

# Scunthorpe United Football Club

## Safeguarding and Child Protection Policy



ISSUE NUMBER	DATE	BRIEF DESCRIPTION OF AMENDMENT	BY WHOM
V001	29/01/2019	OLD POLICY	
V002	06/10/2021	UPDATE FROM 2015 ACT TO 2018 ACT FROM LADO	LKM
V003	10/12/2021	UPDATES FROM NEWLY APPOINTED DSO	CDL
V004	02/02/2022	SHELDON REPORT UPDATE	CDL
V005	04/06/2022	NEW SEASON REVIEW, NO CHANGES	CDL
V006	19/05/2023	SAFER RECRUITMENT UPDATE	CDL

**If you believe a child or  
vulnerable adult is in  
immediate danger, call  
999, then contact your  
DSO.**

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## 1. IMPORTANT CONTACT DETAILS

### **SAFEGUARDING IS EVERYONE'S RESPONSIBILITY**

Your DSO can help you with any worry's or inquires and can be contacted at any time.

**If you believe a child or vulnerable adult is in immediate danger, Call 999, then contact your DSO.**

#### **For advice and reporting:**

**EFL Safeguarding Team**

**FA National Safeguarding Team**

**North Lincolnshire LADO**

**SUFC Designated Police Liaison Officer**

**Lincolnshire FA**

#### **Children Safeguarding Hubs:**

**Lincolnshire 01522 782111**

**North Lincolnshire 01724 296500**

**North East Lincolnshire 01472 326292**

#### **Adult Safeguarding Hubs:**

**Lincolnshire 01522 782155**

**North Lincolnshire 01724 297000**

**North East Lincolnshire 01472 256256**

#### **Other numbers you can call to report your concerns to are:**

**NSPCC Hotline- 0800 800 5000 Childline- 0800 1111 Crime Stoppers- 0800 800 5511**

#### **Scunthorpe United Football Club Contacts**

Scunthorpe United Football Club understands and accepts our collective responsibility to adhere to our Safeguarding Children & Vulnerable Adults Policies & Procedures. We commit to ensuring our members are aware of and have access to our policies.

This document has been agreed and signed by those with overall responsibility for Safeguarding Children & Vulnerable Adults.

<b>Role</b>	<b>Name</b>	<b>Contact</b>	<b>Sign/Date</b>
COO	Lee Turnbull	<a href="mailto:Lee.turnbull@scunthorpe-united.co.uk">Lee.turnbull@scunthorpe-united.co.uk</a>	
SSM			
DSO	Clare De Laloe	<a href="mailto:Clare.delaloe@scunthorpe-united.co.uk">Clare.delaloe@scunthorpe-united.co.uk</a>	
Academy Manager	Tony Daws	<a href="mailto:Tony.daws@scunthorpe-united.co.uk">Tony.daws@scunthorpe-united.co.uk</a>	
Education & Player Care	Ian James	<a href="mailto:ian.james@scunthorpe-united.co.uk">ian.james@scunthorpe-united.co.uk</a>	
Head Coach	Mark Smith	<a href="mailto:Mark.smith@scunthorpe-united.co.uk">Mark.smith@scunthorpe-united.co.uk</a>	

The Board of directors will ensure that all staff and volunteers are aware that it is their responsibility to:

- Refer all welfare and disclosures to the DSO.
- Protect children and adults at risk from abuse.
- Be aware of the SUFC's safeguarding and child protection policy and procedures.
- Include the DSO in matters of concern regarding staff conduct.
- Undertake appropriate training, refresher training which will be updated every 3 years in accordance with Local Safeguarding Children Board (LSCB) requirement.

The SUFC has appointed a Senior Safeguarding Manager to monitor its safeguarding policy and procedures on behalf of the Board and to liaise with the DSO.

The SUFC will annually review this policy and the implementation of its procedures and in the following circumstances:

- Changes in legislation and/or government guidance.
- As required by the LSCB, FA and the EFL.
- As a result of any other significant change or event.

## **2. SAFEGUARDING AND CHILD PROTECTION POLICY STATEMENT**

2.1 Scunthorpe United Football Club acknowledges their duty of care to safeguard and promote the welfare of children and young people and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice, the Football Association (FA) and English Football League (EFL) requirements.

2.2 This policy recognizes that the welfare and interests of children and young people are paramount (Children Act 1989) in all circumstances. It aims to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socioeconomic background, they have a positive and enjoyable experience of sport in a safe and child centered environment. We recognise that those aged under 18 years of age are legally defined as children.

2.3 We acknowledge that some children, including disabled children and young people or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

As part of our safeguarding policy, SUFC will:

- promote and prioritise the safety and wellbeing of children and young people as being paramount.
- make sure that everyone understands their roles and responsibilities in respect of safeguarding, and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people.
- ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern. All suspicions and allegations of abuse will be taken seriously.
- take care that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored.
- prevent the employment/deployment of unsuitable individuals.
- ensure robust safeguarding arrangements and procedures are in operation.

2.4 The policy and procedures will be widely promoted and are mandatory for everyone involved in SUFC. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion.

2.5 SUFC recognise's and accepts the responsibility to act 'in loco parentis' during organised activities, and also have a responsibility towards all our adult volunteers to take children and young people's safety and wellbeing seriously.

2.6 We take steps to minimise any possibility that abuse or harm could occur, and make sure if a concern, allegation or disclosure arises they are dealt with quickly and appropriately. Good links are maintained with the statutory safeguarding authorities such as North Lincolnshire Local Safeguarding Children Board (LSCB), and if we have significant concerns about the suitability of a member of staff or a volunteer to work with children or young people, we will refer it to the Local Area Designated Officer (LADO).

2.7 Everyone within SUFC must fully understand and implement the safeguarding policies and procedures relevant to their role. To enable this to happen there is a comprehensive training program and safeguarding structure that ensures we protect children and young people across the organisation



### **3. SCUNTHORPE UNITED ACADEMY SAFEGUARDING CHILDREN STATEMENT 2021**

Scunthorpe United's Academy believes that children must be protected from harm at all times.

1. We believe every child should be valued, safe and happy. We want to ensure that children at the Academy know this and are empowered to tell us if they are suffering harm.
2. We want children at our Academy to enjoy what we have to offer in safety.
3. We want parents, guardians and carers who attend or who send their children to the Academy to be assured that we care for their children in a way that promotes their child's health and wellbeing and keeps them safe.
4. We want all who work with us, or who provide funding to us (League Football Education) to have confidence and recognise that we are a safe organisation.
5. We will achieve this by having an effective Child Protection Policy and by all of our staff and volunteers been Child Protection Workshop trained and by being a "Whistle Blowing – Telling Club".
6. If we discover or suspect a child is suffering harm, we will notify social services via the Child Protection Officer and the Academy Manager or the Police - in order that the child can be protected if necessary.
7. This Safeguarding Children statement and our Child Protection Policies apply to all employees, voluntary staff and attendees at Scunthorpe United's Academy and anyone carrying out any work for us.
8. We will review our Safeguarding Children Statement, our Child Protection Policy and our Code of Conduct annually, to make sure that they are still relevant, effective and meet government legislation.

Safeguarding concern and referral

If you are ever concerned that a child is in immediate danger, please call the police on 999.

#### **4. SCUNTHORPE UNITED ADULTS AT RISK STATEMENT 2021**

Scunthorpe United Football Club is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all adults involved in Football in accordance with the Care Act 2014.

Scunthorpe United Football Club safeguarding adults' policy and procedures apply to all individuals involved in Scunthorpe United Football Club.

Scunthorpe United Football Club will encourage and support partner organisation, including clubs, counties, suppliers, and sponsors to adopt and demonstrate their commitment to the principles and practice of equality as set out in this safeguarding adult's policy and procedures.

Safeguarding is everyone's responsibility.

This policy represents the Club's response to the need to protect adults at risk and outlines our key objectives for all staff and volunteers working within our organisation to:

- Enable everyone, regardless of age, culture, disability, gender, racial origin, religious belief and/or sexual identity to participate equitably in football in a safe environment
- Ensure all those working with Adults at Risk are competent and have been provided with relevant awareness training regarding the potential difficulties Adults at Risk can face and how to manage them.
- Review our ways of working to incorporate good practice
- Take all suspicions and allegations of abuse or poor practice seriously and respond swiftly and appropriately to them in accordance with current legislation and football governing body procedures
- Ensure the safer recruitment of staff

## 5. LEGAL FRAMEWORK AND GUIDANCE

- Children Act 1989
- United Convention of the Rights of a Child 1991
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Special educational needs and disability (SEND) code of practice: 0 – 25 years.
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers 2015.
- Working together to safeguard children: a guide to inter-agency working to safeguard and promote the welfare of children 2018.
- Keeping Children Safe in Education (KCSiE) 2016
- FA
- EFL
- North Lincolnshire Council

Safeguarding children and young people is the responsibility of everyone. If you are concerned that a child is being abused or they may be at risk of harm, you should contact and make a referral to North Lincolnshire's Single Point of Contact Team on:

01724 296500 (9am to 5pm Monday to Thursday, 9am to 4.30pm Friday)

08081 689667 (free phone)

01724 296555 (answerphone – out of office hours and at weekends)

101 – Police non-emergency

999 – Police emergency

The three safeguarding partners are:

North Lincolnshire Council

Humberside Police

North Lincolnshire Clinical Commissioning Group

They have joint responsibility for local safeguarding arrangements.

## 6. GLOSSARY OF TERMS

6.1 Terminology in this area is complex and changes as services are reshaped. This glossary sets out some key terms. The definitions below are extracted from Working Together 2015:

**Activity** means any activity or series of activities, arranged by or in the name of the EFL, for Children, Young People and/or Adults at Risk, or to be attended by Children, Young People and/or Adults at Risk.

**Child, Children, Young Person and Young People** means any person(s) who have not yet reached their eighteenth birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.

**Child protection:** Part of safeguarding and promoting welfare. This refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

**Club** means an association football club in membership of the EFL.

**Contextual safeguarding** - Contextual safeguarding was renamed in the guidance as 'assessment of risk outside the home', and teenage relationship abuse has been added as an area of risk, however the primary content of this section has not changed. Contextual safeguarding or assessment of risk outside the home is a growing area of interest for sport; the CPSU will be developing further content on this topic in 2021.

**Safeguarding Children and Young People** is the action that is taken to promote the welfare of children and protect them from harm.

This means:

- Protecting Children and Young People from abuse and maltreatment.
- Preventing harm to their health or development.
- Ensuring they grow up with the provision of safe and effective care; and
- Taking action to enable all Children and Young People to have the best outcomes.

**Staff** means any person employed or deployed by Scunthorpe United Football Club whether in a paid, voluntary, consultancy or third-party capacity.

