed in a confidential waste bin.

If BAFC or part of an organisation is closed, arrangements for the ongoing management of records will be made. This will include the review, retention, and disposal of records.

Reviewing the Retention of Child Protection Records and Storage

BAFC will review the recording, retention and storage of Child Protection records regularly to ensure it is effective and continues to comply with current legislation and guidance.

When records are being kept for longer than the recommended period, files will be clearly marked with the reasons for the extension period.

LOOKED AFTER AND PREVIOUSLY LOOKED AFTER CHILDREN

The SSM has appointed the Safeguarding Manager, who will work with local authorities to promote the educational achievement of registered pupils who are looked after. On commencement of sections 4 to 6 of the Children and Social Work Act 2017, our designated staff will have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England and Wales.

The DSL will work with the relevant agencies and Virtual School to provide the most appropriate support utilising the pupil premium plus to ensure they meet the needs identified in the child's personal education plan.

The DSL should also work with the Virtual School to promote the educational achievement of previously looked after children.

USE OF PHOTOGRAPHY AND FILM IMAGES

All images are taken by BAFC staff who have been briefed by the DSL. Before taking images of children, parental consent is sought in writing at the start or prior to the event.

BAFC staff are briefed on the following:



- Parents / Carers / Guardians are responsible for informing BAFC of any change of circumstances within the season that may affect consent.
- Parents / Carers / Guardians will be informed of how the image will be used. BAFC will not allow an image to be used for something other than that for which it was initially agreed.
- All children featured in BAFC 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.
- The DSL will undertake a DBS check and attend an FA Safeguarding Children in Football and Welfare Officers workshop and in any case, will be personally responsible for keeping up to date with the latest policy and procedure.
- No images of children featured in BAFC publications will be accompanied by personal details such as their home address.
- Recordings of children for the purposes outlined in the consent form are stored safely and securely at BAFC's premises.
- Any instances of inappropriate images should be reported to the DSI

SOCIAL NETWORKING GUIDANCE

BAFC recognises that social media and social networking services provide opportunities to effectively communicate with a wide range of audiences in a positive manner. However, BAFC is also aware of the potential safeguarding risks, especially to children when using these forms of media.

Social networking is referenced within the Staff Handbook.

The Staff Handbook is available on the BAFC internal network to view and a copy can be request from hr@burtonalbionfc.co.uk

SPECIFIC PROJECTS

It is recognised that specific projects have the potential for safeguarding issues. This can include child health and safety issues, bullying, meeting the medical needs of children, providing first aid, setting security, alcohol, and substance misuse. There may also be safeguarding issues that are specific to the local area or population that need to be considered.

All safeguarding concerns will be dealt with in accordance with BAFC's procedure.

Staff have the option to report concerns themselves directly to the DSL or by informing the designated point of contact for the specific project, who will assist in completing the safeguarding referral form. The DSL must be informed accordingly.

Any project specific safeguarding documentation will also be completed.

BAFC's Transport Policy should be followed when children are being transported on behalf of BAFC and children shall be accompanied by the activity leader. Only vehicles and drivers approved under BAFC's Transport Policy will be used to transport children.

Children accessing alternative education activities may require as part of the programme, to be transported in a personal vehicle by one of the staff members delivering the programme. A consent form signed by parent / carer will be obtained in advance and a risk assessment will be completed and will address safeguarding concerns. Staff will ensure that the DSL is informed of the need to transport children. Staff will also ensure that the relevant paperwork is satisfactorily completed and handed to the DSL in advance of any journey taking place. Documents will be stored securely in accordance with the General Data Protection Regulation (GDPR).



Health and Safety

Where a child is involved in a project that requires any health and safety discussions, a Risk Assessment in accordance with BAFC's procedures will be carried out in advance. If there are any concerns that a child would be at risk than the project will not go ahead.

ABUSE AND NEGLECT

Neglect

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

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger.
- Stealing, scavenging and/or hoarding food.
- Frequent tiredness or listlessness.
- Frequently dirty or unkempt.
- Often poorly or inappropriately clad for the weather.
- Poor school attendance or often late for school.
- Poor concentration.
- Affection or attention seeking behaviour.
- Illnesses or injuries that are left untreated.
- Failure to achieve developmental milestones, for example growth, weight.
- Failure to develop intellectually or socially.
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings.
- The child is regularly not collected or received from school; or
- The child is left at home alone or with inappropriate carers.
- Adolescent neglect
- Affluent neglect

Physical Abuse

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape.
- Bruises that carry an imprint, such as a hand or a belt.
- Bite marks.
- Round burn marks.
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders, or buttocks.
- An injury that is not consistent with the account given.



- Changing or different accounts of how an injury occurred.
- Bald patches.
- Symptoms of drug or alcohol intoxication or poisoning.
- Unaccountable covering of limbs, even in hot weather.
- Fear of going home or parents being contacted.
- Fear of medical help.
- Fear of changing for PE.
- Inexplicable fear of adults or over-compliance.
- Violence or aggression towards others including bullying; or
- Isolation from peers.

Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge.
- Anal or vaginal discharge, soreness, or scratching.
- Reluctance to go home.
- Inability to concentrate, tiredness.
- Refusal to communicate.
- Thrush, persistent complaints of stomach disorders or pains.
- Eating disorders, for example anorexia nervosa and bulimia.
- Attention seeking behaviour, self-mutilation, substance abuse.
- Aggressive behaviour including sexual harassment or molestation.
- Unusual compliance.
- Regressive behaviour, enuresis, soiling.
- Frequent or open masturbation, touching others inappropriately.
- Depression, withdrawal, isolation from peer group.
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

Exploitation

Child Sexual Exploitation occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to Staffordshire Children’s Services. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity).
- Entering and/or leaving vehicles driven by unknown adults.
- Possessing unexplained amounts of money, expensive clothes or other items.
- Frequenting areas known for risky activities.
- Being groomed or abused via the Internet and mobile technology; and



- Having unexplained contact with hotels, taxi companies or fast-food outlets.
- Missing for periods of time (CSE and County Lines)

Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly.
- Over-reaction to mistakes.
- Delayed physical, mental, or emotional development.
- Sudden speech or sensory disorders.
- Inappropriate emotional responses, fantasies.
- Neurotic behaviour: rocking, banging head, regression, tics and twitches.
- Self-harming, drug, or solvent abuse.
- Fear of parents being contacted.
- Running away.
- Compulsive stealing.
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B.: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

Recognising Abuse

Recognising abuse is not easy, and it is not the responsibility of staff to decide whether abuse has taken place or if there is significant risk. Staff do however have a responsibility to act if they think it may be happening.

Abuse, including neglect are forms of maltreatment of a child or vulnerable adult. Somebody may abuse a child or vulnerable adult by inflicting harm, by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger for example via the internet. They may also be abused by an adult or by another child / children.

