



**FLEETWOOD TOWN**  
**SAFEGUARDING CHILDREN**  
**POLICY & PROCEDURES**  
**2023/24**



## Safeguarding Children Policy

### Introduction

1.1 The Club acknowledges and accepts it has a statutory obligation and responsibility for the wellbeing and safety of all children who are under the Club's care or utilising the Club's facilities. Everyone working at the Club has a duty of care to safeguard the welfare of children by creating an environment that protects them from harm.

1.2 The wellbeing of children is paramount, and all staff must make themselves aware of the Club's Safeguarding Children Policy. The following guidelines will be supplemented by appropriate training and additional guidance accordingly.

### Definitions

1.3 A "Child" (collectively referred to as "Children") is defined as anyone under the age of 18.

1.4 An "Activity" means any activity or series of activities arranged for a Child or Children by or in the name of a Club. These are deemed to be regulated and therefore activate the required levels of Criminal Record Checks that are associated.

### Rules and Regulations

1.5 In the management of its programmes, the discharge of its functions, and in implementing this policy and procedure, The Club will remain mindful of its' duty of care and other legal obligations such as those set out in the Health and Safety at Work Act 1974, Data Protection Act 2018, Equality Act 2010 and Protection of Freedoms Act 2012.

1.6 In the case of children, the Club is also mindful of its responsibilities under the following legislation and guidance;

- The Children Act (1989) and Children Act (2004)
- Working Together to Safeguard Children (2018)
- Keeping Children Safe in Education (2022)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2018)
- Protection of Freedoms Act (2012)
- Data Protection Act (2018)
- The Prevent Duty Guidance for England and Wales (2015)
- Sexual Offences Act (2003) and Serious Crime Act (2015)
- FA Safeguarding Children Rules, Premier League and English Football League rules and guidance.

1.7 The Club recognises the definition and follows the guidance relating to "Position of Trust" as defined in the Sexual Offences Act 2003.

1.8 The Club also recognises its responsibility to work with other agencies



to protect children from harm and to respond to safeguarding concerns.

## Review

1.10 This policy will be reviewed annually or if there is a statutory legislative or organisational change, or following a safeguarding incident, concern or allegation whereby the policy is found to be in need of revision to ensure the aims and key principles are met.

All policy documents and reviews will be submitted to the Operational Safeguarding Board and ratified at the Strategic Safeguarding Meeting for approval.

## Aims and Key Principles

1.11 The aims of the Club's Safeguarding Children Policy are:

- To safeguard all children and young people who interact with the Club.
- To demonstrate best practice in the area of safeguarding children.
- To positively reflect and promote the club values in regard to safeguarding children.
- To develop a positive and pro-active welfare programme to enable all children and young people to participate in an enjoyable and safe environment.
- To encourage parents and other members of the child or young person's family to be involved in a relationship with the Club.
- To ensure that coaches, parents and other adults who come in to contact with children and young people provide good role models of behaviour.
- To promote high ethical standards throughout the Club.

1.12. The key principles underpinning this policy are:

- The child's welfare is, and must always be, the paramount consideration. When concerned about the welfare of a child, staff will always act in the best interests of the child.
- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity.
- All allegations of abuse or poor practice will be taken seriously and responded to efficiently and proportionately.
- Everyone who comes into contact with children and their families has a role to play in safeguarding children.
- Board Members, employees, staff, agency workers, contractors and volunteers have a responsibility and role to identify concerns, share information appropriately and take prompt action.

1.13. Senior Safeguarding Manager.

The Senior Safeguarding Manager (SSM) has overall responsibility for the safeguarding of children at the Club. The SSM will:

- Report to the Chief Executive Officer, who acts as the board level safeguarding champion at FTFC, on recommendations for changes to the Safeguarding Policy and Procedures taking into account legislative changes.



- Undertake regular monitoring and review of activities involving children, or will designate this task to a suitably trained departmental Designated Safeguarding Lead (DSO) or the Ground Safety Officer.
- Ensure they undertake regular and appropriate training for the role.
- Make the decision whether to investigate any allegations or concerns of abuse and/or whether to refer any matter to an external agency.
- Liaise with local Safeguarding Children's Partnerships.
- Ensure staff are trained on Club safeguarding procedures.
- Ensure they undertake regular and appropriate training for the role.
- Source appropriate external training for safeguarding
- The Senior Safeguarding Manager is Tim McDermott [tim.mcdermott@fleetwoodtownfc.com](mailto:tim.mcdermott@fleetwoodtownfc.com)

## 1.14. Designated Safeguarding Officers.

The Club will maintain a suitably qualified a Designated Safeguarding Officer (DSO) for each of the following club departments:

- FTFC Academy.
- Fleetwood Town International Football Academy (FTIFA)
- Match Day Operations.
- Poolfoot Operations.