**The Football Association ("The FA")** is English football's governing body.

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6.2 Types of abuse:

**Abuse:** A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or 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 others (e.g., via the internet). They may be abused by an adult or adults or another child or children.

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

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

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

**Neglect:** 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 of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers).

**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 criminal exploitation** - As set out in the Serious Violence Strategy, published by the Home Office, where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology. Page 110 Working Together 2018.

**Modern Slavery:** encompasses slavery, human trafficking, forced labor and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.

**Female Genital Mutilation (FGM):** female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done. It is also known as "female circumcision" or "cutting", and by other terms such as Sunna, gudniin, halalays, tahur, megrez and khitan, among others. FGM is usually conducted on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is child abuse.

**Forced Marriage** - forced marriage is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The Anti-social Behavior, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

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

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

**Extremism:** goes beyond terrorism and includes people who target the vulnerable, including the young, by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. Calls for the death of members of our armed forces is classed as extremist.

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

- Emotional being unfriendly, excluding (emotionally and physically) sending hurtful text messages, tormenting, (e.g., hiding football boots/shin guards, threatening gestures).
- Physical pushing, kicking, hitting, punching or any use of violence.
- Sexual unwanted physical contact or sexually abusive comments.
- Discriminatory comments, jokes about or targeted abuse aimed towards disabled children, homophobic, transphobic, sexist, gendered, racist or faith-based comments.
- Verbal name-calling, sarcasm, spreading rumors, teasing.

**Cyberbullying:** is when a person uses technology i.e., mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets), to deliberately upset someone. This could take the form of posting derogatory abusive comments, videos or images on social media

Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on.

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

**Discriminatory behavior is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).**

**Poor practice:** This is behavior that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of Children, Young People and Adults at Risk are not afforded the necessary priority, compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing Children, Young People and Adults at Risk in potentially compromising and uncomfortable situations, failing to ensure the safety of Children, Young People and Adults at Risk, ignoring health and safety guidelines, or giving continued and unnecessary preferential treatment to individuals.

**Hazing:** Any rituals, initiation activities, actions or situations, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of Children, Young People and Adults at Risk.

**Peer-on-peer abuse:** Children can abuse other children. This is most likely to include, but may not be limited to:

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



- **Sexting** (also known as youth produced sexual imagery); and
- **Initiation/hazing** type violence and rituals.

**Infatuations:** Children, Young People and Adults at Risk may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. They should therefore ensure that their own behavior is above reproach. A member of Staff who becomes aware that a Child, Young Person or Adult at Risk may be infatuated with him/her or with a colleague, should discuss this at the earliest opportunity with the Safeguarding Team.

**Domestic violence or abuse.** is any type of controlling, bullying, threatening or violent behavior between people in a relationship It can seriously harm children and witnessing domestic abuse is child abuse. It's important to remember domestic abuse:

- Can happen inside and outside the home.
- Can happen over the phone, on the internet and on social networking sites.
- Can happen in any relationship and can continue even after the relationship has ended.
- Both men and women can be abused or abusers.

6.3 This policy should read alongside our policies and procedures on:

- Safe Recruitment Policy and procedures (Annex 18.1)
- Anti-Bullying Policy (Annex 18.2)
- Whistle- Blowing (Annex 18.3)
- Social Networking Policy (Annex 18.4)
- Equality and Diversity (Annex 18.6)
- Complaints and Compliments (Annex 18.7)
- Health, Safety and Safety (Annex 18.8)
- Data Protection (GDPR) (Annex 18.9)
- Consent for Photography (Annex 18.18)
- Trips, events and activities (Annex 18.11)
- Missing Child (Annex 18.12)
- Adults at Risk (Annex 18.13)

6.4 We will seek to keep children and young people safe by:

- valuing, listening and respecting them.
- appointing a Senior Safeguarding Manager (SSM), a Designated Safeguarding Officer (DSO), and adopting child protection and safeguarding practices through procedures and a Code of Practice and Behavior for staff and volunteers.
- developing and implementing an e-safety policy and procedures.
- providing effective management for staff and volunteers through supervision, support, training and quality assurance measures.
- recruiting staff and volunteers safely, ensuring all necessary checks are made.
- recording and storing information professionally and securely.
- sharing and promoting information about safeguarding and good practice with children, young people, their families, staff and volunteers via leaflets, posters, newsletters and/or one-to-one discussions.
- using our safeguarding procedures to share concerns and relevant information with agencies who need to know, and involving children, young people, parents, families and carers appropriately.
- creating and maintaining an anti-bullying environment and ensuring that we have a policy and procedure to help us deal effectively with any bullying that does arise.
- ensuring that we have effective complaints and whistleblowing measures in place.
- ensuring that we provide a safe place for our children, young people, staff and volunteers, by applying health and safety measures in accordance with the law and regulatory guidance.

## **7 STAFF SAFER RECRUITMENT POLICY**

### **Policy Statement**

Scunthorpe United Football Club endorses the use of The FA Criminal Records Checks (FACRC) through the Disclosure and Barring Service (DBS) to ensure appropriate assessment for clearance for work in football for those working with children, young people or vulnerable groups. It is anticipated that all positions within the Academy and some within the wider Club will require a DBS check to be carried out and Safeguarding is to be embedded throughout the entire Staff Safer Recruitment Process to ensure only suitable candidates are appointed to all and any position.

Our Staff Safer Recruitment policy will is to clearly identify the role and responsibilities of each job and its contribution to the business as a whole, being flexible where possible in our working practices in order to attract and retain a high caliber of employee and to identify positions that will be working with children, young people or vulnerable groups.

### **Policy**

- \* We will endeavor to provide appropriate staffing levels in all areas in line with agreed business needs.
- \* Our recruitment practices will be viewed as fair and professional to both internal clients and potential employees.
- \* We will actively promote the appointment of internal candidates whilst ensuring that this does not compromise on our recruitment standards.
- \* We will actively encourage managers to review their department structure in order to review the necessity for recruitment.
- \* Where possible we shall ensure that external appointments will be made at least one level below board level.
- \* We will ensure that the remuneration for a given position is sufficient to recruit and retain the appropriate caliber of staff.
- \* All external advertising will be professional and portray the desired Club image in line with corporate advertising.
- \* Since each appointment is viewed as a key business decision, the recruitment process will be geared to identifying the key skills, knowledge and attitudes required in the successful candidate.
- \* Employees will be recruited on the basis of their qualifications and experience to do the work to be performed, regardless of sex, sexual orientation, gender reassignment, marital status, pregnancy or maternity, ethnicity, religion, age, and disability. In view of this, we will ensure that each manager adheres to the Equality Policy and provides management information in relation to this.

V006:

- \* We will ensure that each new recruit undergoes induction training in order to maximise the rate of individual and organisational learning.
- \* We will continuously review the success of our recruitment process and in doing so continue to improve upon it.

## **Roles in the Staff safer Recruitment Process**

### **Managers**

Managers are responsible for developing their staff to ensure proactive succession planning within their department. Where changes in human resource requirements are necessary, they will consider alternatives to meet short-term requirements. They will consider all applicants and make the recruitment decision in line with the Club's Equality Policy.

### **HR Consultant**

Provides support to managers in exercising their responsibilities specifically in the following areas:

1. Advising on appropriate recruitment methods
2. Planning the recruitment process
3. Drafting job and person specifications
4. Establishing the market rate of pay for the position
5. Assisting with the interviewing and testing of candidates
6. Assisting with / obtaining 2 employment references
7. Monitoring equal opportunities in line with EFL regulations.
8. Making offers of employment

### **Process**

- \* Prior to vacancies arising we will prompt managers to consider actively succession planning within their department so that vacancies can provide development opportunities for other individuals within the department.
- \* We will initiate discussion with the managers to ascertain if a vacancy requires advertising, or if it can be filled by a change of job responsibilities within the department, or if temporary cover is more appropriate. This will include specific statements on the Safeguarding, and Equality and highlighting the requirement for a DBS check.
- \* Once a vacancy has been identified, we will work closely with the appointing manager to produce a job and person specification capable of supporting selection decisions of the highest standards.
- \* We will advise on appropriate objective assessment methods that will identify the key criteria as

outlined in the job and person specifications.

\* Recruitment process, timetable and service standards will be agreed in conjunction with the appointing manager.

\* All jobs will be advertised internally. External advertising will only take place when there is reasonable justification, for example, where a position carries very tight person specification criteria that only a limited number of people are likely to fit.

\* All advertising will be non-discriminatory against gender, marital status, creed, colour, race, ethnic

origin, nationality or disability and will not contain matters likely to cause widespread offence.

\* Advertisements will be as specific as possible and geared to attracting only those who fill the essential person specification criteria.

\* Response handling will be dealt with efficiently and professionally. We will ensure that applications are acknowledged within two days of receipt and applicants will be informed about when they are likely to receive further communication.

\* Active consideration of all applicants will take place regardless of their sex, sexual orientation, marital status, race, colour, nationality, ethnic or national origin, religion, age, and disability or union membership status. This process will be monitored and management information produced. Consider gaps in CV.

\* Interviews will take place will at least two relevant SUFC staff conducting the interview. Notes of the interview will be kept. Suitable questions / scenario's surrounding safeguarding and inclusion will be asked to all candidates regardless of the position for which they are applying.

\* Working interviews will be conducted for all full-time coaching positions, observed by the Head of Academy Coaching and / or the Academy Manager.

\* Where a DBS has been determined as necessary, all relevant job offer will be made on condition of this.

\* All job offers will be made on condition that the successful candidate can provide two business references which are satisfactory to us, undergoes a medical examination whose results are acceptable to us (if required) and, where qualifications have been stated to be essential for the successful candidate, has furnished proof of their compliance with that requirement. All references will need to be written references, received prior to the commencement of employment, and these will need to be kept on the employee's file.

Until all three conditions have been met, an unconditional offer will not be issued.

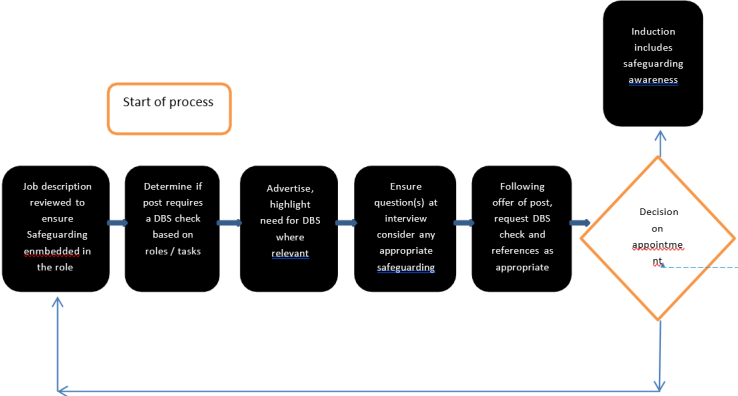
\* All successful candidates will, wherever possible, receive a copy of the terms and conditions on which employment is offered with their offer letter.