Types and Signs of Abuse

It is generally accepted that the below are types of abuse:

- Physical
- Emotional (or psychological)
- Sexual
- Exploitation



- Neglect

KEEPING CHILDREN SAFE IN EDUCATION 2021 – SPECIFIC SAFEGUARDING ISSUES

All staff in BAFC have an awareness of safeguarding issues through regular training and briefings, some of which are listed below. BAFC enables staff to be aware that these behaviours which put children in danger. All BAFC staff are aware of the DSL who is the expert within the organisation and is there to support staff and the board of trustees further.

Abuse

Behaviours linked to safeguarding issues.

Children and the courts system

Children with family members in prison

Children missing from education.

Child missing from home or care.

Child Criminal Exploitation (CCE)

Child sexual exploitation (CSE)

County Lines

Domestic abuse

Drugs

Fabricated or induced illness

Faith abuse

Female genital mutilation (FGM)

Forced marriage.

Gangs and youth violence

Gender-based violence/violence against women and girls (VAWG)

Homelessness

Mental health

Missing children and adult's strategy

Online safety

Peer on peer abuse/child on child abuse

Private fostering

Preventing radicalisation

Prevent Duty and Channel

Serious violence

Sexual violence and sexual harassment

Sexting

Trafficking

Up skirting

Behaviours linked to safeguarding issues.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

Bullying including Cyberbullying

Bullying may be defined as deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to protect themselves. It can take many forms, but the main types are:

- Physical (e.g., hitting, kicking, theft)
- Verbal (e.g., racist or homophobic remarks, threats, name-calling)



- Emotional (e.g., isolating an individual from the activities and social acceptance of their peer group)
- Cyberbullying (including sexting)

Our antibullying policy can be requested from hr@burtonalbionfc.co.uk

Child Missing from Home or Care

There are strong links between children involved in sexual exploitation and other behaviours such as running away from home or care, bullying, self-harm, teenage pregnancy, truancy, and substance misuse. In addition, some children are particularly vulnerable, for example, children with special needs, those in residential or foster care, those leaving care, migrant children, particularly those who are unaccompanied, those forced into marriage, those involved in gangs and unaccompanied asylum-seeking children. The majority of children who go missing are not in care and go missing from their family home. However, children who are looked after are much more likely to run away than those who live at home, and over 50% of young people in care have run away at some point.

Child Sexual Exploitation (CSE)

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and / or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. (Child Sexual Exploitation: -Definition and Guidance, Feb 2017. Gov.uk)

CSE can affect any child or young person (male or female) under the age of 18 years, including 16- and 17-year-olds who can legally consent to have sex.

- Can still be abuse even if the sexual activity appears consensual.
- Can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity.
- Can take place in person or via technology, or a combination of both.
- Can involve force and / or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.
- May occur without the child or young person's immediate knowledge (e.g., through others copying videos or images they have created and posted on social media).
- Can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- Is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

- Unexplained gifts or new possessions.
- Association with other young people involved in exploitation.
- Older boyfriends or girlfriends.
- Suffering from sexually transmitted infections or become pregnant.
- Changes in emotional well-being
- Misuse of drugs and alcohol:
- Going missing for periods of time or regularly come home late; and
- Regularly missing school or education or do not take part in education.



Child Criminal Exploitation: County Lines

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: County Lines is a form of drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism 98 should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years.
- Can affect any vulnerable adult over the age of 18 years.
- Can still be exploitation even if the activity appears consensual.
- Can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence.
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

Domestic Violence

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Exposure to domestic abuse and / or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

Drugs

There is evidence that children and young people are increasingly misusing alcohol and illegal drugs. Consequences range from non-attendance and poor attainment at school, poor health, committing crimes to support 'habits' and also an increased risk of being a victim of violent crime and sexual exploitation.

Fabricated or induced illness

Fabricated or Induced Illness is a condition whereby a child suffers harm through the deliberate action of their carer, and which is attributed by the adult to another cause.

There may be many explanations for these circumstances, and each requires careful consideration and review. Concerns about a child's health will be discussed by the DSL with a health professional who is involved with the child.



Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM is known by different names including “cutting”, “female circumcision” or “initiation”. The term female circumcision suggests that the practice is similar to male circumcision, but it bears no resemblance to male circumcision, has serious health consequences and no medical benefits.

FGM is also linked to domestic abuse, particularly in relation to “honour-based violence”.

With effect from 31 October 2015, all schools are subject to a mandatory reporting requirement in respect of female genital mutilation. When a member of staff discovers (either by verbal or visual disclosure) that an act of FGM appears to have been carried out on a girl aged under the age 18, that member of staff has a statutory duty to report it to the Police and DSL. Failure to report such cases will result in disciplinary sanctions.

Staff **must** personally report to the police, cases where they discover that an act of FGM appears to have been carried out. Unless the staff member has good reason not to, they should still discuss any such case with the DSL and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e., where the staff member does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, staff should follow local safeguarding procedures.

Forced Marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. BAFC can play an important role in safeguarding children from forced marriage.

There are some significant differences between the referral of a concern about a young person being forced into marriage and other child protection referrals. Professionals must be aware that sharing information with a young person’s parents, extended family or members of their community, could put the young person in a situation of significant risk. Any disclosure that indicates a young person may be facing a forced marriage must be taken seriously and reported to the DSL who should also realise that this could be ‘the one chance’ to save a life. A forced marriage is a marriage in which one or both spouses do not consent to the marriage but are coerced into it. Duress can include physical, psychological, financial, sexual and emotional pressure. In cases of vulnerable adults who lack the capacity to consent to marriage, coercion is not required for a marriage to be forced.

Mental Health

This non-statutory advice clarifies the responsibility of BAFC, outlines what they can do and how to support a child or young person whose behaviour, whether it is disruptive, withdrawn, anxious, depressed or otherwise, may be related to an unmet mental health need.





Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of us all. Players who are struggling under the current circumstances should contact the Club safeguarding staff as outlined above. Support can also be accessed through a number of national organisations including:

The Samaritans Tel: 116 123 <https://www.samaritans.org>

ChildLine: Tel: 0800 1111 <https://www.childline.org.uk>

NSPCC: Tel: 0808 800 5000 <https://www.nspcc.org.uk>

Mind: Tel: 0300 123 3393 <https://www.mind.org.uk>

PFA: Tel: 07500 000 777 <https://www.thepfa.com/wellbeing>

Online Safety

The use of technology has become a significant component of many safeguarding issues. Child Criminal Exploitation, Child Sexual Exploitation, radicalisation, sexual predation, and technology often provides the platform that facilitates harm.

At BAFC we realise that it is essential for our children to be safeguarded from potentially harmful and inappropriate online material. We have an effective whole school/college approach to online safety which empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms for us to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- Content: being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.
- Contact: being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
- Conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying); and
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

We ensure that online safety is a running and interrelated theme whilst devising and implementing policies and procedures. We consider online safety in other relevant policies, when planning curriculum, teacher training, the role and responsibilities of the DSL and parental engagement. We have filters and monitoring systems in place, and these are regulated, and risk assessed as part of the prevent duty.

Peer on Peer Abuse

All staff at BAFC have the knowledge and awareness that children can and sometimes do abuse other children (often referred to as peer on peer abuse).





