

Harrogate Town AFC CIO - Child Protection and Safeguarding Policies and Procedures



Introduction

At Harrogate Town AFC CIO we are dedicated to providing a safe learning environment for players and everyone who engages with us. We acknowledge that we have a duty of care to ensure that in all our activities, the participants welfare and safety is number one.

Throughout this document we will detail what steps we have made to meet Football Association (FA) Guidance, our Safeguarding Authorities guidance and other relevant policies.

For reference: within this policy a child is defined as anyone who has not yet reached their 18th birthday. Therefore the terms “child” or “children” also means “young person” or “young people” throughout the document.

To make sure that this policy is fit for purpose, it will be based on the FA’s three stages of safeguarding;

1. Getting the right people involved
2. Creating a safe environment for all participants
3. Promoting clear systems

All staff that are involved in activities that require a CRB/DBS will be identified and processed after communication with our safeguard lead. Individuals will carry out the appropriate and sanctioned training throughout the year to update knowledge and best practice. Training provided by the County FA or by the local safeguarding authority.

Key Principles

- The child’s welfare is, and must always be, the paramount consideration
- 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 and sexual orientation
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- Working in partnership with other organisations, children and young people and their parents and carers is essential

We are committed to providing a safe, fun and challenging learning experience for all participants involved in our programmes. Safeguarding is paramount to everything that we do, and as a club we are committed to developing, updating and improving our systems to ensure best practice.

Yours Sincerely

Iain Service

Community Manager / Welfare Officer – Harrogate Town AFC CIO

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(1) References & Resources Used in Developing HTAFC CIO's Safeguarding Policies & Procedures

Harrogate Town AFC CIO's (HTAFC CIO) Child Protection & Safeguarding Handbook has been produced, making reference in parts to the following policies and procedures;

- **The Football Associations (FA) "Safeguarding for All - Raising Awareness":**
<http://www.thefa.com/football-rules-governance/safeguarding/raising-awareness---downloads-section>

In addition, the above link provides a **Best Practice Download Section** which hosts many useful safeguarding resources. All HTAFC CIO staff members and volunteers are encouraged to use these resources to develop their safeguarding knowledge and practice.
- **The NSPCC's Child Protection in Sport Unit website:** <https://thecpsu.org.uk/>
- **The NSPCC's Child Protection in Sport Units "Standards for Safeguarding & Protecting Children in Sport January 2005":** <https://thecpsu.org.uk/media/1040/english-standards.pdf>
- **The UNICEF Safeguarding in Sport website and the "Eight International Safeguards for Children in Sport October 2014":** <https://www.unicef.org.uk/sport-for-development/safeguarding-in-sport/>
- **The Department for Education's "Working Together to Safeguard Children March 2015" (updated February 2018):** <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **The Affiliated Football's Safeguarding Policy and Procedures:**
<http://www.thefa.com/-/media/files/thefaportal/governance-docs/safeguarding/raising-awareness/affiliated-footballs-safeguarding-policy-and-procedures.ashx>
- **The Department for Education's "Keeping Children Safe in Education (Part 1) March 2015" (updated September 2016):**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/550499/Keeping_children_safe_in_education_Part_1.pdf
- **The NSPCC's "Safe Network Standards - Safeguarding Children in the Voluntary & Community Sector 2014":**
<https://www.nspcc.org.uk/globalassets/documents/publications/safe-network-standards.pdf>
- **The Home Office's "Prevent Duty Guidance March 2015" (updated March 2016):**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/445977/3799_Revised_Prevent_Duty_Guidance_England_Wales_V2-Interactive.pdf
- **The Department for Education and Home Office's "Female Genital Mutilation Legislation October 2015" (updated December 2016):**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf

Reviewed & Updated: September 2019

HTAFC CIO will review this References & Resources Used in Developing HTAFC CIO's Safeguarding Policies & Procedures and good practice at least annually.

(2) Accountabilities for Safeguarding and Promoting the Welfare of all Children

Senior Safeguarding Manager: To ensure that HTAFC CIO can undertake its duty of care for every child that engages with the organisation, a senior member of the management team has been appointed as the Senior Safeguarding Manager (SSM) - and as such takes operational leadership responsibility for our safeguarding arrangements.

The SSM is required to undertake mandatory appropriate safeguarding training a minimum of every two years. In addition, the SSM receives annual safeguarding updates on development and best practice in the safeguarding of children. **The core responsibilities of HTAFC CIO's SSM are to:**

- Support HTAFC CIO staff members or volunteers who are responsible for making referrals to Children Services and or to Channel
- **Liaising with the Local Authority's Designated Officer regarding allegations**

Designated Safeguarding Officer: To support all staff members and volunteers - as well as taking the lead for the day to day safeguarding responsibilities of the organisation - HTAFC CIO has appointed a Designated Safeguarding Officer (DSO). The DSO is responsible for HTAFC CIO having the appropriate safeguarding policies and procedure in place; and for processes related to reporting concerns, allegations or disclosures related to the welfare of a child. The DSO has a detailed job description that outlines their responsibilities and includes the safeguarding induction and refresher safeguarding training for all staff members and volunteers.

HTAFC CIO's DSO will meet with the FA Welfare Officer on a quarterly basis to review any incidents, share information and best practice in accordance with **Working Together to Safeguard Children March 2015** (updated February 2018). Minutes of these meetings will be made and stored in accordance with the Data Protection Act (1998) and will be reported to HTAFC CIO's SSM on a regular basis.

As detailed in **HTAFC CIO's Training Policy** in this Handbook, the DSO is required to undertake mandatory appropriate safeguarding training a minimum of every 12 months. In addition, HTAFC CIO's SSM receives annual safeguarding updates on development and best practice in the safeguarding of children.

HTAFC CIO will ensure that it provides sufficient time, funding, supervision, training and support for the DSO to fulfil their safeguarding responsibilities effectively.

All personnel undertaking the safeguarding roles outlined above are named in the **Contact Details for HTAFC CIO's Child Protection & Safeguarding Responsibilities** section of this Handbook.

Reviewed & Updated: September 2019

HTAFC CIO will review this Accountabilities for Safeguarding and Promoting the Welfare of all Children and good practice at least annually.

(3) Contact Details for HTAFC CIO's Child Protection & Safeguarding Responsibilities

Throughout this Child Protection & Safeguarding Policies and Procedures Handbook, various job titles are mentioned in directing HTAFC CIO staff members, volunteers, children, young people, parents and carers to the right person for help, guidance and/or advice. This page details in one place all of the relevant contacts - and their contact details - to assist with contacting the right person without delay.

- **HTAFC CIO Welfare Officer / Senior Safeguarding Manager – Iain Service**

Email: iainservice@harrogetownafc.com

Phone: 07465290222

- **HTAFC CIO Designated Safeguarding Officer – Damien Smith**

Email: damiensmith@harrogetownafc.com

Phone: 07500700680

North Yorkshire County Council Social Care

Telephone: 01609 780780

Email: social.care@northyorks.gov.uk.

- **Local Police: Harrogate Main Police Station - Telephone Number: 101 Non-Emergency & 999 Emergency**
- **NSPCC Helpline: 0808 800 5000 or help@nspcc.org.uk**
- **ChildLine: 0800 1111 or text phone 0800 400 222) or www.childline.org.uk**

In addition to the above designated safeguarding personnel and statutory bodies, the Designated Safeguarding Officer will also liaise with the following Safeguarding Leads from the Football Club and/or the FA / whenever there is a safeguarding concern.

Reviewed & Updated: September 2019

HTAFC CIO will review these Contact Details for HTAFC CIO's Child Protection & Safeguarding Responsibilities every time a change in personnel and/or good practice dictates, but always least annually.

(4) Child Protection Policy

Policy Statement: HTAFC CIO believes that it is always unacceptable for any child to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children by a commitment to practice which protects them.

HTAFC CIO recognises that:

- The welfare of the child is paramount
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity, have the right to equal protection from all types of harm or abuse
- Some children are additionally vulnerable because of the impact of previous experiences, their level of dependency, communication needs or other issues surrounding disabilities
- Working in partnership with children, their parents, carers and other agencies is essential in promoting children's welfare

Purpose & aim of policy: HTAFC CIO will always seek to provide protection for the children who receive our services. To this end HTAFC CIO will provide staff and volunteers with guidance on procedures they should adopt in the event that they suspect a child may be experiencing, or be at risk of, harm. HTAFC CIO believes that a child should never experience abuse of any kind. We have a responsibility to promote the welfare of all children and to keep them safe. We are committed to practice in a way that protects them. This policy applies to everyone that comes into contact with HTAFC CIO - including as applicable - Community Manager, Management Team, Employees, Sessional Workers, Volunteers, Students on work experience, as well as anyone working on behalf of HTAFC CIO.

HTAFC CIO will seek to safeguard children through taking a child-centred approach to its responsibilities and by doing the following:

- Valuing children and young people by listening to and respecting them
- Adopting child protection guidelines through procedures and a code of conduct for staff and volunteers
- Developing and implementing an effective e-safety policy and related procedures
- Recruiting staff and volunteers safely, ensuring all necessary checks are made
- Sharing information about child protection and good practice with children, parents, staff and volunteers
- Sharing information about concerns with agencies who need to know - and involving parents and children appropriately
- Providing effective management for staff and volunteers through supervision, support and training

Principles of a child-centred approach: HTAFC CIO will always seek to underpin its policy on safeguarding children by:

- Being **vigilant** and notice when things are troubling children
- **Understanding** what is happening - as well as hearing and understanding the child - and then **acting** upon that understanding
- Developing an on-going **stable** relationship of trust with children
- **Respecting** children and treating them with the expectation that they are competent, rather than assume they are not
- Providing **information** and **engagement** with children by keeping them informed about and involved in procedures, decisions, concerns and plans
- **Explaining** to children the outcome of assessments and decisions - as well as the reasons if their views have not met with a positive response
- **Support** children in their own right and not just as a member of their family
- Providing access to **advocacy** to assist children in putting forward their views
- **Involving** children (and their parents/carers) in developing and shaping safeguarding policies and procedures.

Reviewed & Updated: September 2019

HTAFC CIO will review this Child Protection Policy and good practice at least annually.

Part 1: Safer Recruitment Policies & Procedures

(5) Safer Recruitment Policy

Policy Statement: HTAFC CIO is committed to promoting the welfare of all children and young people who use and interact with the Company's services and for keeping them safe. In line with the **Equal Opportunities Policy** contained in this Handbook, HTAFC CIO is committed to equality, valuing diversity and working inclusively across all of its activities - and this applies also to the selection, recruitment and induction of new staff and volunteers. To this end, HTAFC CIO aims to have a workforce that reflects a variety of backgrounds and cultures and who can provide the relevant knowledge, abilities and skills that are required for the organisation.

All elements of HTAFC CIO's **Part 1: Safer Recruitment Policies & Procedures** applies to any person responsible for the recruitment, selection and induction of employees and volunteers at HTAFC CIO - as well as those who participate in shortlisting and interview panels.

The purpose of this Safer Recruitment Policy is to ensure that HTAFC CIO:

- Recruits and selects the best possible people available to join the organisation
- Takes all reasonable steps to prevent unsuitable people joining the organisation
- Recruits, selects and manages all employees and volunteers in a way that complies with legislation designed to combat inequality and discrimination
- Does all it can to achieve and maintain a diverse workforce
- Has recruitment and selection processes that are consistent and transparent
- Assesses and judges applicants as competent before an offer of employment/volunteering is made
- Inducts properly and fully all new staff and volunteers

HTAFC CIO recognises that:

- Its workforce is its greatest asset
- Unsuitable individuals sometimes seek out opportunities via employment and volunteering to have contact with children in order to harm them
- Some groups face unfair discrimination in the workplace
- Children, as well as their families and carers, all benefit from the organisation's efforts to recruit and select a skilled and committed workforce, drawn from a diverse range of backgrounds
- Newly recruited employees and volunteers cannot possibly perform their roles effectively unless they are inducted properly and receive on-going support and supervision as appropriate.

Single central record: HTAFC CIO will ensure it meets its legal requirements for vetting staff and volunteers who work with children and work in Regulated Activity. To this end, HTAFC CIO will ensure its safe recruitment processes are recorded on a Single Central Record - and which will include information on DBS checks. HTAFC CIO's Single Central Record is a comprehensive record on which the safe recruitment of all HTAFC CIO staff and volunteers (who work with children) will be recorded. The details collated on HTAFC CIO's Single Central Record will include the following information relating to the staff member or volunteer:

- **Identity details:** Including full name, full address, date of birth, date employment/volunteering commenced and ID verification details.
- **Role details:** Including job role, department and contract type.
- **Safeguarding qualifications:** Including copies of certificates, dates of safeguarding training and FAN number.
- **Vetting details:** Including dates of checks relating to DBS.
- **Right to work details:** Including types of evidence used to complete the check.
- **YD2 self-declarations:** Where these are required.
- **Referencing details:** Including when references were requested and received and who checked them.
- **Leaver details:** Including dates, exit interviews and whether references have been issued.

Where an HTAFC CIO staff member or volunteer leaves the organisation - as a consequence of a safeguarding concern,

complaint or allegation - the Single Central Record will record this event. HTAFC CIO will always have taken advice in line with HTAFC CIO's Child Protection Procedures in these circumstances prior to this happening.

HTAFC CIO uses the Single Central Record to support its Safer Recruitment of Staff and Volunteers.

Reviewed & Updated: September 2019

HTAFC CIO will review this Safer Recruitment Policy and good practice at least annually.

(6) Safer Recruitment Procedure

To implement this Safer Recruitment Policy, HTAFC CIO will commit to undertake each part of the following procedure whenever it seeks to recruit to fill a vacancy:

1	Job description:	For every vacancy, prior to commencing advertising, HTAFC CIO will produce a clear job description outlining the tasks that the successful applicant will be required to undertake.
2	Personal Specification:	For every vacancy, prior to commencing advertising, HTAFC CIO will produce a clear personal specification which will detail the skills that the successful applicant will be expected to have.
3	Application form:	Every applicant will be required to complete the Company's standard application form to enable them to be considered for the role. The completed application form will be used to initially assess the applicant's suitability for the role advertised. The use of a standard application form will enable HTAFC CIO to more easily compare the experience and skills of job applicants and will ensure that all the important and relevant information is collected consistently.
4	Child protection & safeguarding awareness:	Every advertisement will make it clear that HTAFC CIO has a commitment to safeguarding and protecting children. To this end, every job applicant will receive HTAFC CIO's <u>Child Protection Policy</u> statement as part of the Company's job application pack.
5	Applicant shortlisting for interview:	All shortlisting for interviews will be carried out by more than one person and will be against the job description, personal specification and HTAFC CIO's standard application form.
6	Face to face interviews:	All short-listed applicants will be required to undergo a face-to-face interview with at least two interviewers present. At the interview, pre-prepared and clear questions will be asked in pursuit of selecting the most suitable person for the vacancy.
7	Questioning:	Every applicant that is interviewed will be asked specifically whether they have any criminal convictions, cautions, other legal restrictions or pending cases that might affect their suitability to work with children.
8	Identity checks:	Every applicant that is invited to an interview will be required to bring original photographic identification - as well as one other form of identification - which will be from the prescribed list of acceptable photographic identification required for a Disclosure & Barring Service (DBS) check.
9	Qualifications & certificates:	Where qualifications and/or certificates are a condition of employment, applicants will be required to demonstrate (prior to being made a conditional offer of employment) that they actually hold any relevant qualifications/certificates that they say they have. This will be achieved by requiring applicants to produce the original documents or through providing the required information to enable verification to be made with the awarding body or establishment that provided the training.
10	Disclosure & Barring Service check:	Every applicant who is made a conditional offer of employment (and where the post requires them to possess one) will be required to undergo an enhanced DBS check which proves satisfactory to HTAFC CIO. If the job role involves regulated activity, the DBS check will also include a check against the barred list. All new staff and volunteers in posts requiring any level of DBS check will be required to subscribe to the DBS online update service.
11	Employment references:	Every applicant who is made a conditional offer of employment/volunteering will have a minimum of two references (covering the last five years of employment) taken up. The reference will specifically enquire from the referee whether the individual is considered suitable to work with children.

12	Child protection & safeguarding policies and procedures:	Every new recruit will receive a copy of HTAFC CIO's <u>Child Protection & Safeguarding Handbook</u> and will be required to sign their statement of terms and conditions of employment/volunteers agreement agreeing to abide by all policies and procedures contained within this document.
13	Induction training:	All new recruits will be given an induction plan - appropriate to the role they have been recruited for - to enable them to effectively undertake their responsibilities. Part of this induction training will include training and awareness on how to keep children safe that use the organisation's services.
14	Probationary period:	All job offers will be conditional on the successful completion of an agreed probationary period. No new recruit will be confirmed in to post until they have completed their probationary period (and any extension of that period) and have been formally reviewed through the completion of a post-induction review form.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Safer Recruitment Procedure** and good practice at least annually.

(7) Recruitment, Selection & Induction Process Flow Overview

When undertaking any recruitment process on behalf of HTAFC CIO, managers must ensure that the steps - set out in this flowchart - are followed at all times. No part of this process is optional and all steps must be adhered to...

Step 1:	Identify the vacancy.
Step 2:	Review HTAFC CIO's Part 1: Safer Recruitment Policies & Procedures .
Step 3:	Analyse the job role and produce the role profile using the Role Profile Template available from HTAFC CIO's Designated Safeguarding Officer.
Step 4:	Using the completed role profile, produce or update the job description using the Job Description Template available from HTAFC CIO's Designated Safeguarding Officer.
Step 5:	Plan the recruitment & selection process taking into account where the role will be advertised, and who will be responsible for each stage of the recruitment, selection and induction process - with reference to the minimum standards outlined in HTAFC CIO's Part 1: Safer Recruitment Policies & Procedures .
Step 6:	Advertise the vacancy ensuring that the advert refers to HTAFC CIO's commitment to safeguarding and protecting children.
Step 7:	Ensure every interested applicant receives a copy of HTAFC CIO's Standard Application Form as well as a copy of HTAFC CIO's Child Protection Policy Statement .
Step 8:	Review all applications forms that are returned against the criteria in the job description and the role profile.
Step 9:	Create a shortlist of suitable applicants ensuring that at least two people are involved in ratifying the short-list.
Step 10:	With reference to the role profile and the assessments methods identified on it, prepare and agree on the interview questions.
Step 11:	Invite the short-listed candidates to a face to face interview (ensuring that all interviewees are informed to bring original photographic ID and originals of certificates with them) and where at least two people will conduct the interviews.
Step 12:	Conduct the interviews against the prepared questions and assessments and verify each candidate's identity and qualifications.
Step 13:	Consider any confidential information that the candidate has submitted along with their application, and discuss this with the candidate.
Step 14:	Make a decision on suitable appointment of candidate/s.
Step 15:	Make a conditional offer of employment/volunteering subject to return of a signed copy of the statement and terms and conditions of employment/volunteers agreement; satisfactory completion of a probationary period; receipt of a DBS that proves satisfactory; receipt of references that prove satisfactory; as well as satisfactory validation and verification of all information provided on the application form, CV and discussed at interview.
Step 16:	Plan the induction and prepare the induction checklist.
Step 17:	Complete the take up of references and all other verification checks required.
Step 18:	If any issues arise from references, DBS checks and other verification checks speak to the employee/volunteer.

Once you have arrived at **Step 18**, you must take the appropriate course of action identified below - and which is dependent on how you answer the first question **"Are the issues now resolved?"**

Are the issues now resolved?		
Yes		No
Confirm the offer of employment/volunteering on a probationary period, or continue the probationary period.		Withdraw the offer of employment/volunteering or terminate employment/volunteering.
Step 19:	New staff member or volunteer starts. Follow through the induction programme.	
Step 20:	Conduct the scheduled reviews using the relevant review forms which are available from HTAFC CIO's Designated Safeguarding Officer.	
Step 21:	At the end of the probationary period carry out a post induction review.	
Has the employee/volunteer satisfactorily completed their probationary period?		
Yes		No
Confirm the appointment and continue with regular supervision and appraisals.		Either extend the probationary period or terminate employment/volunteering.
Step 22:	If at the end of the probationary period extension, the employee/volunteer has still not reached the required standards, then terminate employment/volunteering. If the employee/volunteer has now reached the required standards, then confirm their appointment and continue with regular supervision and reviews.	

Reviewed & Updated: September 2019

HTAFC CIO will review this Recruitment, Selection & Induction Process Flow Overview and good practice at least annually.

(8) Equal Opportunities Policy

Policy statement: HTAFC CIO is an equal opportunity employer and is fully committed to a policy of treating all of its employees and volunteers - as well as applicants for employment or volunteering equally. HTAFC CIO will avoid unlawful discrimination in all aspects of recruitment and selection, promotion, transfer, opportunities for training, pay and benefits, other terms of employment or volunteering arrangements - as well as discipline, selection for redundancy and dismissal/termination.

The aim of this policy is to ensure that everyone is treated fairly and with respect and that activities are equally accessible to all. HTAFC CIO is responsible for setting standards and values to apply throughout the organisation at every level. Sport and healthy activities belong to and should be enjoyed by, anyone who wants to participate in it.

Our commitment is to confront and eliminate discrimination whether by reason of gender, sexual orientation, marital status, race, nationality, ethnic origin, colour, religion or belief, ability or disability and to encourage equal opportunities.

This policy is fully supported by the Officers of HTAFC CIO who are responsible for the implementation of this policy.

HATFC, in all its activities will not discriminate, or in any way treat anyone less favourably on grounds of gender, sexual orientation, marital status, race, nationality, ethnic origin, colour, religion or belief, ability or disability. It means that HATFC will ensure that it treats people fairly and with respect and that it will provide access and opportunities for all members of the community to take part in, and enjoy, its activities.

HTAFC CIO will not tolerate harassment, bullying, abuse or victimisation of an individual, which for the purposes of this policy and the actions and sanction applicable is regarded as discrimination. This includes sexual or racially based harassment or other discriminatory behavior, whether physical or verbal.

HTAFC CIO will work to ensure that such behavior is met with appropriate action in whatever context it occurs.

HATFC is committed to taking positive action where inequalities exist and to the development of a programme of ongoing training and awareness raising events and activities in order to promote the eradication of discrimination and promote equality in sport.

APC is committed to a policy of equal treatment of all participants, employees, volunteers and requires everyone to abide and adhere to these policies and the requirements of the relevant equalities legislation – Race Relations Act 1976, Sex Discrimination Act 1975 and Disability Discrimination Act 1995 as well as any amendments to these acts and any new legislation.

HTAFC CIO commits itself to the immediate investigation of any claims when brought to its attention, of discrimination on the above grounds and where such is found to be the case, a requirement that the practice stop and sanctions are imposed as appropriate.

- **Protected characteristics:** HTAFC CIO will take all reasonable steps to engage, train and promote employees and volunteers on the basis of their experience, abilities and qualifications - without regard to age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origins), religion or belief, sex or sexual orientation. In this policy, these are known as the “protected characteristics”.

Employees and volunteers have a duty to co-operate with HTAFC CIO to make sure that this policy is effective in ensuring equal opportunities and in preventing discrimination. Action will be taken under the Company’s disciplinary procedure against any employee who is found to have committed an act of improper or unlawful discrimination. Serious breaches of this equal opportunities policy statement will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated.

All HTAFC CIO employees and volunteers must always bear in mind that they can be held personally liable for any act of unlawful discrimination.