\* Prior to an individual commencing employment, a tailored induction process will be designed and carried out upon commencement of employment. This will specifically include Safeguarding Awareness.

\* After the individual has been appointed, we will review the recruitment process with the manager to ascertain what went well and where improvements could be made. On a regular

basis we will examine the longer-term effectiveness of our recruitment strategy and make amendments where necessary.

Process Flowchart



## 8 RECRUITMENT, SELECTION AND TRAINING

### 8.1 Safe recruitment (See Full Policy and Process Document at Annex 18.1)

8.1.1 Scunthorpe United follows the Government's recommendations for the safer recruitment and employment of staff who work with children and young people. Scunthorpe United endorses the use of the FA Criminal Records Checks (FACRC) through the Disclosure and Barring Service (DBS) to ensure appropriate assessment for clearance for work in football for those working with children, young people or vulnerable groups. It is anticipated that all positions within the Academy and some within the wider Club will require a DBS check to be carried out and Safeguarding is to be embedded throughout the entire Staff Safer Recruitment Process to ensure only suitable candidates are appointed to all and any position.

The SUFC's Safe Recruitment Policy is the first step towards safeguarding and promoting the welfare of children and young people.

8.1.2 There is a commitment is to prevent people who pose a risk of harm from working by:

- checking staff and volunteers who work with children and young people.
- taking proportionate decisions on whether to ask for any checks beyond what is required.
- ensuring volunteers are appropriately supervised.
- having appropriate procedures in place for appointing staff and volunteers.

8.1.3 Safe recruitment and selection procedures help to ensure a safe workforce by deterring and screening out unsuitable individuals.

#### 8.1.4 Roles in the Staff in the Safer Recruitment Process

##### Managers

Managers are responsible for developing their staff to ensure proactive succession planning within their department. Where changes in human resource requirements are necessary, they will consider alternatives to meet short-term requirements. They will consider all applicants and make the recruitment decision in line with the Club's Equality Policy.

##### HR Consultant

Provides support to managers in exercising their responsibilities specifically in the following areas:

1. Advising on appropriate recruitment methods
2. Planning the recruitment process
3. Drafting job and person specifications
4. Establishing the market rate of pay for the position
5. Assisting with the interviewing and testing of candidates
6. Assisting with / obtaining employment references
7. Monitoring equal opportunities in line with EFL regulations.
8. Making offers of employment

## 8.2 Induction for staff and volunteers

8.2.1 All new employees will be given an induction program which will clearly identify the policies and procedures, including the Child Protection and Safeguarding Policy, the Code of Practice and Behavior and Part One of KCSIE 2016, and made clear the expectations which will govern how they carry out their roles and responsibilities.

8.2.2 All new staff must complete the certificated module on the Prevent Duty as part of their induction.

## 8.3 Safeguarding & Child Protection Training

8.3.1 All training will be carried out in accordance with LSCB procedures. The DSO and Senior Safeguarding Manager attend safeguarding and child protection training courses and relevant training at least every 2 years.

8.3.2 All staff and volunteers will be provided with relevant safeguarding induction training. the purpose of this induction training is to make sure they understand the SUFC's safeguarding policy and procedures and they have up to date knowledge of safeguarding issues; including risks of radicalization, FGM, and identification of children at risk, e-safety, whistleblowing, staff conduct and training to enable staff to identify signs of abuse and children and young people who may be in need of early help.

8.3.3 Further safeguarding training covering statutory updates including managing disclosures and specific safeguarding issues is provided to all staff at least annually and as required.

## 8.4 Duty to refer to DBS



Duty to refer to DBS is met when an employer has dismissed or removed a person from working with Children and Adults at Risk (or would or may have if the person had not left, resigned, retired, been made redundant or moved to another position) because the person has

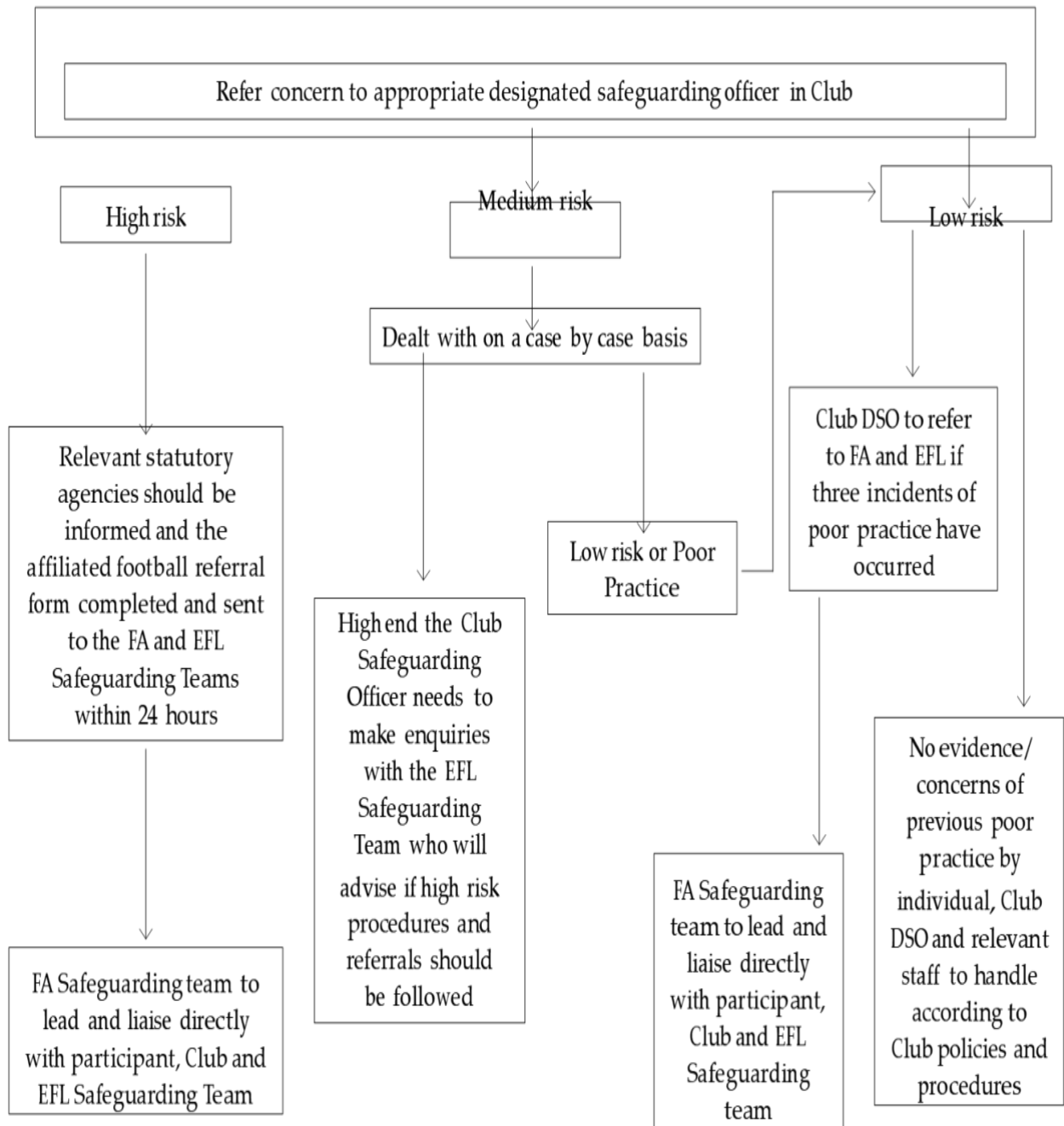
- Been cautioned or convicted for a 'relevant offence.' A 'relevant offence' for the purposes of referrals to the DBS is an offence that would result in the individual's automatic inclusion in the Children's or adults' barred list.
- Engaged in 'relevant conduct.' 'Relevant conduct' is that which endangers or is likely to endanger Children and Adults at Risk.
- Satisfied the 'harm test.' A person satisfies the harm test if they may harm a child or adult at risk or put them at risk of harm. It is something a person may do to cause harm or pose a risk of harm to a child or adult at risk.

Referrals to the DBS should be made once investigations and disciplinary processes are complete. (Even if the person has left employment).

Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.

Referral Process flowchart:

A disclosure has been made that an adult at risk is suffering abuse or harm  
 OR  
 a disclosure or an allegation about a person's behaviour towards an adult at risk has been made



## **9 MANAGING ALLEGATIONS AGAINST SCUNTHORPE UNITED STAFF AND VOLUNTEERS**

- 9.1 This guidance is by Scunthorpe United Football Club deal with instances when allegations are made against club employees and/or people volunteering for the club e.g. Board, coaches, and/or other volunteers directly deployed on behalf of the club to work with under-18s and adults at risk (AAR), including those who work on a temporary or locum basis. This guidance is underpinned by the government guidance Working Together to Safeguard Children (2018).

As an employer, the Club has a duty of care to its staff and volunteers and, as such, must also ensure that members of staff against whom an allegation has been made are treated fairly and are provided with effective support. It is essential that any allegation of abuse is dealt with fairly, consistently and as swiftly as possible, in a way that provides effectively

protection for the child and/or AAR and at the same time supports the person who is the subject of the allegation.

The Club is required to inform The FA of any such allegation and this guidance informs the club of the process to do so, which includes working with the relevant Local Authority Designated Officers (LADO) or Adult Safeguarding Board (ASB).

Investigations into club staff or volunteers must be led by the Senior Safeguarding Lead, who must inform the CEO. They can take advice from people with specific safeguarding knowledge, such as the Designated Safeguarding Officer, but the responsibility for the investigation sits with the Senior Safeguarding Lead, who is the primary Designated Person in these instances, unless the investigation is about the Senior Safeguarding Lead.

Allegations and complaints against staff can be minimised by having:

- An open and transparent safeguarding ethos.
- Safer recruitment practices that are followed.
- Systematic induction and training procedures.
- A Code of Conduct for coaches and parents that is signed up by all coaches and parents; and
- Regular briefing and discussion of safeguarding issues.

## 9.2. What is an allegation?

An allegation is information or a concern which suggests that an employee or volunteer working with children and young people and/or AAR has:

- Poses or may pose a risk of harm to an AAR.
- Behaved in a way that has harmed a child or may have harmed a child.
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she could pose a risk of harm if they worked with children.

If anyone sees, hears, suspects or reports something that fits into one of the four categories above there is a statutory duty to report this.