Peer on peer abuse including sexual violence and sexual harassment can occur between two children of **any** age and sex. It can occur with a single child or group of children. This can happen both inside and outside of our setting including online.

Children who are victims of peer on peer abuse including sexual violence and sexual harassment will find the experience stressful and distressing. This is likely to have an adverse effect their educational attainment. This type of abuse can exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable.

All staff at BAFC recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports of it. They understand the importance of the **timely** challenge of inappropriate behaviours between peers, many listed below, that are abusive in nature. They are aware of the importance of: -

- Making clear that peer on peer abuse including sexual violence and sexual harassment is not acceptable and that we have a zero-tolerance approach.
- Not dismissing peer on peer abuse (incl sexual violence or sexual harassment) as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- Challenging behaviours (potentially criminal in nature), such as physical and sexual assaults e.g. grabbing bottoms, breasts, and genitalia, flicking bras and the lifting up of skirts.

All staff know that if we do not challenge and support our children that this will lead to a **culture** of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

At **BAFC** we strive for a culture where children feel safe to speak to staff about their experiences. We know that the initial response to a report from a child is vitally important. We do not want to miss that opportunity and so we reassure victims that their reports are being taken seriously and that they will be supported and kept safe. We never give victims the impression that they are creating a problem by reporting sexual violence or sexual harassment. We reassure victims that they should not feel ashamed for making a report.

All victims are taken seriously and offered appropriate support. Staff are aware of the groups that are potentially more at risk as evidence shows that girls, children with SEND and LGBT children are at greater risk. The DfE states ‘peer on peer abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Victims of peer on peer abuse will be supported by the school’s pastoral system and referred to specialist agencies if appropriate. Risk assessment and/or safety planning are an integral part of this support plan, particularly regarding the post incident management.

All staff understand, that even if there are no reports in our setting, this does not mean that it is not happening, it may be the case that it is just not being reported. As such it is important that if staff at **BAFC** have any concerns regarding peer on peer abuse, they speak to the DSL. Our staff will not develop high thresholds before acting.

Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence such as rape, assault by penetration and sexual assault and may include an online element which facilitates, threatens and/or encourages sexual violence. Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.



- sexual harassment such as sexual comments, remarks about clothes and/or appearance, jokes, taunting and online sexual harassment. This also includes the telling of sexual stories, making lewd comments and calling someone sexual names and physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment.
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as sexting or youth produced sexual imagery) Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive.
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

If staff have a concern about a child or a child makes a report to them, they will follow the safeguarding referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the designated safeguarding lead (or a deputy). Schools behaviour policy will support any sanctions.

The DfE states 'peer on peer abuse should be taken as seriously as abuse by adults and should be subject to the same child protection procedures.

Private Fostering

Many adults find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.

The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a stepparent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness.
- Children whose parents cannot care for them because their work or study involves long or antisocial hours.
- Children sent from abroad to stay with another family, usually to improve their educational opportunities.
- Unaccompanied asylum seeking and refugee children.
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents.
- Children staying with families while attending education away from their home area.



There is a mandatory duty on BAFC to inform Staffordshire Children's Social Care of a private fostering arrangement by contacting First Response. (08001313126), who then has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

Preventing Radicalisation

BAFC will ensure that all staff adhere to the duties in the Prevent Guidance 2015 to prevent radicalisation. This will be done by:

- establishing mechanisms to understand the risk of radicalisation.
- ensure that staff understand the risk and build capability to deal with the issues arising.
- communicate the importance of the duty.
- ensure that staff implement the duty.

All staff will receive awareness raising and training in preventing extremism and radicalisation.

Since 2010, when the Government published the first version of the Prevent Strategy, there has been an awareness of the specific need to safeguard children, young people and families from

extremist ideologies. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.

BAFC values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society's values. Pupils / students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. BAFC is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the BAFC's safeguarding duty.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are detailed in appendix below.

BAFC seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo-Nazi / White Supremacist ideology, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

BAFC also adheres to the Guide to Prevent for EFL Member Clubs, a copy of which can be obtained from the DSL.

Risk Reduction

The Board, SSM and the SM will assess the level of risk within the organisation and put actions in place to reduce that risk.



Response

With effect from 1 July 2015, all schools are subject to a duty to have “due regard to the need to prevent people being drawn into terrorism” (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty.

There is no single way to identify an individual who is likely to be susceptible to an extremist ideology. Specific background factors may contribute to vulnerability, and these are often combined with specific needs for which an extremist group may appear to provide answers, and specific influences such as family, friends and online contacts. The use of social media has become a significant feature in the radicalisation of young people. BAFC is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL. The SPOC for BAFC is **Club Safeguarding Officer**.

Staff within BAFC will be aware of changes in a child’s behaviour or attitude which could indicate that they are in need of help or protection.

BAFC will monitor online activity within the organisation to ensure that inappropriate sites are not accessed by students or staff. When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC / DSL.

Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason, the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug / alcohol issues.

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of BAFC’s safeguarding approach.

- **Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

At BAFC we value freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society’s values. Children and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child’s vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).



The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. **BAFC** is clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation is part of the school's safeguarding duty.

The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are detailed in Appendix below.

Prevent Duty and Channel

Prevent

The Board, the SSM and the DSL will assess the level of risk within BAFC and put actions in place to reduce that risk.

All Educational establishments are subject to a duty to have "due regard to the need to prevent people being drawn into terrorism" (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty and is part of our wider safeguarding obligations.

Designated safeguarding leads and other senior leaders familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and covers childcare). We follow the guidance in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

BAFC's Prevent Single Point of Contact (SPOC) is the SM, who is the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

The SPOC for BAFC is Club Safeguarding Officer

Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the Staffordshire Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.
- The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's participation in the programme is entirely voluntary at all stages.
- Schools have a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Serious Violence

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-





harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Sexual Violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children of **any** age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that **all** victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” and
- Challenging behaviours (potentially criminal in nature), such as grabbing and genitalia, flicking clothing. Dismissing or tolerating such behaviours risks normalising them.

It is important that BAFC staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003 as described below:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: he / she intentionally penetrates the vagina or anus of another person (B) with a part of his / her body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: he / she intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

What is consent? Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g., to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration



only if he / she agrees by choice to that penetration and has the freedom and capacity to make that choice.

Sexual Harassment

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and / or make them feel intimidated, degraded or humiliated and / or create a hostile, offensive or sexualised environment.

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

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- Sexual "jokes" or taunting.
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (BAFC should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and / or sexual violence. It may include:
 - Non-consensual sharing of sexual images and videos.
 - Sexualised online bullying.
 - Unwanted sexual comments and messages, including, on social media; and
 - Sexual exploitation; coercion and threats

Response to a report of Sexual Violence or Sexual Harassment

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow BAFC's safeguarding referral process. As is always the case, if staff are in any doubt as to what to do, they should speak to the DSL.

Sexting

Sexting is defined as the production and / or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and / or sexual acts. It is also referred to as 'youth produced sexual imagery'.