- **Duty to report and not victimise:** All HTAFC CIO employees and volunteers must draw the attention of their line manager to suspected discriminatory acts or practices. No HTAFC CIO employee or volunteer is to victimise or retaliate against an employee or volunteer who has made allegations or complaints of discrimination; or who has provided information about such discrimination. Such behaviour will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated. All HTAFC CIO employees and volunteers are expected to support colleagues who suffer such treatment and are making a complaint.
- **Direct discrimination:** Direct discrimination occurs when, because of one of the protected characteristics, an applicant or an employee/volunteer is treated less favourably than other applicants or employees/volunteers are treated or would be treated.

The treatment will still amount to direct discrimination even if it is based on the protected characteristic of a third party with whom the applicant or employee/volunteer is associated - and not on the applicant's or employee's/volunteer's own protected characteristic. In addition, it can include cases where it is perceived that an applicant or an employee/volunteer has a particular protected characteristic, when in fact they do not.

Discrimination after employment is also unlawful if it arises out of and is closely connected to the employment/volunteering relationship, for example refusing to give a reference or providing an unfavourable reference for a reason related to one of the protected characteristics.

HTAFC CIO will take all reasonable steps to eliminate direct discrimination in all aspects of employment and volunteering.

- **Indirect discrimination:** Indirect discrimination is treatment that may be equal in the sense that it applies to all applicants or employees/volunteers, but which is discriminatory in its effect on, for example, one particular sex or racial group. Indirect discrimination occurs when there is applied to the applicant or employee/volunteer, a provision, criterion or practice (PCP) which is discriminatory in relation to a protected characteristic of the applicants or employees/volunteers. **A PCP is discriminatory in relation to a protected characteristic of the applicants or employees/volunteers if:**
 - It is applied, or would be applied, to persons with whom the applicant or employee/volunteer does not share the protected characteristic
 - The PCP puts, or would put, persons with whom the applicant or employee/volunteer shares the protected characteristic at a particular disadvantage when compared with persons with whom the applicant or employee/volunteer does not share it
 - It puts, or would put, the applicant or employee/volunteer at that disadvantage, and
 - It cannot be shown by HTAFC CIO to be a proportionate means of achieving a legitimate aim.

HTAFC CIO will take all reasonable steps to eliminate indirect discrimination in all aspects of employment and volunteering.

- **Victimisation:** Victimisation occurs when an employee or volunteer is subjected to a detriment - such as being denied a training opportunity or a promotion - because they have raised or supported a grievance or complaint of unlawful discrimination; or because they have issued employment tribunal proceedings for unlawful discrimination; or they have given evidence in connection with unlawful discrimination proceedings brought by another employee or volunteer. However, an employee or volunteer is not protected if they give false evidence or information, or make a false allegation, and they do so in bad faith.

Post-employment victimisation is also unlawful, for example refusing to give a reference or providing an unfavourable reference because the former employee has done one of the protected acts set out above.

HTAFC CIO will take all reasonable steps to eliminate victimisation in all aspects of employment and volunteering.

- **Recruitment, advertising and selection:** The recruitment process will be conducted in such a way as to result in the selection of the most suitable person for the post in terms of relevant experience, abilities and qualifications. HTAFC CIO is committed to applying its equal opportunities policy statement at all stages of recruitment and selection.

Advertisements will aim to positively encourage applications from all suitably qualified and experienced people. When advertising vacancies - and in order to attract applications from all sections of the community - HTAFC CIO will, as far as reasonably practicable:

1. Ensure advertisements are not confined to those areas or publications which would exclude or disproportionately reduce the numbers of applicants with a particular protected characteristic.
2. Avoid setting any unnecessary provisions or criteria which would exclude a higher proportion of applicants with a particular protected characteristic.

Where vacancies may be filled by promotion or transfer, they will be published to all eligible employees and volunteers in such a way that they do not restrict applications from employees and volunteers with a particular protected characteristic.

However - where having regard to the nature and context of the work - having a particular protected characteristic is an occupational requirement and that occupational requirement is a proportionate means of achieving a legitimate aim, HTAFC CIO will apply that requirement to the role and this may therefore be specified in the advertisement.

The selection process will be carried out consistently for all jobs at all levels; and all applications will be processed in the same way. All HTAFC CIO line managers will strictly follow the **Part 1: Safer Recruitment Policies & Procedures** detailed in this handbook.

HTAFC CIO will have regard to its duty to make reasonable adjustments to work/volunteering provisions, criteria and practices or to physical features of its premises or to provide auxiliary aids or services in order to ensure that a disabled person is not placed at a substantial disadvantage in comparison with persons who are not disabled. If it is necessary to assess whether personal circumstances will affect the performance of the role (for example, if the role involves unsociable hours or extensive travel), this will be discussed objectively, without detailed questions based on assumptions about any of the protected characteristics.

- **Training and promotion:** HTAFC CIO will train all line managers in its policy on equal opportunities and in helping them identify and deal effectively with discriminatory acts or practices. Line managers will be responsible for ensuring they actively promote equality of opportunity within the areas for which they are responsible. HTAFC CIO will also train all line managers in its policy relating to safer recruitment of staff and volunteers.

HTAFC CIO will provide training to all employees and volunteers to help them understand their rights and responsibilities in relation to equal opportunities; and to help them understand and contribute to creating a working environment that is free from discrimination in all its forms.

Where a promotional system is in operation, it will not be discriminatory and it will be checked from time to time to assess how it is working in practice. When a group of workers/volunteers - who predominantly have a particular protected characteristic - appear to be excluded from access to promotion, transfer and training and to other benefits, the promotional system will be reviewed to ensure there is no unlawful discrimination.

- **Terms of employment/volunteering, benefits, facilities and services:** All terms of employment/ volunteering, benefits, facilities and services will be reviewed from time to time, in order to ensure that there is no unlawful direct or indirect discrimination because of one or more of the protected characteristics.

- **Equal pay and equality of terms:** HTAFC CIO is committed to equal pay and equality of terms in employment. It believes its male and female employees should receive equal pay where they are carrying out like work, work rated as equivalent, or work of equal value. In order to achieve this, HTAFC CIO will endeavour to maintain a pay system that is transparent, free from bias and based on objective criteria.
- **Reporting complaints:** All allegations of discrimination will be dealt with seriously, confidentially and speedily. HTAFC CIO will not ignore or treat lightly grievances or complaints of unlawful discrimination from employees and volunteers.

If any employee or volunteer wishes to make a complaint of discrimination, they should do so promptly by bringing the matter to the attention of either their line manager - or where the line manager may be the subject of the complaint - to another more senior HTAFC CIO manager or HTAFC CIO's Designated Safeguarding Officer.

Monitoring equal opportunity: HTAFC CIO will regularly monitor the effects of its selection decisions, personnel structure, pay practices and other procedures in order to assess whether equal opportunity is being achieved. This will also involve considering any possible indirectly discriminatory effects of its working practices. If changes are required, HTAFC CIO will implement them. HTAFC CIO will also make reasonable adjustments to its standard working practices to overcome substantial disadvantages caused by disability.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Equal Opportunities Policy** and good practice at least annually.

(9) Dignity at Work Policy

Policy statement: HTAFC CIO are committed to providing a work environment in which all employees and volunteers are treated with respect and dignity - and which is free from any form of bullying or harassment based upon age, disability, gender reassignment, race (including colour, nationality and ethnic or national origins), religion or belief, sex, sexual orientation or upon any other ground. In this policy, these are known as the “protected characteristics”.

Employees and volunteers have a duty to co-operate with HTAFC CIO to make sure that this policy is effective in preventing harassment or bullying. Appropriate action will be taken against any employee or volunteer who is found to have committed an act of improper or unlawful harassment, bullying or intimidation. Serious breaches of this dignity at work policy statement will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated.

All HTAFC CIO employees and volunteers must always bear in mind that they can be held personally liable for any act of unlawful harassment. Employees or volunteers who commit serious acts of harassment may also be guilty of a criminal offence.

All employees and volunteer are responsible for conducting themselves in accordance with this policy. HTAFC CIO will not condone or tolerate any form of harassment, bullying or intimidation, whether engaged in by employees, volunteers or by outside third parties who do business with HTAFC CIO, such as clients, customers, contractors and suppliers.

- **Duty to report and not victimise:** All HTAFC CIO employees and volunteers must draw the attention of their line manager to suspected cases of harassment, bullying or intimidation. No HTAFC CIO employee or volunteer is to victimise or retaliate against an employee or volunteer who has made allegations or complaints of harassment, or who has provided information about such harassment. Such behaviour will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated. All HTAFC CIO employees and volunteers are expected to support colleagues who suffer such treatment and are making a complaint.

HTAFC CIO will also take appropriate action against any third parties who are found to have committed an act of improper or unlawful harassment, bullying or intimidation against its employees.

This policy covers harassment, bullying and intimidation both in the workplace and in any work- related setting outside the workplace, for example during business trips, at external training events or at work-related social events.

- **Bullying and harassment:** Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee or volunteer.

An employee/volunteer unlawfully harasses another employee/volunteer if they engage in unwanted conduct related to a protected characteristic, and the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person.

An employee/volunteer also unlawfully harasses another person if they engage in unwanted conduct of a sexual nature, and the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other employee.

Finally, an employee/volunteer unlawfully harasses another person if they - or a third party - engage in unwanted conduct of a sexual nature or that is related to gender reassignment or sex, the conduct has the purpose or effect of violating the other person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment for that other person, and because of that other person's rejection of or submission to the conduct, they treat that other person less favourably than they would treat them if they had not rejected, or submitted to, the conduct.

The unwanted conduct will still amount to harassment if it is based on the protected characteristic of a third party

with whom the person is associated and not on that particular person's own protected characteristic, or if it was directed at someone other than that person, or even at nobody in particular, but they witnessed it. In addition, harassment can include cases where the unwanted conduct occurs because it is perceived that a person has a particular protected characteristic, when in fact they do not.

Conduct may be harassment whether or not the employee/volunteer intended to offend. Something intended as a "joke" or as "office banter" may offend another person. This is because different people find different levels of behaviour acceptable; and everyone has the right to decide for themselves what behaviour they find acceptable to them.

- Behaviour which a reasonable person would realise would be likely to offend another person will always constitute harassment - without the need for the other person having to make it clear that such behaviour is unacceptable e.g. touching someone in a sexual way. With other forms of behaviour, it may not always be clear in advance that it will offend a particular person e.g. "office banter" and "jokes". In these cases, the behaviour will constitute harassment if the conduct continues after the person has made it clear - by words or conduct - that such behaviour is unacceptable to them. A single incident can amount to harassment if it is sufficiently serious.

Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include, but are not limited to, the following:

- Unwelcome sexual advances, requests for sexual favours, other conduct of a sexual nature
- Subjection to obscene or other sexually suggestive or racist comments or gestures, or other derogatory comments or gestures related to a protected characteristic
- The offer of rewards for going along with sexual advances or threats for rejecting sexual advances
- Jokes or pictures of a sexual, sexist or racial nature or which are otherwise derogatory in relation to a protected characteristic
- Demeaning comments about another person's appearance
- Questions about a person's sex life
- The use of nicknames related to a protected characteristic - whether made orally or by e-mail
- Picking on or ridiculing a person because of a protected characteristic
- Isolating a person or excluding them from social activities, or relevant work-related matters, because of a protected characteristic.

Reporting complaints: All allegations of harassment, bullying or intimidation will be dealt with seriously, confidentially and speedily. HTAFC CIO will not ignore or treat lightly grievances or complaints of harassment, bullying or intimidation from employees and volunteers.

- HTAFC CIO encourages employees and volunteers - who believe they are being harassed, bullied or intimidated - to notify the offender (by words or by conduct) that the behaviour is unwelcome, if at all possible. However, HTAFC CIO also recognises that actual or perceived power and status disparities may make such confrontation impractical. In the event that such informal direct communication is either ineffective or impractical - or the situation is too serious to be dealt with informally - employees and volunteers should then promptly bring the matter to the attention of either their line manager - or where the line manager may be the subject of the complaint - to another more senior HTAFC CIO manager or HTAFC CIO's DSO.
- **Disciplinary action:** Any employee or volunteer who is found to have harassed another person in violation of this policy will be subject to the appropriate action. Serious breaches of this dignity at work policy will be treated as potential gross misconduct and could render an employee liable to summary dismissal - or a volunteer to have their agreement terminated. In addition, any HTAFC CIO line managers who had knowledge that such harassment had occurred in their departments - but who had taken no action to eliminate it - will also be subject to disciplinary action under the Company's disciplinary procedure.
- **Training:** HTAFC CIO will train all line managers in the Company's policy on dignity at work and in helping them identify and deal effectively with harassment, bullying or intimidation. HTAFC CIO line managers will be responsible for ensuring they actively promote dignity at work within the departments for which they are

responsible.

- HTAFC CIO will provide training to all employees and volunteers to help them understand their rights and responsibilities in relation to dignity at work and what they can do to create a work environment that is free from harassment, bullying and intimidation.

Reviewed & Updated: September 2019

HTAFC CIO will review this Dignity at Work Policy and good practice at least annually.

(10) Engagement of Ex-Offenders Policy

Policy statement: HTAFC CIO is an equal opportunity employer and is fully committed to a policy of treating all of its job applicants fairly and equally. HTAFC CIO aims to select people for employment and volunteering on the basis of their skills, experience, abilities and qualifications. HTAFC CIO will therefore consider ex-offenders for employment and volunteering on their individual merits. Having a criminal record will not necessarily bar a person from working for HTAFC CIO. This will depend on the nature of the job role and the circumstances and background of the criminal offences.

HTAFC CIO's approach towards engaging ex-offenders differs depending on whether the job role is, or is not, exempt from the provisions of the Rehabilitation of Offenders Act 1974 (ROA).

Job roles exempt from the Rehabilitation of Offenders Act 1974: If the job role into which HTAFC CIO is seeking to recruit is one of the excluded jobs listed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 or, in Scotland, the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Scotland) Order 2003, HTAFC CIO will require the applicant to disclose all convictions and cautions, whether spent or unspent. If an applicant has a conviction or caution, HTAFC CIO may, at its absolute discretion, decline to select the person for the particular role.

If the job role is exempt, once HTAFC CIO has selected the applicant to whom it wishes to offer employment or volunteering to, it may seek documentary evidence about that person's criminal convictions. HTAFC CIO may seek the applicant's agreement to make a joint application to the Disclosure and Barring Service or Disclosure Scotland for a Criminal Record Certificate (also known as Standard Disclosure) or an Enhanced Criminal Record Certificate (also known as Enhanced Disclosure), as appropriate. In this case, any offer of employment or volunteering will be made conditional on this documentation being obtained to HTAFC CIO's satisfaction.

Where there is a requirement for a DBS check, this will be made clear to all applicants early in the recruitment process, for example in the job advertisement, or on the application form.

HTAFC CIO will always discuss any matter revealed in a disclosure with the applicant, before taking a decision to withdraw a conditional offer of employment.

Spent convictions: HTAFC CIO will not refuse to employ an applicant just because they have a spent conviction or caution and it acknowledges that, unless the job role is exempt from the Rehabilitation of Offenders Act 1974, job applicants are under no obligation to disclose spent convictions or cautions. Applicants will therefore not be asked any questions about spent convictions or cautions during the recruitment process and, where information on criminal convictions is requested, it will be made clear that spent convictions or cautions do not need to be declared or disclosed.

Unspent convictions: HTAFC CIO will not automatically refuse employment or volunteering opportunities with an applicant just because they have an existing or unspent conviction or caution. During the recruitment process, applicants may be asked to disclose any unspent convictions or cautions. If an applicant has a conviction that is not spent and if the nature of the offence is relevant to the job for which they have applied, HTAFC CIO will review the particular circumstances of the case and it may, at its absolute discretion, decline to select the person for employment or volunteering.

Failure to disclose information about convictions or cautions when asked to do so during the recruitment process - where either the job role is exempt, or they are unspent - could lead withdrawal of an offer of employment or volunteering with HTAFC CIO; or alternatively, to termination of the working relationship if the applicant has already commenced work.

Ultimately, although a person's criminal record, in itself, will not debar that person from being appointed to a post with HTAFC CIO - where the **Protection of Children Act 1999**, the **Criminal Justice and Court Services Act 2000** and/or the **Care Standards Act 2000** applies - this will be an automatic bar to working for HTAFC CIO. In addition, discretion will be exercised where it is felt that a recent and/or serious conviction might mean that a person might re-offend or cause harm.

Data protection requirements: HTAFC CIO is committed to ensuring that all information about a person's criminal convictions or cautions, including any information released in disclosures, is used and processed fairly and stored confidentially and in accordance with the provisions of the **Data Protection Act 1998**. In particular, personal data about a person's criminal convictions will only be held for as long as it is required for employment or volunteering purposes,

it will only be seen by those who need to see it as part of the recruitment and engagement process and it will not be shared with or disclosed to any other employer, prospective employer or other unauthorised third party.

HTAFC CIO will also take guidance from NACRO's **Recruiting Safely & Fairly - A Practical Guide to Employing Ex-offenders**.

Reviewed & Updated: September 2019

HTAFC CIO will review this **References & Verification Policy** and good practice at least annually.

(11) Disclosure & Barring Service Checks Policy

Policy statement: It is a mandatory requirement that any person that seeks to work with HTAFC CIO in a position defined in law as “**Regulated Activity**”; or who will undertake normal job duties which include “**coaching**”, “**teaching**”, “**training & instruction**”, “**caring for & supervising**”, or “**advice & guidance on the wellbeing for children**” must possess a valid **Enhanced Disclosure & Barring Service Check** (DBS).

Therefore, no person will be permitted to commence any form of paid or unpaid work with the organisation, prior to HTAFC CIO being satisfied that the DBS certificate permits them to be engaged in post.

HTAFC CIO will ensure that applicants are shown as being accepted on **The FA Whole Game** database before taking up a post.

Conflicts of interest: HTAFC CIO requires that all staff members and volunteers immediately disclose any matters that could reasonably be considered to be a conflict of interest to HTAFC CIO. All disclosures of a potential conflict of interest will be treated confidentially. Examples that may be considered as a conflict of interest - and which is not intended to be an exhaustive list - are as follows:

- A complaint of wrong doing being made against you by another person or organisation - whether substantiated or not
- Any situation that could result in a report being filed with the Disclosure & Barring Service
- Any situation which could potentially result in the withdrawal of your DBS certification
- Undertaking work for another organisation that could reasonably be considered as being in conflict with the work and ethos of HTAFC CIO
- Anything happening inside or outside of work - that if you were linked with HTAFC CIO through that incident - could reasonably be considered as bringing HTAFC CIO into disrepute

If you are in any doubt as to whether a particular situation could be considered a conflict of interest that requires disclosure, you are encouraged to bring this to HTAFC CIO's attention so that a decision can be made as to the appropriate steps that should be taken.

If you fail to voluntarily disclose to HTAFC CIO something of a nature that a reasonable person would consider to be a potential conflict of interest, it will be assumed that there may have been an attempt to cover up wrong doing and this will result in formal disciplinary action being taken. Depending on the seriousness of the cover up and the conflict of interest, it may amount to potential gross misconduct and could result in your summary dismissal, or the termination of your volunteering agreement.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Disclosure & Barring Service Checks Policy** and good practice at least annually.

(12) References & Verification Policy

Introduction: The purpose of HTAFC CIO seeking references and verification on a new staff member or volunteer is to ensure that enough information relating to that individual - along with that gained through the selection process - can be used to determine their suitability for a particular post.

- **References:** Accordingly, it is the Company's policy to seek at least two written references, one of which must be from a previous employer (or, if this is the person's first job, their school teacher or higher or further education lecturer) and to ask for documentary proof of qualifications and eligibility to work in the UK. Any offer of working with HTAFC CIO will therefore be conditional on this information and documentation being satisfactory to HTAFC CIO. Before references are taken up, the individual's consent will be sought first.

Only Senior Managers are authorised to provide written references on behalf of HTAFC CIO. All other HTAFC CIO employees and volunteers are absolutely prohibited from providing references on behalf of HTAFC CIO. If any HTAFC CIO manager, staff member or volunteer should ever be approached to provide a reference for an ex-employee, or ex-volunteer, they must in all circumstances refer that request to HTAFC CIO's Community Manager.

- **Verification:** HTAFC CIO will take the necessary steps to verify any of the information provided on the staff member or volunteer's CV and application form. In all cases where verification is being undertaken, HTAFC CIO will explain to the individual - in advance - the nature of its verification process and the methods to be used to carry it out, including details of any external sources that will be used.

Where it is considered necessary to secure the release of documents or information from a third party, the individual's consent will be sought first. If any verification checks produce discrepancies - when compared to information already provided by the individual - HTAFC CIO will always give them the opportunity to make representations and provide an explanation of the inconsistencies, before any decision is taken to withdraw a conditional offer of employment or volunteering.

Where an individual has provided website links on their CV, or in their application form, to their social media personal website pages, HTAFC CIO may check these links once an offer of employment/volunteering is about to be made. Until that stage, however, these links will be disregarded in the recruitment process.

Reviewed & Updated: September 2019

HTAFC CIO will review this References & Verification Policy and good practice at least annually.

(13) Probationary Period Policy

Policy Statement: HTAFC CIO's Probationary Period Policy is an integral part of the Company's Safer Recruitment Policy. This policy's aim is to ensure that all appointment decisions are sound and that the person who has been recruited is an appropriate person who would not pose a risk to children. The probationary period allows HTAFC CIO a period of time to undertake, collect and verify all relevant information that it is required to have on a new employee or volunteer, to be able to confirm them in post - following successful completion of the relevant probationary period. This information includes, but is not limited to, past employment references, DBS checks, verification of training, qualifications and certification - as well as any other information that was provided at interview and on application forms and CV's.

- **Probationary period:** Employment/volunteering with HTAFC CIO is subject to a probationary period of three months during which the new employee or volunteer will be required to demonstrate their suitability for the position in which they have been recruited for. To this end a new employee or volunteer will have their progress against their induction plan assessed on a regular basis throughout the probationary period.
- **Extension of probationary period:** The probationary period may be extended at HTAFC CIO's discretion up to a maximum of six months and this is without prejudice to the Company's right to terminate employment/volunteering before the expiry of the probationary period. An extension to the probationary period may be implemented in circumstances where the employee/volunteer's performance or conduct has not been entirely satisfactory, but it is thought that an extension may lead to improvement.

An extension to the probationary period may also be considered in circumstances when the employee/volunteer has been absent from work (for any reason) for a significant period during the probationary period.

Employment or volunteering may be terminated at any time during, or at the end of, the probationary period (or during, or at the end of, any extension of the probationary period) on the grounds of unsuitability for the role, poor or unsatisfactory performance, misconduct, poor attendance, poor timekeeping, lack of capability, for reasons of health and safety, or if it is believed or established that the employee/volunteer does not have the qualifications, experience or knowledge that was claimed at the time of recruitment. This list is not intended to be exhaustive. Any termination will be confirmed in writing and there will be no right of appeal.

- **Post induction review:** At the end of the probationary period, HTAFC CIO will carry out a post induction review within a reasonable time of its expiry. The probationary period will not be deemed to have been completed until HTAFC CIO has carried out its review and formally confirmed the position in writing to the employee/volunteer. If the probationary period has been successfully completed, the employee/volunteer's continued engagement by HTAFC CIO will then be confirmed.
- **Notice period for employees during probation:** During the probationary period (and during any extension of the probationary period) - and until HTAFC CIO has carried out its review at the end of it and formally confirmed the position in writing to the employee - the notice period will be one week and the Company's disciplinary and/or capability procedure/s will not apply.

Reviewed & Updated: September 2019

HTAFC CIO will review this Probationary Policy and good practice at least annually.