## 9.3 Principles

The club's procedures should make it clear that all allegations should be reported immediately, normally to the CEO, who is also most likely to be the Senior Safeguarding Lead. The procedures should also identify the person, often the Chairperson or Board Safeguarding Champion, to whom reports should be made in the absence of the CEO or in cases where the CEO themselves are the subject of the allegation or concern. Procedures

should also include contact details for the LADO, Adult Safeguarding Board (ASB) and The FA Case Management team responsible for providing advice and monitoring cases.

If an allegation is made against a member of staff:

- Priority should be given to resolving the matter as soon as possible.
- Staff should not be automatically suspended; all other options should be considered before suspending a member of staff.

If an allegation is made against a volunteer

They may be asked not to volunteer, attend the club's premises or contact any members of club staff or service users.

9.4 Duties towards staff and volunteers

Employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. The club takes its obligations in relation to volunteers seriously and will therefore also provide volunteers with a named contact whilst any investigation is ongoing.

This guidance is about managing cases of allegations that might indicate a person will pose a risk of harm if they continue to work in regular or close contact with children or AAR in their present position, or in any capacity.

The club will use its existing Disciplinary Procedures to handle these cases involving employees. Copies of the Disciplinary Procedure are contained in the Staff Handbook. If, following a disciplinary procedure the employee wishes to appeal against any disciplinary action taken, the employee should follow the appeal process in the Disciplinary Procedure.

If the CEO or equivalent is the subject of a complaint or concern, the matter would need to be heard by the Chairperson, supported by the Board Safeguarding Champion.

The Disciplinary Procedure does not apply to volunteers but any allegations which falls under the scope of this guidance will be fully investigated as set out below. It is essential that any allegation of abuse made against a member of staff or a volunteer is dealt with quickly in a fair and consistent way that provides effective protection for the child/ children or AAR and at the same time supports the person who is the subject of the allegation.

## 9.5 Procedures

When an allegation is received which falls under the scope of this guidance the club should:

- Take the matter seriously and keep an open mind.
- Not promise confidentiality to the person making the allegation/sharing the concern.
- Make a written record of the allegation using the words of the person who made the allegation (including time, date and place where the alleged incident took place, what was said and anyone else present). This should be signed and dated. If the concern is about an AAR, their views and wishes (if known) should also be recorded.
- Contact the Chairperson or Board Safeguarding Champion if the concerns are about the CEO or equivalent.
- Ensure the Designated Person immediately contacts the LADO/ASB and The FA Case Management Team in 24 hours.
- Not make decisions without a discussion with the LADO/ASB and The FA Case Management Team.
- Make a written record of discussions with LADO/ASB and The FA Case Management Team; and
- Make sure LADO/ASB and The FA Case Management Team have full details of the person against whom a concern has been raised and the person who is the subject of the concern.

The procedures for dealing with allegations need to be applied with common sense and judgement.

Some cases may not meet the criteria set out above or may do so without warranting consideration of either a police investigation or enquiries by local authority children's and/or Adult Services. In these cases, the club should use the Disciplinary Procedure (where appropriate), to resolve cases without delay and in consultation with The FA Safeguarding Case Management Team. When an allegation against a member of staff is made, the club needs to contact the LADO/ASB to inform him/her of the allegation and at the same time make a referral to The FA Safeguarding Case Management Team. If a referral is received by The FA Case Management Team, the CEO or equivalent will be informed within one working day and the normal procedure will apply. Some rare allegations will be so serious they require immediate intervention by Local Authority children's social care, Adult Services and/or police

The purpose of an initial discussion is for the LADO/ASB, the club Designated Person and The FA Safeguarding Case Management Team to consider the nature, content and context of the allegation and agree a course of action.

Actions to be agreed in initial discussion:

- What further information is required?
- Whether any immediate action needs to be taken to safeguard and protect children or AAR.
- When and what should the parents/carers of any child/children involved be told.
- How and when an AAR should be kept informed.
- What should be said to the member of staff or volunteer facing the allegation?
- Whether suspending the member of staff or asking a volunteer to cease their volunteering activities, refrain from attending the club's premises or contacting any members of staff or service users is required.
- What is the appropriate risk management strategy? Suspension should not be an automatic response.

As employers the club must consider carefully whether the circumstances of the case warrant a person being suspended from contact with children and/or AAR or whether alternative arrangements can be put in place. Suspension should be considered where children and/or AAR are at risk of harm, or the case is so serious it may be grounds for dismissal.

If suspension is agreed, the reason for suspension must be communicated to the member of staff in writing within one day. Alternatives to suspension might include alternative work, or the deployment of another adult to work alongside the person subject to the allegation to supervise them. The club should consider asking a volunteer to cease their volunteering activities, refrain from attending the club's premises or contacting any members of staff. This should be confirmed in writing. Possible outcomes of the initial discussion include:

- Strategy meeting normally held within three days.
- Referral to the LADO/ASB.
- Referral to Police for investigation; or
- No further action (NFA).

The LADO/ASB may ask the clubs Designated Person/The FA to provide or obtain relevant additional information, such as previous history, where there have been previous similar allegations and details of the individual's current contact with children. The club should

decide with the LADO/ASB and The FA whether an investigation needs to be carried out. In situations where the person is deemed to be an immediate risk to children or there is evidence of a criminal offence, or even if there is no such evidence, the LADO/ ASB should determine whether police involvement is necessary. The initial sharing of information and evaluation may lead to a decision that no further action is to be taken; in which case this decision and a justification for it should be recorded by the LADO/ASB, the club and The FA and agreement reached on what information should be put in writing to the individual concerned and by whom. The Designated Person should then consider with the LADO/ASB and the FA, what action should follow both in respect of the individual and those who made the initial allegation.

Informal action should be resolved in a timely fashion. Ideally, most cases should be concluded with one month. Where there may be a case to answer, the club should decide with the LADO/ASB and The FA how to proceed further, which may include further investigation and internal disciplinary action or the cessation of a volunteer's activities.

The club Designated Person should inform the individual about the allegation as soon as possible after consulting the LADO/ASB and the FA. It is extremely important that the club Designated Person provides the individual with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services or ASB need to be involved, the club Designated Person should not do so until those agencies have been consulted and have agreed what information can be disclosed to the club member of staff or volunteer.

If the allegation is not demonstrably false or unsubstantiated, and there is cause to suspect a child or AAR is suffering or is likely to suffer significant harm, a strategy discussion should be convened. Where an investigation by the police or children's social care services or ASB is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the LADO or ASB should discuss the next steps with the club Designated Person and the FA. In those circumstances, the options open to the club and The FA will range from taking no further action to dismissal or a decision not to use the person's services in future.

The following definitions should be used when determining the outcome of allegation investigations:

- **Substantiated:** there is enough evidence to prove the allegation.
- **False:** there is enough evidence to disprove the allegation.



- **Unsubstantiated:** this is not the same as a false allegation. It means that there is insufficient evidence to prove or disprove the allegation. The term, therefore, does not imply guilt or innocence.
- **Malicious:** there is enough evidence to disprove the allegation and there has been a deliberate act to deceive.

## 9.6 Confidentiality

It is extremely important that, when an allegation is made, the club makes every effort to maintain confidentiality and guard against unwanted publicity, including comments on social media, while an allegation is being investigated or considered. The club Designated Person should take advice from the LADO, the police and children's social care services or ASB and The FA to agree the following:

- Who needs to know and, importantly, exactly what information can be shared.
- How to manage speculation, leaks and gossip.
- What, if any information can be reasonably given to the wider community to reduce speculation.
- How to manage media interest when it should arise.

Breaches of confidentiality may lead to disciplinary action being taken against members of staff or ceasing an individual's volunteering activities.

## 9.7 Supporting those involved.

Employers should act to manage and minimise the stress inherent in the allegations process. Support for the individual is key to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and have the likely course of action explained to them, unless there is an objection by the LADO/ASB, children's social care services or the police. The individual should be advised to contact their trade union representative, if they are a member of staff and have one, or a colleague for support. The club Designated Person is responsible for keeping the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. It should be decided at the outset which of the Designated Persons is leading the investigation and who is providing feedback and support to the person who is subject to the allegation. Social contact with colleagues and friends should not be prevented unless there is evidence to suggest that such contact is likely to be.

prejudicial to the gathering and presentation of evidence. In cases where a child or AAR may have suffered significant harm, or there may be a criminal prosecution, children's social care services, adult services or the police as appropriate, should consider what support the child or children involved may need and discuss with the AAR if they want support.

#### 9.8 Resignations and settlement agreements

If the person who is subject to the allegation resigns, or ceases to provide their services you must:

- Follow up any allegations in accordance with this guidance.
- Remember to make every effort to reach a conclusion in all cases of allegations and concerns relating to the welfare of a child/ children or AAR, including any in which the person concerned refuses to co-operate with the process.
- Never enter into a "settlement/ compromise agreement" with the accused where they are employed (i.e. an agreement by which the parties agree the individual's employment will end if the employer agrees not to pursue disciplinary action and/or in exchange for a termination payment. Typically, the parties agree a form of words to be used in any future reference). A settlement/compromise agreement will not prevent a thorough police investigation where that is appropriate, nor should it override the statutory duty to make a referral to the Disclosure and Barring Service (DBS) where circumstances require that e.g., someone leaves their employment for safeguarding reasons.

#### 9.9 Record-keeping

Details of allegations that are found to have been malicious should be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved and a note of any action taken, and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned. Where the allegation is found to be false, unsubstantiated, or malicious, the information should not be included in any reference.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS disclosures reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary reinvestigation if, as sometimes happens, an allegation re-surfaces after a period. The Information Commissioner has published guidance on employment records in its

Employment Practices Code and supplementary guidance, which provides some practical advice on employment retention ([ico.org.uk/for- organisation/](http://ico.org.uk/for-organisation/)).

#### 9.10 Timescales

It is in everyone's interest to resolve cases as swiftly as possible, consistent with a fair and thorough investigation. All allegations must be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness, complexity of the allegation and whether external agencies, such as the police, are involved. The club should set targets to conclude these investigations in order to bring the matter to a close as soon as possible. The club can refer to the LADO/ASB for guidance on timescales.

#### 9.11 Action on conclusion of a case

If the allegation is substantiated and the person is dismissed or the club ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the LADO or ASB should discuss with the club Designated Person and The FA whether a referral to the DBS is required. There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct (including inappropriate sexual conduct) that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child. In such circumstances, the duty to refer an individual to the DBS arises where an employer has removed the individual from relevant work with children or the person has chosen to cease relevant work in circumstances where they would have been removed had they not done so.

There is a duty to refer to DBS where an individual has been working in Adult Regulated Activity and may have engaged in "relevant conduct" with an adult.