Each DSO will:

- Address any immediate protection issues.
- Provide public facing support to FTFC staff on matters of safeguarding.
- Report to the Operational Safeguarding Board on their area of business, maintain and update the FTFC Risk Register with matters relating to their department and liaise with the SSM on all safeguarding matters arising.
- Undertake regular monitoring and risk assessments of activities involving children, or designate this task to a trained activity lead.

The Designated Safeguarding Officers for the start of season 2023/24 are:

FTFC Academy : Jack Higgins – [jack.higgins@fleetwoodtown.fc.com](mailto:jack.higgins@fleetwoodtown.fc.com)  
FTIFA : Mick Horsfall – [michael.horsfall@fleetwoodtownfc.com](mailto:michael.horsfall@fleetwoodtownfc.com)  
Match Day Operations : Dave Wilson – [dave.wilson@fleetwoodtownfc.com](mailto:dave.wilson@fleetwoodtownfc.com)  
Poolfoot Operations : Rob Smith – [Robert.smith@fleetwoodtownfc.com](mailto:Robert.smith@fleetwoodtownfc.com)

Anybody who wishes to discuss a concern about a child's welfare may contact the SSM or relevant DSO direct.

## 1.15 All employees, contractors and volunteers are expected to:

- Be alert to signs of abuse and radicalisation and take responsibility for referring concerns to the SSM or a DSO.
- Be prepared to listen to and take seriously the concerns of children.
- Abide by the codes of conduct for employees and volunteers.
- Promote the health, safety and welfare of children.
- Maintain records as necessary.



- Set a good example to children by their own behaviour.

## 2. Safer Recruitment

2.1. As part of the Clubs recruitment and selection process, offers of work for positions which involve working with children are subject to safer recruitment practices.

FTFC operates a Safer Recruitment Policy which is available to staff. This policy clearly define the recruitment and selection procedures that the Club follows to ensure, as far as is reasonably practical, that it only recruits individuals that are deemed suitable to work with children.

2.2 Below is summary of the key elements of the FTFC Safer Recruitment Policy.

The aims of this policy are:

- To attract, select and retain the best candidate for any given vacancy on the basis of their abilities and suitability for the role.
- To ensure that all candidates are considered equally, consistently and fairly for the role.
- To ensure that no candidate is discriminated against on the basis of age, disability gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or beliefs, sex or sexual orientation (protected characteristics);
- To ensure compliance with relevant legislation and guidance in place at any such time.;
- To ensure that the Club meets its commitment to safeguarding and promoting the welfare of children by carrying out all necessary pre-employment checks.

2.3 It is the responsibility of the Group HR Department, The Senior Safeguarding Manager, Designated Safeguarding Officers and relevant hiring managers to:

- Ensure that safer recruitment procedures are followed.
- Ensure all appropriate and necessary checks are carried out on successful candidates.
- Monitor contractors and agencies compliance with this policy.
- Promote the welfare of children at every stage of the procedure.

2.4 All employees involved in the recruitment and selection of staff are responsible for familiarising themselves with, and complying with, the provisions of this policy.

2.5 Definition of Regulated Activity and Frequency

Any position undertaken at, or on behalf of the Club will amount to "regulated activity" if it is carried out:

- frequently, meaning once a week or more; or
- overnight, meaning between 2.00 am and 6.00 am; or
- satisfies the "period condition", meaning four times or more in a 30-day period; and
- provides the opportunity for contact with children.

Roles which are carried out on an unpaid/voluntary basis will only amount to regulated activity if, in addition to the above, they are carried out on an unsupervised basis.

The Club is not permitted to check the Children's Barred List unless an individual will be engaging in "regulated activity". The Club is required to carry out an enhanced disclosure



and Barring Service (DBS) check for all staff who will be engaging in regulated activity. However, the Club can also carry out an enhanced DBS check on a person who would be carrying out regulated activity but for the fact that they do not carry out their duties frequently enough i.e. roles which would amount to regulated activity if carried out more frequently.

Whether a position amounts to “regulated activity” will be considered by the SSM to decide which checks are appropriate. It is however likely that in nearly all cases for posts in the Academy the Club will be able to carry out an Enhanced DBS check and a Children’s Barred list check.

## 2.6 Disclosure and Barring Service Criminal Record (DBS) Checks.

DBS checks will be carried out for all relevant postholders. New staff will not be allowed unsupervised access to children until a satisfactory FTFC DBS check has been received by the Club or, in limited circumstances, until a suitable risk assessment and policy decision has been made by the SSM. The Departmental DSO is responsible for ensuring all checks are carried out in the required timescales. The Club processes DBS checks via the FA Online Application System for posts governed by FA Regulations. All other posts outside this scope will have DBS checks processed by the Club directly with First Advantage Online Disclosures.