(14) Safer Induction Policy

Policy statement: HTAFC CIO recognises that all new employees and volunteers will require adjustment in their new role. HTAFC CIO aims to give support all new starters through a structured induction programme appropriate to the role being undertaken. All employees and volunteers who are included in HTAFC CIO's Safer Induction Programme will be given every required support throughout their induction programme.

- **Objectives of induction:** The induction programme exists to ensure that all new employees and volunteers understand:
 - How HTAFC CIO operates
 - The work of the different departments
 - The history and culture of the business
 - The business plan and goals of HTAFC CIO for the forthcoming years
 - How their job role fits in with the other members of their department and HTAFC CIO as a whole
 - Their own targets and performance objectives up until the first formal appraisal
 - Their role and responsibility in safeguarding and promoting the welfare of all children.
- **Safeguarding induction:** With regard to safeguarding, all new starters who will be working with children (or be in contact with them) will undergo induction and necessary training on the safeguarding and promoting the welfare of children. This element of induction training will be undertaken by HTAFC CIO's DSO - and will include the familiarisation with the DSO's role and responsibilities; an overview of HTAFC CIO's safeguarding policy and commitment; and an outline of the procedures to be followed in the event of a concern existing about a child's safety or welfare.

As part of HTAFC CIO's safeguarding induction process, all staff and volunteers who will be working with children will receive a copy of each of the following:

- HTAFC CIO's Child Protection & Safeguarding Handbook
- Football Association's Handbook relating to Safeguarding
- The Department of Education's Keeping Children Safe in Education (Part 1)

Part of HTAFC CIO's commitment to safeguarding will entail the DSO testing the maturity and the understanding of boundaries and the position of trust of all new starters - prior to them undertaking work with children that use the services of the organisation.

- **Induction programme:** The safer induction programme will be put in place once an applicant has formally accepted a conditional offer to work from HTAFC CIO. The detail and exact content of the induction programme will vary according to the seniority of the role; the individual needs of the new starter; as well as the role description. However, in the first week, all new starters will be introduced to their work colleagues; as well as meeting with their line manager and other relevant senior members of the management team, as appropriate. **At this point it will be the line managers responsibility to go through the following:**
 - Main terms and conditions of employment or volunteers agreement
 - Working or volunteering arrangements, including sickness absence reporting procedures
 - Role description, which will include duties and responsibilities
 - Employee Handbook or Volunteer Handbook
 - Child Protection & Safeguarding Handbook
 - Vulnerable Adults Safeguarding Handbook
 - Health and safety rules and procedures, including first aid facilities, accident reporting and emergency evacuation procedures
 - Equal opportunities and dignity at work
 - Targets and performance objectives up until the first formal appraisal
 - Training and development plan up until the first formal appraisal
 - Information about the structure and organisation of HTAFC CIO
 - Information about the department/team the new starter will work in
 - Location of entrances, exits, fire exits, kitchen, rest rooms, toilets and any other facilities
 - Location of HTAFC CIO notice board
 - Location of workstation or work area

- Use and operation of equipment and location of office supplies
- Useful contact numbers
- Bank details, P45, National Insurance number, contact details, next of kin etc. as appropriate for either employee or volunteer

The HTAFC CIO manager responsible for the induction, will use an induction checklist to ensure that all matters are covered - and will sign this off once the induction programme has been completed. HTAFC CIO may involve other managers, employees and volunteers in the induction programme as appropriate.

- **Mentoring & coaching:** New starters will also be allocated a mentor upon commencement. This appointed mentor will meet with the new starter during their first week with the organisation and their role will be to assist the new starter with any day-to-day matters in the first three months of working with HTAFC CIO. The mentors role is not to coach or train the new starter, but to give advice and assistance as appropriate. The relevant line manager is responsible for training the new starter and for supporting them in their new duties and tasks.
- **Induction reviews:** All new starters will have their progress reviewed via formal and structured induction reviews - which will be carried out at the end of week 1; the end of month 1; the end of month 2 and the end of month 3. The purpose of these reviews is to discuss how the induction training is progressing and to identify and address any gaps in the desired results of the induction training.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Safer Induction Policy** and good practice at least annually.

(15) Supervision Policy

Policy statement: HTAFC CIO recognises the need for regular and effective supervision of its employees and volunteers to ensure that they feel well supported and motivated in their work; that the Company is delivering quality services to the people that use its services; and that the organisation can function effectively.

- **Purpose of Supervision:** This is an opportunity to review an employee/volunteer's work programme, as well as to monitor their progress and to review the direction of their work. Supervision is also an opportunity to identify any gaps in skills and training, with a focus on enhancing professional development.

Just as importantly, the employee/volunteer's successes and achievements in their work can also be identified and celebrated. Supervision is also a place where an employee/volunteer can be challenged supportively and constructively within mutually agreed and accepted boundaries. Issues relating to the workplace and to working practices can be identified and discussed.

Ultimately, supervision is an ideal opportunity to demonstrate that the employee/volunteer is a valued member of the team at HTAFC CIO and offers them a chance to ensure that their emotional well-being is considered and that their personal development needs are being met. During the session, the employee/volunteer will be able to 'offload' their concerns and have these discussed in a supportive environment. **In summary, the purpose of supervision includes:**

- Review of work programme
 - A place to be challenged, supportively and constructively
 - Issues related to the workplace are addressed
 - A place to identify skills gaps and training needs - professional development
 - Employee's experiences are valued
 - Working practices are discussed
 - Achievements are identified and celebrate
 - Work progress is monitored and direction is reviewed
 - Emotional well-being/work-life balance and a place for personal development
 - Mutually agreed and acceptable boundaries
 - A place to offload
- **What the employee/volunteer can expect from supervision:** This is an opportunity for the employee/volunteer to review their current workload with their line manager and discuss future work and agree on targets. The line manager will acknowledge the work that the employee/volunteer is responsible for and offer praise and constructive feedback where appropriate. Support and guidance can also be offered where necessary.

This is also a time when the line manager can challenge the employee/volunteer appropriately and address actions and anticipated follow-up relating to these. Training needs will also be identified during the meeting and notes will be made by the line manager and copied to the employee/volunteer which will serve as a record to refer back to at the next supervision. Employees/volunteers should feel able to raise any issues or concerns, both related to work; or personal things unrelated to work. **In summary, the employee/volunteer can expect the following from supervision:**

- A place where guidance is received
- To be challenged appropriately by their line manager
- A place to address actions and follow up
- That notes and records of the supervision are made and stored/copied
- An assessment of training needs is made
- Support is offered
- That their supervisor has an understanding of their work and workload
- Acknowledgement and praise is received
- Work is discussed and targets agreed
- A place where personal things (including those that are not work related) can be discussed if the employee/volunteer so desires
- A place to talk about any concerns and issues

- **Frequency of supervision:** Frequency and length of supervision is expected to be in line with the following minimums:
- Full time and part time employees should receive supervision no less than once every six months for a minimum of 60 minutes

Any supervisory sessions must be re-booked for as soon as possible after the missed sessions to maintain the minimum regularity set out above.

- **Location of supervision:** Supervision should take place in a private and uninterrupted space during the employees/volunteers scheduled working day.
- **Recording supervision sessions:** It is the line manager's responsibility to take notes and ensure that the employee/volunteer receives a copy and that a copy goes on file. Both the line manager and the employee/volunteer must agree and sign a final copy of the supervision records - which will then be kept in individual supervision files in a secure place. After six months, supervision notes should be archived and held in the employees HR folder for six years.

Records will be made in a manner that works for each line manager, however a summary action sheet will be completed during or immediately after each session. It is important that any agreed actions are given to a the employee/volunteer and that the line manager ensures that actions are reviewed & agreements followed up - with negotiation around timescales & outcomes where necessary - in future sessions.

- **Access to supervision sessions:** Should the line manager with responsibility for supervision of an employee/volunteer leave, they are required to provide access - to the person taking over responsibility for that employee/volunteer's future supervision - to six months of previous supervision notes.
- **Confidentiality:** There will be three levels relating to the need to breach confidentiality within supervision as set out below. This explanation is provided so that all employees/volunteers receiving supervision within their work role at HTAFC CIO are clear about what can - and cannot - remain confidential:

Issues	Level
<ul style="list-style-type: none"> ▪ If the behaviour or activities would bring HTAFC CIO into disrepute ▪ If it is about harm to self and/or others ▪ If it involves illegal activity - depending on currency and severity of activity ▪ If it concerns actions of gross misconduct ▪ If it concerns activities where child protection & safeguarding policies apply 	<ul style="list-style-type: none"> ▪ There is a duty as a line manager to report/action via HTAFC CIO's most senior person responsible for HR & appropriate public authorities - where appropriate.
<ul style="list-style-type: none"> ▪ If it concerns activities that may lead to disciplinary action being taken ▪ If it concerns actions relating to performance or capability 	<ul style="list-style-type: none"> ▪ Items may need to be reported via line management structures to HTAFC CIO's most senior person responsible for HR.
<ul style="list-style-type: none"> ▪ If the information given by the employee/volunteer will have significant impact on HTAFC CIO e.g. long term sickness/absence 	<ul style="list-style-type: none"> ▪ Items may need to be reported through the line management structure and to HTAFC CIO's most senior person responsible for HR.

Reviewed & Updated: September 2019

HTAFC CIO will review this Supervision Policy and good practice at least annually.

(16) Appraisal Policy

Policy statement: A performance appraisal will be carried out on each employee at least once per year. The timing of that review may vary depending upon the employee's job and, in any event, is in the absolute discretion of HTAFC CIO. The purpose of the annual appraisal is to review the performance of the employee and provide constructive feedback; whilst identifying areas of satisfaction and where improvements can be made. In addition, discussions will focus on future goals, development and training needs.

- **Structure of appraisals:** The employee will attend a meeting with their line manager to discuss their work performance. **The objectives of the meeting will be to:**
 - Discuss the previous year's achievements
 - Identify any shortfalls in achieving objectives and establish the reasons for any shortfalls
 - If necessary, agree any changes required to objectives and actions required to improve the employee's performance and/or to enable them to achieve their full potential in the work they carry out for HTAFC CIO
 - Consider any future training, development and career needs for the employee
 - Discuss opportunities for advancement or alternative work.
- **Personal development:** The employee should also set out what actions they intend to take to develop themselves and they must assist in making the performance review process a worthwhile exercise. The meeting will be an open forum where views can be exchanged and agreed conclusions reached.
- **Preparation for the appraisal:** Employees should prepare for their appraisal meeting by considering what points they wish to discuss about their performance. They should consider their achievements over the previous year and the progress they have made in achieving objectives and they should be prepared to explain the reasons for any shortfalls.
- **Appraisal documentation:** During and after the meeting, the employee's line manager will complete an appraisal form as a record of the discussions that took place at the meeting. This will then be given to the employee for agreement and signature.

If the employee disagrees with any of the comments made, they will be able to record this on the form. Once the employee has signed the form, they should return it to their line manager and retain a copy for their own safekeeping.

The form will be kept confidential and will be held on the employee's personnel file and a copy. The appraisal process will be reviewed by the most senior person in the organisation to ensure the fairness and effectiveness of each line manager's approach to the process.

The completed appraisal form must be viewed as a working document and as such should be continually referred to and reviewed throughout the year by both employees and line managers.

- **Disagreements:** Any employee who feels that their appraisal was entirely unsatisfactory, or unfair to them, may ask that a more senior HTAFC CIO manager review the appraisal with them and their line manager - or where a more senior manager is not available - to request a meeting to discuss concerns and issues.
- **Employees in probationary period:** Those employees who are still in their probationary period will not receive an annual appraisal. Instead, their performance will be reviewed, independently of the annual appraisal process, during and at the end of the probationary period as outlined in the **Safer Induction Policy** in this Handbook .
- **Volunteers:** All HTAFC CIO volunteers will be appraised as part of their regular supervision; and at the intervals referred to in the **Supervision Policy** in this Handbook.

Reviewed & Updated: September 2019

HTAFC CIO will review this Appraisal Policy and good practice at least annually.

Part 2: Child Protection Policies & Procedures

(17) Introduction to Child Protection

The purpose of this introduction is to ensure that everyone that this document applies to has a clear understanding of what is meant by child protection and safeguarding - and thereby has no confusion as to what their responsibilities are.

Definition of child protection: Child protection is part of safeguarding and promoting welfare and refers to the activity that is undertaken by HTAFC CIO staff members and volunteers to protect specific children who are suffering, or are likely to suffer, significant harm.

Definition of safeguarding: Safeguarding and promoting the welfare of children is defined by the UK Government's guidance, **Working Together to Safeguard Children March 2015** (updated February 2018) as the following:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Definition of child abuse: Child abuse is any action by another person that causes significant harm to a child. The abuse can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Child abuse will often take place over a period of time, rather than being a one-off event. Children may be abused in a variety of settings - such as the family or institutional or community setting. A child can be abused by those known to them or, more rarely, by others - e.g. via the internet. An abuser can be an adult or adults, or another child or children and harm may occur intentionally or unintentionally.

The core definitions of harm are outlined below and are as defined by the UK Government's guidance **Working Together to Safeguard Children**.

Sexual abuse: Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities - not necessarily involving a high level of violence - and 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.

Abusers 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.

Emotional abuse: Emotional abuse is the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), 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, though it may occur alone.

It's important to remember that parents and/or caregivers of children with multiple needs may find it difficult to ensure that the full range of the child's needs, including their emotional needs, are met. Whilst it may prove difficult

to include such children in everyday activities alongside other family members, not to include them may be harmful.

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

Neglect: Neglect is the persistent failure to meet a child's basic physical and/or psychological needs and which is 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 caregiver failing to:

- Provide adequate food, clothing or 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 care-givers
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. However, what is known, is that neglect - in whatever form it takes - can be just as damaging to a child as physical abuse.

Although these four categories of abuse in this introduction are those detailed in the UK Government's guidance "Working Together to Safeguard Children", there are numerous more detailed categories of abuse that it is important all HTAFC CIO staff members and volunteers are aware of. The next section "Recognising the Signs of Child Abuse" provide a fuller breakdown of all the recognised categories and further guidance on how to help safeguard and protect children.

Reviewed & Updated: September 2019

HTAFC CIO will review this Introduction to Child Protection at least annually.

(18) Recognising the Signs of Child Abuse

Recognising child abuse is not easy. HTAFC CIO does not believe it is the responsibility of its staff members or volunteers to decide whether or not child abuse has taken place - or if a child is at significant risk of harm from someone. However, every HTAFC CIO staff member and volunteer has both a responsibility and duty - as set out in this Handbook - to act in order that the appropriate agencies can investigate and take any necessary action to protect a child.

This section starts by providing greater detail about the four core categories of abuse detailed in the UK Government's guidance "Working Together to Safeguard Children". This Handbook provides more specific guidance on how to help safeguard and protect children in relation to many of the other recognised types of child abuse. The following information is provided to help all HTAFC CIO staff members and volunteers to be more alert to the signs of possible abuse.

Sexual abuse: A child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact and it can happen online. Sometimes the child won't even understand that what's happening to them is abuse - or that it is wrong.

Defining child sexual abuse: There are two different types of child sexual abuse - "contact abuse" and "non- contact abuse". Further information on each type is detailed below:

- **Contact abuse** involves touching activities where an abuser makes physical contact with a child, including penetration. **It includes the following:**
 - a) Sexual touching of any part of the body - whether the child's wearing clothes or not
 - b) Rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
 - c) Forcing or encouraging a child to take part in sexual activity
 - d) Making a child take their clothes off, touch someone else's genitals or masturbate
- **Non-contact abuse** involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet and flashing. **It includes the following:**
 - a) Encouraging a child to watch or hear sexual acts
 - b) Not taking proper measures to prevent a child being exposed to sexual activities by others
 - c) Meeting a child following sexual grooming with the intent of abusing them
 - d) Online abuse including making, viewing or distributing child abuse images
 - e) Allowing someone else to make, view or distribute child abuse images showing pornography to a child
 - f) Sexually exploiting a child for money, power or status (This is known as child exploitation and is covered in further detail later in this section)

Changes in behaviour which can indicate sexual abuse include:

- Staying away from certain people
- Avoiding being alone with people, such as family members or friends
- Seeming frightened of a person or a reluctance to socialise with them
- Showing sexual behaviour that's inappropriate for their age
- Becoming sexually active at a young age
- Being promiscuous
- Using sexual language or knowing information that you wouldn't expect them to
- Having physical symptoms such as anal or vaginal soreness, an unusual discharge, sexually transmitted infection (STI) and/or pregnancy

Emotional abuse: Children who are emotionally abused suffer ongoing emotional maltreatment or emotional neglect. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development as well as causing serious harm.

Defining emotional abuse: Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child.

Children who are emotionally abused are usually suffering another type of abuse or neglect at the same time - but this may not always be the case.

Physical abuse: It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them.

Defining physical abuse: Physical abuse is deliberately hurting a child and causing injuries such as bruises, broken bones, burns or cuts. There's no excuse for physically abusing a child. It causes serious, and often long-lasting, harm - and in severe cases, death. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell - this is known as fabricated or induced illness (FII).

Neglect: Neglect is the ongoing failure to meet a child's basic needs. It's dangerous and children can suffer serious and long-term harm and neglect is the most common form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents or carers. A child who is neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death.

Defining neglect: There are four specific types of neglect and each is listed below with further detail:

- 1. Physical neglect:** This is failing to provide for a child's basic needs such as food, clothing or shelter. It is also failing to adequately supervise a child, or provide for their safety.
- 2. Educational neglect:** Failing to ensure a child receives an education.
- 3. Emotional neglect:** Failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, intimidating or isolating them. This form of neglect is often the most difficult to prove.
- 4. Medical neglect:** Failing to provide appropriate health care, including dental care and refusal of care or ignoring medical recommendations.

Neglect can have serious and long-lasting effects. It can be anything from leaving a child home alone to the very worst cases where a child dies from malnutrition or being denied the care they need. In some cases, it can cause permanent disabilities. Neglect can be really difficult to identify, making it hard even for professionals to take early action to protect a child.

Changes in behaviour which can indicate neglect: Having one of the signs or symptoms below doesn't necessarily mean that a child is being neglected. However, if HTAFC CIO staff members or volunteers ever notice multiple - or persistent - signs then it could indicate that there is a serious problem. Children who are neglected may have:

- Poor appearance and hygiene
- Health and development problems
- Housing and family issues

Reviewed & Updated: September 2019

HTAFC CIO will review this Recognising the Signs of Child Abuse at least annually.

(19) Child Abuse: Domestic Abuse

Domestic abuse: Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. However, domestic abuse isn't just physical violence - it also includes any emotional, physical, sexual, financial or psychological abuse. It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers. Witnessing domestic abuse is also child abuse. Teenagers can also suffer domestic abuse in their relationships. Domestic abuse can seriously harm children and young people.

Defining domestic abuse: Domestic abuse can include the following:

- Sexual abuse and rape
- Punching, kicking, cutting, hitting with an object
- Withholding money or preventing someone from earning money
- Not letting someone leave the house
- Reading emails, text messages or letters
- Threatening to kill or harm them, another family member or pet

Reviewed & Updated: September 2019

HTAFC CIO will review this Child Abuse: Domestic Abuse at least annually.

(20) Child Abuse: Grooming & Online Abuse

Grooming: Many children do not understand that they have been groomed; or that what has happened is abuse. Children can be groomed online, or in the real world - and this can take place by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female and they can be any age.

Defining grooming: Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation.

How grooming happens: Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time gaining a child's trust. They may also try to gain the trust of the whole family so they can be alone with the child. Groomers manage to do this by:

- Pretending to be someone they are not e.g. saying they are the same age online
- Offering advice or understanding
- Buying gifts
- Giving the child attention
- Using their professional position or reputation
- Taking them on trips, outings or holidays.
- Using secrets and intimidation to control children

Once a groomer has established trust, they then exploit the relationship by isolating the child from friends or family and making the child feel dependent on them. They will use any means of power or control to make a child believe they have no choice but to do what the groomer wants. Groomers may introduce 'secrets' as a way to control or frighten the child. Sometimes they will blackmail the child, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

Online grooming: It's easy for groomers to hide their identity online. They may pretend to be a child and then chat and become 'friends' with children they are targeting. Groomers can use social media sites, instant messaging apps including teen dating apps, or online gaming platforms to connect with a young person or child. They can spend time learning about a young person's interests from their online profiles and then use this knowledge to help them build up a relationship. **Groomers may look for:**

- Usernames or comments that are flirtatious or have a sexual meaning
- Public comments that suggest a child has low self-esteem or is vulnerable

Groomers don't always target a particular child. Sometimes they will send messages to hundreds of young people and wait to see who responds. Groomers no longer need to meet children in real life to abuse them. Increasingly, groomers are sexually exploiting their victims by persuading them to take part in online sexual activity.

Online abuse: Children may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world - for example bullying or grooming. However, it may also be that the abuse only happens online e.g. persuading children to take part in sexual activity online. A real problem is that children can feel like there is no escape from online abuse, as abusers can contact them at any time of the day or night. Online abuse results in children being abused in what should be considered safe places like their bedrooms - and images and videos can be stored and shared with other people.

Defining online abuse: Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.

Reviewed & Updated: September 2019

HTAFC CIO will review this Child Abuse: Grooming & Online Abuse at least annually.

(21) Child Abuse: Child Sexual Exploitation & Child Trafficking

Child sexual exploitation (CSE): Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status. Children may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children are trafficked into - or within the UK - for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Defining child sexual exploitation: Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people - or a third person or persons - receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition e.g. being persuaded to post sexual images on the Internet and via mobile phones without immediate payment or gain.

In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common. Involvement in exploitative relationships being characterised in the main by the child's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

Child trafficking: Child trafficking is child abuse and is a type of abuse where children are recruited, moved or transported and then exploited, forced to work, or sold. They are often subject to multiple forms of exploitation. Children are trafficked for many reasons which include:

- Child sexual exploitation
- Benefit fraud
- Forced marriage
- Domestic servitude such as cleaning, childcare, cooking
- Forced labour in factories or agriculture
- Criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another. Trafficked children experience multiple forms of abuse and neglect because physical, sexual and emotional violence are often used to control victims of trafficking. Children who are trafficked are also likely to be physically and emotionally neglected.

Defining child trafficking: The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in human beings'. **Official definition of child trafficking produced by the Council of Europe and ratified by the UK government in 2008**

Reviewed & Updated: September 2019

HTAFC CIO will review this Child Abuse: Child Sexual Exploitation & Child Trafficking at least annually.

(22) Child Abuse: Female Genital Mutilation

Female genital mutilation (FGM): There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous - as well as being a criminal offence.

Defining female genital mutilation: Female genital mutilation is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or sunna.

The law and female genital mutilation: FGM has been a criminal offence in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. Since July 2015, anyone can apply to the court for an FGM Protection Order if they are concerned that someone is at risk of FGM. Breaching an FGM Protection Order is a criminal offence with a maximum sentence of five years' imprisonment.

Since October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales.

Professionals must make a report to the Police, if, in the course of their duties:

- They are informed by a girl under the age of 18 that she has undergone an act of FGM
- They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18

Changes in behaviour which can indicate a child has undergone female genital mutilation: A girl or woman who has had FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear

Changes to look out for which may indicate a child is at risk of undergoing female genital mutilation: A girl at immediate risk of FGM may ask a teacher, or another adult for help if she suspects FGM is going to happen, or she may run away from home or miss school. Although the girl may not know what's going to happen, she might talk about:

- Being taken 'home' to visit family
- A special occasion to 'become a woman'
- An older female relative visiting the UK

Please note: Although this Handbook is specifically concerned with child protection and safeguarding, the following is relevant to this aim:

There is no requirement for automatic referral of adult women with FGM to adult social services or the Police. Therefore, referral to the Police must not be introduced as an automatic response when identifying adult women with FGM - and each case has to therefore be individually assessed. Adult women with FGM should be supported by offering referral to community groups who can provide the appropriate support, and clinical intervention - or other services as appropriate e.g. through an NHS FGM clinic. However, the wishes of the woman concerned must be respected at all times.