'Sexting' does not include the sharing of sexual photos and videos of under 18-year old's with or by adults. This is a form of child sexual abuse and must be reported to the DSL **immediately**.

Once an image has been taken and sent, the sender has lost control of these images and these images could end up being seen by anyone, including friends and paedophiles.

By having in their possession, or distributing, indecent images of a person under 18 on to someone else – young people are not even aware that they could be breaking the law as these are offences under the Sexual Offences Act 2003.

What to do if an incident involving 'sexting' comes to your attention

Any incidents must be reported to the DSL **immediately**.

- Never view, download or share the imagery yourself, or ask a young person to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL.
- Do not delete the imagery or ask the young person to delete it
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and / or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL. If a 'sexting' incident comes to your attention, report it to your DSL.

https://www.thinkuknow.co.uk/14_plus/need-advice/selfies-and-sexting/

Trafficking

Human trafficking is defined by the UNHCR guidelines (2006) as a process that is a combination of three basic components:

- Movement (including within the UK).
- Control, through harm / threat of harm or fraud.
- For the purpose of exploitation.

The Palermo Protocol establishes children as a special case for whom there are only two components – movement and exploitation. Any child transported for exploitative reasons is considered to be a trafficking victim – whether or not he / she has been deceived, because it is not considered possible for children to give informed consent.

'Child' refers to children anyone below 18 years of age.

A child may be trafficked between several countries in the EU or globally, prior to being trafficked into / within the UK. The child may have entered the UK illegally or legally (i.e. with immigration documents), but the intention of exploitation underpins the entire process. Child victims may be indigenous UK nationals, European Union [EU] nationals from any country outside the EU.

RESPONDING TO DISCLOSURES, CONCERNS AND ALLEGATIONS

Staff may come across cases of suspected abuse either through direct or indirect contact with children. It is not a staff members responsibility to decide whether a child has been abused. It is however their responsibility to act immediately on any such suspicions and report their concerns and to ensure any relevant information is passed in the first instance to the DSL or in their absence, SSM. Any information should be reported via the online MyConcern safeguarding system.

Responding to low level concerns

MANAGING LOW LEVEL CONCERNS

It has been recognised by the club there is a need to manage issues that fall under the umbrella of safeguarding yet which are of a minor nature. These matters are classified as 'Low Level Concerns'.



Handling such concerns appropriately and proportionately will strengthen confidence of staff and volunteers in the Club.

Where Low Level concerns are shared with a designated safeguarding member of staff in accordance with the Clubs' safeguarding policy, these must be recorded as per the normal process for managing Safeguarding issues.

What is a Low Level Concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that an person may have acted in a manner inconsistent with the Club's Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to their behaviour.

Low Level Concerns where no emergency actions are required, should be managed internally and recorded within the MyConcern electronic Safeguarding management system and entitled 'Low Level Concern' in the 'Concern Summary' section. Low Level Concerns do not in any way override or replace the Clubs 'Whistle Blowing Policy' but compliment and work alongside that process.

Two Examples of Low level Concerns:

Physical - Staff error causing no/little harm, e.g. skin friction mark due to ill-fitting bib during football/PE session

Psychological – This could be an isolated incident where and adult, adult at risk or child is spoken to in a rude or inappropriate way – respect is undermined but little or no distress caused.

This list is not limited to the above but is extensive and any uncertainty should be discussed with the DSL or SSM.



Responding to Disclosure

When a child tells you about abuse, they have suffered, what should I remember?

- Stay calm
- Do not communicate shock, anger, or embarrassment
- Reassure the child and tell them that you are pleased that they are speaking to you
- Never agree or promise to keep it a secret. Assure them that you will try to help but let the child know that you will have to tell other people to do this and state who this will be and why.
- Tell them that you believe them. Children very rarely lie about abuse; but they may have tried to tell others and not been heard or believed.
- Tell the child that it is not their fault
- Encourage the child to talk but do not ask "leading questions" or press for information
- Use the acronym T.E.D: Tell me. Explain. Describe
- Listen and remember to check that you have understood correctly what the child is trying to tell you
- Communicate that they have a right to be safe and protected
- It is inappropriate to make any comments about the alleged offender
- Be aware that the child may retract what they have told you. It is essential to record in writing, all you have heard, though not necessarily at the time of the disclosure.
- At the end of the conversation, tell the child again who you are going to tell and why it is that person or people who need to know
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions that you may have asked. Do not add any opinions or interpretations. (dates, times, names mentioned and to whom the information was passed need to be clearly recorded).
- Use written/electronic recording forms where available
- If the disclosure relates to a physical injury do not photograph the injury, but record in writing in as much detail as possible

The information should then be passed, in a timely way, to the SSM and immediately if the child discloses any abuse they have suffered or may be at risk of suffering.

If the DSL or SSM is not available, it is the staff member's responsibility to make a referral to Staffordshire Childrens Advice and Support and inform the DSL at the earliest opportunity. (Staffordshire Childrens Advice and Support 0800 13 13 126) or email www.staffordshire.gov.uk/reportconcern

Abused children are more likely to disclose details of abuse to someone they feel safe with whom they feel safe. By listening and taking seriously what the child is saying staff are already helping the situation.

The following points are a guide to help staff respond appropriately:



Please see Appendix below for information on how to respond to a disclosure of abuse

Responding to Concerns

It is the responsibility of the individual staff member to report any concerns to the DSL and to assist in any further action required on behalf of BAFC.

If any employee, Board member or volunteer has any concerns regarding a child or vulnerable adult who they think is being abused it is important for them to act immediately. All concerns must be shared with the DSL. If this person(s) is not available, either because they are on annual leave or off sick then any concerns should be discussed with the SSM or Burton Albion Football Club's DSL.

The DSL or SSM should also ensure that the employee reporting the incident is reassured that their concerns are being appropriately addressed and that they have access to staff support if needed.

Where there is evidence of immediate harm then the employee should phone 999 and report the incident to the Police.

***Where there is any possibility that a criminal act may have been committed care should be taken not to take any action that may jeopardise any subsequent criminal investigation. ***

To make a referral about a child contact First Response at the Multi-Agency Safeguarding Hub (MASH) on 0800 1313126. The referral must be followed up in writing within 48 hours.

NB: if the child lives outside of Staffordshire but accesses services within Staffordshire, the referral must be made to the area in which the child resides.

The record should include:

- The date and time
- The child or vulnerable adult's name, address, and date of birth
- The nature of the allegation
- A description of any visible injuries
- Observations – e.g., a description of the child or vulnerable adult's behaviour and physical and emotional state
- What the child or vulnerable adult said and what was said in reply. Please record this as accurately as possible, using their choice of language
- Any action taken because of the concerns being raised e.g., who was spoken to and resulting actions. Include names, addresses and telephone numbers.
- Sign and date what has been recorded.
- Store the information in accordance with relevant procedures, e.g., Data Protection.
- Report to DSL.