2.7 Should a check highlight a criminal record on the individual that would deem them unsuitable to work with children, the following will apply;

- For checks completed via the FA Online Application System, the FA will confidentially liaise directly with the applicant. The FA will only inform the Club if the individual is considered unsuitable to work with children but will not disclose the reason.
- For checks completed via the First Advantage Online Disclosures, the Designated Safeguarding Officer will confidentially liaise directly with the applicant. In the event that a DBS check highlights a criminal record on the individual that would not deem them necessarily unsuitable to work with children and young people, this will be referred to the SSM and Group Head of HR for a risk assessment and final decision, and any subsequent job offer will be subject to consideration of:
  1. the Rehabilitation of Offenders Act 1974.
  2. the nature, seriousness and relevance of the offence.
  3. the time passed since the offence occurred and the age of the individual when the offence occurred.
  4. whether it is an isolated offence or numerous offences.
    - In the event that the applicant disputes any information contained in the disclosure, FTFC may, solely at the clubs discretion, defer the decision regarding the appointment until the applicant has had reasonable opportunity to have the dispute considered by the DBS.
    - The Club will accept portability of DBS certificates if individuals have joined the DBS Update Service.
    - Postholders previously employed in an FA regulated post will have their FA records checked on the FA Whole Game system before a new application is processed.
    - It is compulsory that postholders agree to inform the Club of any cautions or convictions that they have received mid cycle. It is also compulsory that postholders confirm there are no changes to the DBS status prior to the start of each season.



## 3. Process for Disclosure and Barring Service (DBS) Checks

### 3.1. New Appointments.

All staff who are offered a position which involves working with children will be required to complete a YD2 Self-Declaration Form and also undertake an Enhanced DBS check with a barred list check where appropriate. All offers of work are subject to the outcome of the screening process.

Should a positive DBS check be received, a risk assessment will be carried out by the Senior Safeguarding Manager, with support from the Group Head of HR (or nominated deputy).

### 3.2. New Appointments who already have an FA DBS Check.

If a new member of staff has been subject to an FA DBS check by their previous employer, the club will still require a further check if the date of such check is in excess of one month old.

If a new member of staff has been subject to a non-FA DBS check by their previous employer, the club will always still require a further check. However, there may be limited circumstances in which a non TFC DBS check, when considered in the context of individual circumstances, enables a member of staff to commence work early. For clarity, an example of such a scenario might be one where an applicant is successful for a part-time coaching post, they are currently employed as a school teacher with a suitable reference from their current school and have an in date enhanced DBS certificate from their current football club from whom they also have a suitable reference. Such a scenario may, with the express permission of the SSM, enable a member of staff to commence unsupervised work with children pending completion of an FTFC DBS check. For the avoidance of doubt this scenario would NOT guarantee such an outcome and the consent of the SSM will always be required.

### 3.3. Temporary Staff and External Consultants

The Club will ensure that all temporary staff and short term external consultants will sign a YD2 Self Declaration Form where appropriate and, in any case, will not have unsupervised access to children during their time with the Club.

## 4. Training and Awareness for Employees, Third Parties and Contractors.

4.1. The Childrens Version of the FTFC Safeguarding Childrens Policy is issued to club employees and casual workers who come into contact with children at induction. The full policy will be available to all employees via the clubs external website and, where they have access, via the FTFC Company Date OneDrive. Such employees will also be provided with an induction video prepared by the SSM (DRAFT)

4.2. All staff working in direct contact with children are required to complete the FA's Safeguarding Children Awareness workshop and undertake a refresher course, as advised by the FA, at least once every 3 years. Details of training and qualifications will be recorded on the Single Central Register (SCR)

### 4.3. Interns / work experience / volunteers.

The Club may from time to time offer non paid work experience or internships. The club may also use unpaid volunteers. Whilst undertaking work for the Club, those on short term work experience



will not have unsupervised access to children. Interns or volunteers who require unsupervised access for their roles will be subject to the same processes as employed members of staff.

#### 4.4. Contractors

All external contractors engaged by FTFC undergo a suitability test prior to commencing work. This will include evidencing the contractor's Safety Record, Safety Policy, Liability Insurance, Risk assessment/Method Statement and details of Competent Person.

On arrival at the club the contractor will receive a site induction from a suitable member of staff and be provided with the Club's expected code of behaviour. Contractors are subject to inspection from Club personnel. In the event of a Contractor carrying out work on an area that is usually occupied by children, this work where possible, will be undertaken when children are not present.