#### 9.12 Action in respect of unfounded or malicious allegations

If an allegation is determined to be unfounded or malicious, the LADO should refer the matter to the children's social care services to determine whether the child concerned is in need of services or may have been abused by someone else. The same process could be considered for AAR. Details of allegations that are found to be malicious should be removed from personnel records and should not be included in any references. Consideration should be given as to whether any action should be taken in relation to the individual who made the malicious allegation (e.g., disciplinary action in the case of an employee).

#### 9.13 Allegations Involving Adults at Risk (AAR)

If the club becomes aware of an allegation that a Staff member or volunteer has harmed an adult at risk (see Appendix 2: Safeguarding Adults: Briefing Note) a report must be made to The FA's Case Safeguarding Management Team ([safeguarding@TheFA.com](mailto:safeguarding@TheFA.com)). Whilst the procedures will be similar it will also be necessary to involve the adult and consider their views and wishes. This process must be guided by Case Management who will have access to expert external help and advice.

## 10. MATCHDAY SAFEGUARDING PLAN

### 10.1 Purpose of the plan: Introduction and approach

The event safeguarding plan compliments the existing safeguarding policies and procedures held by the Scunthorpe United FC.

The Safeguarding Plan applies only to match day and summaries the arrangements specifically relating to safeguarding. The purpose of this plan is to ensure that effective Club specific processes and procedures are agreed and implemented in order to safeguard all those involved in the match day event, whether as staff, participant, spectator or player. It is important to have procedures in place to ensure there is a clear, effective and consistent response for dealing with concerns of possible abuse and harm to children and adults at risk.

**Match Day Safeguarding Officer – Clare De Laloe**

**Tel: 07957498777**

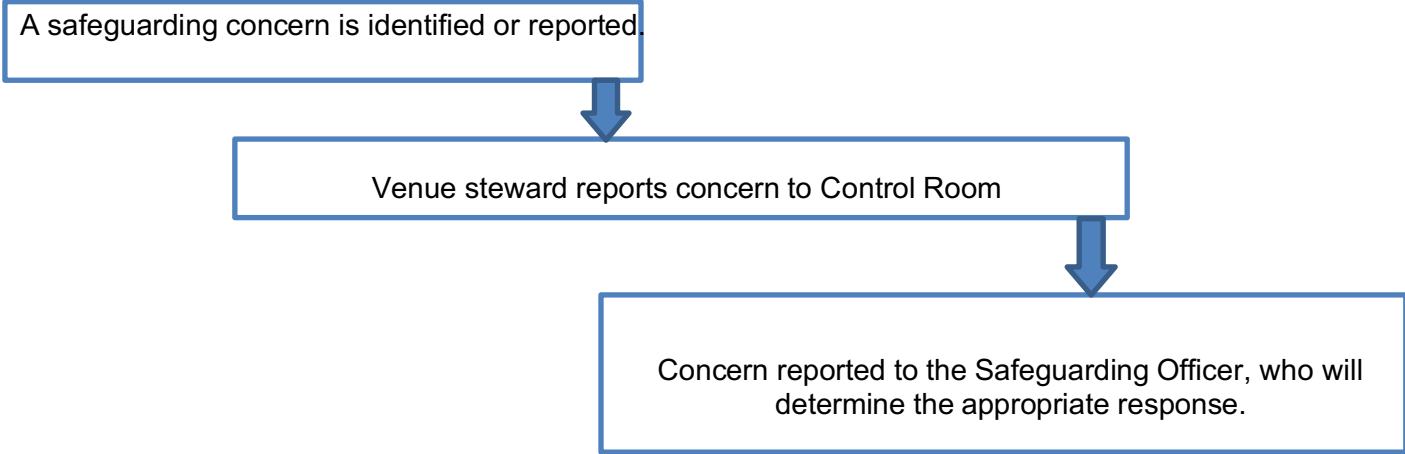
**[Email: clare.delaloe@scunthorpe-united.co.uk](mailto:clare.delaloe@scunthorpe-united.co.uk)**

### 10.2 Roles and Responsibilities

<b>Role</b>	<b>Safeguarding responsibility</b>
Club Senior Safeguarding Manager (Enhanced DBS)	<p>Strategic responsibility for the overall safeguarding provision within the Club. Implementing and embedding of the Club's children safeguarding policy and associated guidance and event safeguarding plan.</p> <p>The Senior Safeguarding Manager will participate in pre-event multi-agency event planning meetings as required.</p>

<p>Club Designated Safeguarding Officer (Enhanced DBS)</p>	<p>An event Safeguarding Officer (as named above) will be present during the event, to ensure safeguarding responsibilities, policies and procedures are implemented.</p> <p>Provide pre-event briefing to key operational managers and supervisors.</p> <p>Based between the control room and medical facility, liaise with Club internal staff, emergency services, statutory authorities, and the League in order to ensure that safeguarding concerns are responded to by the most appropriate person/agency.</p> <p>Support staff in the process of recognising, responding and recording safeguarding incidents.</p> <p>Receive reports of safeguarding concerns and disclosures, Managing all immediate external referrals where necessary.</p> <p>Provide guidance to staff to ensure the immediate wellbeing of any potential victim/s.</p>
<p>Specialists (Safety Officer, Police, medical) (Safety officer = Enhanced DBS)</p>	<p>Will consult with Event Safeguarding Advisor to agree appropriate response to report of possible safeguarding incidents/concerns</p>

10.3 Venue Reporting Structure



Report any Safeguarding disclosure or concern to the Safeguarding Officer via the control room. If the Event Safeguarding Officer is not available, then report to your supervisor/line manager. Event Safeguarding Officer will co-ordinate the recording and further reporting of any issues/incidents.

#### 10.4 Managing Safeguarding concerns and incidents.

Remember – IT IS NOT the responsibility of Staff to decide if abuse has taken place, but IT IS everybody's responsibility to act on any concerns.

If the victim needs urgent medical treatment, the person raising the concern needs to contact the medical team or emergency services immediately – not the Safeguarding Officer. The medical team or emergency services should be advised there is a potential Safeguarding issue. The Event Safeguarding Officer should then be informed.

#### 10.5 Ball children and mascots.

Children will be with a parent, supervised and guided by Coordinator.

Coordinator has spoken to the parents of mascots in advance of the event to check any additional needs of the child - none reported.

Known medical conditions have been identified and are as follows.

#### 10.6 Academy players and parents

Academy schoolboy players are provided with a specific area in which to watch the game and tickets must be requested by email by a parent with one complimentary ticket provided with a paying adult only (community offer of £10).

#### 10.7 Vulnerable Adults

Vulnerable adults or adults at risk may include those accompanied by a carer or those seated in the designated disabled area. Vulnerable adults may request to be seated in a quieter area such as the family area. Stewards in this area will be Enhanced DBS checked.

#### 10.8 Arrival/ departure and changing arrangements.

The ball children and mascots will be met at the reception area and walk to the changing/meeting point area if applicable

Changing area is not provided as children will arrive ready if bad weather changing area will be allocated in restricted access area. All children are situated in 1 changing facility. Parents are always with children. coordinator. will remain outside changing area doors. Parents and children have been informed no photos to be taken in changing facilities.

Whilst carrying out mascot duties Club representatives will escort them and their parents around the stadium. The children will be escorted from changing room to stadium seating. During and after the match mascots should follow procedures alongside other fans and as directed by stadium staff.

#### 10.9 Unaccompanied Children and Spectators bringing in infants.

The age limit is 14.

Concerns regarding unaccompanied children within stadium include:

- physical harm from inappropriate use or access to equipment
- contact with dangerous adults or others within the wider facility (potential for grooming or abuse)
- parents' contact details and children's medical information is not available in the event of an emergency
- staff being required to manage children's unruly or dangerous behavior
- substance misuse alcohol/drugs

Primarily, it's a parent's or carer's responsibility to judge whether it's safe and appropriate to allow their unaccompanied child to visit the stadium.

Stewards will inform control room if unaccompanied child under 14 is trying to gain entry.

Safety officer with guidance from safeguarding officer will advise on best course of action no child will be just told to go away before contact is made to parent or carers.

Parents will be reminded that minors under the age of 14 should not be unaccompanied when visiting the toilet. If unaccompanied minors do attend the toilet area, an enhanced DBS steward (female for female toilets and male for male toilets) will accompany them and return to their parents with them.

#### 10.10 Searching of U 18's.

The decision to conduct searches of U18's will be made by the Safety Officer.

Protocols and the process of searching children should promote mutual respect to and from all



parties. Someone is deemed a child up to their 18th birthday.

### **The basics**

Stewards should always identify themselves and provide proof that they are an authorised event steward with the Club.

Good practice is to have two stewards present for the search, who should both give their name and job title.

### **Thereafter stewards should:**

1. Explain the reason for the search.
2. Ask the child for permission to undertake the search, explain that the person has a right to refuse, but doing so can lead to non-admittance; if an adult is present with the child, obtain their permission to conduct the search.
3. Ask the child if they are carrying anything which may be dangerous, prohibited or that they plan to use to celebrate during the match.
4. Ask if anyone else has asked them to carry anything into the ground for them; Explain what they think they may find in the search.
5. Only search people of the same gender as themselves.
6. Follow the correct Stadium procedure when finding unauthorised items and explain these procedures to the people involved.
7. Keep people only for as long as necessary.

### **Searching**

Stewards should not need to touch the child during the search, as the procedure is to guide the child or young person to demonstrate that they are not carrying/hiding any dangerous or prohibited items.

1. Ask the child to empty and turn out their pockets.
2. Ask the child to take off any outer jacket(s) and pass them over to the other steward for searching.
3. Ask the child to roll up their trousers to the knees and roll down their socks;

4. If wearing trousers, ask them to pull out the shirt at the waist and visually ensure there is nothing in the trouser belt area.
5. Request that they replace all clothing before moving on.

#### 10.11 Lost/Missing children

Lost and/or missing children will be managed by stewards as per Club standard operating procedure. The Safeguarding Officer should be notified if the circumstances of the child being lost and/or missing raise a potential safeguarding concern. For example, if the parent/carer is intoxicated and the child has been lost due to the actions of the parent/carer.

#### 10.12 Dealing with Ejecting Minors

On rare occasion it may be necessary to eject minors from the stadium. On this no ejections of minors will take place without the authority of Safety officer with the Safeguarding Manager must be informed immediately.

We will consider the following points,

- Age of individual
- Reason and circumstances for ejection from stadium.
- Are they accompanied by others.
- Can we reseat them in different area of stadium until end of the event, such as family area or areas inside the stadium, to be supervised by appropriate staff.
- Before ejecting gaining and contacting parents or carer and advise them reason for ejection

## 11. FOOTBALL AGENCY GUIDANCE

### 11.1 EFL Information for member clubs

The FA sets the safeguarding policy and regulatory framework across the game.