Where this note becomes of relevance to HTAFC CIO's child protection and safeguarding policies is that if the woman who has undergone FGM is pregnant - then the welfare of the unborn child or others in her extended family must be considered at this point - as these children are potentially at risk of FGM also and safeguarding action must be taken accordingly.

If any HTAFC CIO staff member or volunteer is in any way concerned about a girl being at risk of FGM they must

immediately bring their concerns to the attention of HTAFC CIO's Designated Safeguarding Officer.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Child Abuse: Female Genital Mutilation** at least annually.

(23) Child Abuse: Harmful Sexual Behaviour

Harmful sexual behaviour: Children and young people who develop harmful sexual behaviour harm themselves and others. **Harmful sexual behaviour includes:**

- Using sexually explicit words and phrases
- Inappropriate touching
- Using sexual violence or threats
- Full penetrative sex with other children or adults

Sexual behaviour between children is also considered harmful if one of the children is much older - particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them - for example, if the older child is disabled.

Why children develop harmful sexual behaviour: Children and young people who develop harmful sexual behaviour have usually experienced abuse and neglect themselves. A 2013 study of children and young people with harmful sexual behaviour suggested that two-thirds had experienced some kind of abuse or trauma such as physical abuse, emotional abuse, sexual abuse, severe neglect, parental rejection, family breakdown, domestic violence, and parental drug and alcohol abuse. Around half of them had experienced sexual abuse.

Reviewed & Updated: September 2019

HTAFC CIO will review this Child Abuse: Harmful Sexual Behaviour at least annually.

(24) Child Abuse: Bullying & Cyberbullying

There is clear evidence that bullying is abusive and will include at least one or more of the four core categories of abuse - sexual abuse, emotional abuse physical abuse and/or neglect. For this reason, bullying in all its forms has been included in HTAFC CIO's Child Protection & Safeguarding Policy.

Bullying and cyberbullying: Bullying can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

Defining bullying: Bullying is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. **Bullying includes the following:**

- **Verbal abuse** - such as name calling and gossiping
- **Non-verbal abuse** - such as hand signs or text messages
- **Emotional abuse** - such as threatening, intimidating or humiliating someone
- **Exclusion** - such as ignoring or isolating someone
- **Undermining** - by constant criticism or spreading rumours
- **Controlling or manipulating** someone
- **Physical assaults** - such as hitting and pushing
- **Making silent, hoax or abusive calls**
- **Online or cyberbullying** - further details are provided below

Defining online or cyberbullying: Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos. Children may know who's bullying them online - as it may just be an extension of offline peer bullying they are already experiencing - or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of an individual engaging in bullying behaviour. Because cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - it can feel like there is no escape. **Cyberbullying includes the following:**

- Sending threatening or abusive text messages
- Creating and sharing embarrassing images or videos
- Trolling – which is the sending of menacing or upsetting messages on social networks, chat rooms or online games
- Excluding children from online games, activities or friendship groups
- Setting up hate sites or groups about a particular child
- Encouraging young people to self-harm
- Voting for or against someone in an abusive poll
- Creating fake accounts, hijacking or stealing online identities - with the aim to embarrass a young person or cause trouble using their name
- Sending explicit messages - also known as sexting
- Pressuring children into sending sexual images or engaging in sexual conversations

Bullying can also be motivated by a discrimination towards the person being bullied. Further details of these types of bullying are provided below:

- **Racial bullying** - identified by the motivation of the bully, the language used, and/or by the fact that victims are singled out because of the colour of their skin, the way they talk, their ethnic grouping or by their religious or cultural practices
- **SEN & Disability bullying** - this is where children are singled out because of a disability and which deaf children can be bullied more than other children with SEN's or disabilities
- **Sexual bullying** - behaviour, which whether physical or non-physical, is based on a person's sexuality or gender; and is when sexuality or gender is used as a weapon by boys or girls towards other boys or girls. Sexual bullying is more prevalent towards girls than boys
- **Homophobic/Bi-phobic bullying** - irrational dislike, hatred or fear of individuals that are, or are perceived to be lesbian, gay or bisexual
- **Transphobic bullying** - transphobic is an umbrella term to describe people whose gender is not the same as

- or does not sit comfortably with - the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, cross dresser, non- binary, gender queer

Changes in behaviour which can indicate a child is being bullied or cyberbullied: It can be hard for adults, including parents, to know whether or not a child is being bullied. A child might not tell anyone because they're scared the bullying will get worse. They might think that they deserve to be bullied, or that it's their fault. However, the following should be looked out for by HTAFC CIO staff members and volunteers:

- Belongings getting “lost” or damaged
- Physical injuries - such as unexplained bruises
- Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- Not doing as well at school
- Asking for, or stealing, money - to give to a bully
- Being nervous, losing confidence, or becoming distressed and withdrawn
- Problems with eating or sleeping
- Bullying others

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). For this reason, HTAFC CIO has put in place rigorously enforced anti-bullying strategies.

Reviewed & Updated: September 2019

HTAFC CIO will review this Child Abuse: Bullying & Cyberbullying at least annually.

(25) Code of Good Practice: Promoting Good Safeguarding Practice when Working with Children

Introduction: Every staff member and volunteer associated with HTAFC CIO has been selected to work with the organisation, because they have demonstrated a desire to provide a positive, fun and safe environment for children and young people. Any person working with young people is automatically placed in a position of trust - that carries with it authority, status, power and responsibility. It has been proven, that where adults are positive role models - and display high moral and ethical standards - the benefits to a young person's development can be significant.

Duty of Care: Every staff member and volunteer that works with HTAFC CIO has a legal responsibility to provide a duty of care. This duty of care means that each and every individual adult must take all reasonable steps to ensure the safety of any child involved in an activity for which they and HTAFC CIO are responsible. This duty of care is extended by a moral responsibility to work at developing a culture in which all young people can take part in activities in a safe and enjoyable environment.

Relationship of Trust: HTAFC CIO recognises that genuine and appropriate relationships do occur between staff members/volunteers and the children and young people that use the organisations services. While the relationship of trust should always be nurtured, allowing appropriate relationships to lead into sexual, or inappropriate relationships, will always be wrong. HTAFC CIO staff members and volunteers need to be aware of the power and influence that can be exercised over a young person. Where activities undertaken by HTAFC CIO have an element of competitiveness e.g. selection to play, mentoring, assessment etc., a child can become dependent on the adult - and thereby, be more vulnerable. Therefore, it is vital that staff members and volunteers recognise their responsibility - and ensure that they do nothing to abuse their position of trust.

Good Safeguarding Practice: Despite having the best safeguarding policies and procedures; and the most effective safeguarding induction training and refresher training - there can still be many situations, that an HTAFC CIO staff member or volunteer may find themselves in, which could be misconstrued and/or misinterpreted by others. HTAFC CIO wants to help reduce such situations from occurring - and which could be viewed from the outside as inappropriate, poor practice, or abusive. **Therefore:**

- **By developing the following standards of good safeguarding practice, HTAFC CIO is seeking to ensure that all of its staff members and volunteers are protected from false allegations relating to child safeguarding concerns.**
- **By HTAFC CIO staff members and volunteers following these standards of good safeguarding practice, we further live and breathe our mission of protecting all children and young people.**

Ultimately though, every staff member and volunteer should never believe that they can rely on their own good reputation; or the good reputation of HTAFC CIO to protect them. All HTAFC CIO staff members and volunteers should always behave and conduct themselves in such a way as to ensure that nothing they do can be misconstrued or misinterpreted.

Underpinning Principles of HTAFC CIO's Good Safeguarding Practice: For the avoidance of doubt, the following forms an unequivocal and unalterable core standard and principle that applies to all staff members and volunteers that work with - and for – HTAFC CIO, in any capacity:

- **Never develop or nurture an inappropriate relationship (or any form of inappropriate contact) with a child, that in any way falls outside of the work that you have been authorised to undertake on behalf of HTAFC CIO.**
- An **inappropriate relationship** with a child also includes a sexual relationship, or any form of sexual contact.
- **N.B. Inappropriate contact** would include a breach of any of the good safeguarding practices detailed under any of the headings below, where contact is being made in breach of any instruction to the contrary.

Important note: Even if a child is aged 16 years or older, it is forbidden for an HTAFC CIO staff member or volunteer to have a sexual relationship; sexual contact; or an otherwise inappropriate relationship with them. Any such behaviour - by any HTAFC CIO staff member or volunteer - towards any person under the age of 18 years of age, represents a serious breach of trust and is not acceptable under any circumstances.

In circumstances, where the above underpinning principle is breached by a staff member, they will be subject to HTAFC CIO's disciplinary procedures. Any breach of the above underpinning principle involving a volunteer - or

member of staff from another organisation - will result in them being asked to leave HTAFC CIO. Any such breaches of HTAFC CIO's underpinning principle, by staff members or volunteers, will always result in a referral being made to one or more statutory agencies such as the Police, the Local Authority Children's Social Care Department, the FA and the Disclosure and Barring Service.

Not-with-standing the above underpinning principle, it is HTAFC CIO's intention to regularly review the following guidelines - relating to standards of good safeguarding practice - to ensure that they reflect the very latest best practice; and that they take account of the ever-changing safeguarding risks that children can face.

General Good Safeguarding Practice: HTAFC CIO staff members and volunteers must adhere to the following:

- Never exaggerate or trivialise child abuse issues.
- Never make inappropriate promises to a child, particularly in relation to confidentiality.
- Do not ask a child to keep a secret.
- Do not jump to conclusions about others, without first checking the facts.
- Never allow allegations by a child to go unchallenged, unrecorded - or in any way not acted upon.
- Never agree to meet a child or young person on their own on a one to one basis. If such a situation should be requested by a child or young person, then you are required to immediately speak with HTAFC CIO's DSO.

Behaviour Good Safeguarding Practice: HTAFC CIO staff members and volunteers must adhere to the following:

- Never act in a way towards a child that can be perceived as threatening or intrusive. This includes verbal aggressiveness and shouting.
- Do nothing that would cause a child to lose self-esteem e.g. by embarrassing, humiliating, undermining them; or otherwise acting in a way that would reduce them to tears.
- Never make sarcastic, insensitive or derogatory comments (or gestures) to a child, even if this was meant to be in fun.
- Never make sexually suggestive comments (or gestures) to a child, even if this was meant to be in fun.
- Never patronise or treat a child as if they are silly.

In addition to not behaving in any of the ways listed above, HTAFC CIO staff members and volunteers should always be careful not to behave in any of the ways listed above either in front of - or within the presence of - a child, even though it is not intended to be directed towards the child.

Communication Good Safeguarding Practice: HTAFC CIO staff members and volunteers must adhere to the following:

- Never use inappropriate language in the presence of a child.
- Do not allow children to use inappropriate language unchallenged.

Personal Contact Good Safeguarding Practice: HTAFC CIO staff members and volunteers must adhere to the following:

- Never allow - or take part in - any form of inappropriate touching of a child.
- Never take part in any rough, physical, or sexually-provocative games - which includes horseplay of anykind.
- Do not undertake things of a personal nature for a child which they can do for themselves, unless you have been requested to provide that assistance by their parent or carer.

N.B. It is recognised that some children may need help with such things as tying laces and this is acceptable. This element of good safeguarding practice does not preclude attending to an injured or ill child, or from rendering first aid.

Personal Information Good Safeguarding Practice: HTAFC CIO staff members and volunteers must adhere to the following:

- Never let a child have your personal home address.
- Never let a child have your personal telephone number/s.
- Never contact a child via text message using a personal phone.
- Never email a child from a personal email address.

N.B. Where emailing or texting a children is an accepted and documented operational procedure of HTAFC CIO,

this email and/or text must at all times come from the authorised HTAFC CIO email account or work mobile phone - and each child's parent/carer must be copied into the email or text.

Physical Contact Good Safeguarding Practice: HTAFC CIO staff members and volunteer should only use appropriate physical contact if the sole aim is to:

- Develop sports skills techniques.
- Treat an injury.
- Prevent an injury or accident from occurring.
- To meet the professional requirements of the sport or activity being undertaken.

Acceptable physical contact - as outlined above - would always take place in an open or public environment; and would never take place in secret or out of sight of others.

N.B. In all circumstances where physical contact is required, the adult must always explain the nature and reason for the physical contact; and reinforce the teaching or coaching skills being used. Unless the HTAFC CIO staff member or volunteer is responding to an emergency situation, the adult must always seek the child's permission for initiating the required physical contact.

Appropriate physical contact will never involve touching in or around the genital area, the buttocks and/or the breasts. In addition, any physical contact anywhere else on the body should not cause a child distress or embarrassment.

Positive Influence Good Safeguarding Practice: HTAFC CIO staff members and volunteers must adhere to the following:

- Never smoke in front of children - or in any place that you could be seen smoking by them.
- Never consume alcohol in front of children - or in any place that you could be seen drinking alcohol by them.
- Never offer children drugs or other illegal substances.
- Never offer children sexual materials e.g. adult magazines, adult videos and/or adult website addresses etc.
- Never accept bullying, rule violations, cheating or the use of prohibited substances - such as performance enhancers etc.

Supervision Good Safeguarding Practice: HTAFC CIO staff members and volunteers must adhere to the following:

- Never leave a child unsupervised.
- Do not treat any child more favourably than others.
- Avoid spending too much time alone with any one particular child where you are away from other adults.
- A child must never be taken to an adult's home.
- Never go to a child's home where you would be alone with them.
- Do not be in a dressing room with a child on your own. If this is unavoidable, ensure the door remains open.
- Should circumstances require adults and children to share a dressing room, adults are required to provide the child with privacy and ensure that the adult showers and changes at a separate time to the child.
- Mobile phones - and any technology capable of taking photos or videos - are not permitted to be used in changing rooms.
- Never share a room with a child.

Social Media Good Safeguarding Practice: HTAFC CIO staff members and volunteers must adhere to the following:

- Never contact or communicate with a child through social media sites; or via any other form of social media app or interface.
- Never permit a child to be added to your social media feed/s or social media apps.

Where a child requests to be added to any personal social media feed or social media app, you must immediately refuse the request and communicate the attempt to connect with you through social media to HTAFC CIO's DSO. HTAFC CIO's DSO will explain to the child that staff members and volunteers are not permitted to have child

participants on their social media feeds; and that they should not send such requests again.

N.B. There may be circumstances where an HTAFC CIO staff member or volunteer may have a child participant on their social media feed - or on social media apps - as a consequence of appropriate contact prior to commencing work with HTAFC CIO. In all circumstances, HTAFC CIO staff members and volunteers should disclose this social media connection to the DSO and then delete all social media connections with that child. HTAFC CIO's DSO will explain to the child and/or their parent/carer the reasons this action has been taken.

Social media definition: Social media is an interactive online media that allows users to communicate instantly with each other or to share data in a public forum. It includes social and business networking websites such as Facebook, Myspace, Reddit, Twitter and LinkedIn. Social media also covers video and image sharing and blogging websites such as YouTube, Instagram, Google+, Tumblr and Flickr, as well as personal blogs, any posts made on other people's blogs and all online forums and noticeboards. This is a constantly changing area with new websites and apps being launched on a regular basis and therefore this list is not exhaustive. This element of HTAFC CIO's social media good safeguarding practice policy applies in relation to any social media that staff members and volunteers may use, regardless of whether it is specifically detailed in the definition above or not.

Transport Good Safeguarding Practice: HTAFC CIO staff members and volunteers must adhere to the following:

- Never use a mobile phone while driving with a child or children - whether or not the mobile phone meets handsfree legislation.
- No adult is permitted to transport a child or children if they are in an unregulated job category.
- Never transport a child or children if not in possession of the relevant licence entitlement; or the relevant insurances.
- You should not transport a child without another adult being present.

N.B. Where such a journey is unavoidable, then the staff member or volunteer required to transport the child **must** first speak to their line manager or HTAFC CIO's DSO and gain the consent of that other person **prior** to making the journey. The staff member or volunteer must also ensure that they communicate with the parent/carer of the child to ensure that they are also fully aware that their child is being transported without another adult being present.

In all cases where the above procedure is used to transport a child without another adult being present, the staff member or volunteer must complete a journey log and submit this at the end of each week to HTAFC CIO's DSO. HTAFC CIO will monitor journey logs to further reduce situations where a child needs to be transported by a lone adult.

In all cases where a child is transported as a single passenger - without another adult being present - the child should sit in the back seat of the vehicle and wearing their seat belt.

Reviewed & Updated: September 2019

HTAFC CIO will review these Code of Good Practice: Promoting Good Safeguarding Practice when Working with Children and good practice at least annually.

(26) Whistle Blowing Policy

Policy statement: Whistleblowing is quite simply when an HTAFC CIO staff member or volunteer reports suspected wrongdoing at HTAFC CIO. Officially this is called 'making a disclosure in the public interest'. HTAFC CIO understands that sometimes things go wrong. If they do, then we ask you to tell us.

- **Purpose:** The purpose of this Whistleblowing Policy is to make it clear that HTAFC CIO staff members or volunteers can whistleblow without fear of victimisation, subsequent discrimination or disadvantage. This Whistleblowing Policy is therefore intended to encourage and enable everyone to raise serious concerns directly to HTAFC CIO, rather than overlooking a problem or seeking a resolution of the problem outside of the organisation.

All HTAFC CIO staff members and volunteers have a responsibility to maintain the highest standards of care towards everyone they come into contact with through their work with and for the organisation. This Whistleblowing Policy aims to ensure that serious concerns can be properly raised and addressed within the organisation and are recognised as a way of enabling the delivery of good practice - and which will help to ensure the protection of every child.

- **Responsibilities:** HTAFC CIO believes that all staff members and volunteers are professional and skilful in the work and tasks they undertake. However, occasionally it may be that a staff member or volunteer has concerns about another person's conduct or standards of practice **e.g.** they may be worried that a child is not being cared for properly; is being abused; or even at serious risk. It could be that they have concerns about fraud; financial irregularity; or other issues they have become aware of within while working for HTAFC CIO. All HTAFC CIO staff members and volunteers have a responsibility to raise those concerns so that they can be resolved.

HTAFC CIO acknowledges that raising concerns can be an extremely difficult and courageous thing to do. Any HTAFC CIO staff member or volunteer who has good grounds on which to base their concerns - even if they do not have proof - will be listened to.

Please remember though, that it is not your responsibility to investigate the matter - this is HTAFC CIO's responsibility.

- **Procedure for raising concerns:** In most circumstances, staff members and volunteers wishing to raise their concerns, should ideally discuss the matter with their line manager. If this is not possible, perhaps because this person is thought to be involved or colluding in the suspected wrongdoing, another HTAFC CIO manager or HTAFC CIO's DSO or SSM should be contacted. The person that the staff member or volunteer raises their concerns to, will be responsible for ensuring the concerns are looked into or passed to the most appropriate person within HTAFC CIO - in line with the organisations Disclosures in the Public Interest Policy contained in the Employee Handbook .
- **Follow-up:** Depending on the nature of the concern raised, a response regarding the action taken will be supplied to the staff member or volunteer raising it as soon as possible. However, it is important to be aware that it might not always be appropriate to reveal the full extent of the investigation, where this relates to personal issues involving a third party.
- **Never keep quiet about wrongdoing:** HTAFC CIO staff members or volunteers - who do not report bad practice or abuse, neglect or ill treatment of a child, young person or adult, or for that matter anything else illegal that they are suspicious about - may be seen as colluding with that unacceptable practice. Such collusion constitutes a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure (for staff) and resolving problems with volunteers procedure (for volunteers) and could result in the termination of the working relationship - as well as the information being forwarded to the appropriate authorities.
- **False and/or malicious allegations:** No HTAFC CIO staff member or volunteer will ever be penalised for whistleblowing - even if it is not upheld - unless they made a false accusation which they knew was both untrue and made with malice. If it is found that a false accusation was knowingly made, this would be treated as gross misconduct in accordance with the Company's disciplinary procedure (for staff) and resolving problems with volunteers procedure (for volunteers) and could result in the termination of the working relationship.

Reviewed & Updated: September 2019

HTAFC CIO will review this Whistle Blowing Policy and good practice at least annually.

(27) Procedure for Responding to Signs or Suspicions of Abuse

The following procedure applies to any HTAFC CIO staff member or volunteer who may be concerned about the safety and protection of a child. The different types of abuse have been detailed in sections 19 through to 24 of this Handbook. HTAFC CIO staff members and volunteers should refer back to these sections when reading this procedure.

Where there is concern relating to a child being vulnerable to radicalisation, extremism, or that they are being drawn into extremism, please refer to section 34 of this Handbook which provides detailed guidance under HTAFC CIO's Prevent Duty.

Purpose and aim of procedure: We aim to ensure that those children who attend and/or participate in activities or events organised by HTAFC CIO, and any other children who may come to the attention of HTAFC CIO, receive the protection and support they need if they are at risk of abuse or radicalisation. This procedure provides clear direction to staff and volunteers at HTAFC CIO if they have concerns that a child is in need of protection. **Ways that abuse might be brought to your attention include:**

- A child might make a direct disclosure about him or herself
- A child might make a direct disclosure about another child
- A child might offer information that is worrying but not a direct disclosure
- A member of staff or volunteer might be concerned about a child's appearance or behaviour or about the behaviour of a parent or carer towards a child
- A parent or carer might make a disclosure about abuse that a child is suffering or at risk of suffering
- A parent might offer information about a child that is worrying but not a direct disclosure

When talking to a child - who has told you that they are/or another child is being abused - please take account of the following guidance:

1. Reassure the child that telling someone about it was the right thing to do
2. Tell them that you now have to do what you can to keep them (or the child who is the subject of the allegation) safe
3. Let the child know what you are going to do next and who else needs to know about it
4. Let the child tell his or her whole story - but don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying.
5. Ask the child what they would like to happen as a result of what they have said, but don't make or infer promises you can't keep.
6. Give the child the **ChildLine** phone number which is **0800 1111**.

How to help a child in immediate danger or in need of emergency medical attention:

- If the child is in immediate danger and is with you, remain with them and call the Police
- If the child is elsewhere, contact the Police and explain the situation to them
- If the child needs emergency medical attention, call an ambulance and while you are waiting for it to arrive, get help from HTAFC CIO's first aider
- If a first aider is not available, use any first aid knowledge that you may have yourself to help the child
- You also need to contact your line manager or HTAFC CIO's Designated Safeguarding Officer to let them know what is happening

A decision will need to be made about who should inform the child's family and the Local Authority Children's Social Care Department and when they should be informed. If you have involved the Police and/or the health services, they should be part of this decision. Consider the welfare of the child in your decision making as the highest priority. **Issues that will need to be taken into account are:**

- The child's wishes and feelings
- The parent's right to know - unless this would place the child or someone else in danger, or would interfere with a criminal investigation
- The impact of telling or not telling the parent
- The current assessment of the risk to the child and the source of that risk
- Any risk management plans that currently exist

Once any immediate danger or emergency medical need has been dealt with, follow the steps set out in the **Flow Chart to Follow when Responding to Signs of Abuse** in this Handbook.

Keeping a record of your concerns: Use the **Reporting Concerns about a Child Form** (available for HTAFC CIO's Designated Safeguarding Officer). The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory child protection authorities if a referral to them is needed. The form should be signed and dated by all those involved in its completion and kept confidentially on the child's file and in line with HTAFC CIO's Data Protection Policy. The name of the person making the notes should be written alongside each entry.