Actions to be taken by the DSL, SSM and staff are as follows:

- The procedure contained within this policy will be followed.
- Where concerns relate to a child or young person advice must be sought from Staffordshire Children's Social Care (via First Response Team (FRT)'s First Response Team based at the MASH on 0800 1313126 (between 8.00 am and 5.30 pm and 4.30 pm on a Friday) or via a brief e-mail to firstr@staffordshire.gov.uk with your contact details (please note this should not include any confidential details about a child or young person) and explain the need for an urgent response due to a child protection concern
- Alternatively, Staffordshire Police Central Referral Unit can be contacted on 101 or dial 999 in an emergency.



Consent

The DSL should in general discuss any concerns with the child and family and where possible seek their consent to making referrals to Staffordshire Children's Social Care (via First Response Team (FRT) Services, this should only be done where such discussion and agreement-seeking will not place the child or others at increased risk of suffering significant harm.

Consent is not required for child protection referrals; the DSL would need to inform parents or carers that you are making a referral as stated above, unless by alerting them you could be putting that child or others at risk.

STAFF – CHILDREN SUBJECT TO CHILD PROTECTION PROCEDURES

Any member of staff whose own children become subject to child protection procedures must inform the SM. The SM will discuss this with the SSM and LADO in accordance with Staffordshire Safeguarding Children Board procedures for dealing with allegations against who work in a position of BAFC with children. Appropriate action will be agreed.

Staff who fail to follow this policy and procedures for safeguarding and promoting the welfare of children may be subject to disciplinary procedures.

EARLY HELP

The DSL will ensure staff are aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

Every member of staff working with children at BAFC are advised to maintain an attitude of **'professional curiosity and respectful uncertainty'** where safeguarding is concerned.

When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to act as outlined in this policy.

Early intervention is a key part of a wider continuum of services and will work alongside universal services. For early intervention to be successful each stage of the process must be carried out well and followed through by every person who works with children, young people and families and has an individual responsibility for early intervention.

Any Child may benefit from Early Help, but all staff should be particularly 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 in to antisocial 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 circumstances presenting challenges for the child, such as drug or alcohol issues, 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.

The DSL should complete the Staffordshire Early Help Assessment (EHA) when:

- Age-appropriate progress is not being made and the causes are unclear or.
- The support of more than one additional agency is needed to meet the child or young person's needs.
- Children do not meet the threshold, yet concerns are emerging e.g., attendance, behavioural, academic progress, change in behaviour.

The DSL may need to make a referral directly to other agencies or request the support of Staffordshire County Council Local Support Team (LST). That referral will be made through Families First Responsive Services (0800 1313126) or to report a concern via email, www.staffordshire.gov.uk/reportconcern

The DSL may also consider seeking advice and guidance from [Staffordshire Education Safeguarding Advice Service](#) around thresholds and appropriate referrals to First Response.

Staffordshire Education Safeguarding Advice Service (ESAS): - 01785 895836

Concerns about a child should always lead to help for a child. BAFC may need to escalate its concerns with Children's Services to ensure a referral is accepted or work with other agencies to ensure an Early Help Assessment is completed

REFERRAL TO ESCALATE BEYOND EARLY HELP

Child in Need (Section 17 of Children Act 2004)

If the DSL considers that the welfare concerns indicate that a Child in Need referral is appropriate, they will speak with parents / child and obtain their consent for referral to the Staffs Children Advice & Support Service or the appropriate social care team if a different authority, to request an assessment. If parents refuse to give consent, but the child's needs are not being met, the DSL will discuss the issues with the Staffs Children Advice & Support Service. The DSL should be invited to participate in Child in Need (CIN) meetings convened by Children's Social Care when children are deemed to require section 17 services.

Child Protection (Section 47 of Children Act 2004)

If the local authority has reasonable cause to suspect that a child is suffering, or likely to suffer, significant harm they have a duty to make enquires under section 47 to enable them to decide whether they should take any action to safeguard and promote the child's welfare. This duty also

applies if a child is subject to an emergency protection order (under section 44 of the Children Act 1989) or in police protective custody under section 46 of the Children Act 1989.

Children's Services will convene a Child Protection Conference, once a child protection enquiry under Section 47 of the Children Act 1989 has been undertaken and the child is judged to be at continuing risk of significant harm. A review conference will take place once a child has been made the subject of a Child Protection Plan to monitor the safety of the child and the required reduction in risk. Between conferences regular meetings of a core group will take place to monitor the progress of the child protection plan.



The DSL and sometimes other staff members may be asked to attend a child protection conference on behalf of BAFC in respect of individual children. In any event, the person attending will require to have as much relevant up to date information / case files about the child as possible; any member of staff will be required to contribute to this process. The person attending must contribute a recommendation on the risks / protective factors for the family from their information and a view on a need for child protection plan.

Clearly child protection conferences can be upsetting for parents. We recognise that we are likely to have more contact with parents than other professionals involved. We will work in an open and honest way with any parent whose child has been referred to First Response or whose child is subject to a child protection plan. Our responsibility is to promote the protection and welfare of all children and our aim is to achieve this in partnership with our parents.

ESCALATION PROCEDURE

Staffordshire Safeguarding Children Board expects members of staff working directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues within agencies and between agencies provides a healthy approach to the work.

Where members of staff from any agency feel concerns regarding a child are not being addressed it is expected that the escalation process should be used until a satisfactory conclusion is reached.

The process of resolution should be kept as simple as possible and the aim should be to resolve difficulties at a professional practitioner level wherever possible. It should be recognised that.

differences in status and experience may affect the confidence of some workers to pursue this course of action and support should be sought from the DSL.

NON-RECENT ABUSE

Non-recent abuse (also known as historical abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years old.

Many people who were abused in childhood believe that they are to blame and that the abuse was their fault. But this is never the case – a child cannot consent to abuse.

In countless circumstances children are too young to fully understand or articulate what is happening to them. Some spoke out at the time weren't believed. Others were too embarrassed to tell anyone or did not know who to turn to.

For many, the abuse may have been too difficult to process, and they may only remember aspects of what happened as they get older.

Reporting non-recent abuse

It is never too late to report the abuse.

Adults often report non-recent abuse to stop the offender abusing other children. Some feel that reporting gives them a greater sense of closure.

Deciding on when or whether to report can be very difficult. You should never feel forced to take any action that you do not feel comfortable with.





It may be reassuring to know that if you do decide to report, you will be supported throughout the process.

The more information you can provide, the better such as your name and contact details, the name of the alleged perpetrator and the location and (approximates) dates that the abuse took place.

Reporting to the Police

You can report abuse to the police regardless of how long ago it happened.

For example; if you were a victim of childhood sexual abuse and decide to report this to the police:

- firstly, contact the local police on the UK wide non-emergency number 101 and briefly explain what you are calling about;
- you will be put through to a specifically trained officer such as a sexual offences liaison officer (SOLO) who will take an initial statement;
- the SOLO will arrange with you a time and place that you feel comfortable with, to take a more detailed statement your details will be treated sensitively, and you do not have to face the alleged offender.

What happens next?