#### 4.5. Service Level Agreements/Partnership Agreements

The Club's commitment to Safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to children.

### 5. Ratios and the Supervision of Children

5.1. Any activity undertaken by the Club will always be given full consideration to the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision.

5.2. Regardless of these ratios a minimum of 2 members of staff will always be available on site to supervise an activity. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).

- For children under 5 the recommended ratio should be no more than 1:6.
- For children under 8 the recommended ratio should be no more than 1:8.
- For children over 8 the recommend ratio should be no more than 1:10, but this varies depending on the activity. Advice should be sought from the SSM if unsure.
- For organised groups of children attending a match day, the minimum ratio is 2 responsible adults to 20 children.

Where the club is taking responsibility for the care of the children, parents/carers should not be included in supervision calculations.

These ratios are partially based on the NSPCC and Ofsted guidelines which are as follows:

Child's Age	Ratio of adults to children:
0-2	1:3
2-3	1:4
4-8	1:6
9-12	1:8
13-18	1:10





Lone Working Guidance.

Working 1:1 with children should only occur in exceptional circumstances, and if it does, the staff member must seek and follow specific guidance from the SSM or DSO.

## Scouts

FTFC Scouts will regularly work alone, unsupervised and remotely from FTFC premises at other clubs facilities. References are sought for all Scouts and, on registration with The Club, Scouts identifying players under the age of 18 are issued with a copy of the Premier League's Premier Practice booklet on Player Recruitment, a Club Code of Conduct and the Club's Safeguarding Children Policy.

The Club only permits visiting scouts from other clubs to attend its matches in accordance with the provisions of the EFL Youth Development Rules.

## 6. Gifts and Favouritism

Staff should take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment.

The Club recognises that there are occasions when children or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a "thank you", and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others. Staff should report any gifts received to their line manager and they should be dealt with appropriately.

Similarly, it is not permitted for staff to give personal gifts to children. This could be misinterpreted as a gesture either to bribe, or to single out the child. It might also be perceived that a "favour" of some kind is expected in return.

Any reward given to a child must first be agreed with the staff member's line manager as part of a structured reward system in line with the departmental policy and not based on favouritism.

## 7. Use of Images

The Club takes its guidance on the use of images from guidelines issued by the FA Document "Photographing and Filming Children", guidance notes 8.3 issued in July 2020.

- Before taking images of children who are members of FTFC Academy or FTIFA, parental consent is sought in writing at the start of each football season / period with the club. Parents/Legal Guardians are responsible for informing the club of any change of circumstances within the season which may affect consent.
- Parents/Legal Guardians will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed.
- All children featured in Club publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific child.
- Where appropriate, images represent the broad range of people participating safely in the event.



- Designated Club photographers will, where applicable, undertake a DBS check and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by the Club, the Lancashire Safeguarding Children Partnership, and by the Premier League from time to time.
- Children who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any Club document providing the club have been made aware of such proceedings.
- No images of children featured in Club publications will be accompanied by personal details such as their school or home address.
- Recordings of children for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises.
- Any instances of inappropriate images in football should be reported to the Clubs Head of Communications, and the Designated Safeguarding Manager immediately.
- The Club does not put player profiles with images and personal information on its website until the U18 age group.

## 8. Match day

### 8.1 Unaccompanied Children

In accordance with the Club's ticketing terms & conditions, the minimum age that a child is permitted to attend a match at the Club unaccompanied is 12 years old. Children aged 11 and younger must be accompanied and appropriately supervised by an adult.

### 8.2 Mascots & Ball Retrieval Team

The Club will only allow children to be match day mascots or ball retrieval persons once parental consent has been obtained. A signed image consent form is also required before any images are published in the Club's match day programme.

No photographs of mascots or ball retrieval persons featured in Club publications will be accompanied by personal information about the child, such as their school, home address or local sports team.

The FTFC Match Day Operation will have a bespoke risk assessment prepared.

## 9. Communication with players.

9.1 FTFC is committed to the welfare and safety of all children, both within the Academy and at the club as a whole. The Academy also realises the importance of communication and works closely with parents, carers, host families, schools and local authorities to ensure that the wellbeing of all children is paramount.

9.2 In the interests of ensuring professional boundaries are maintained employees must not become friends with, add to their social media network any potential, current, or former player under the age of 18 unless a clear reason exists for example, they are a relative or family friend. Entering into



such a relationship may lead to abuse of an employee's position of trust and breach the standards of professional behaviour and conduct expected by the Club.

All on-line or phone contact with players under 16 will always be conducted via a parent or guardian.

Where players progress to a Scholars contract and have entered school year 12, phone contact with coaching staff that is essential to their safeguarding or coaching programme will be permitted but all staff agree that at any time the content of any such communication must be made available for examination to the SSM or their line manager. No contact via messaging apps between a member of staff and a scholar will be deleted.