Reporting child protection concerns: If a child is in need of emergency medical attention or in immediate danger, follow the procedure set out in the earlier section above on **Helping a Child in Immediate Danger or in Need of Emergency Medical Attention**.

How HTAFC CIO will support employees and volunteers: HTAFC CIO recognises that employees and volunteers working for the organisation and who have become involved in supporting/working with a child who has suffered harm - or appears to be likely to suffer harm - may find the situation stressful and upsetting. It is HTAFC CIO's paramount concern that all employees and volunteers receive all necessary support in these circumstances.

HTAFC CIO will support all employees and volunteers who find themselves in this situation, by providing an opportunity to talk through any anxieties, concerns and worries with HTAFC CIO's Designated Safeguarding Officer. In all cases - and where required or considered appropriate - HTAFC CIO and the Designated Safeguarding Officer will seek-out further support. This could be provided by, for example, Occupational Health and/or a teacher/trade union representative as appropriate.

HTAFC CIO will ensure that the Designated Safeguarding Officer and Deputy Designated Safeguarding Officer have access to support and appropriate workshops, courses or meetings as organised by the Local Authority and/or the FA to enable them to manage such situations.

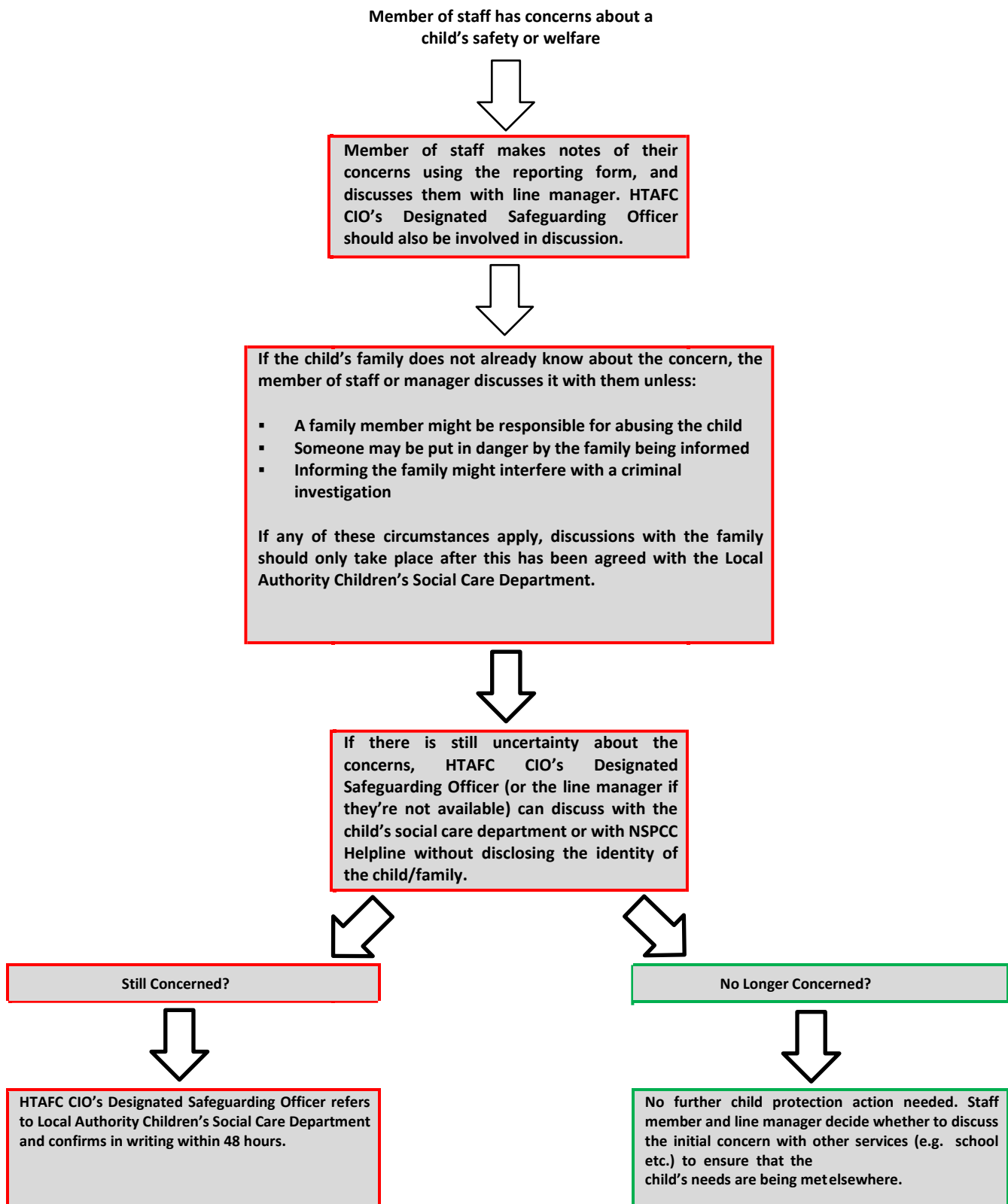
Any HTAFC CIO employee or volunteer - who is struggling with any issues or concerns as a consequence of their safeguarding responsibilities - are encouraged to speak with the Designated Safeguarding Officer, who will be able to provide, or access, the appropriate support.

HTAFC CIO staff members and volunteers should then take the steps set out in the flowchart on the following page to ensure the concern is dealt with...

Reviewed & Updated: September 2019

HTAFC CIO will review this **Procedure for Responding to Signs or Suspicions of Abuse** and good practice at least annually.

(28) Flow Chart to Follow when Responding to Signs of Abuse



Reviewed & Updated: September 2019

HTAFC CIO will review this Procedure for Responding to Signs or Suspicions of Abuse and good practice at least annually.

(29) Code of Conduct for Children

This Code of Conduct has been developed in order to provide children with advice on the behaviour that is expected of them when attending and using the facilities and services of HTAFC CIO. It has been shaped by the views of children and young people.

Purpose: To ensure children are treated fairly by all adults working with them at HTAFC CIO - and so they know what is expected of them.

Basic principles: This code of behaviour for children is intended to:

- Identify acceptable behaviour for children
- Promote self-respect and self-control
- Raise children's self-esteem and self confidence
- Encourage individual responsibility for behaviour and outline the consequences of poor behaviour
- Encourage children to recognise and respect the rights of others
- Encourage cooperation at all times and in all situations
- Promote the values of honesty, fairness and respect
- Anticipate and resolve any conflict that may arise
- Ensure that children are aware of when sanctions will be put into place

Dos and don'ts: Children are expected to:

- Co-operate with each other
- Be friendly
- Listen to each other
- Be helpful
- Follow this code of behaviour and other rules
- Stick to the e-safety agreement when using the internet, social networking sites, mobile phones etc.
- Have good manners
- Join in
- Respect each other's differences
- Treat all staff and volunteers with respect
- Report anything that worries or concerns them to HTAFC CIO's Designated Safeguarding Officer

Children shouldn't:

- Pick on or make fun of each other
- Bully each other
- Stare at others
- Yell or shout at others
- Be abusive
- Use equipment to be abusive or to cyberbully e.g. by using mobile phones to send nasty messages, taking and sharing photos without permission, sending nasty emails, or 'trolling' (leaving unkind comments on a webpage or social network profile)

Breach of this Code: This Code of Conduct is only useful if it forms part of a process for guiding children to receive appropriate support. Therefore, it is the responsibility of HTAFC CIO's Designated Safeguarding Officer to ensure that all children attending HTAFC CIO are informed of this Code and to confirm with them that they have seen, understood and agreed to follow it. HTAFC CIO will always ensure that all children are made aware of the consequences if they should breach the code. **Following the traffic light system:**

1. If a child breaches the Code of Conduct, the most appropriate sanction for a minor or first time breach will be to remind them about the Code and ask them to comply with it. Children will be given the opportunity to reflect - enabling them to plan a positive response - with support from either a staff member or volunteer.
2. **If, having followed the above step, the child continues to exhibit inappropriate behaviour, they will be referred to the appropriate member of HTAFC CIO staff - who will give them a formal, green light warning.**

Supportive interventions may need to be identified at this stage. The action will also be recorded in the discipline book and parents/carers informed.

3. Any further persistent inappropriate behaviour will result in a more serious sanction being imposed e.g. restriction/suspension from HTAFC CIO's facilities. This is the yellow light warning.

Again, supportive interventions may need to be identified at this stage. This action will also be recorded in the discipline book and parents/carers informed.

4. If these interventions are still not effective in helping the child to change their behaviour, a red light warning may be needed, with further sanctions. It may be that at this point, HTAFC CIO will discuss with the child and their family a possible referral for further support from other services.

Use of child protection procedures: If staff or volunteers at HTAFC CIO become concerned that a child's behaviour suggests either that they may be at risk of significant harm - or that they may present a risk of significant harm to other children - HTAFC CIO's child protection procedures will be followed and a referral may be made to the Local Authority Children's Social Care Department.

Such a referral will be discussed with the child and their family at the earliest possible opportunity, except in situations where this could possibly endanger a child's safety, or interfere with a Police investigation.

Reviewed & Updated: September 2019

HTAFC CIO will review all Code of Conducts and good practice at least annually.

(30) Dealing with Allegations of Abuse made against an Employee or Volunteer Policy

Policy statement: HTAFC CIO has developed clear policies and procedures for dealing with allegations against HTAFC CIO employees or volunteers who work with children. Examples of allegations that would be covered by this policy, although no intended to be exhaustive, include:

- Behaviour that has, or may have, harmed a child
- Criminal acts against or related to a child
- Behaviour towards a child or children in a way that indicates they may pose a risk of harm to children

Principles: In the first instance, any such allegation against an HTAFC CIO employee or volunteer must be reported immediately to HTAFC CIO's Designated Safeguarding Officer. HTAFC CIO's Designated Safeguarding Officer must immediately make HTAFC CIO's Community Manager aware of the allegation; and the Community Manager will then be responsible for notifying the named Board Safeguarding Lead and the Senior Safeguarding Manager - if different from the Community Manager.

Reporting time limits: HTAFC CIO's Designated Safeguarding Officer is accountable for contacting the Local Authority's Designated Officer and informing them of all allegations that have come to their attention **within 24 hours of the allegations being made.**

HTAFC CIO's Designated Safeguarding Officer will notify The FA Case Management Team, where an allegation at HTAFC CIO results in a safeguarding referral being made to any of the following:

- The Police
- The Local Authority Designated Officer
- Any other statutory agency, social care or Children's Services Directorate

HTAFC CIO's Designated Safeguarding Officer is accountable for contacting The FA Case Management Team as soon as possible after the allegations have been made - but in any event **within 72 hours of the allegations being made.**

DBS Referral: Where any HTAFC CIO employee or volunteer - working in regulated activity - is suspended from their duties as a consequence of concerns, allegations and/or internal investigations related to their work with children, then HTAFC CIO's Designated Safeguarding Officer will notify The FA Case Management Team as soon as possible after the suspension takes place - but in any event **within 72 hours of the suspension happening.**

As a provider of Regulated Activity, HTAFC CIO has a legal duty to make a referral to DBS in certain circumstances. HTAFC CIO's Designated Safeguarding Officer - supported by HTAFC CIO's Senior Safeguarding Manager - will seek support from The FA Case Management Team, when a DBS referral needs to be made.

Information relating to a DBS referral as well as further advice relating to making a DBS referral being available here:

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

Reviewed & Updated: September 2019

HTAFC CIO will review this Dealing with Allegations of Abuse made against an Employee or Volunteer Policy and good practice at least annually.

(31) Procedure for Dealing with Allegations made against an Employee or Volunteer

Purpose of procedure: This procedure outlines what should happen if a child protection allegation is made against an adult working for, or involved in HTAFC CIO. The procedure provides clear direction to those HTAFC CIO staff who are called upon to deal with such allegations - and to manage the investigations that may result from them.

The aims of this procedure are:

- To ensure that children who access the services and facilities provided by HTAFC CIO - and any other children who may come to its attention - are protected and supported following an allegation that they may have been abused by an adult from within HTAFC CIO
- To ensure that there is a fair, consistent and robust response to any allegations made, so that the risk posed to other children by an abusive individual is managed effectively
- To facilitate an appropriate level of investigation into allegations - whether they are said to have taken place recently; at any time the person in question has been employed by/volunteered with HTAFC CIO; or prior to the person's involvement with HTAFC CIO
- To ensure that HTAFC CIO continues to fulfil its responsibilities towards members of staff and volunteers who may be subject to such investigations
- To ensure that individuals are able to continue in their role if they have been at the centre of allegations that are unfounded or deemed to be malicious in origin

This procedure applies to:

- Any HTAFC CIO staff member or volunteer to whom an allegation of abuse has been made and which involves another HTAFC CIO staff member or volunteer
- Anyone in a managerial position (including HTAFC CIO's Designated Safeguarding Officer, line managers and supervisors) who may be required to deal with such allegations and manage investigations that result from them

How an allegation of possible abuse may be disclosed: Allegations might be made against an adult working for, or who is involved with HTAFC CIO in the following manner:

- A child or parent/carer making a direct allegation against an HTAFC CIO staff member or volunteer
- A child or parent/carer expressing discomfort with the behaviour of an HTAFC CIO staff member or volunteer that falls short of a specific allegation
- Another HTAFC CIO staff member or volunteer directly observing behaviour that is a cause for concern
- HTAFC CIO being informed by the Police or another statutory authority that an HTAFC CIO staff member or volunteer is the subject of an investigation
- Information emerging from the renewal of a DBS check that suggests that an HTAFC CIO staff member or volunteer may have committed an offence - or may have been involved in an activity - that could compromise the safety of the children they work with at HTAFC CIO
- A HTAFC CIO staff member or volunteer telling someone at HTAFC CIO that they have been the subject of allegations; have actually harmed a child; or committed an offence against (or related to) a child

What to do if an allegation is made, or information is received: There are potentially two issues that need to be dealt with as a matter of urgency:

1. Is a child in immediate danger or do they need emergency medical attention?

- If a child is in immediate danger and is with you, remain with them and call the Police
- If the child is elsewhere, contact the Police and explain the situation to them
- If the child needs emergency medical attention, call an ambulance and, while you are waiting for it to arrive, get help from HTAFC CIO's first aider
- If a first aider is not available, use any first aid knowledge that you may have yourself to help the child. You

must also contact your line manager and HTAFC CIO's Designated Safeguarding Officer to let them know what is happening.

The HTAFC CIO staff member or HTAFC CIO manager should also inform the child's family if the child is in need of emergency medical attention - and arrange to meet them at the hospital or medical centre.

The parents/carers should be informed that an incident has occurred; that the child has been injured; and that immediate steps have been taken to get help.

- 2. Is the HTAFC CIO person at the centre of the allegation working with children now?** If this is the case, the concern needs to be discussed immediately with HTAFC CIO's Community Manager and the Designated Safeguarding Officer. Either the Community Manager or Designated Safeguarding Officer should then, in a sensitive manner, remove the staff member or volunteer involved in the allegation from direct contact with children.

It should then be explained to the person, in private, that there has been a complaint made against them, although the details of the complaint should not be given at this stage. The person should be informed that further information will be provided as soon as possible but that, until consultation has taken place with the relevant agencies and within the organisation, they should not be working with children. It may be best, under the circumstances, for the person to return home on the understanding that the either HTAFC CIO's Community Manager or Designated Safeguarding Officer will telephone them later in the day.

The information provided to them at this stage will need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the Local Authority's Designated Officer, the Local Authority's Children's Social Care Department, the Police, as well as the FA and EFL Trust.

If the person is a member of a Trade Union or other professional organisation, they should be advised to make contact with that Body. Arrangements should also be made for the HTAFC CIO staff member or volunteer to receive ongoing support in line with the responsibilities the organisation has towards their welfare.

Conducting an investigation: Once any urgent necessary steps have been taken, attention can be given to dealing with the full implications of the allegations. **There are up to three possible lines of enquiry when an allegation is made:**

- 1. A Police investigation of a possible criminal offence.**
- 2. Enquiries and an assessment by the Local Authority Children's Social Care Department about whether a child is in need of protection.**
- 3. Investigation by HTAFC CIO and possible disciplinary action being taken against the person in question. This will include implementing a plan to manage any risk posed by the individual to children connected with HTAFC CIO until the outcome of the other investigations and enquiries are known.**

Reporting an allegation or concern: If the allegation is made by a child or family member to an HTAFC CIO staff member or volunteer - or if an HTAFC CIO staff member or volunteer observes concerning behaviour by a colleague at first hand - this should be reported immediately to the staff member/volunteer's line manager and HTAFC CIO's Designated Safeguarding Officer - who will be HTAFC CIO's lead in relation to handling the allegation.

If a staff member has received an allegation or observed something of concern about their own manager, the staff member should report the allegation or concern to the person more senior to their manager.

If the person who is the subject of the concern is the Designated Safeguarding Officer, the matter should be reported to HTAFC CIO Managing Director and SSM Garry Plant.

When to involve the Local Authority's Designated Officer: The Designated Safeguarding Officer must report the allegation to the Local Authority's Designated Officer within 24 hours if the alleged behaviour suggests that the person in question:

- May have behaved in a way that has harmed or may have harmed a child
- Has possibly committed a criminal offence against or related to a child
- Has behaved towards a child in a way that suggests that they may be unsuitable to work with children

This should also happen even if the individual has volunteered the information themselves.

The Local Authority's Designated Officer may be told of the allegation from another source. If this is the case, then the first information received by HTAFC CIO may be when the Local Authority's Designated Officer makes contact with HTAFC CIO's Designated Safeguarding Officer in order to explain the situation.

Whoever initiates the contact, there will be discussion between the Local Authority's Designated Officer and HTAFC CIO's Designated Safeguarding Officer to share information about the nature and circumstances of the allegation, and to consider whether there is any evidence to suggest that it may be false or unfounded.

If there is any reason to suspect that a child has suffered (or be likely to suffer) significant harm and there are no obvious indications that the allegation is false, the Local Authority's Designated Officer, in cooperation with HTAFC CIO, will make an immediate referral to the Local Authority Children's Social Care Department to ask for a strategy discussion.

The Local Authority's Designated Officer and HTAFC CIO's Designated Safeguarding Officer will take part in the strategy discussion. HTAFC CIO's Designated Safeguarding Officer - and any other representative from HTAFC CIO - will co-operate fully with this and any subsequent discussion with the Children's Social Care Department.

HTAFC CIO will ask from the outset that the Children's Social Care Department shares any information obtained during the course of their enquiries with HTAFC CIO's Designated Safeguarding Officer where it has any relevance to the person's employment or volunteering with the organisation.

Dealing with a criminal offence: If there is reason to suspect that a criminal offence may have been committed (whether or not the threshold of 'significant harm' is reached), the Local Authority's Designated Officer will contact the Police and involve them in a similar strategy discussion, which will include HTAFC CIO's Designated Safeguarding Officer.

The Local Authority's Designated Safeguarding Officer - and any other representative from HTAFC CIO - will cooperate fully with any discussion involving the Police and will ask for similar cooperation from the Police in terms of the sharing of information relevant to the person's employment or volunteering with the organisation.

Discussions with the Police will also explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place - or whether disciplinary action must wait until the criminal process is completed.

Talking to parents about the allegation or concern: If the child's parents/carers do not already know about the allegation, HTAFC CIO's Designated Safeguarding Officer and the Local Authority's Designated Officer will discuss how they should be informed and by whom.

Talking to the person who is the subject of the allegation: The person at the centre of the allegation will be informed as soon as possible after the initial consultation with the Local Authority's Designated Officer. However, if a strategy discussion with Children's Social Care or the Police is needed, this might have to take place before the person concerned can be spoken to in full. The Police and Children's Social Care Department may have views on what information can be disclosed to the person.

Only limited information will be given to the person in question, unless the investigating authorities have indicated that they are happy for all information to be disclosed - or unless there is no need for involvement from these statutory agencies.

HTAFC CIO's Designated Safeguarding Officer will keep in close communication with the Local Authority's Designated Officer and the other agencies involved, in order to manage the disclosure of information appropriately.

Taking disciplinary action: If the initial allegation does not involve a possible criminal offence, HTAFC CIO's Designated Safeguarding Officer and the line manager of the person at the centre of the allegation will consider whether formal disciplinary action is needed.

If the Local Authority Children's Social Care Department has undertaken any enquiries to determine whether a child or children are in need of protection, HTAFC CIO's Designated Safeguarding Officer will take account of any relevant information from these enquiries when considering whether disciplinary action should be brought against the person at the centre of the allegations. **The following timings should be kept to wherever possible, depending on the nature of the investigation:**

- If formal disciplinary action is not needed, other appropriate action should be taken within **three working days**
- If disciplinary action is required - and can be progressed without further investigation - this should take place **within 15 days**
- If HTAFC CIO decides that further investigation is needed in order to make a decision about formal disciplinary action, HTAFC CIO's Designated Safeguarding Officer will discuss with the Local Authority's Designated Officer the possibility of this investigation being done by an independent person to ensure that the process is objective. Whether or not the investigation is handled internally or independently, the report should be presented to HTAFC CIO's Designated Safeguarding Officer within **10 working days**
- Having received the report of the disciplinary investigation, HTAFC CIO's Designated Safeguarding Officer should decide **within two working days** whether a disciplinary hearing is needed
- If a disciplinary hearing is needed, it should be held within **15 working days**
- HTAFC CIO's Designated Safeguarding Officer will continue to liaise with the Local Authority's Designated Officer during the course of any investigation or disciplinary proceedings - and will continue to use the Local Authority's Designated Officer as a source of advice and support

If a criminal investigation is required, it may not be possible to make decisions about initiating disciplinary proceedings - or about the person's future work arrangements - until this is concluded. The Police are required to complete their work as soon as reasonably possible and to set review dates, therefore HTAFC CIO's Designated Safeguarding Officer will either liaise with the Police directly or via the Local Authority's Designated Officer to check on the progress of the investigation and criminal process.

The Police are required to inform HTAFC CIO immediately if the person is either convicted of an offence or acquitted or, alternatively, if a decision is made not to charge them with an offence, or to administer a caution. In any eventuality, once the outcome is known, HTAFC CIO's Designated Safeguarding Officer will contact the Local Authority's Designated Officer to discuss the issue of disciplinary proceedings.

If the allegation is substantiated and if, once the case is concluded, HTAFC CIO dismisses the person or ceases to use their services, or the person ceases to provide their services, HTAFC CIO's Designated Safeguarding Officer will consult with the Local Authority's Designated Officer about referral of the incident to the Disclosure and Barring Service (DBS). This should take place within a month.

Managing risk and supporting the person at the centre of the allegation: The first priority of HTAFC CIO must always be the safety and welfare of children. However, as an employee or volunteer of HTAFC CIO, the person who is the subject of the allegation has a right to be treated in a fair, sensitive and non-judgemental manner - and to have their privacy respected - as far as this ensures the safety of the child and other children.

Information about the allegation must only be shared on a need to know basis with those directly responsible for

supervising and managing the staff member or volunteer. Any other information (for example, explanations to other staff members as to why the person is not at work or working to different arrangements) should be agreed and negotiated with the individual concerned.

If the person is a member of a Trade Union or a professional organisation, they should be advised to make contact with that body as soon as possible after being informed that they are the subject of an allegation. Arrangements should also be made for them to receive ongoing support and information about the progress of the investigation.

The possible risk of harm to children presented by the person who is the subject of an allegation needs to be carefully managed both during and after any conclusion to the investigation processes following the allegation. This means that HTAFC CIO may need to consider suspending the person if there is cause to suspect that a child may be at risk of significant harm, or if the allegation is serious enough to warrant investigation by the Police - or if it is so serious that it could lead to dismissal. However, a decision to suspend should not be taken automatically, as there may be other ways of managing any risk presented by the person.