A copy of the FA regulatory handbook can be found here:

<http://www.thefa.com/football-rules-governance/lawsandrules/fa-handbook>

The EFL produce annual safeguarding standards and regulations that govern Club's safeguarding arrangements and practices. A copy of the standards can be found here:

[https://www.efl.com/siteassets/image/202021/safeguarding-standards-guide\\_-final-version2020-21.pdf](https://www.efl.com/siteassets/image/202021/safeguarding-standards-guide_-final-version2020-21.pdf)

The EFL regulations can be found here:

<https://www.efl.com/-more/governance/efl-rules--regulations/>

Clubs implement their own safeguarding policies and procedures that must be consistent with the football regulation, legislation, statutory guidance and current best practice. All Clubs receive an annual safeguarding quality assurance visit which assesses their compliance against these requirements.

When in receipt of a referral from a Club the EFL safeguarding team will firstly provide support and guidance to the Club. Further action by the EFL may include:

- Having oversight and working with Clubs to ensure that internal procedures and football regulations are followed.
- Agreeing a Club led internal investigation with the outcome shared with the Football Authorities.
- Conducting a joint investigation with the FA.
- Commissioning an independent case review (possibly in conjunction with the FA).
- Participation in multi-agency strategy meetings.
- Working with Clubs to implement agreed multi-agency strategy meeting actions.
- Working with Police and football media relations to manage communication.
- Issuing of sanctions where EFL requirements have been breached.
- Working with Clubs to ensure that learning outcomes are implemented to mitigate risk of recurrence.
- Sharing anonymised learning from cases to strengthen safeguarding provision across the game

The flowchart in Appendix 2 outlines the steps to be taken by Clubs when dealing with a disclosure, safeguarding incident or allegation.

The EFL Safeguarding Team produce a number of guides to help and support Clubs in the area of safeguarding copies of which can be found on the Portal (League intranet facility). A list of the documents can be found below and available upon request from the EFL Safeguarding Team:

- Managing Safeguarding Concerns
- DBS Eligibility Guidance
- Guide to Safer Working Practice for EFL Member Clubs
- Six steps for Operating Trips, Tours and Tournaments
- Six steps for Developing a Club Transport Policy
- Guidance to Member Clubs, Senior Appearance by an under 18
- Young Persons Guide to Safeguarding
- Care and Accommodation Arrangements for Academy Players
- EFL guide to Prevent

Thresholds for referral to football authorities

The thresholds below are set out in the Youth Development Rules and Affiliated Football's

- Any allegation of abuse of a child or adult at risk by a Participant or anyone who has previously been or is seeking to work or volunteer in football.
- Any referral to or from any external authority (including, without limitation; the Police, the Local Authority or the DBS) about abuse of or unsuitable behavior towards a child or adult at risk by a Participant or anyone who has previously been or is seeking to work or volunteer in football.
- Three or more incidents or allegations of poor practice by the same Participant or anyone who has previously been or is seeking to work or volunteer in football.

It is important to note that football authority and/or internal employer disciplinary procedures may be delayed pending the outcome of statutory authority processes and/or criminal proceedings.

Identifying poor practice

Incidents of poor practice occur when the needs of children and young people are not afforded the necessary priority, so that their welfare is compromised

For example:

- When insufficient care is taken to avoid injuries (e.g., by excessive training or inappropriate training for the age, maturity, experience and ability of players)
- Giving continued and unnecessary preferential treatment to individuals and regularly or unfairly rejecting others (e.g., Singling out and only focusing on the talented players and failing to involve the full squad)
  - Placing children or young people in potentially compromising and uncomfortable situations with adults  
(e.g., changing in a 1:1 situation with a young referee)
- Allowing abusive or concerning practices to go unreported (e.g., a coach who ridicules and criticises players who make a mistake during a match)
- Ignoring health and safety guidelines (e.g., allowing young players to set up goal posts unsupervised by adults)
- When a child's impairment related needs have not been taken into account

The assessment about whether an incident is one of child abuse or poor practice (or hazing) may not be able to be made at the point of referral, but only after the collation of relevant information.

There is evidence which indicates that some children and young people have experienced what may be referred to as 'initiations more commonly now referred to as 'hazing'' into a sports club or team; often a historical practice which may have been started with good intentions but can result in oppressive, intimidating and abusive behavior. Hazing: is any action or situation, with or without the consent of the children and young people, which recklessly, intentionally, or unintentionally endangers the mental, physical, or emotional wellbeing of a child or young person. Reported concerns of hazing will be taken seriously and appropriate actions taken.

- The majority of poor practice concerns can be dealt with by the club or alternatively with support and guidance from the EFL Safeguarding Team and/or FA
- All child abuse will be dealt with by The FA (in conjunction with the statutory agencies) and with the support of the EFL

### Thresholds for referrals to statutory authorities

Clubs may receive information regarding the welfare of a child or young person who is involved in football, yet the concern itself does not relate to someone within the game. In these circumstances (e.g., the concern relates to the child's home or a social setting other than football) the individual Clubs safeguarding policy and procedures should be implemented:

- Refer the concerns directly to local Children's Social Care or to the local Police. These agencies will advise the Club whether a formal referral to Children's Social Care is necessary and what further action the Club might need to be taken.

### FURTHER SAFEGUARDING INFORMATION FOR ANY INDIVIDUAL INVOLVED IN FOOTBALL

Whilst we encourage concerns within our member Clubs to be raised with the employees with relevant safeguarding roles in the first instance, we recognise that there are occasions when employees, stakeholders, parents and children may not feel comfortable in doing so. In these instances, other relevant professional agencies can be contacted for advice, guidance and support:

ALEX RICHARDS  
EFL SAFEGUARDING MANAGER  
T: 01772 325940  
E: arichards@efl.com

THE FA SAFEGUARDING TEAM  
T: 0800 169 1863 and ask to speak to The FA Safeguarding Team  
E: safeguarding@thefa.com

### POLICE

Contact the NSPCC helpline by calling 0808 800 5000 or by emailing [help@nspcc.org.uk](mailto:help@nspcc.org.uk) to get advice or share your concerns about a child. Trained professionals are available 24 hours a day, 7 days a week.

**In an emergency or if someone is in immediate danger, call the Police on 999 (101 for non-emergencies).**

The FA produce a number of safeguarding documents and guides for parents, young people and employees within the game which can be found here:

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

## 11.2 The FA Safeguarding Policy

### **Working Together to Safeguard Football – Our Policy and Procedures**

'Affiliated Footballs' overarching Safeguarding Children Policy and Procedures. Endorsed and codeveloped by the FA, Premier League, Football League, PFA, LMA, Football Foundation, League Football Education and NSPCC Child Protection in Sport Unit.

### **Safeguarding is everyone's responsibility.**

To make sure you have appropriate safeguards in your club or league it is important everyone is aware of your safeguarding children policy and the procedures for reporting a concern about the welfare of a child.

Your designated safeguarding officer (club welfare officer) will be able to advise you, but if you want to find out more about how to increase your understanding of safeguarding in football why not complete the Safeguarding Children workshop - for more information visit the safeguarding learning page.

### **Every affiliated club and league with youth teams must have in place a Safeguarding Children Policy and Procedures.**

#### **Anti-bullying policy**

The FA defines bullying as one of the five categories of abuse. Having an Anti-bullying policy in place will help everyone understand what is and is not acceptable within your club. Having a clear process will help your club to manage any issues and hopefully prevent bullying.

#### **“Whistleblowing”**

Whistleblowing can be used as an early warning system or when it's recognised that appropriate actions have not been taken. This approach or policy is adopted in many different walks of life. It is about revealing and raising concerns over misconduct or malpractice within an organisation or within an independent structure associated with it.

Any adult or young person with concerns about a colleague can also use whistleblowing by calling 0800 169 1863 and asking for The FA's safeguarding team, or via email on [safeguarding@TheFA.com](mailto:safeguarding@TheFA.com).

Alternatively, you can go direct to the Police or Children's Social Care and report your concerns there, or to the Child Protection in Sport Unit via [cpsu@nspcc.org.uk](mailto:cpsu@nspcc.org.uk) or the NSPCC

Helpline via **0808 800 5000** or by emailing [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **12. SUPPORT FOR SURVIVORS WHO HAVE EXPERIENCE CHILD ABUSE IN FOOTBALL**

In order to support those who have come forward and disclosed sexual abuse in a football context, affiliated football authorities have:

- Set up a dedicated helpline number for survivors via the NSPCC: This provides survivors with initial advice and guidance, as well as ensuring referrals are made to the police. From 23 November 2016 to 19 October 2017 the football helpline received more than 2,500 calls. 941 calls were from people concerned about abuse in football and approximately 65% of these resulted in referrals to external agencies. The remainder of the calls were enquiries and advice contacts.
- Partnered with Sporting Chance: This partnership is to provide nationwide opportunities for support to survivors of sexual abuse in football. Sporting Chance has increased the number of available phone lines, tailored the initial face-to face therapist assessment process for survivors, developed a set of criteria to select therapists with expertise in the field, and educated them about the Crown Prosecution Service pre-trial therapy guidance. This is important to ensure that survivors receive support that will not hinder the progress of any criminal or civil justice processes.
- Offered direct support to all known survivors via the police: Only the police know the details of the survivors who have come forward to pursue a criminal justice route. With this in mind, a letter signed by all the football authorities was sent by Operation Hydrant to all 43 police forces to distribute to everyone who had come forward. This offered survivors who chose to, free specialist therapeutic support for a sustained period of time. This offer from the football authorities was shared with and supported by survivors with whom we had an active dialogue.



## 13. PROTECTING CHILDREN AND YOUNG PEOPLE

13.1 Abuse is a form of maltreatment of a child or young person. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or an institutional or community setting by those known to them or, more rarely, by others, for example via the internet. They may be abused by an adult, adults, another child or children (KCSiE 2016).

13.2 All staff and volunteers have a responsibility to keep children and young people safe. One of the ways of preventing abuse is being aware of and having knowledge of the indicators the different types of abuse its various forms. Abuse can manifest itself in many different forms including peer on peer abuse that may involve bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. **Staff and volunteers should be clear as to the SUFC's policy and procedures with regards to peer-on-peer abuse.**

13.2.1 Expert and professional organisation are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Staff can access government guidance as required on the issues listed below via the [NSPCC](#) and [GOV.UK](#) and other websites.