## 10. Transport

10.1 The Club has a separate Transport Policy which will be made available to all relevant staff.

10.2 In general it will be the responsibility of parents/guardians to transport their child/children to and from fixtures and training unless club arrangements have been made and communicated.

10.3 FTFC do not permit the transport of children by staff on a 1:1 basis or in the private vehicles of staff. However, this policy does not prevent a member of staff from providing transport to a child where not to do so would place them at risk of immediate harm. In such a circumstance the member of staff should contact the SSM at the time by phone or message to alert them to the situation they face, make contact with the child's parents to seek permission and record the journey on CPOMS. Any member of staff transporting the same child in such circumstances for a second time in any 12 month period will trigger a full and urgent review by the SSM.

10.4 Only vehicles and drivers that meet the criteria of the FTFC Transport Policy will be used to transport children. Under no circumstances will a member of staff pre-plan to use a private vehicle to convey children on club business.

## 11. Medical

11.1 There will be occasions where medical treatment is necessary during training sessions and fixtures. The Club is unable to guarantee that two members of staff are present during treatment sessions and parental consent for 1:1 treatment will be sought. Medical staff who may be involved in such treatment will receive appropriate guidance and should any circumstance arise in which medical staff have any concerns about such treatment they will stop and seek guidance from their line manager, the SSM or a DSO.

11.2 All members of the medical department have a valid DBS check and are required to attend the FA's Safeguarding Children awareness workshop and internal Safer Working Practice training. The Club is fully committed to equal opportunities for all individuals and, as such, the Club employs both male and female staff to work within the medical department.

11.3 The Club will permit parents and carers of players U16 to attend pre booked medical treatments if required.

11.4 In the event that a safeguarding disclosure is made to a member of the Medical Department, the staff member will always report such disclosure to the SSM or to a DSO.



## **12. Club Accommodation.**

12.1 FTFC has a specific Accommodation Policy. FTFC staff involved in activity relating to The Lodge or “72” will be provided with a copy of this policy.

## **13. Youth Loans, Trials & Work Experience.**

13.1 If an Academy Player or young Professional under the age of 18 joins another club on trial, work experience, or a Football League Youth Loan, the Academy will seek written parental consent (additional to the standard consent sought at the start of every season) prior to the activity taking place. Consideration will also be given to the player’s education programme, travel and accommodation arrangements. FTFC will designate a member of Academy Staff who will check on the player/s on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience.

13.2 For players under the age of 18 who are joining the Club on trial, parental consent will be sought prior to the trial taking place, along with suitable checks e.g. medical forms. Where accommodation is required during the trial period, this will be in designated host family accommodation or, if the player’s parent/guardian is also travelling with the player then a local hotel may be used as an alternative. Transportation will be arranged during the trial period via the Academy and agreed with parents/guardians.

## **14. U18, U21 & First Team Progression.**

14.1 As players progress through the Academy system they may have the opportunity to train and play with the adult provisions of the Club. This may raise concerns for the individual and/or their parent/guardians as they will be entering an adult provision and as such may witness adult behaviours and language. The Club will support the player(s) during this transition, and ensure that the welfare of the player concerned is paramount. Parents will be included and consent sought where appropriate.

## **15. Types of abuse and concerns that may arise.**

“Child abuse” and “neglect” are generic terms encompassing all ill treatment of children as well as cases where the standard of care does not adequately support the child’s health or development. Children may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child and may be of the same or opposite sex. There is often a common misconception that only a certain type of person can abuse children but this is simply not the case – abuse can take place in any setting, by someone of either sex, of any sexual orientation and of any age.

15.1 Recognition – Types of Abuse



Definitions of types of abuse are provided below. Should you have any concern that abuse is occurring you should contact the SSM or DSO immediately.

15.2 Physical abuse: Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.

15.3 Emotional abuse: Any act or other treatment which may cause emotional damage and undermine a person's sense of wellbeing, including persistent criticism, denigration or putting unrealistic expectations on Children, Young People and Adults at Risk, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

15.4 Sexual abuse: Any act which results in the exploitation of Children, Young People and Adults at Risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This includes non-contact activities, such as indecent exposure, involving Children, Young People and Adults at Risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst the age of consent (the age at which a person is considered to be legally competent to consent to sexual acts) is sixteen, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.

15.5 Child sexual exploitation: A form of Child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child or Young Person into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.