- The role of the police is to investigate the crime and recover evidence.
- The role of the Crown Prosecution Service is to decide if there is enough evidence to prove the abuse occurred 'beyond reasonable doubt'.
- Even if there is little evidence it might be taken to court if there is a concern for public safety.

The process will not be a short one, but the police will update you of the developments.

Contact the NSPCC

If you do not feel comfortable contacting the police directly you can contact the NSPCC Helpline any time where an advisor will discuss with you your options for reporting.

If you decide you wish to report and provide the name and details for yourself and the alleged offender, we will pass this information on to the police on your behalf.

The police will then contact you to discuss the disclosure further and arrange to take a formal statement. Your details will be treated sensitively.

It is never too late to report the abuse!

Adults often report non-recent abuse to stop the offender abusing other children. Some feel that reporting gives them a greater sense of closure.

If a person does decide to report, they will be supported internally by the DSL or a member of staff they feel comfortable with and externally by the Police or / and NSPCC during the process.



RISKS THAT INCREASE THE POSSIBILITY OF ABUSE HAPPENING

There are certain situations and factors that put people at risk of abuse. If one or more of these factors are present, it does not mean that abuse will occur, but it will increase the risk:

- Isolation
- Living in the same household as an abuser
- A previous history of abuse
- The existence of financial problems
- A member of the household experiences emotional or social isolation
- Inappropriate physical or emotional environment e.g., lack of privacy and / or personal space
- Where there has been a change of lifestyle e.g., illness, unemployment or employment.
- Dependence on others for personal and practical care
- Where a person is dependent on other people to administer money or where several people manage their money
- Where the vulnerable person exhibits difficult and challenging behaviour
- The carer has difficulties such as debt, alcohol or mental health problems.
- Poor leadership in care services
- Unmonitored provision of care e.g., where reviews or inspections do not take place.
- Failure to comply with standard operating policies and procedures.

Increased Risk to Vulnerable Children

There are many issues that may contribute to child abuse, but some factors increase the risk to children and make them more vulnerable to abuse. They can be found in the background of parents, in the environmental situation and in attributes of the child themselves.

Parental factors:

- Parent has a mental illness.
- Parent is abusing drugs or alcohol.
- Parent has already abused a child.
- Pregnancy was not wanted.
- Parent has a background of abuse when growing up.
- Young, unsupported mother often with low education
- Parents have unrealistic expectations of the child and lack parenting knowledge.
- Parent is isolated and has little support.
- Parent has a learning difficulty.

Environmental factors:

- Overcrowding in the house
- Poverty or lack of opportunity to improve the family's resources.
- Domestic violence is present.
- A non-biological adult (i.e., unrelated) living in the house.
- Family is experiencing multiple stresses.

Child factors:

- Baby is sickly, colicky or unwanted.
- Child has a physical or developmental disability.
- Child is the product of an abusive relationship.
- Lack of attachment between child and parent
- Child resides in care, particularly residential.
- Child is excluded from mainstream education.
- Child uses drugs / alcohol.



It is possible to limit the situations where the abuse of children may occur, by promoting good practice to all staff.

POLICY REVIEW

This will be an ongoing process in preparation for the annual review (unless legislative change or learning outcomes from an incident dictates the need to review sooner). Regard will be given to implementing, communicating and monitoring the policy to ensure procedures and practices are effective, strengthened or developed and are focused on keeping children safe.

BAFC and key partners will formulate an action plan based on the key principles and recommendations contained within the policy.

Informed conclusions will be drawn from monitoring, surveys, and anecdotes. The NSPCC Child Protection in Sport Unit (CPSU) audit and assessment process will be used to identify areas of strength and areas where improvement is needed.

FURTHER CONTACTS

EFL Child Protection Advisor	Alexandra Richards Safeguarding Manager EFL arichards@efl.com T: 01772 325940 M: 07792284740
The Football Association	www.thefa.com/football-rules-governance/safeguarding
FA Safeguarding Team	0800 169 1863 or via Safeguarding@TheFA.com
The FA CRC	FAChecks@TheFA.com GB Group (formerly TMG CRB 2015) are the registered body administering the CRC process on behalf of The FA
LFE	League Football Education www.lfe.org.uk Tel: 01772 326 870
NSPCC Helpline Number	www.nspcc.org.uk Tel: 0808 800 5000
Text Phone Number	88858
Childline	www.childline.org.uk



	Tel: 0800 1111 (free, confidential 24-hour helpline for Children and young people)
CEOP	Child Exploitation and Online Protection Centre www.ceop.gov.uk (Dedicated to eradicating the sexual abuse of Children)
Child Protection in Sport Unit	www.nspcc.org.uk/inform/cpsu (works with sport's governing bodies to minimise the risk of Child abuse)
Anti-Bullying Alliance	www.anti-bullyingalliance.org.uk (Brings together over 60 organisations into one network to develop a consensus around how to stop and prevent bullying. Aims to influence policy and develop and disseminate (best practice)
DBS	The Disclosure & Barring Service (helps employers make safer recruitment decisions) www.gov.uk/government/organisations/disclosure-and-barring-service
DBS Referral Guidance	Factsheet: when to make a referral to the (DBS) https://www.gov.uk/government/collections/dbsreferrals-guidance--2#barring-and-referral-guidance DBS Eligibility Guidance – Available from the DSL
DBS Frequently Asked Questions	https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/143692/dbs-referral-faq.pdf
DBS and 'Regulated Activity'	www.gov.uk/government/organisations/disclosure-and-barring-service

FURTHER ADVICE ON SAFEGUARDING MATTERS CAN BE OBTAINED FROM

Local Contacts

- Staffordshire County Council's Education Safeguarding Advice Service
01785 895836 e-mail : esas@staffordshire.gov.uk
- LADO Staffordshire 0800 13 13 126
- Staffordshire Children's Social Care Services: Staffs Children Advice & Support Service in Multi Agency Safeguarding Hub (M.A.S.H.) 0800 1313 126. Email www.staffordshire.gov.uk/reportconcern
- Emergency Duty Services (out of hours safeguarding concerns) 0845 604 2886 or email eds.team.manager@staffordshire.gov.uk
- Staffordshire Police M.A.S.H. can be contacted on 101. In the event of an emergency please dial 999
- Stoke-on-Trent Children's Services: Advice and Referral Team (ART) 01782 235100
Emergency Duty Team: 01782 234234 (outside office hours, weekends and bank holidays)
Minicom: 01782 236037





- Sam Hubza – School Guidance around Asylum Seekers (Central Thoroughfare Team) Tel: 01785 854906
- Staffordshire Police Force coordinator: Mark Hardern
Tel: 07539 3636299 Email: mark.hardern@staffordshire.pnn.police.uk
- Staffordshire Police Prevent Team 01785 232054, 01785 233109 or email prevent@staffordshire.pnn.police.uk