### 13.3 Managing allegations against other children (Peer on peer abuse)

13.3.1 If an allegation is made by a child/young person about another child/young person, staff must consider whether the disclosure raises safeguarding and child protection concerns. If one child causes harm to another one it may not be abuse. Bullying, fighting and harassment between children and young people may not be a child protection issue. However, children are vulnerable to abuse by their peers; such abuse will be taken as seriously as abuse by adults, it will not be dismissed as 'part of growing up' and will be subject to the same child protection procedures. KCSiE 2016. **All peer on allegations must be referred to the DSO immediately.**

### 13.12.4 Reporting concerns, suspicions and allegations

13.4.1 Any member of staff or volunteer who either knows of, is told of, or strongly suspects any incident of child abuse has a duty to report the information immediately to the DSO or Deputy DSO. In their absence, the General Manager will inform the Safeguarding Senior Manager without delay.

13.4.2 What is a disclosure?

A disclosure is when a child or young person tell you something that has affected them, for example about instances of abuse.

13.4.3 Part of your work is to offer children and young people a safe space to be themselves and say what they think. As a staff member or volunteer they will trust you and because they feel comfortable and safe, they might discuss things that concern or affect them. This might include concerns involving another member of staff.

13.4.4. Some things that may be shared with you include self-harm and physical, sexual or emotional abuse, and you may notice signs of neglect. They may also have a concern about something that has happened online or through social media.

13.4.5 Talking about these things may be difficult to hear and tough to deal with. Following these Dos and Don'ts will help you offer them the best support possible.

**Do:**

remain calm, approachable and receptive.

listen carefully, without interrupting.

acknowledge you understand how difficult this may be.

make it clear that you are taking what is said seriously.

reassure them that they have done the right thing in telling you.

let them know that you'll do everything you can to help them make a written record of exactly what has been said.

**Don't:**

promise confidentiality.

ask leading or probing questions.

investigate

repeatedly question or ask them to repeat the disclosure discuss the disclosure with people who do not need to know delay in reporting the disclosure to the Safeguarding team.

**To report a concern:**

Make a written record of your concern, including the date, time and all relevant details of the person involved, young person concerned, others involved and witnesses (if there are any);

Contact your Designated Safeguarding Officer (DSO) or the Deputy who will inform you of the next actions to take.

Complete a safeguarding incident form and send to the DSO.

If it is an emergency - and the child is at risk - inform the police or social services first, then the Safeguarding team.

**Who to ask for support:**

If you have a concern about a volunteer and require advice or support, you should contact your DSO.

13.4.6 If the allegation or suspicion is about the conduct of a member of staff or volunteer, SUFC. adhere to the LSCB guidelines on dealing with allegations.

13.4.7 Local Authority Designated Officer (LADO)

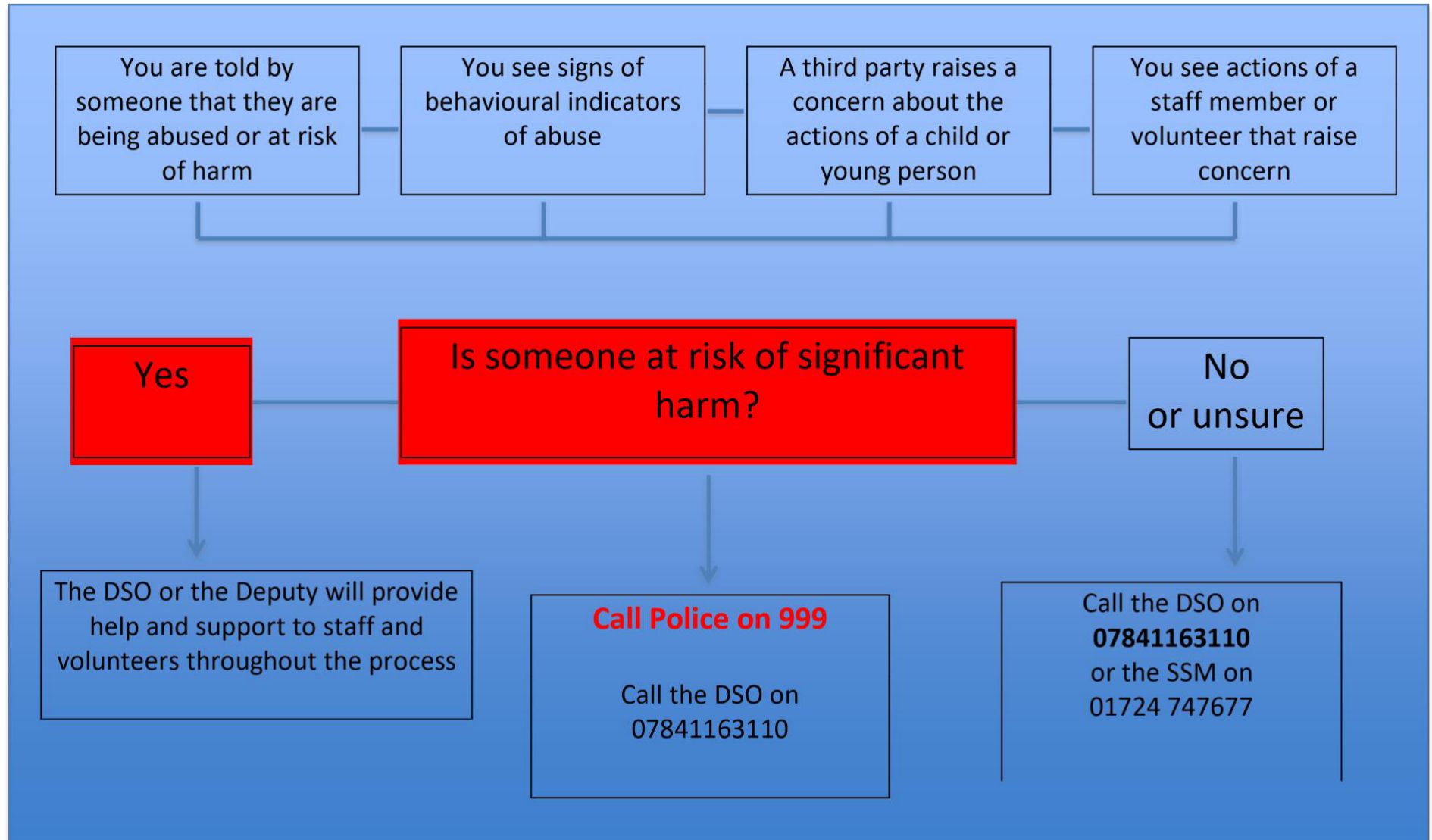
Every local authority nationally is expected to have a LADO. This individual can provide advice and guidance to employers and voluntary organisation following specific cases of concern where an individual has:

behaved in a way that has harmed a child/young person or may have harmed them.

possibly has committed a criminal offence against or related to a child; or behaved towards a child or young person in a way that indicates s/he is unsuitable to work with children/young people.

13.4.8 The LADO should be informed within one working day of all allegations that come to an employer's attention or that they are made to the police





V006: The DSO Number has been updated to 07957498777



### 13.5 Duty to Report a 'Serious Incident'

13.5.1 In addition, any serious incident **must also be reported** to the EFL Safeguarding Officer, the FA Regional Officer (in line with the contractual agreement) or alternatively the Child Protection Sports Unit (CPSU) or the National Society for the Prevention of Cruelty to Children (NSPCC).

### 13.6 Early Help

13.6.1 If a child or young person has not suffered and is not likely to suffer significant harm but is in need of additional support in the form of early help services, the DSO will always seek consent to share any welfare information. The best interests of the child or young person must always take priority and their wishes and feelings taken into account whilst decisions are made about suitable support. The DSO monitors the Early Help process using **North Lincolnshire Threshold Document**.

### 13.7 Confidentiality and the Sharing of Information

13.7.1 This section should be read in conjunction with the Data Protection Policy.

13.7.2 It is imperative that information gained whilst working as an employee or volunteer is only ever to be disclosed on a 'need to know' basis. The DSO and Deputy DSO will determine the extent of the information to be shared and identify staff who may 'need to know' sensitive welfare and child protection information. Information should not be shared without prior consultation with the DSO. The unnecessary discussion of any information about children and young people is inappropriate. This is true even if the identities of the children / young people at issue are not disclosed. **SUFC should therefore be cautious in what they say in public about individuals and activities.**

### 13.8 Safeguarding Structure

13.8.1 Senior Safeguarding Manager - overall responsibility make sure that all staff, children and young people are kept safe in line with current legislation, approved codes of practice (ACOP) codes of practice (COP) and other guidance.

13.8.2 Designated Safeguarding Officer - ensures that all activities on a day-to-day basis comply with the organisation's policies and procedures

13.8.3 All staff and volunteers - ensure that they adhere to the relevant policies and procedures to keep children safe and they must attend Safeguarding training and updates as agreed.

13.8.4 Legislation and government guidance make it increasingly clear of the need for all adults to play a role in safeguarding. The SUFC is fully committed to complying with all UK legislation and guidance to safeguard children and young people. This policy has been drawn up on the basis of legislation and guidance that seeks to protect children and young people.

13.8.5 Anyone offering confidentiality to a child would be promising to keep the content of his or her conversation completely secret and discuss it with no one. Promises of confidentiality must not be made whilst in contact with children and young people. Confidentiality will not be promised by staff or volunteers if a child's welfare is considered a safeguarding or child protection concern. The SUFC will minimise the sharing of information, restricting it to circumstances where it is needed to ensure children and young people's wellbeing and safety.

13.8.6 The SUFC will keep all child protection records confidential, allowing disclosure only to those who need the information in order to safeguard and promote the welfare of children. They will co-operate with Police and Children's Services to ensure that all relevant information is shared for the purposes of child protection investigations under section 412 of the Children Act 1989 in accordance with the requirements of Working Together to Safeguard Children 2018.

13.8.7 Sometimes, we are asked to share information about individuals with other organisation's when there isn't a concern about abuse or harm. If this happens, we will only share information when we have that person's explicit consent to do so.

### 13.9 Whistleblowing **(See Annex 14.3)**

13.9.1 At SUFC we want to protect children and young people from all areas of abuse. Staff members or volunteers on the frontline may be the only ones aware of potentially unsafe or inappropriate practice and it is important that they can raise awareness of it without fear of reprisal, regardless of whether the suspicions or allegations turn out to be true. One of the ways we do this is to provide an accessible reporting system to reveal any poor practice, abuse or unethical behavior by staff or volunteers within the organisation to those in positions of authority.

### 12.10 Sexting

V006:



Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows the sharing of media and messages. In the UK, the age of consent for sexual intercourse is 16. However, it is an offence to make, distribute, possess or show any indecent images of anyone aged under 18, even if the content was created with the consent of that young person. The law is contained in Protection of Children Act 19128 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18

Sexting is the sharing of images or videos of a sexual or indecent nature that are:

- Of children (anyone under the age of 18), of
- Generated by children

It is against the law to take, make, share or possess such images. Sexting can be a form of peer-on peer abuse.