15.6 Child criminal exploitation: Can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

15.7 County lines: The organised criminal distribution of drugs by gangs from the big cities into smaller towns and rural areas using Children, Young People and Adults at Risk. Gangs recruit Children, Young People and Adults at Risk through deception, intimidation, violence, debt, bondage and/or grooming. Gangs also use local property as a base for their activities, and this often involves taking over the home of an Adult at Risk who is unable to challenge them. County line gangs pose a significant threat to Children, Young People and Adults at Risk upon whom they rely to conduct and/or facilitate such criminality.

15.8 Cuckooing: Cuckooing is a term often linked to county lines. Cuckooing is when gangs establish a base in the location they are targeting for drug dealing and to operate their criminal activity from, often taking over the homes of adults at risk by force or coercion. People exploited in this way will quite often be exposed to physical, mental and sexual abuse, and in some instances will be trafficked to areas a long way from home as part of the network's drug dealing business. Victims of 'cuckooing' are often drug users but can include older people, those suffering from mental or physical health



problems, female sex workers, single mums and those living in poverty. Victims may suffer from other forms of addiction, such as alcoholism.

15.9 Neglect: Ongoing failure to meet the basic needs of Children, Young People and Adults at Risk. Neglect may involve failing to provide adequate food or shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger or failing to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that Children, Young People and Adults at Risk are safe and adequately supervised or exposing them to unnecessary risks. Grooming: The process of developing a relationship with and the trust of an individual, and sometimes their family, to exploit, abuse or traffic them. Grooming can happen both online and in person.

15.10 Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of Children, Young People and Adults at Risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

15.11 Female genital mutilation (“FGM”): Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take women and girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

15.12 Forced Marriage: Where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. This is recognised in the UK as a form of domestic and/or sexual violence against women and men and is a serious abuse of human rights. Where it affects children and young people it is child abuse.

15.13 Honour based Abuse/Violence: Honour based abuse (HBA) or violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. It is a violation of human rights and may be a form of domestic and/or sexual violence. Where it affects children and young people it is child abuse. It can be distinguished from other forms of abuse and violence, as it is often committed with some degree of approval and/or collusion from family and/or community members.

15.14 Women, men and younger members of the family can all be involved in the abuse. Victims of honour-based abuse are more likely to be abused multiple times by multiple perpetrators. Honour based abuse and violence manifests itself in a diverse range of ways with children and young people, it can lead to a deeply embedded form of coercive control, built on expectations about behaviour that are made clear at a young age. Often the control is established without obvious violence for instance through family members threatening to kill themselves because of the victim’s behaviour. Honour based abuse can also include forced marriage, domestic and/or sexual violence, rape, physical assaults, harassment, kidnap, threats of violence (including murder), witnessing violence directed towards a sibling or indeed another family member, and female genital mutilation. Do not underestimate the potential risk of harm.



### 15.15 'One Chance Rule'

All staff working with suspected or actual victims of forced marriage and honour-based violence need to be aware of the "one chance" rule. That is, they may only have one opportunity to speak to a victim or potential victim and may possibly only have one chance to save a life. If the victim is allowed to leave without the appropriate support and advice being offered, that one chance might be wasted.

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

15.17 Cyberbullying: As with bullying but by the use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person.

15.18 Discriminatory abuse: Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

15.19 Poor practice: This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of 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 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.

15.20 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 and Adults at Risk.

15.21 Child-on-child abuse: Children and Young People can be taken advantage of or harmed by another child or young person. Child-on-child abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between individuals and within relationships (both intimate and non-intimate).

15.22 Infatuations: Children 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 behaviour is above reproach. A member of Staff who becomes aware that a Child or Adult at Risk may be infatuated with them or with a colleague, should discuss this at the earliest opportunity with the Safeguarding Team.



15.23 Domestic violence or abuse: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass, but is not limited to: psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.

## 16. Responding to a Report or Suspicion.

The most important part of responding to any concern or suspicion is to ACT. If someone is at risk of immediate harm you should take action immediately and call 999 for an emergency service if required.

In circumstances where there is no obvious risk of immediate harm you should report your concerns to the SSM or a DSO as soon as possible and in any event within 24 hours. If there are specific circumstances that make you feel that you wish to remain anonymous, FTFC has on display at Poolfoot, Highbury and club accommodation clearly identifiable QR codes that take you to an anonymous on-line reporting form. This form goes direct to the SSM.

16.1 The following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice.

### Do....

- Ensure the child or young person's safety.
- Treat any allegations extremely seriously and act at all times towards the child as if you believe what they are saying.
- Tell the child they are right to tell you.
- Reassure the child that they are not to blame.
- Be honest about your own position, who you have to tell and why.
- Tell the child what you are doing and when, and keep them up to date with what is happening.
- Take further action – you may be the only person in a position to prevent future abuse.
- Write down everything said and what was done (handwritten is preferable) and sign and date the notes. A referral must be made to the SSM or a DSO within 24 hours of the incident taking place and if you have access record your actions on CPOMS.
- Seek medical advice if necessary.