NSPCC

Harmful Sexual Behaviour project: **0844 892 0273**

Local Advice

- Entrust Learning Technologies ICT / Computing / E-safety Teacher Consultants 0300 111 8030
- Families First Local Support team (Staffordshire) email families.first@staffordshire.gov.uk
- Fostering Service (Staffordshire) 0800 169 2061 email fostering&adoptionbus@staffordshire.gov.uk Out of Hours: Emergency Duty Service 01785 354030
- Staffordshire Safeguarding Children Board 01785 277151 sscb.admin@staffordshire.gov.uk
- Entrust HR Services (subscription basis) 01785 278961
- Fostering Service (Stoke-on-Trent) 01782 234555 Email: fostering@stoke.gov.uk
- Stoke-on-Trent Family Information Service Hub (F.I.S.H) 01782 232200 email fish@stoke.gov.uk

National Contacts

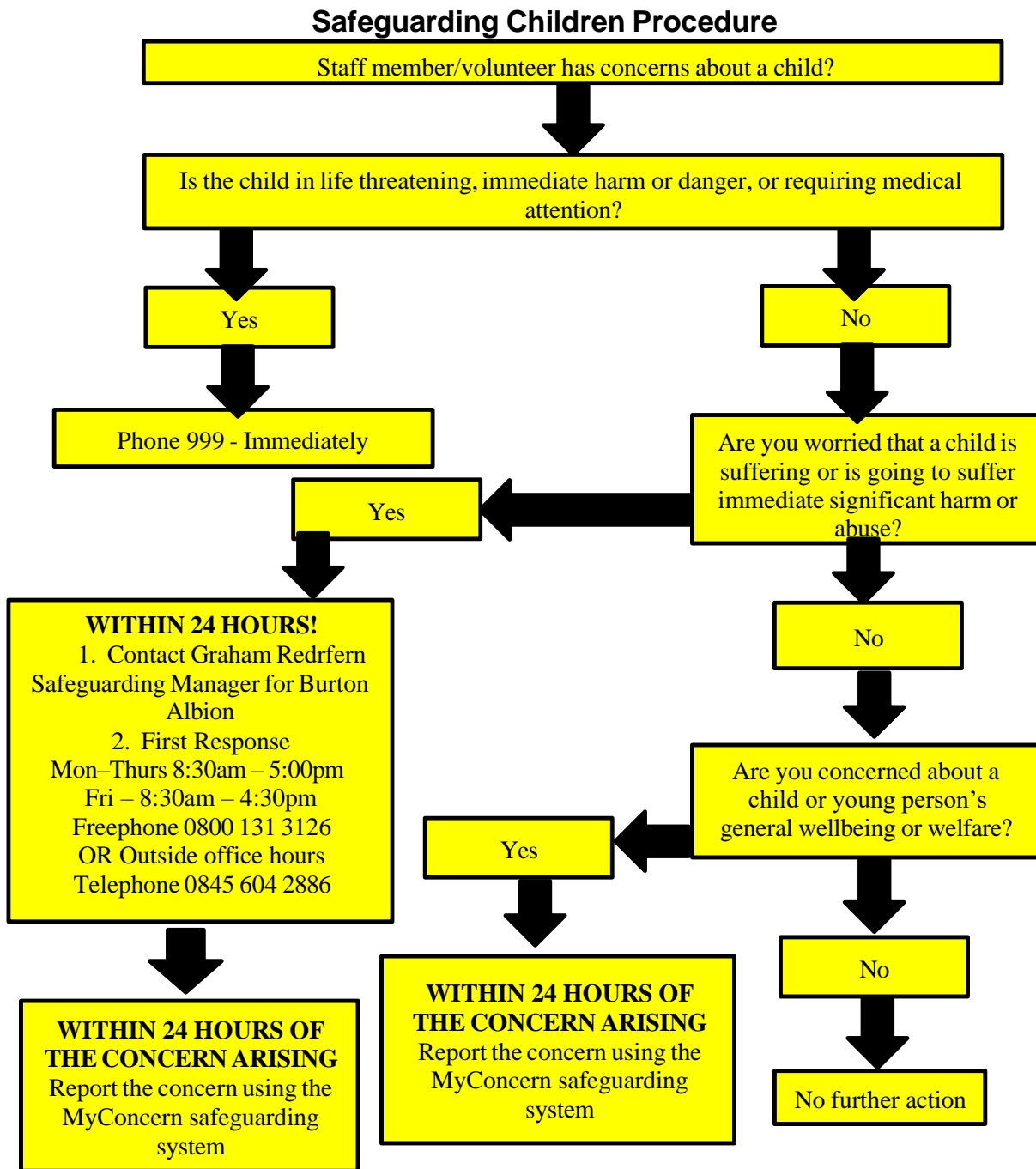
- Police (Non-emergency 101)
- CEOP (Child Exploitation and Online Protection) <http://ceop.police.uk/>
- Professionals Online Safety Helpline – 0844 381 4772 www.saferinternet.org.uk/helpline
- Internet Watch Foundation (IWF) – <http://www.iwf.org.uk>
- Safer Internet Centre – helpline@saferinternet.org.uk
- Childline – 0800 1111 www.childline.org.uk
- HM Government (advice on protecting children from radicalisation for parents, teachers and leaders) www.educateagainsthate.com
- **NSPCC Harmful Sexual Behaviour project: 0844 892 0273**

Useful websites

- Staffordshire Safeguarding Children Board <http://www.staffsscb.org.uk>
- Stoke-on-Trent Safeguarding Children Board <http://www.safeguardingchildren.stoke-on-trent.gov.uk>
- Child Exploitation and Online Protection Centre (CEOP) – www.ceop.police.uk & www.knowaboutcse.co.uk
- NSPCC – 24-hour Child Protection Helpline 0808 800 5000
<https://www.nspcc.org.uk/>
- WOMENS AID - 24 Hour Helpline: **0870 2700 123**
http://www.staffordshirewomensaid.org/contact_us/
- UNICEF – Support Care Team 0300 330 5580 (Mon – Fri 8am-6pm). If you think a child is in immediate danger, please call 999.
www.unicef.org.uk



Appendix A



Graham Redfern – Safeguarding manager (07739 351146)

If Graham Redfern is unavailable and in an emergency contact John Widdowson - Senior Safeguarding Manager (07535 971119)