According to the NSPCC Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it, is a child. A young person is breaking the law if they:

- take an explicit photo or video of themselves or a friend
- share an explicit image or video of a child, even if it's shared between children of the same age
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

However, as of January 2016 in England and Wales, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public interest. Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they're a risk.

Staff should:

- Confiscate and secure the device(s) involved
- Inform the Head of Safeguarding before searching a device (searches can only be conducted by the Head of Safeguarding or other authorised person of the same sex)
- Remind the child they can contact Childline at any time if they want to talk to someone about how they're feeling, their trained counsellors can give free non-judgmental advice and support
- Record the incident on the incident form and consider making a referral to LADO

- Inform the police, where illegal images are found.

Sexting does not include the sharing of sexual photos and videos of under-18-year-olds with or by adults. This is a form of child sexual abuse and must be referred to the police. Sexting disclosures should follow normal safeguarding reporting protocols

## **14. PREVENTING AND RESPONDING TO BULLYING**

### **14.1 E-safety and Online Media (See Annex 14.4)**

14.1.2 Our E-safety and social media Policy provides guidance on how we use the internet and social media and our procedures for doing this. It also outlines how we expect our staff and volunteers, who work for us, and the children / young people, who are enlisted on our programs, to behave online. The purpose of the policy is:

To protect all children, young people and adults at risk who make use of technology whilst in our care.

To provide staff and volunteers with a policy regarding on-line safety and how to respond to it.

To ensure our organisation is operating in line with our values and within the law regarding how we behave on-line.

### **14.2 Code of Practice and Behavior**

14.2.1 Our Code of Practice and Behavior will help to protect children, young people and adults at risk from abuse and inappropriate behavior from adults. It will also help staff and volunteers to maintain the standard of behavior expected of them and should reduce the possibility of unfounded allegations being made against them.

### **14.3 Equality and Diversity (See Annex 14.6)**

14.3.1 As an organisation we want to prevent discriminatory practice and uphold the rights of children and young people, as well as staff and volunteers in line with Article 2 of the United Nations Convention on the Rights of the Child. Our Equality and Diversity Policy ensures that this right is put into effect.

### **14.4 Complaints and Compliments (See Annex 14.7)**

14.4.1 The SUFC recognise the right of children/young people and their parents/carers have access to the complaint's procedure, and we intend to ensure that all comments are taken seriously and dealt with swiftly and in confidentially

14.4.2 Children/young people and, where appropriate, parents/carers should know how to, and feel able to, complain or make comments if they are unhappy or pleased with any aspect of the SUFC. We manage this process through our Complaints/Compliments Policy and procedure

## **15 RUNNING SAFE TRIPS, ACTIVITIES AND EVENTS**

### **15.1 Consent for Photography (See Annex 18.10)**

15.1.1 The SUFC may use images of children and young people in publications, websites and social networking sites. This policy can also be used to help children, parents, staff and volunteers understand how photographs can be shared more safely. We will always ensure that:

15.1.2 Children's names will not be used in photograph captions. If a child is named, we will avoid using the photograph.

15.1.3 A parental consent form will be obtained to for a child to be photographed and videoed.

15.1.4 Children and adult permission will always be requested to use their image.

15.1.5 We will only use images in suitable clothing to reduce the risk of inappropriate use. Some activities present a much greater risk of potential misuse. Images accompanied by personal information, such as the name of a child and their hobby could be used to learn more about a child prior to grooming them for abuse.

15.1.6 We will express our written expectations of professional photographers or the press who are invited to an event. These should make clear the organisation's expectations of them in relation to child protection.

15.1.9 Photographers will not be allowed unsupervised access to children, nor can we approve photography sessions outside the event or at a child's home.

### **15.2 Seeking consent for children and young people.**

15.2.1 Children should always be consulted about the use of their photograph. This ensures they're aware that the image is taking place and understand what the picture is going to be used for. This should be recorded on a child's permission form.

15.2.2 For young people under 18 get parental consent to use an image for promotional purposes. Make sure parents and carers are aware of your school or organisation's photography policy. Ask parents to sign a consent form for use of their child's images and keep a record

15.2.3 Images or video recordings of children must be kept securely. Hard copies of images should be kept in a locked drawer and electronic images should be in a protected folder with restricted access. Images should not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

15.2.4 Avoid using any personal equipment to take photos and recordings of children and use only cameras or devices belonging to the school or organisation.

15.2.5 Organisation's who are storing and using photographs to identify children and adults for official purposes, such as identity cards, should ensure they are complying with the legal requirements for handling personal information. Further guidance on the Data Protection Act and other privacy regulations can be found on the [Information commissioner's office website](#).

### 15.3 Trips, events and activities **(See Annex 18.11)**

15.3.1 The SUFC recognise that all activities provided for children and young people must operate within an environment that supports a culture of safety whilst encouraging them to grow and develop. This includes making sure that the environment and activity is risk assessed and risk managed regardless of if the activity takes place on our own site or at another site.

### 15.4 Missing child **(See Annex 18.12)**

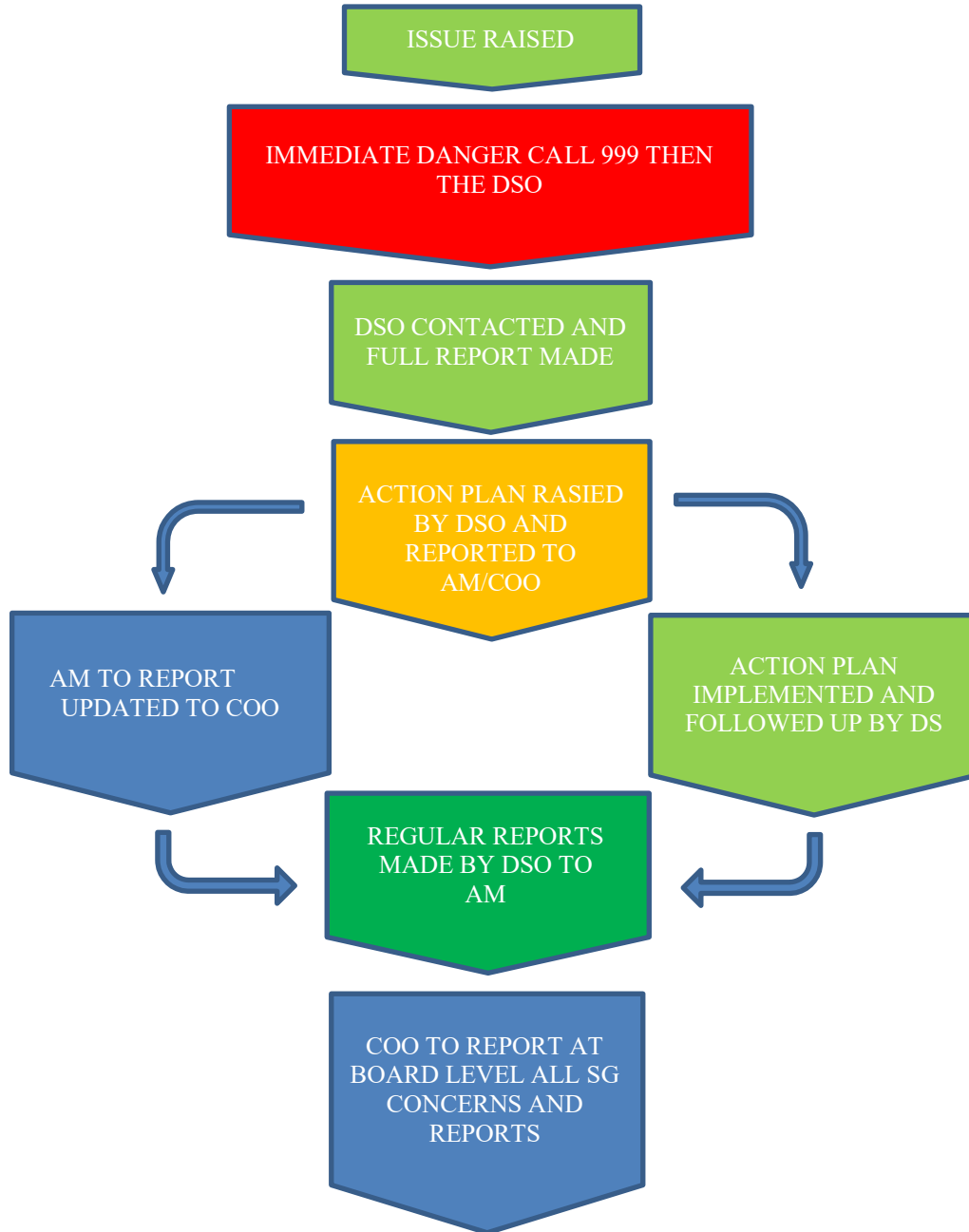
15.4.1 All staff and volunteers are informed of the procedure to be used for searching, and if necessary, reporting any child or young person that may go missing. This includes recording the incident, and the action taken and reasons given by the child or young person for being missing. If we become aware of a child or young person having run away, this will be dealt with as a safeguarding matter and the child protection procedures will be followed

## **16. EFL SAFEGUARDING, MENTAL AND EMOTIONAL WELLBEING STATEMENT 2021**

Each Club shall take all reasonable steps to ensure that it protects the welfare of each of its Academy Players and Players up to the Under 23 age group who continue to train with the Academy on a regular basis by offering support for his wellbeing and pastoral care generally.

Each Club which operates an Academy shall devise a mental and emotional wellbeing action plan to include details of support available and a referral process for concerns, in accordance with such guidance issued by the League from time to time. The provisions of Section 11 of the Regulations: Safeguarding apply to Academies and Development Centers. Without prejudice to the generality of Rule 204 each Club shall appoint an Academy safeguarding officer who shall: undertake the functions set out in Regulation 120 specifically with regard to the Academy; and liaise with the Club's Head of Safeguarding

## 17. SAFEGUARDING REPORTING CHART





**18. SAFEGUARDING REPORTING FORM**

<u>NAME</u>	<u>DATE</u>	<u>TIME</u>

**REPORT**

<u>RECEIVED</u>	<u>NAME</u>	<u>DATE/TIME</u>

**ACTION REQUIRED**

<u>NAME</u>	<u>DATE</u>	<u>TIME</u>

## **19. ANNEXES**

- Safe Recruitment Policy and procedures ( Annex 19.1)
- Anti-Bullying Policy (Annex 19.2)
- Whistle- Blowing (Annex 19.3)
- Social Networking Policy (Annex 19.4)
- Equality and Diversity (Annex 19.6)
- Complaints and Compliments (Annex 19.7)
- Health, Safety and Welfare (Annex 19.8)
- Data Protection (GDPR) (Annex 19.9)
- Consent for Photography (Annex 19.18)
- Trips, events and activities (Annex 19.11)
- Missing Child (Annex 19.12)
- Adults at Risk (Annex 19.13)