### Don't....

- Make promises you cannot keep or to keep secrets.
- Interrogate the child, it is not your job to carry out an investigation. (Asking a few sensible questions open questions to establish the facts is fine. Allowing the child to speak for as long as they want is fine. Repeated or in-depth questioning isn't. This is a common sense judgement for you but if in doubt seek advice).
- Cast doubt on what the child has told you, don't interrupt or change the subject.
- Say anything that makes the child feel responsible for the abuse.

DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.





## 16.2. Information sharing with parents.

Unless there is a reason not to, FTFC will always keep a child's parent fully informed of any concerns we have about their child. However there may be situations where the parent/s are the subject of the concerns or that the child specifically doesn't want their parent to know. In either of these circumstances you should contact the SSM immediately to discuss. If the SSM isn't available contact a DSO. If we are in a situation where we are unable to tell a parent it is likely we will need to inform Children's Social Care.

## 17. Recording and Investigation of Allegations or Suspicions.

17.1 If possible make notes at the time you speak to the child. If necessary make immediate contact with the SSM or a DSO to discuss. Record your actions and knowledge on CPOMS as soon as possible. If you do not have access to CPOMS send the information via club email to the SSM in order that it is recorded and time and date stamped.

### 17.2 Senior Safeguarding Manager actions.

The SSM will consider if further fact finding by FTFC is appropriate or whether immediate referral to Children's Social Care and/or the Police is required.

If FTFC do obtain a further written account from a child (likely in low level concerns or where there are concerns of poor practice) a parent/guardian/appropriate adult will be present.

Any statement made by the child should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, questions should be kept to a minimum, and where used, they should be of an open format (TED questions; 'tell me', 'explain', 'describe'). No suggestion of who the perpetrator was or how any concern or incident happened should be suggested.

17.3 A child should never be pressured to give information or show physical marks unless they do so willingly. If they choose to show markings, two members of staff should be present and any marks raising concern should be recorded. If a child unexpectedly shows you marks or images, write down what happened and how this came about and report this to the SSM or a DSO.

Do not take images of injuries without consultation with the SSM or the police.

17.4 There are actions which staff have to, and are obliged to take, once they are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring any issue to the SSM or a DSO. The key issue is that the welfare of the child is protected.

17.5 If the SSM or a DSO is the subject of an allegation do not report directly to that person.

17.6 Investigations into possible abuse will require careful management. The SSM, or in their absence a DSO, will first seek the advice of Children's Services, the LADO or the Police. In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, the Club must provide a report to the FA Head of Safeguarding Children, the EFL Safeguarding Team and inform the Club's Chief Executive Officer.

17.7 Any investigation we undertake will follow the key principles as follows:



- Integrity – we will be honest with all parties involved in regard to the process and what we can, and can't do.
- Fairness and Impartiality – we will speak to the complainant/s, witnesses, and the individual/s to which the concern relates to, to seek a balanced and unbiased account of events.
- Confidentiality – we will ensure that we follow confidentiality protocols and only share information with parties necessary for safeguarding reasons e.g., statutory authorities, (such as police or children's services), or local authorities (such as LADO).
- Proportionality – decision making will be made on a case-by-case basis, taking into consideration a number of factors relevant to each case.
- Timeliness – whilst we recognise that investigations can be disruptive to the organisation, we will ensure that investigations are prioritised, but also thorough and methodical with a person-centric approach and are never rushed.
- Communication - will maintain dialogue with all parties involved with the allegation until such time as the matter has reached a reasonable outcome, taking the lead from external agencies where required.

## 17.8 Specific information regarding allegations against members of staff.

If the report involves an allegation about any member of the Club staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc.) and the Club believes that the report could demonstrate that the member of staff in question has:

- 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 is unsuitable to work with children,

then the SSM (or in their absence a DSO) shall immediately inform the Local Authority Designated Officer (LADO) where the alleged incident took place so that he or she can consult with the Police and Children's Social Care colleagues as appropriate. FTFC will also inform the FA Safeguarding Team.