The situation should be discussed fully between HTAFC CIO's Designated Safeguarding Officer, the individual's line manager and the Local Authority's Designated Officer - who will seek the views of the Police and the Children's Social Care Department on the question of possible suspension. The conclusions of the discussion should also be carefully documented. Grounds for suspension should be clearly set out if this is the conclusion. If suspension is not the conclusion, then a clear plan should be made as to how any possible risk posed by the individual is to be managed. This could involve, for example, changes to the person's duties so that they do not have direct contact with children, and/or increased levels of supervision whilst at work.

If it is decided, once the case has been concluded, that a person who has been suspended - or who has taken sick leave due to the stress induced by the allegation - is able to return to work, HTAFC CIO's Designated Safeguarding Officer and the line manager of the person who has been the subject of the allegations should consider how best to support the individual in this process. A plan to facilitate a return will be drawn up in consultation with the individual themselves and should take into account the need to manage any remaining child protection risks; as well as supporting the person concerned, after what will have been and will remain a very difficult experience.

If the decision is that the person cannot return to work and has to be dismissed or chooses to resign, the HTAFC CIO's Designated Safeguarding Officer and the Local Authority's Designated Officer will discuss the need for the matter to be referred to the Disclosure and Barring Service and/or to any professional body to which the person may belong.

HTAFC CIO does not enter into compromise agreements with individuals who resign following the conclusion of investigations into allegations made against them, and will always comply with its statutory obligations to share information about the individual in the interests of protecting children and young people.

If the allegation is found to be without substance or fabricated, HTAFC CIO will consider referring the child in question to the Children's Social Care Department for them to assess whether they are in need of services or whether they may have been abused by someone else. If it is felt that there has been malicious intent behind the allegation, HTAFC CIO will discuss with the Police whether there are grounds to pursue any action against the person responsible.

Keeping a record of the investigation: All those involved in dealing with the allegation should keep clear notes of the allegations made; how they were followed up; any actions and decisions taken; together with the reasons for these.

These notes should be compiled gradually as the situation unfolds, with each entry being made as soon as possible after the event it describes. The notes should be signed and dated by the person making them, and the person's name should be printed alongside.

The notes should be kept confidentially on the file of the person who is the subject of the allegation. Discussion should take place with the Local Authority's Designated Officer to determine whether any aspects of the notes may not be shared with the person concerned. If there are no reasons not to do so, a copy of the records should be given to the individual.

The notes should be held on file for a 10-year period, whether or not the person remains with HTAFC CIO for this period.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Procedure for Dealing with Allegations made against an Employee or Volunteer** and good practice at least annually.

(32) Procedure for Dealing with Allegations Made Against another Child

The different types of abuse that one child can do to another have been detailed in sections 19 through to 24 of this Handbook. HTAFC CIO staff members and volunteers should refer to these sections when reading this procedure.

Purpose of procedure: The purpose of this procedure is to provide a clear direction to staff that are called upon to deal with allegations made against a child, by another child and to manage investigations and care plans which may result from them. **This procedure applies to:**

- Any HTAFC CIO staff member or volunteer to whom an allegation of abuse has been made which suggests that another child is responsible
- Anyone in a managerial position, including HTAFC CIO's Designated Safeguarding Officer, line managers and supervisors who may be required to deal with such allegations and manage investigations and care plans that result from them

The aims of this procedure are:

- To ensure that children who attend HTAFC CIO - and any other children who may come to the attention of HTAFC CIO - are protected and supported following an allegation that they may have been abused by another child involved with HTAFC CIO
- To ensure that there is a fair, consistent and robust response to any allegations of this nature so that the risk posed to other children by the child in question is managed effectively
- To facilitate an appropriate level of investigation into allegations, whether they relate to recent alleged activity, said to have taken place during the time that the child in question has been involved with HTAFC CIO, or whether they relate to abuse which allegedly took place prior to the child's involvement with HTAFC CIO
- To ensure that HTAFC CIO continues to fulfil its responsibilities towards children who may be subject to such investigations and are in need of support
- To ensure that there is an appropriate response in situations where allegations are unfounded or deemed to be malicious in origin

Ways that allegations might be made against another child or young person involved with HTAFC CIO could include the following:

- A child or parent/carer might make a direct allegation against another child
- A child or parent/carer might express discomfort with the behaviour of another child that falls short of a specific allegation
- Another child, HTAFC CIO staff member or volunteer may directly observe behaviour from one child towards another that gives cause for concern
- HTAFC CIO may be informed by a parent, or by the Police, or another statutory authority that a child is the subject of an investigation
- A child may volunteer information to HTAFC CIO that they have harmed another child - or is at risk of doing so - or has committed an offence against or related to a child

Is this a child protection issue or bullying? When faced with a situation of one child behaving inappropriately towards another, a decision needs to be made about whether the problem behaviour constitutes bullying or a child protection concern. This is a decision that needs to be reached by HTAFC CIO's Designated Safeguarding Officer, in consultation with the staff member/volunteer responsible for the child; the staff member/volunteer's line manager; and, if necessary, the Local Authority Children's Social Care Department. If the conclusion is that the behaviour is an example of bullying, and if both children attend HTAFC CIO, it needs to be dealt with under the **Anti- bullying Policy & Procedure** detailed in this Handbook.

If, however, it is behaviour that could be described as child abuse and has led to the victim possibly suffering significant harm, then it must be dealt with under child protection procedures. This should include all incidents of sexual assault

and all but the most minor incidents of physical assault. **The following checklist can be used to help inform the decision:**

Bullying

- The difference of power between the bully and the person being bullied is relatively small
- The bullying behaviour may be from a number of children/young people acting in a group rather than from one child acting alone
- It may also, but not necessarily, be directed towards a group of other children rather than an individual child
- The behaviour involves teasing or making fun of someone, excluding a child from games and conversations, pressurising other children not to be friends with someone, spreading hurtful rumours or circulating inappropriate photographs/images/drawings, cyberbullying, shouting at or verbally abusing someone, stealing someone's possessions, making threats, or harassment on the basis of race, gender, sexuality or disability
- The behaviour has not previously been a concern and the bully or bullies may have been responding to group pressure
- The behaviour is perceived as bullying by the victim

Please note: Physical or sexual assault, or forcing someone to do something embarrassing, harmful or dangerous is also included in the list of bullying behaviours, but are the most likely to constitute a child protection concern if the victim suffers significant harm as a result of the behaviour.

Child protection concerns

- The difference of power between the child who is abusing and the person being abused is significant e.g. there is an age difference of more than two years, there is a significant difference in terms of size or level of ability, the abuser holds a position of power (such as being a helper, volunteer or informal leader) or the victim is significantly more vulnerable than the other child or young person
- The behaviour involves sexual assault or physical assault (other than the most minor physical assault)
- The child who is the victim of the behaviour may have suffered significant harm
- The behaviour may not necessarily be perceived by the victim as abusive, particularly if it is sexual in nature
- The behaviour is not a one-off incident and is part of a pattern of concerning behaviour on the part of the child who is abusing
- The behaviour, if sexual, is not part of normal experimentation that takes place between children

Is this sexual abuse or normal experimentation? All children develop an interest in their own sexuality from a young age and seek to learn about sex from their peers. It is important not to label normal, healthy behaviour as deviant or abusive. It is equally important not to allow sexually abusive behaviour perpetrated by one child towards another to go unchecked - as this is harmful both for the victim and the perpetrator. There are ways of assessing whether sexual behaviour between children is abusive or not. **Indicators of abusive behaviour include:**

- There is a significant difference in age, dominance or understanding between the children
- The behaviour was accompanied by the use of threats or bribes
- The behaviour was carried out in secret

For the purposes of this procedure however, it is enough to say that if there is any question that the behaviour could be abusive, the matter should be discussed - by HTAFC CIO's Designated Safeguarding Officer - with the Local Authority Children's Social Care Department or with the **NSPCC Helpline** which is **0808 800 5000**.

This can initially take place without the names of the children being disclosed, although such information will have to be provided if the view of the Children's Social Care Department or the NSPCC is that the behaviour may constitute significant harm and that an investigation is needed.

What to do if you have child protection concerns

If you believe that the child who has been allegedly abused, or the child who has allegedly perpetrated the abuse, is in immediate danger or requires emergency medical attention you must take the following action:

- If either child is in immediate danger and is with you, remain with them and call the Police if you are unable to remove the danger yourself
- If the child is elsewhere, contact the Police and explain the situation to them
- If a child needs emergency medical attention, call an ambulance and while you are waiting for it to arrive, get help from your first aider
- If the first aider is not available, use any first aid knowledge that you may have yourself to help the child
- You also need to contact your line manager or HTAFC CIO's Designated Safeguarding Officer to let them know what is happening

A decision will need to be made about when and who should inform the families of both the child who has been abused and the child who has allegedly perpetrated the abuse, as well as the Local Authority Children's Social Care Department.

Please note: If the child who is the alleged victim is not known to HTAFC CIO, it is not your role to inform the child's family. Even if the child who is the alleged victim is known, the Police and/or the Health Services, should be part of the decision making process if they have been contacted.

The paramount consideration should always be the welfare of the children involved. **Issues that will need to be taken into account are:**

- The children's wishes and feelings
- The parents' right to know (unless this would place the child who has allegedly perpetrated the abuse in danger, or would interfere with a criminal investigation)
- The impact of telling or not telling the parents
- The current assessment of the risk to the child who has been abused and the source of that risk
- The current assessment of any risk to the child who has allegedly perpetrated the abuse and the source of that risk
- Any risk management plans that currently exist for either child

Once any immediate danger or emergency medical need has been dealt with, the procedure set out below should be followed:

1. The member of staff/volunteer who has been informed of the allegation or who has the concern, should make notes of what they have been told - or their direct concerns - using the reporting form and should discuss these with their line manager **within 24 hours**. HTAFC CIO's Designated Safeguarding Officer should also be involved in the discussion.
2. If both children are known to HTAFC CIO and if their families do not already know about the allegation or concern, the member of staff/volunteer, line manager or HTAFC CIO's Designated Safeguarding Officer should discuss it with them unless:
 - The view is that someone (for example the child who has allegedly perpetrated the abuse) may be put in danger by the family being informed
 - Informing the family might interfere with a criminal investigation

If either of these circumstances applies, discussions with the families should only take place after this has been agreed with the Local Authority Children's Social Care Department.

3. If only the child who is alleged to have harmed another child is known to HTAFC CIO then, subject to the considerations set out above, discussions with only this child's family should take place.
4. The child who is the subject of the allegation should also be informed of what has been said about them. However, if the view is that Children's Social Care Department or the Police should be involved, the child should only be informed after discussion and agreement with these agencies. These agencies may have views about what

information should be disclosed to the child at this stage.

5. If there is still uncertainty about whether the allegation or concern constitutes a child protection issue, HTAFC CIO's Designated Safeguarding Officer should discuss with Children's Social Care Department or with the NSPCC Helpline without disclosing the identity of either child/family.
6. If, having discussed the situation fully and taken advice if necessary, HTAFC CIO's Designated Safeguarding Officer concludes that the alleged behaviour does not constitute a child protection issue, then consideration should be given to whether the **Anti-bullying Policy and Procedure** should be used (if both children are known to the organisation) and whether either or both children should be referred for other services.
7. If the view is that the behaviour does indeed amount to a child protection issue, then HTAFC CIO's Designated Safeguarding Officer should refer both children to the Local Authority Children's Social Care Department and confirm the referral in writing **within 24 hours**.
8. Pending the outcome of the referral to the Children's Social Care Department and the possible investigation or assessment that may follow from this, any risk that may be posed to other children by the child who has allegedly harmed another child will need to be carefully managed. This should be done on an inter-agency basis in accordance with procedures developed by the Local Safeguarding Children Board for children who display harmful behaviour towards others.
9. HTAFC CIO's Designated Safeguarding Officer should enquire of the Children's Social Care Department whether these procedures are being used and, if so, should ask to be involved in or at least kept informed of inter-agency decisions made in accordance with these procedures.
10. If the procedures are not being used but HTAFC CIO remains concerned that the child could pose a risk to other children, then HTAFC CIO's Designated Safeguarding Officer should consider whether the child can continue to be involved with HTAFC CIO and if so, on what basis. This is a situation that needs to be kept under regular review as the investigation and assessment conducted by the statutory agencies is carried out and reaches a conclusion. It may also need to be reviewed regularly following the conclusion of the assessment process, as the child may be receiving support that should, with time, reduce the level of risk they present.
11. If the allegation is found to be without substance or fabricated, HTAFC CIO will consider referring the child who was said to have been harmed to the Children's Social Care Department for them to assess whether they are in need of services (for example, the child may have been abused by someone else).
12. If it is felt that there has been malicious intent behind the allegation, HTAFC CIO will discuss with the Police whether there are grounds to pursue any action against the person responsible.

How to respond to a child who says that they - or another child - is being abused by another child:

- Reassure the child that they have done the right thing by telling someone about it
- Tell them that you now have to do what you can to keep them (or the child who is the subject of the allegation) safe
- Let the child know what you are going to do next and who else needs to know about it
- Let the child tell their whole story - don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying
- If possible, explain to the child's parent/carer what has happened. Do this first without the child there, and then summarise it again in front of the child so that it is an open subject between parent/carer and child. This may enable them to talk about it together more easily.
- Check out what the child would like to happen as a result of what they have said, but don't make or infer promises you can't keep
- Give the child the **ChildLine** phone number - which is **0800 1111**
- Make sure that the parent/carer has support too

How to respond to a child who says that they have abused another child:

- Reassure the child that they have done the right thing by telling someone about it
- Tell them that you now have to do what you can to keep them and the child who has been abused safe
- Let the child know what you are going to do next and who else needs to know about it
- Let the child tell their whole story - don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying
- If there is no risk to the child from the child's parent/carer, then explain to the parent/carer what has happened.

Do this firstly without the child there, and then summarise it again in front of the child so that it is an open subject between parent/carer and child. This may enable them to talk about it together more easily.

- Check out what the child expects to happen as a result of what they have said - offer reassurance where appropriate but don't make or infer promises you can't keep
- Reassure the child that, with help, the problem can be sorted out and that what has happened does not make them an abuser for life
- Give the child the **ChildLine** phone number - which is **0800 1111**
- Remember that the child who has behaved in this way is a child in need of support
- Make sure that the parent/carer has support too

Recording the concerns: Use the **Reporting Concerns about a Child Form** (available from HTAFC CIO's Designated Safeguarding Officer) to record the concern and for clear steps on how you should deal with it. The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory child protection authorities if a referral to them is needed.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Procedure for Dealing with Allegations Made Against another Child** and good practice at least annually.

(33) E-Safety Policy

This policy - and the procedures that it underpins - apply to all HTAFC CIO staff members and volunteers, as well as anyone else that works for and on behalf of HTAFC CIO. The purpose of HTAFC CIO's e-safety policy is to:

- 1.** Protect children and young people who receive HTAFC CIO's services and make use of information technology (such as mobile phones, games consoles and the Internet) as part of their involvement with the organisation
- 2.** To provide HTAFC CIO staff members and volunteers with the overarching principles that guide the organisations approach to e-safety;
- 3.** To ensure that, as an organisation, HTAFC CIO operate in line with its values and within the law in terms of how information technology is used

HTAFC CIO recognises that:

- The welfare of the children who come into contact with HTAFC CIO's services is paramount and should govern the approach to the use and management of electronic communications technologies
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse
- Working in partnership with children, their parents, carers & other agencies is essential in promoting children's welfare & in helping children to be responsible in their approach to e-safety
- The use of information technology is an essential part of everyone's lives; it is involved in how HTAFC CIO as an organisation gather and store information; as well as how we all communicate with each other. It is also an intrinsic part of the experience of the children who use HTAFC CIO's services - and is greatly beneficial to all. However, it can present challenges in terms of it is used responsibly and - if misused either by an adult, young person or a child - can be actually or potentially harmful to them.

HTAFC CIO will seek to promote e-safety by:

- a.** Developing a range of procedures that provide clear and specific directions to HTAFC CIO staff members and volunteers on the appropriate use of ICT
- b.** Supporting and encouraging the children using HTAFC CIO's services to use the opportunities offered by mobile phone technology and the internet in a way that keeps themselves safe and shows respect for others
- c.** Supporting and encouraging parents and carers to do what they can to keep their children safe online and when using their mobile phones and game consoles
- d.** Incorporating statements about safe and appropriate ICT use into the codes of conduct, both for HTAFC CIO staff members and volunteers, as well as for children
- e.** Developing an e-safety agreement for use with children and their parents/carers
- f.** Use HTAFC CIO's procedures to deal firmly, fairly and decisively with any examples of inappropriate ICT use, complaints or allegations, whether by an adult or a child (these may include breaches of filtering, illegal use, cyberbullying, or use of ICT to groom a child or to perpetrate abuse)
- g.** Informing parents and carers of incidents of concern as appropriate
- h.** Reviewing and updating the security of HTAFC CIO's information systems regularly
- i.** Providing adequate physical security for ICT equipment
- j.** Ensuring that user names, logins and passwords are used effectively
- k.** Using only official email accounts provided via the organisation, and monitoring these as necessary
- l.** Ensuring that the personal information of HTAFC CIO staff members, volunteers and service users (including service users' names) are not published on HTAFC CIO's website
- m.** Ensuring that images of children and families are used only after written permission has been obtained - and then only for the purpose for which consent has been given
- n.** Any social media tools used in the course of HTAFC CIO's work with children and families will be risk assessed in advance by the member of HTAFC CIO staff or volunteer wishing to use them
- o.** Providing effective management for HTAFC CIO staff and volunteers on ICT issues, through supervision, support and training
- p.** Examining & risk assessing any emerging new technologies before they are used within the organisation

HTAFC CIO will review this E-Safety Policy and good practice at least annually.

(34) Prevent Duty Policy

Background: The Prevent Duty requires specified authorities to have due regard to the need to prevent people from being drawn into terrorism. The Prevent Duty is part of the Counter-Terrorism & Security Act 2015 and commenced with effect on 1st July 2015. **The Prevent Strategy is seeking to:**

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat that is faced from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

Under the Prevent Duty, all schools and childcare providers are considered specified authorities and therefore must have due regard to the need to prevent people being drawn into terrorism.

N.B : Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The definition of extremism for the purposes of HTAFC CIO's interpretation of its responsibilities under the Prevent Duty also includes calls for the death of members of our armed forces, whether in this country or overseas.

Policy statement: HTAFC CIO is committed to the protection and safeguarding of all children that utilise the services it offers. As such, HTAFC CIO will have due regard to the Prevent Duty and will take the steps outlined in this **Prevent Duty Policy** as part of its commitment to child protection and safeguarding. Therefore, this policy demonstrates HTAFC CIO's intention to:

- Make every effort to identify children that may be vulnerable to radicalisation and take the appropriate actions to protect them.
- Promote fundamental British Values (where our interactions permit) to help build a child's resilience to radicalisation and enable them to challenge extremist views.

HTAFC CIO's approach to its responsibilities will focus on four key themes as follows:

1. Risk assessment; 2. Working in partnership; 3. Staff training & 4. IT policies Each of the

above core four themes are explained in greater detail below:

- 1. Risk Assessment:** As part of its risk assessment processes, HTAFC CIO will undertake a risk assessment of the children that attend and utilise its services to identify any risk of individuals being drawn into terrorism - including support for extremist ideas that are part of terrorist ideology.

Whilst HTAFC CIO realises that there is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology, as with managing our other safeguarding risks and responsibilities, HTAFC CIO's staff members and volunteers will be alert to changes in a child's behaviour which could indicate that they may be in need of help or protection. HTAFC CIO accepts that children at risk of radicalisation may display different signs or seek to hide their views. HTAFC CIO's staff members and volunteers will use their professional judgement in identifying children who might be at risk of radicalisation and bring any concerns they have to HTAFC CIO's Designated Safeguarding Officer -who will ensure that any action taken is proportionate.

HTAFC CIO accepts that even very young children may be vulnerable to radicalisation by others - whether in the family or outside - and consequently display concerning behaviour. The Prevent Duty does not require HTAFC CIO's staff members or volunteers to carry out unnecessary intrusion into family life, but as with any other safeguarding risk, HTAFC CIO must take action if there is any behaviour that raises concerns. **Possible signs of radicalisation include:**

- a) The individual's views become increasingly extreme regarding another section of society or government policy
- b) The individual becomes increasingly intolerant of more moderate views
- c) The individual expresses a desire/intent to take part in or support extremist activity
- d) They are observed downloading, viewing or sharing extremist propaganda from the web
- e) They become withdrawn and focused on one ideology
- f) The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.

HTAFC CIO staff members and volunteers should refer to HTAFC CIO's **Child Protection & Safeguarding Policies and Procedures** relating to the **Procedure for Responding to Signs or Suspicions of Abuse** if they have any concerns relating to children at risk of radicalisation. Where it is felt that there is a concern with regard to radicalisation, then HTAFC CIO's Designated Safeguarding Officer will make the referral to the **Channel Programme**.

What is the Channel Programme: The Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. **Further information relating to the Channel Programme is available at the end of this policy.**

2. **Working in partnership:** HTAFC CIO will continue to work with and build upon its existing local partnership arrangements with the Local Safeguarding Children Boards (LSCBs) - who are responsible for co-ordinating what is done by local agencies for the purposes of safeguarding and promoting the welfare of children. HTAFC CIO already takes in to account the relevant policies and procedures of the LSCB - which includes following the threshold guidance indicating when a child might be referred for support.

Where HTAFC CIO's local authority provides Home Office funded dedicated Prevent co-ordinators, the organisation will work in partnership with them. In addition, HTAFC CIO will work with local Police and any other civil society organisations that may be able to provide advice and support to the organisation with regard to implementing the duty.

Finally, HTAFC CIO will continue to work closely with parents, carers and families who are in a key position to spot signs of radicalisation. Where concerns are raised, HTAFC CIO will assist and advise families and point them to the right support mechanisms.

3. **Staff training:** Where HTAFC CIO's risk assessment identifies that there is a **high risk** of children who use its services being at risk of radicalisation, it will ensure that the appropriate employees participate in the Home Office's **Workshop to Raise Awareness of Prevent (WRAP)**. As a minimum, HTAFC CIO's Designated Safeguarding Officer will undertake the **WRAP** training to ensure that they are able to provide advice and support to other members of HTAFC CIO's staff and volunteers on protecting children from the risk of radicalisation.

However, as part of HTAFC CIO's commitment to raise awareness generally about the Prevent Duty and the associated responsibilities, all employees and volunteers will be required to complete the **Channel General Awareness Training** on-line module and print out their **Certificate of Completion**. The **Channel General Awareness Training Module** can be found here:

http://course.ncalt.com/Channel_General_Awareness/01/index.html

The **Channel General Awareness Training Module** is a free resource and takes just 25 minutes to complete. This on-line module provides an introduction to how to identify factors that can make people vulnerable to

radicalisation, as well as case studies illustrating the types of intervention that may be appropriate, in addition to Channel.

- 4. IT policies:** HTAFC CIO acknowledges its duty to ensure that children are safe from terrorist and extremist material when using the internet whilst accessing the organisations services. To this end, HTAFC CIO has in place suitable internet filtering which it will ensure is regularly updated. HTAFC CIO will require every child who accesses the internet via its computers (and other IT equipment that can access the internet) to sign its **E-Safety Agreement** which is available form HTAFC CIO Designated Safeguarding Officer.