APPENDIX B

INDICATORS OF VULNERABILITY TO RADICALISATION

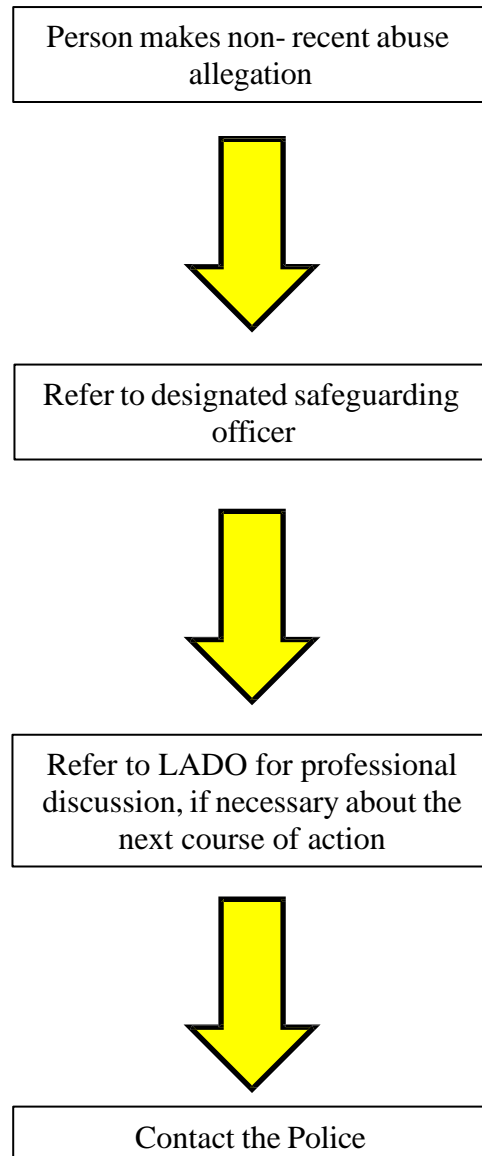
1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as: Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:
 - The demonstration of unacceptable behaviour by using any means or medium to express views which:
 - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
 - Seek to provoke others to terrorist acts;
 - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
 - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that BAFC staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
 - Identity Crisis – the student / pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
 - Personal Crisis – the student / pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
 - Personal Circumstances – migration; local community tensions; and events affecting the student / pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
 - Unmet Aspirations – the student / pupil may have perceptions of injustice; a feeling of failure; rejection of civic life;
 - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;
 - Special Educational Need – students / pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.



7. This list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include:
 - Being in contact with extremist recruiters;
 - Family members convicted of a terrorism act or subject to a Channel intervention;
 - Accessing violent extremist websites, especially those with a social networking element;
 - Possessing or accessing violent extremist literature;
 - Using extremist narratives and a global ideology to explain personal disadvantage;
 - Justifying the use of violence to solve societal issues;
 - Joining or seeking to join extremist organisations;
 - Significant changes to appearance and / or behaviour; and
 - Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

APPENDIX C

NON RECENT ABUSE PROCEDURE





APPENDIX D

Prevent Leads	Contact Name	Email Address
Cannock	Kerry Wright	KerryWright@cannockchasedc.gov.uk
	Karla Vowles	KarlaVowles@cannockchasedc.gov.uk
East Staffs	Mike Hovers	Michael.hovers@eaststaffsbc.gov.uk
	Sal Khan	sal.khan@eaststaffsbc.gov.uk
Lichfield	Susan Bamford	Susan.Bamford@lichfielddc.gov.uk
Newcastle	Sarah Moore	Sarah.moore@newcastle-staffs.gov.uk
South Staffs	Helen Marshall	H.Marshall@sstaffs.gov.uk
Stafford	Victoria Cooper	vcooper@staffordbc.gov.uk
Staffs Moorlands	David Smith	david.smith@staffsmoorlands.gov.uk
Tamworth	Joanne Sands	joanne-sands@tamworth.gov.uk
Staffordshire County Council (Safer Communities)	Fiona Chapman	fiona.chapman@staffordshire.gov.uk
Staffordshire Police Prevent Team	Sgt. Calum Forsyth	prevent@staffordshire.pnn.police.uk

APPENDIX E

SAFE WORKING PRACTICES

The Safe Working Practices document was initially produced as those working with children had expressed concern about their vulnerability and requested clearer advice about what constitutes illegal behaviour and what might be considered as misconduct. Education staff asked for practical guidance about which behaviours constitute safe practice and which behaviours should be avoided.

This Safe Working Practice document is NOT statutory guidance from the DfE; it is for employers, local authorities and / or Local Children's Safeguarding Board to decide whether to use this as the basis for their Code of Conduct.

The document seeks to ensure that the responsibilities of educational settings leaders towards children and staff are discharged by raising awareness of illegal, unsafe, unprofessional and unwise behaviour. It should assist staff to monitor their own standards and practice and reduce the risk of allegations being made against them. It is also recognised that not all people who work with children work as paid or contracted employees. The principles and guidance outlined in this document still apply and should be followed by any person whose work brings them into contact with children.

The guidance also supports BAFC in giving a clear message that unacceptable behaviour will not be tolerated and that, where appropriate, legal or disciplinary action is likely to follow. Once adopted, this will form part of the staff behaviour policy and BAFC may refer to the document in any disciplinary proceedings.

Safe working practice document can be found on the following website:

[Professional and Personnel Relationships \(saferrecruitmentconsortium.org\)](http://saferrecruitmentconsortium.org)





The Guide to Safer Working Practice for EFL members is available from EFL.

Both document forms part of the behaviour expectations staff must adhere to.

A copy of the Staff Handbook is available upon request at Linda.Brown@burtonalbionfc.co.uk

Separate Codes of Conduct outlining the expectations of the organisation for players, other participants and parents / carers can requested from BAFC Admin.

GOOD PRACTICE EXAMPLES

All staff should adhere to the following principles when working with children:

- Always work in an open environment (e.g., avoiding private or unobserved situations and encouraging open communication with no secrets)
- Make the experience of sporting activity fun and enjoyable, promote fairness, confront and deal with bullying appropriately.
- Treat all children equally and with respect and dignity.
- Always put the welfare of the child or vulnerable adult first
- Maintain a safe and appropriate distance and avoid unnecessary physical contact with children.
- Where any form of manual / physical support is required it should be in clear view of the rest of the group and with the consent of the child. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child's consent has been given.
- If groups must be supervised in changing rooms always ensure coaches etc work in pairs
- Request written parent / guardian consent if BAFC officials are required to transport children.
- Gain written parent / guardian consent for any significant travel arrangements e.g., overnight stays.
- Ensure that at away events do not invite children to their rooms.
- Be a good role model, this includes not smoking or drinking alcohol in the company of children.
- Always give enthusiastic and constructive feedback rather than negative criticism
- Secure written parent / guardian consent for BAFC to act or to give permission for the administration of emergency first aid or other medical treatment if the need arises.
- Do not transport children in your own personal vehicle.
- Keep a written record of any injury that occurs, along with details of any treatment given.

UNACCEPTABLE BEHAVIOURS EXAMPLES

The following is regarded as poor practice and should be avoided by all staff:

- Unnecessarily spending excessive amounts of time alone with children away from others
- Being alone in changing rooms, toilet facilities or showers used by children.
- Taking children alone in a car journey, however short
- Taking children to your home where they will be alone with you.
- Sharing a room with a child or vulnerable adult
- Engaging in rough, physical or sexually provocative games, including horseplay
- Allow or engage in inappropriate touching of any form.
- Allowing children to use inappropriate language unchallenged.
- Making sexually suggestive comments, even in fun
- Reducing a child or vulnerable adult to tears as a form of control.
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon
- Do things of a personal nature that the child can do for themselves.
- Any member of staff who becomes the subject of a police investigation in relation to physical or sexual offences against children or are charged with such a criminal offence must inform the SM immediately. Staff must disclose any convictions, cautions, court orders, reprimands or warnings which may affect their suitability to work with children whether received before, or during their employment with BAFC.