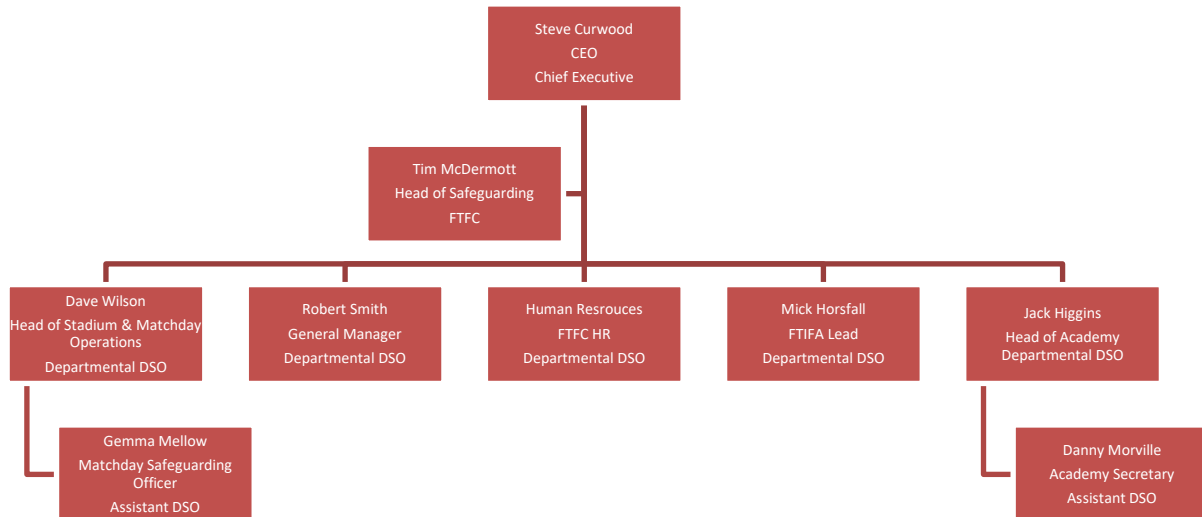
Where the SSM or DSO are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.

The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation. The member of staff in question may be asked to stay away from activities pending the conclusion of any investigation. This process would only be carried out once the advice of the above mentioned external bodies had been sought and only then in consultation with the SSM.

Providing it does not contradict with any advice received from the LADO, any internal investigation will be carried out in line with the Clubs Human Resource Policies.



**18. FTFC Safeguarding Organisational Chart.**



**19. External Resources**

FA Safeguarding Children Guidelines: <https://www.thefa.com/football-rules-governance/safeguarding/section-11-the-complete-downloadsdirectory>

Working Together to Safeguard Children 2018:  
<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

Information Sharing Guidance for Managers and Practitioners:  
<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

Keeping Children Safe In Education (KCSIE) 2022  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1101](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101)

454/Keeping\_children\_safe\_in\_education\_2022.pdf



Sources of further information and advice:

Health & Safety at Work Act 1974 Data Protection Act 2018

Safeguarding Vulnerable Groups Act 2006 Equality Act 2010

Domestic Abuse Act 2021

Sexual Offences Act 2003

Protection of Freedoms Act 2012 Keeping Children Safe in Education

Children Act 1989 Children Act 2004

Education Act 2002 <https://www.gov.uk/government/publications/protectingchildren-from-radicalisation-the-prevent-duty>

DBS barring referral guidance Police Act 1997

Protection of Freedoms Act 2012 Counter-Terrorism and Security Act 2015  
Counter-Terrorism and Security Act 2015 -Part 5

Department for Education: Child sexual exploitation

Home Office: Criminal Exploitation of children and vulnerable adults

Female Genital Mutilation Act 2003

Home Office: Mandatory Reporting of FGM The Right to Choose: Statutory guidance for dealing with forced marriage

Department for Education: Preventing and tackling bullying

Department for Education: Cyberbullying Sexting in schools and colleges: responding to incidents and safeguarding young people

Indecent images of children: guidance for young people  
<https://thecpsu.org.uk/helpadvice/topics/safer-recruitment/>

<http://www.nspcc.org.uk/preventing-abuse/child-abuse-andneglect/>

<http://www.nhs.uk/conditions/social-careand-support-guide/pages/vulnerablepeople-abuse-safeguarding.aspx>

<http://www.forwarduk.org.uk/>

<https://www.ceop.police.uk/> <http://www.karmanirvana.org.uk/>



## 20. Key External Safeguarding Partners FTFC

- Lancashire Safeguarding Assurance Partnership 0300 123 6720 or out of hours 0300 123 6722.
- Local Authority Designated Officer Lancashire 01772 536694.
- NSPCC helpline – helping adults protect children 24 hours a day. For help and support and advice regarding any concerns about children that you think may be at risk of harm: [help@nspcc.org.uk](mailto:help@nspcc.org.uk) Text 88858 Call 0808 800 5000.
- UK Safer Internet Centre professional advice line – helpline for professionals working with children in the UK: [helpline@saferinternet.org.uk](mailto:helpline@saferinternet.org.uk) Call 0844 381 4772.
- Police Anti-Terrorist Hot Line: 0800 789 321.
- National Domestic Abuse Helpline: 0808 2000247.