All of HTAFC CIO's staff members and volunteers will need to be aware of the risks posed by the online activity of extremist and terrorist groups and further guidance and advice will be provided by HTAFC CIO's Designated Safeguarding Officer.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Prevent Duty Policy** and good practice at least annually.

(35) Building Resilience Against the Radicalisation of Children & Young People Policy

HTAFC CIO acknowledges its responsibilities in helping to build the resilience - of the children who use its services - to radicalisation. This will be achieved through providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. HTAFC CIO will use its notice boards and appropriate delivery opportunities to promote fundamental British values. **The British values as far as the Prevent Duty is concerned are:**

- **Democracy:** Respect for democracy and support for participation in the democratic process
- **The rule of law:** Respect for the basis on which the law is made and applies in England
- **Individual liberty:** Support and respect for the liberties of all within the law
- **Mutual respect and tolerance of different faiths and beliefs:** Support for equality of opportunity for all and respect and tolerance of different faiths and religious and other beliefs

These fundamental British values will be integrated into the work of HTAFC CIO with the children it works with as appropriate. This will include - but is not be limited to - personal, social and health education to explore sensitive or controversial issues and equipping them with the knowledge and skills to understand and manage difficult situations. HTAFC CIO will help children to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. This approach can help them develop effective ways of resisting pressures, including knowing when, where and how to get help. HTAFC CIO will help the children it works with to develop positive character traits such as resilience, determination, self-esteem, and confidence.

In addition - and always where appropriate to the specific interaction - HTAFC CIO will seek to incorporate opportunities to provide the knowledge, skills and understanding to prepare children to play a full and active part in society. Specifically, this will be to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. Ultimately, the way that HTAFC CIO approaches its work with children will always underpin the principles of democracy and give them opportunities to understand how laws are made and upheld.

As a consequence of the diverse backgrounds that the children that access our services come from, HTAFC CIO has an excellent opportunity to reinforce the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect and understanding.

What to do if an HTAFC CIO staff member or volunteer has a concern: As detailed in the **Prevent Duty Policy**, if an HTAFC CIO staff member or volunteer has a concern that a particular child is at risk of radicalisation, then in the first instance they should refer to HTAFC CIO's **Child Protection & Safeguarding Policies and Procedures**. In particular, this means following the **Procedure for Responding to Signs or Suspicions of Abuse**. However, in all cases, please discuss your concerns with HTAFC CIO's Designated Safeguarding Officer.

Reviewed & Updated: September 2019

HTAFC CIO will review this Building Resilience Against the Radicalisation of Children & Young People Policy and good practice at least annually.

(36) Guidance on Prevent and the Channel Programme

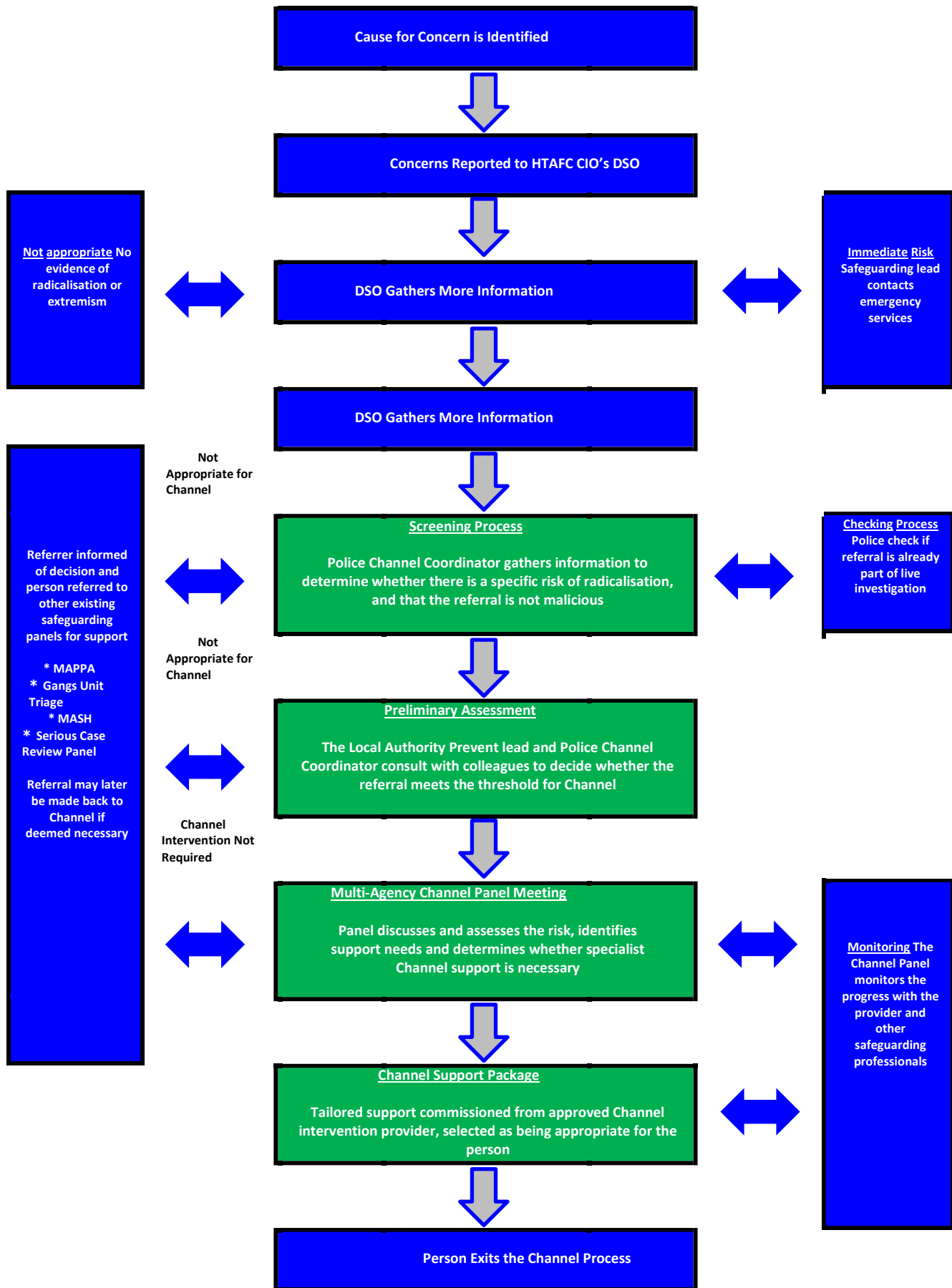
- **What is Prevent?** Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism, in all its forms. Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours.
- **What is Channel?** Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.
- **Who does Channel work with?** Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.
- **How does Channel work?** Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.
- **What does Channel support look like?** Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.
- **How will the person be involved in this process?** A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.
- **Who can make a referral?** Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, Police and social services.
- **What happens with the referral?** Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.
- **Raising a concern:** If you believe that someone is vulnerable to being exploited or radicalised, please follow HTAFC CIO's **Child Protection & Safeguarding Policies and Procedures** and raise your concerns in confidence to HTAFC CIO's Designated Safeguarding Officer, who will be responsible for raising concerns to Channel if appropriate.

Please refer to the flowchart on the next page which identifies the Channel process for HTAFC CIO...

Reviewed & Updated: September 2019

HTAFC CIO will review this Guidance on Prevent and the Channel Programme at least annually.

(37) The Channel Process within HTAFC CIO



(38) Ongoing Safeguarding Training, Professional Development & Support Policy

Policy statement: The only way that HTAFC CIO can be certain that its strategy for implementing safeguarding is effective, is through the induction; the training (and regular refresher training); as well as the on-going professional development of all its staff and volunteers. It is for this reason that HTAFC CIO have developed a **Training Policy** which identifies the distinct steps that the organisation will take to ensure the competence of its key safeguarding personnel; as well as all its remaining staff and volunteers.

Induction training: Upon appointment, all staff and volunteers will undertake a structured induction programme during their probationary period. While induction training will cover many elements related to a new recruit becoming familiar with the organisation and the role they have been recruited for, every new staff member and volunteer will receive specific induction training relating to safeguarding and promoting the welfare of children.

Further details relating to induction training can be found in the **Safer Induction Policy** detailed in this Handbook.

Training & refresher training: Following induction, it is the policy of HTAFC CIO that all staff and volunteers will undertake further training (and refresher training) as necessary to provide them with relevant skills and knowledge to safeguard effectively. To ensure this policy is effective, HTAFC CIO will budget the necessary resources (including time and travel opportunities) for both training and training events. While this will naturally include the training necessary for effective role performance, it will also include - as a matter of course - further safeguarding training linked to maintaining the best standards of child protection; and as appropriate to their role and level of contact with children.

This will include such subject areas as:

- Understanding the legislation and any specific regulations regarding safeguarding
- Updates (and refresher training) on recognising indicators and signs of abuse
- HTAFC CIO's procedures for responding to, reporting, recording and referral of concerns, allegations or disclosures of abuse
- The relevant process for reporting and managing allegations against staff and volunteers
- Ongoing anti-bullying support, training and guidance to support staff and volunteer to be effective at preventing and responding to all forms of bullying, including racist homophobic and sexual bullying

In addition, HTAFC CIO line managers are required to ensure that all staff and volunteers receive safeguarding and child protection updates at regular staff meetings between any formal training and refresher training received throughout the year. Where appropriate, HTAFC CIO will put staff and volunteers onto the annual "FA Safeguarding Children Workshop" to help meet the requirements of training and refresher training.

On-going professional development: While all staff and volunteers are encouraged generally to undertake Continual Professional Development (CPD) to maintain and keep up to date their skills, certain HTAFC CIO staff members are obligated to undertake CPD as part of their role responsibilities for the organisation. Listed below are the minimum CPD requirements for the following HTAFC CIO safeguarding staff members:

- **Safeguarding Manager (SSM):** This post-holder must attend mandatory Safeguarding SSM Training every two years.
- **Designated Safeguarding Officers (DSOs):** This post-holder must attend mandatory Safeguarding DSO training annually.

How HTAFC CIO will support employees and volunteers: HTAFC CIO recognises that employees and volunteers working for the organisation and who have become involved in supporting/working with a child who has suffered harm - or appears to be likely to suffer harm - may find the situation stressful and upsetting. It is HTAFC CIO's paramount concern that all employees and volunteers receive all necessary support in these circumstances.

HTAFC CIO will support all employees and volunteers who find themselves in this situation, by providing an opportunity to talk through any anxieties, concerns and worries with HTAFC CIO's Designated Safeguarding Officer. In all cases - and where required or considered appropriate - HTAFC CIO and the Designated Safeguarding Officer will seek-out further support. This could be provided by, for example, Occupational Health and/or a teacher/trade union representative as appropriate.

HTAFC CIO will ensure that the Designated Safeguarding Officer has access to support and appropriate workshops, courses or meetings as organised by the Local Authority and/or the FA to enable them to manage such situations.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Ongoing Safeguarding Training, Professional Development & Support Policy** and good practice at least annually.

Part 3: Anti-Bullying Policies & Procedures

(39) Anti-Bullying Policy

Definition of bullying: Bullying is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

Purpose of policy: The purpose of HTAFC CIO's anti-bullying policy is to prevent bullying from happening within the organisation, as much as possible. When bullying does happen, HTAFC CIO will make sure it is stopped as soon as possible and that those involved receive the support they need. In addition, HTAFC CIO will provide information to all staff, volunteers, children and their families about what needs to be done to prevent and deal with bullying. Bullying causes real distress. It can affect a person's health and development and, at the extreme, can cause significant harm. People are often targeted by bullies because they appear different from others. HTAFC CIO acknowledges that everyone has a role to play in preventing bullying and putting a stop to bullying.

HTAFC CIO will seek to prevent bullying by:

1. Developing a code of behaviour that sets out the "dos" and "don'ts" in terms of how everyone involved in HTAFC CIO is expected to behave, both in face-to-face contact and online. This Code of Conduct can be found in this Handbook
2. Developing a new members' welcome policy that will help HTAFC CIO to attract members from diverse groups
3. Developing a plan that describes how we welcome new members and help them to settle in
4. Holding regular discussions with HTAFC CIO's staff members, volunteers, children and families who use HTAFC CIO, to ensure that they understand HTAFC CIO's Anti-Bullying Policy. **These discussions will focus on:**
 - a. Group members' responsibilities to look after one another and uphold the behaviour code
 - b. Practising skills such as listening to each other
 - c. Respecting the fact that we are all different
 - d. Making sure that no one is without friends
 - e. Dealing with problems in a positive way
 - f. Checking that the anti-bullying measures are working well
5. Developing a Complaints Policy and Procedure. This policy can be found in HTAFC CIO's **Complaints Policy and Complaints Procedure** in this Handbook
6. Making sure that HTAFC CIO staff, volunteers, children, as well as parents and carers have clear information about our anti-bullying policy, complaints procedure, code of behaviour and anti-bullying procedure

When bullying occurs HTAFC CIO will respond to it by:

1. Having a clear anti-bullying procedure in place
2. Providing support and training for all HTAFC CIO staff and volunteers on dealing with all forms of bullying, including racial, sexist, homophobic and sexual bullying
3. Addressing the issue from the point of view of the person being bullied, the bully, any bystanders and HTAFC CIO as a whole
4. Reviewing the plan developed to address the bullying, in order to ensure that the problem has been resolved
5. Avoiding any punishments that make the individuals concerned seem small, or look or feel foolish in front of others

Reviewed & Updated: September

2019 HTAFC CIO will review this Anti-Bullying Policy and good practice at least annually

(40) Anti-Bullying Procedure

Definition of bullying: Bullying is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone.

Purpose & aim of procedure: This procedure is supported by the HTAFC CIO anti-bullying policy. Its aim is to:

- Provide detailed guidance to HTAFC CIO staff members and volunteers, as well as to children who may experience bullying, so that they will know what to do if an incident of bullying occurs between children.
- To ensure that HTAFC CIO responds fairly and consistently to incidents of bullying, recognising that those who bully often have needs too.

This procedure applies to all children who attend HTAFC CIO and who may be bullied; behave in a bullying way towards others; or observe someone being bullied. It also applies to all HTAFC CIO staff members and volunteers who observe bullying between children within HTAFC CIO and who may have incidents of bullying reported to them - or who may be concerned that a child at HTAFC CIO is showing signs of being bullied.

If an adult is bullying a child, this should be reported under the child protection procedures.

If a child is bullying another child to the extent that it may cause significant harm, then it will also need to be dealt with under child protection procedures.

This procedure does not cover incidents of bullying among HTAFC CIO staff members and volunteers. In these circumstances, HTAFC CIO staff members should use the Grievance Procedure found in the Employee Handbook and HTAFC CIO volunteers should use the Complaints Procedure for Volunteers found in the Volunteers Handbook.

Forms bullying might take: HTAFC CIO recognises that bullying can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night. **Bullying includes the following:**

- **Verbal abuse** - such as name calling and gossiping
- **Non-verbal abuse** - such as hand signs or text messages
- **Emotional abuse** - such as threatening, intimidating or humiliating someone
- **Exclusion** - such as ignoring or isolating someone
- **Undermining** - by constant criticism or spreading rumours
- **Controlling or manipulating** someone
- **Physical assaults** - such as hitting and pushing
- **Making silent, hoax or abusive calls**
- **Online or cyberbullying** - further details are provided below

Defining online or cyberbullying: Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos. Children may know who's bullying them online - as it may just be an extension of offline peer bullying they are already experiencing - or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of an individual engaging in bullying behaviour. Because cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - it can feel like there is no escape. **Cyberbullying includes the following:**

- Sending threatening or abusive text messages
- Creating and sharing embarrassing images or videos
- Trolling – which is the sending of menacing or upsetting messages on social networks, chat rooms or online games
- Excluding children from online games, activities or friendship groups
- Setting up hate sites or groups about a particular child
- Encouraging young people to self-harm

- Voting for or against someone in an abusive poll
- Creating fake accounts, hijacking or stealing online identities - with the aim to embarrass a young person or cause trouble using their name
- Sending explicit messages - also known as sexting
- Pressuring children into sending sexual images or engaging in sexual conversations

Bullying (in whatever forms) can also be motivated by a discrimination towards the person being bullied.

Further details of these types of bullying are provided below:

- **Racial bullying** - identified by the motivation of the bully, the language used, and/or by the fact that victims are singled out because of the colour of their skin, the way they talk, their ethnic grouping or by their religious or cultural practices
- **Special educational needs (SEN) & disability bullying** - this is where children are singled out because of a disability and which deaf children can be bullied more than other children with SEN's or disabilities
- **Sexual bullying** - behaviour, which whether physical or non-physical, is based on a person's sexuality or gender; and is when sexuality or gender is used as a weapon by boys or girls towards other boys or girls. Sexual bullying is more prevalent towards girls than boys
- **Homophobic/Bi-phobic bullying** - irrational dislike, hatred or fear of individuals that are, or are perceived to be lesbian, gay or bisexual
- **Transphobic bullying** - transphobic is an umbrella term to describe people whose gender is not the same as - or does not sit comfortably with - the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, cross dresser, non- binary, gender queer

Changes in behaviour which can indicate a child is being bullied or cyberbullied: It can be hard for adults, including parents, to know whether or not a child is being bullied. A child might not tell anyone because they're scared the bullying will get worse. They might think that they deserve to be bullied, or that it's their fault. **However, the following should be looked out for by HTAFC CIO staff members and volunteers:**

- Belongings getting "lost" or damaged
- Physical injuries - such as unexplained bruises
- Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- Not doing as well at school
- Asking for, or stealing, money - to give to a bully
- Being nervous, losing confidence, or becoming distressed and withdrawn
- Problems with eating or sleeping
- Bullying others

Some of the above behaviour signs might also indicate abuse at the hands of adults or other negative experiences, so they should be treated with caution.

What to do if you are being bullied: If you are being bullied you should never keep it to yourself. Tell someone you trust. This could be a staff member or volunteer at HTAFC CIO, a teacher, or someone else. It could also be your parent or carer. You may prefer to tell another child first and ask that person to help you tell an adult. If the bullying is happening at HTAFC CIO - we will sort it out here. If it's happening somewhere else - maybe at school or near your home - HTAFC CIO will get other people involved to stop it happening there.

Procedure to follow if an HTAFC CIO staff member or volunteer observes a child being bullied - or if someone discloses that they are being bullied:

- **If you are a child** and someone tells you that they are being bullied, don't try to deal with it yourself. Talk to the person about getting help from an adult. Try to persuade them to go with you to explain the situation to an HTAFC CIO staff member or volunteer or perhaps a teacher. If they won't do this, the best way to help is to explain that you will have to tell an adult yourself - and then go ahead and tell someone.

- **If you are an adult** and a child tells you that they are being bullied, take the child seriously. Do not tell them to stop being silly or to keep out of the way of the bullies. This will not help and will make the child feel let down and less inclined to tell anyone else. Listen to the child's full account of what is going on and complete the bullying reporting form with the child as soon as possible.

If you observe the bullying directly, act assertively to put a stop to it. Explain to all concerned that the incident will have to be reported properly to stop it happening again. Report the incident to the child's main HTAFC CIO contact or, if you are that person, talk to the child about the bullying and discuss it with your line manager or HTAFC CIO's Designated Safeguarding Officer.

Unless the incident is minor and can be dealt with informally, the child's parent or carer should be informed by the child's main HTAFC CIO contact within one working day.

If possible, there should be a three-way meeting between the child, the HTAFC CIO staff member and the parent.

If the bullying is taking place in another environment e.g. school, the HTAFC CIO staff member should ask what support the parent and child would like, in order to engage with whoever the responsible agencies might be. The HTAFC CIO staff member should aim to work in partnership with both parent and child and any other people who may be involved.

If the bullying is taking place within HTAFC CIO, the parent and child should be reassured that it will be dealt with as a priority and they should be asked for their views on what would be helpful to deal with the situation.

The HTAFC CIO staff member, having spoken to the child who has been bullied and the child's parent/carers, should also speak to the bully (or bullies) and obtain their account of what has happened or is happening. This should be noted in writing and the parents/carers of the bully (or bullies) should be informed. The bully and his or her parents/carers should be asked for their views on what should be done to put a stop to any further bullying and to repair the damage that has been done.

Apart from very minor incidents that have been directly observed by a staff member and dealt with at the time, all bullying that takes place at HTAFC CIO should be discussed within the staff group within five working days.

At the meeting, the bullying incident should be discussed and the details of a draft plan drawn up to address the situation, taking into account any suggestions made by the children involved and their parents/carers. **The following areas should be covered:**

- a. Details of any apology that has been or should be offered by the bully (or bullies)
- b. Details of any support for the person who has been bullied e.g. use of buddy scheme, extra input from the key worker and/or referral to another service
- c. Details of any consequences for the bully, in addition to making an apology, with reference to the behaviour code
- d. Details of any support for the bully, with reference to the behaviour code
- e. Details of any further discussions or work to be done with others in the group, including children who may have observed or encouraged the bullying
- f. Details of any changes in how the staff group may handle issues of bullying in future

The plan should be shared with the children concerned and their parents - and should be reviewed regularly.

Keeping a record of the bullying: Use the Bullying Report Form (available from HTAFC CIO's Designated Safeguarding Officer) to make clear notes of any discussions or meetings that take place following the bullying incident. The plan for dealing with the aftermath of the incident should be copied to the child who has been bullied and their parent/carers and to the bullies and their parents/carers. It should also be placed on the file of all the children directly involved.

Reviewed & Updated: September

2019 HTAFC CIO will review this Anti-Bullying Procedure and good practice at least annually.

(41) Complaints Policy

HTAFC CIO recognises that everyone who comes uses the services of the organisation has the right to a high standard of service, as well as a right to complain if they are not happy with the standard of service they receive. Learning from complaints helps HTAFC CIO improve the services that it provides. Therefore, the purpose of this policy and the subsequent procedure is to:

- a.** Help HTAFC CIO to provide a service of the highest standard to everyone concerned with the organisation
- b.** Help HTAFC CIO to ensure that children and families using - or wishing to use - the organisations services know that they have a right to complain about them if they need to
- c.** Help HTAFC CIO to deal with complaints in a positive way and to use them to improve the quality of services offered and provided
- d.** Set out the issues that could be covered under this procedure
- e.** Set out the steps that children, young people and their families should take if they wish to make a complaint
- f.** Set out how HTAFC CIO will deal with complaints in a fair and consistent way

This policy and procedure applies to all children and families attending, or wishing to make use of the services provided by HTAFC CIO.

The complaints procedure is not intended to be used by HTAFC CIO staff members or volunteers who are unhappy about their own experience in the workplace. In these circumstances, HTAFC CIO staff members should use the Grievance Procedure found in the Employee Handbook and HTAFC CIO volunteers should use the Complaints Procedure for Volunteers found in the Volunteers Handbook.

It is also not intended to cover concerns that staff or volunteers may have about issues of possible malpractice or wrongdoing in the workplace. These should be dealt with under the **Whistle Blowing Policy** found in this Handbook.

If anyone, whether staff member, volunteer, child or family member, is concerned that a child or children may be at risk of harm, they should use HTAFC CIO's Child Protection Policies & Procedures as outlined in this Handbook - rather than this complaints policy and procedure.

HTAFC CIO will seek to deal with complaints by:

- Defining clearly what is meant by a complaint
- Setting out a procedure that can be easily followed and understood
- Making sure that everyone knows about the policy and procedure
- Producing child and family friendly material explaining this policy and procedure
- Reassuring people that they will not be penalised in any way for using HTAFC CIO's complaints procedure and that the organisation will always respond positively to any complaints made in good faith
- Offering extra support to those who need help to make a complaint
- Taking a staged approach to complaints that takes account of the level of seriousness and the possibility of resolution at different points
- Investigating each complaint as objectively and fully as it reasonably can
- Keeping the complainant informed during the course of the investigation and of the outcome of their complaint
- Keeping clear records of complaints and of how they are resolved

Reviewed & Updated: September 2019

HTAFC CIO will review this Complaints Policy and good practice at least annually.

(42) Complaints Procedure

Definition of a complaint: A complaint is a statement from someone that they are not happy about the service provided to them by HTAFC CIO and that they would like this to be improved. **The complaint might be about:**

- a. The behaviour of an HTAFC CIO staff member or volunteer. If this relates to allegations that someone may have harmed a child - or be at risk of doing so - HTAFC CIO's Child Protection Procedures should be used instead
- b. The behaviour of other children in the group - although please note the comment about child protection procedures above
- c. The level of service received
- d. The type of service received
- e. Being refused a service altogether
- f. The building or facilities
- g. Written information
- h. Service received over the telephone e.g. not being able to get through or being kept waiting
- i. A child or family member feeling that they have been treated unfairly, or in a way that is discriminatory
- j. A specific activity or outing
- k. Anything else related to the service provided at HTAFC CIO

Procedure for making a complaint:

1. If possible, the person should discuss the complaint with their key worker. If this is not possible - for example the complainant does not feel comfortable speaking to the key worker because the relationship is too difficult - the discussion should be with the key worker's line manager.
2. The key worker or manager will, in the first instance, try to resolve the matter informally. This is often possible and can mean that the problem is sorted out simply and more quickly.
3. If an informal solution has been tried before and has not worked, or if the complainant does not feel that informal discussions are adequate or likely to be effective, stage one of the complaints procedure should be followed.

Stage One of Formal Complaints Procedure

4. The complainant should put their concerns in writing to their key worker or, if the key worker is the subject of the complaint, to the key worker's line manager. If they need help to do this, and a family member is not able to offer this support, help should be provided by the key worker, or, if the key worker is the subject of the complaint, by another member of staff identified by the line manager.
5. The key worker should give the written complaint to their line manager **within 24 hours**. The manager should then acknowledge the complaint **within two working days** by sending a brief letter to:
 - Thank the complainant for getting in touch & express regret that a complaint has been necessary
 - Assure them that the matter will be investigated
 - Set a provisional timescale for the investigation that is achievable, but avoids delay as much as possible
 - Explain when the manager will next be in contact
 - Offer a contact name - usually the key worker or the line manager's own name - in case the complainant has any questions in the meantime
 - Make any temporary arrangements that may be necessary pending the outcome of the investigation into the complaint
6. Normally the service to the complainant should continue as normal during the investigation into the complaint. If this is not possible - e.g. because a child has had to be excluded from an activity, or because the complainant does not want to use the service at that point, or because it would not be appropriate for the key worker to continue working with the child/family - then this should be acknowledged and temporary alternative arrangements made, if possible.
7. If the complaint is about a specific staff member, volunteer or other child/young person, then that person (and the parent/carer if the person is a child) should be informed **within two working days** - or as soon as possible - that a complaint has been made against them and the nature of the complaint. However, the person should not be informed if doing so would compromise anyone's safety or a Police investigation.
8. The manager should normally be responsible for investigating a stage one complaint. The manager should plan

the investigation according to the nature of the complaint, taking into account any witnesses or specialist opinion that should be sought. As a minimum, the complainant (and parent/carer if the complainant is a child) should be interviewed. Any person who might be the subject of the complaint should also be interviewed, provided that doing so would not compromise anyone's safety or a Police investigation.

9. If the complaint is about a building, facilities or equipment, then this should be examined.
10. If the complaint is about access to a service, the reasoning behind a decision to offer or not offer a particular service should be examined.
11. If, at any point during the investigation, it appears that a criminal offence may have been committed, the matter should be reported to the Police. Discussions should be held with the Police about whether the investigation into the complaint can continue alongside their own enquiries.
12. If it emerges at any point that a child may have been caused significant harm or may be at risk of significant harm, child protection procedures should be **instigated immediately**.
13. The investigating manager should make notes of the investigation, including notes of any meetings that take place, and should write a report based on their findings. The report should state clearly whether the complaint is upheld or not, and should make recommendations about how the matter can be taken forward. The report should be shared with both the complainant and any specific member of staff, volunteer or other child, who may be involved. Any comments that either party may wish to make about the extent to which they accept or reject the findings of the report should be noted.
14. Once a way forward has been agreed, this should be reviewed regularly.
15. If either the complainant - or a person who is the subject of the complaint - is not prepared to accept the findings of the report, they should confirm this in writing. The matter then becomes a stage two complaint.
16. A complaint also progresses to stage two if it has previously been handled within the last 12 months as a stage one complaint, but has resurfaced.

Stage Two of Formal Complaints Procedure

17. A stage two complaint may come about for one of two reasons. It may be a complaint that has escalated from stage one because the complainant or a person who was the subject of the complaint wishes to challenge the findings from a stage one investigation. Alternatively, it may relate to matters that were investigated as a stage one complaint within the previous 12 months and have resurfaced.
18. Stage two complaints should be investigated either by a manager senior to the person who was investigating at stage one. Alternatively, it can be investigated by a completely independent person who is not an employee or acting as a volunteer for HTAFC CIO and who should be nominated by the Community Manager of HTAFC CIO. The investigation should be commissioned by the Community Manager and the findings reported back to them.
19. If a complaint is to progress to stage two, the complainant - this could be the original complainant or a person who was the subject of the original complaint - should again indicate in writing that they wish to complain (or complain further) and should state the reason for this.
20. The written statement should be presented to the Community Manager, who should then, **within two working days**, respond in writing to the complainant in the same way as indicated in the stage one procedures. In addition, the Community Manager should provide the complainant with the name of the person who will investigate the stage two complaint.
21. The procedure for the investigation and sharing of the report should be similar to that outlined in the stage one procedure.
22. Stage two is the final stage of the complaints procedure. If any party wishes to complain further following the completion of stage two, this should be taken up with an external party e.g. local councillor, MP or a commissioning body.

Keeping a record of the complaint: Regardless of whether a complaint is dealt with formally or informally, accurate notes should be made by the key worker or investigating manager of each stage of the process, including records of meetings. Copies of the final report should be given to the person making the complaint and to anyone who may be the subject of the complaint.

If the complaint leads to any disciplinary action or a referral to a statutory authority, copies of the notes made during the investigation and the report of the investigation (together with any notes relating to the outcome) should be kept confidentially on the file of any person who is the subject of the complaint.

Anonymous summary notes of any complaint should also be kept on the complaints file with a reference number. This will assist HTAFC CIO in the process of monitoring and learning from complaints.

Reviewed & Updated: September 2019

HTAFC CIO will review this Complaints Procedure and good practice at least annually.

Part 4: Safer Activities Policies & Procedures

(43) Principles of Avoiding Accidents & Running Safe Activities

Policy statement: HTAFC CIO aims to ensure that all activities it undertakes are safe; and that the risk of accidents are minimised. All activities will be risk assessed and if an accident does happen HTAFC CIO will have processes in place to review and learn the necessary lessons to continually avoid accidents and improve the safety of all activities the organisation runs. HTAFC CIO will adhere to the following principles to assist its goal of avoiding accidents and running safe activities:

- HTAFC CIO has in place an accident prevention policy and plan in place - that allows for a risk/benefit analysis of all activity that is undertaken children.
- HTAFC CIO will ensure that there are up-to-date risk/benefit assessments of all venues used to deliver activities to children. Risk assessments will be undertaken prior to activities/outings/events involving children and these assessments will evidence any actions that are required to be taken to manage the identified risks.
- HTAFC CIO will undertake regular checks on all equipment used by children, staff and volunteers - in accordance with health and safety guidance relevant to the equipment.
- HTAFC CIO has a clear policy relating to parental consent that is required for activities - and where appropriate, the consent of children.
- HTAFC CIO will ensure that it collects relevant information relating to each child's medical and dietary needs, allergies and any other specific developmental requirements.
- HTAFC CIO will ensure that staff and volunteers have the appropriate access to each child's emergency contacts (i.e. parents/carers) whenever children are participating in an activity, or on a group trip out.
- HTAFC CIO will ensure that there is access to a phone during every activity or meeting attended by a child.
- HTAFC CIO will ensure that there are first-aid boxes available, regularly checked and properly maintained when working with children.
- HTAFC CIO has in place a procedure for reporting accidents and "near misses" which includes the use of an accident book and will ensure that all staff and volunteers are trained to use them correctly.
- HTAFC CIO will ensure that staff and volunteers have the appropriate access to the contact details of local doctors and health facilities whenever children are participating in an activity, or on a group trip out.
- HTAFC CIO will ensure adequate insurance for all circumstances and activities that it undertakes and this will be prominently and clearly displayed.
- HTAFC CIO will train staff and volunteers on the safe use of equipment - and ensure supervision is provided whenever children make use of that equipment, as necessary.
- HTAFC CIO will induct and train (and refresh that training regularly) all staff and volunteers in accident prevention and health and safety.
- HTAFC CIO will ensure the full compliance with regulations covering fire precautions, first-aid arrangements, food hygiene, use of hazardous substances, reporting injuries and diseases, adult to child ratios and transport.

Reviewed & Updated: September 2019

HTAFC CIO will review this and good practice at least annually.

(44) Accident Prevention Policy

Policy statement: HTAFC CIO will - as far as is possible - remove hazards in the working environment (as well as other hazardous practices) that could cause serious injury to children, HTAFC CIO staff and volunteers. Where such hazards cannot be removed, HTAFC CIO will put into place procedures and processes that protect children - as well as - HTAFC CIO staff and volunteers from potential harm caused by hazards. HTAFC CIO will always seek to take a balanced and proportionate approach to accident prevention, so that staff and volunteers can do their work effectively, while enabling children to be adventurous - all the time learning to understand and deal with risks as they grow up.

- **HTAFC CIO's Accident Prevention Policy is informed by the following principles and beliefs:**
- HTAFC CIO recognise that the welfare of the children who use our services and facilities is paramount and this guides the approach to accident prevention.
- All children - regardless of age, disability, racial heritage or religious belief, sexual orientation or identity - have the right to equal protection from serious injury.
- Risk assessments at HTAFC CIO will always take account of children's needs as they grow and develop - and will always be mindful of needs resulting from disability (and other factors) that may make some children more vulnerable than others.
- HTAFC CIO will work in partnership with children, their parents and carers as well as other agencies in helping them to be responsible in their approach to accident prevention.
- HTAFC CIO cannot and will not strive to create a totally risk free environment, as this would prevent staff and volunteers from being able to carry out meaningful work with children - and would not be in a child's best interests either. HTAFC CIO's focus will therefore be on preventing serious or avoidable accidents, while managing risk appropriately.
- **HTAFC CIO will seek to prevent serious and avoidable accidents by taking the following approach:**
- HTAFC CIO will ensure that it fulfils its responsibilities under health safety and fire regulations.
- HTAFC CIO will appoint a Health & Safety Officer who is responsible for attending to HTAFC CIO's legal responsibilities in this area, and for accident prevention measures.
- HTAFC CIO will use its accident prevention plan to assist in the process of assessing, monitoring and reviewing risks - both on and off HTAFC CIO premises - and for taking the appropriate action to eliminate, or manage risks, in a timely and organised way.
- HTAFC CIO will involve staff, volunteers and children - as well as parents and carers - in developing and implementing its accident prevention measures.
- HTAFC CIO will inform HTAFC CIO staff, volunteers and children - as well as parents and carers - of their responsibilities in keeping themselves safe; while making sure that they understand these and all other relevant accident prevention procedures.
- HTAFC CIO will make sure that all equipment used is safe and stored appropriately.
- HTAFC CIO will ensure that staff and volunteers - and where appropriate - children, are trained in the correct and safe use of all equipment.
- HTAFC CIO will ensure - as far as is possible - that staff and volunteers have a child's information relating to any allergies, health or developmental issues that could increase the vulnerability of that child.

- HTAFC CIO will - where it is applicable to its operations - ensure that food is prepared, served and stored in a way that avoids dangers of food poisoning, burns, scolds, choking and/or accidents caused by such things as shards of glass, or small components from kitchen equipment being mixed up with food.
- HTAFC CIO will providing effective management for HTAFC CIO staff and volunteers on accident prevention issues through the process of supervision, support and training.

Reviewed & Updated: September

2019 HTAFC CIO will review this Accident Prevention Policy and good practice at least annually.

(45) Accident Prevention Plan

In the furtherance of HTAFC CIO's Accident Prevention Policy, the following steps form the basis of the organisations Accident Prevention Plan:

- 1** HTAFC CIO will undertake a risk assessment check on all HTAFC CIO premises and HTAFC CIO activities at least every 6 months - and will ensure that points identified for action from the previous check have been followed up and acted upon.
- 2** HTAFC CIO will keep records of risk assessments and reviews.
- 3** HTAFC CIO will use a timetable for ensuring that equipment is regularly checked in accordance with legislation - and/or best practice.
- 4** HTAFC CIO will check and have updated a child's medical records, needs and allergies etc. at least annually.
- 5** HTAFC CIO will check its records of contact details for parents and carers, as well as the emergency health facilities at least annually.
- 6** HTAFC CIO will check every 6 months that First Aid Boxes are in working order and are adequately stocked.
- 7** HTAFC CIO's Health & Safety Officer will provide an annual report to HTAFC CIO's Board detailing HTAFC CIO's health & safety responsibilities and compliance with them.
- 8** HTAFC CIO will have regular fire alarm checks and fire drills in accordance with the organisations fire management plan.
- 9** HTAFC CIO will review the accident book no less than once every 6 months and report any serious accidents to the Board - as well as taking action to prevent similar accidents in the future, as far as this is possible.

Reviewed & Updated: September

2019 HTAFC CIO will review this Accident Prevention Plan and good practice at least annually.

(46) Parental & Child Consent Policy

Policy statement: HTAFC CIO believe that children's needs are best met when they are involved in making decisions that affect them and when the organisation works in partnership with their parents and carers. This policy describes how HTAFC CIO seeks to play its part in this partnership. This policy brings together HTAFC CIO's responsibilities to consult with and obtain the consent of children; and to consult with and obtain the consent of parents and carers in relation to the organisations activities and events. **HTAFC CIO recognises that:**

- Children have rights as listed in the **United Nations Convention on the Rights of the Child** (the Convention), ratified in the UK in 1991. **This includes:**
 - The right for children to have their views respected and their opinions taken into account
 - The right to freedom of expression
 - The right for children to access information about themselves.

In accordance with the Convention, HTAFC CIO believes that helping children to understand their rights does not mean pushing them into making choices about matters that they do not understand; or with consequences that they lack the maturity to deal with.

- Parents and carers are required to help their child make choices "in a manner consistent with the evolving capacities of the child". This is a principle to which HTAFC CIO subscribes to.
- Parents and carers are the primary source of nurture and support to their child and HTAFC CIO believes that they should be fully supported in fulfilling this role.

HTAFC CIO acknowledges that in a small minority of cases, parents and carers are not able to provide for their child's needs; or to care for them safely without statutory intervention. If HTAFC CIO encounter a situation where it is feared that this might be the case, HTAFC CIO will have a duty to refer the matter to an investigating authority.

HTAFC CIO will take the following steps to obtain consent - from both parents and children - for children's participation in activities and trips/outings:

- HTAFC CIO will seek parental consent and support for a child's participation in activities and trips, regardless of the age of the child.
- For all young people aged 12 and above, HTAFC CIO will also seek their consent - unless our assessment is that the young person is not able to give informed consent **e.g.** because of their level of learning ability, or for some other reason.
- In all cases, consent offered by young people will involve signing up to HTAFC CIO's Behaviour Code, as well as the safety rules for the activity or trip.

Managing withheld consent: If a child is keen to take part in an activity that would be in their best interests to do so, but their parent or carer is not willing to consent, HTAFC CIO's Designated Safeguarding Officer will seek to address the matter with the parent or carer - and to understand the reason/s for the objection.

If, having spoken to the parent or carer, HTAFC CIO's Designated Safeguarding Officer was to feel that the objection is reasonable, HTAFC CIO will support the parent or carer in conveying this decision to the child.

However, where it is felt that the parent or carer's objection is not reasonable, HTAFC CIO's Designated Safeguarding Officer will attempt to remove the barriers preventing the parent or carer from giving consent.

Consent of young people aged 16 to 18: If a young person aged 16 to 18 years of age - with sufficient maturity to make their own decisions; who lives separately from their parents/carers; and has little contact with them - HTAFC CIO may consider allowing them to participate in an activity without the parent or carer's consent.

This decision will always depend on the capacity of the young person concerned; HTAFC CIO's understanding of the reasons why the parents or carers would not be consulted; as well as an assessment of any risks involved. In

such circumstances, HTAFC CIO's Designated Safeguarding Officer will seek specialist advice prior to a decision being made.

Reviewed & Updated: September

2019 HTAFC CIO will review this Parental & Child Consent Policy and good practice at least annually.

(47) Health & Safety Policy

Policy statement: HTAFC CIO is committed to ensuring the health, safety and welfare of its employees, volunteers, children, as well as parents and carers who use its services and facilities. So far as is reasonably practicable, HTAFC CIO will establish procedures and systems necessary to implement this commitment and to comply with its statutory obligations on health and safety. It is the responsibility of each person involved with the organisation to familiarise themselves and comply with the HTAFC CIO's procedures and systems relating to health and safety.

While HTAFC CIO will take all reasonable steps to ensure the health and safety of everyone that it has responsibility for, health and safety is everyone's responsibility too. It is the duty of every employee, volunteer, child, parent and carer to take reasonable care of their own and other people's health, safety and welfare and to report to HTAFC CIO any situation which may pose a serious or imminent threat to the well-being of themselves or of any other person.

HTAFC CIO will provide and maintain a healthy and safe working environment with the objective of minimising the number of instances of accidents and illnesses. **HTAFC CIO will pay particular attention to:**

- 1.** Maintaining all areas it is responsible for in a safe condition.
- 2.** Providing a safe means of access to and egress from its facilities.
- 3.** The provision and maintenance of equipment and systems that are safe.
- 4.** Arrangements for ensuring safety to health in connection with the use, handling, storage and transport of articles and substances.
- 5.** The provision of such information, instructions, training and supervision as is necessary to ensure the health and safety of its employees, volunteers and all other persons.

HTAFC CIO also recognises its duty to protect the health and safety of all visitors to HTAFC CIO, including any members of the public who might be affected by the organisation's work operations.

- **Organisation:** HTAFC CIO have a designated Health & Safety Officer who conducts regular inspections of the workplace and facilities; maintains safety records; as well as investigating and reporting on accidents.
- **Training:** Safety training is an integral part of an effective health and safety programme. All HTAFC CIO staff and volunteers are inducted and trained to perform their job safely and in safe working practices and procedures. Training also includes instruction on the safe use of any equipment provided and require to be used.
- **Persons at special risk:** HTAFC CIO recognises that people may from time to time be at increased risk of injury or ill-health resulting from activities. HTAFC CIO therefore requires that everyone notifies the relevant person at HTAFC CIO if they become aware of any change in their personal circumstances which could result in their being at increased risk. This could include medical conditions, permanent or temporary disability, taking medication and/or pregnancy.
- **First aid and reporting of accidents and/or near misses:** First aid boxes are located at strategic points around HTAFC CIO facilities and there are appointed persons and designated first aid personnel responsible for managing first aid incidents. Information relating to first aid arrangements are also displayed on notice boards around HTAFC CIO facilities.

All injuries, however small, sustained by any person on HTAFC CIO facilities must be reported to either a line manager or HTAFC CIO's Designated Safeguarding Officer and recorded in HTAFC CIO's accident book. Accident records are crucial to the effective monitoring of health and safety procedures and must therefore be accurate and comprehensive. HTAFC CIO's Health & Safety Officer will inspect the accident book on a regular basis and all accidents will be investigated and a report prepared, with any necessary action being taken to prevent a recurrence of the problem.

Reviewed & Updated: September 2019

HTAFC CIO will review this Health & Safety Policy and good practice at least annually.

(48) Fire Safety Policy

Policy statement: HTAFC CIO will take all necessary steps to prevent the outbreak of fire on its premises - so far as reasonably practicable - and will put in place measures to protect all employees, volunteers and visitors in the unlikely event of a fire. HTAFC CIO's Health & Safety Officer has overall responsibility for putting this Policy into effect, although HTAFC CIO's Community Manager and all employees, volunteers, children, as well as parents and carers who use its services and facilities have responsibilities for assisting in these aims too. **The furtherance of effective fire safety will be achieved by HTAFC CIO:**

- Arranging for a competent fire safety risk assessor to conduct a risk assessment of the premises and review that assessment periodically.
- Implementing the recommended fire safety measures arising from the assessment.
- Ensuring that all exits and emergency routes are kept clear at all times. These routes will be properly signed, adequately lit and fitted with the relevant standard of fire doors.
- Ensuring that the premises have appropriate fire-fighting equipment, detectors, alarms and emergency lighting.
- Writing and circulating fire safety arrangements incorporating responsibilities for fire safety matters.
- Instigating a mechanism for the reporting of defects concerning fire equipment or electrical equipment and ensuring that, where necessary, equipment is taken out of use and alternative arrangements are made as appropriate.
- Arranging for the testing and maintenance of fire safety, electrical and gas installations and equipment.
- Ensuring that building alterations and other contract works are properly managed to minimise the fire risk and avoid damage to structural fire protection.
- Ensuring that all HTAFC CIO employees and volunteers are provided with appropriate information and instruction regarding the fire prevention measures and the emergency procedures, including any instruction required in order for them to carry out their particular role.
- Keeping employees and volunteers informed of any changes that are made to HTAFC CIO fire safety procedures and fire safety risk assessment.
- Ensuring that all children, parents/carers and visitors to HTAFC CIO premises are briefed on the evacuation procedures.
- Undertaking ongoing monitoring of the fire safety arrangements.

Reviewed & Updated: September

2019 HTAFC CIO will review this Health & Safety Policy and good practice at least annually.

Part 5: Recording, Storing & Sharing Information Policies & Procedures

(49) Policy Statement – General Data Protection Regulation

1. Introduction

Harrogate Town AFC CIO Community Foundation operate for the benefit of the local residents of Harrogate and District. We form partnerships between community groups that are making a difference and the people who wish to invest in a better future for the local area.

We take our duty to process your personal data very seriously. This policy explains how we collect, manage, use and protect any information we collect about you to ensure you remain informed and in control of your information.

In this policy references to Harrogate Town AFC CIO Community Foundation or HTAFC CIO CF 'we' and 'us' relates to the Community Foundation for Harrogate.

We may change this document from time to time to reflect the latest regulations on what we should lawfully do with your information. Please check back frequently to ensure that you are happy with any changes.

2. What information we collect

Harrogate Town AFC CIO Community Foundation is what's known as the 'controller' of the personal data you provide to us. We will usually collect basic personal data about you like your name, postal address, telephone number, email address if you are supporting us.

Your activities and involvement with HTAFC CIO CF will result in personal data being created. This could include details of how you've helped us by volunteering or being involved with our campaigns or events.

We do not normally collect or store sensitive data (such as information relating to health, beliefs or political affiliation) about participants. However there are some situations where this will occur including, but not exclusively, if:

- An accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers).
- If you are attending one of our events and have disclosed specific access or dietary needs.

If this does occur we will be very clear with you that we wished to collect such information, our reason for collecting such information, and that we would only do so with your specific consent and permission. We'll also take extra care to ensure your privacy rights are protected.

3. How we collect your information

We collect information about you when you enquire about using any of our services, as part of us providing you with our services, or when you register an interest in supporting the Community Foundation.

We collect your personal information in a number of ways:

- When you provide it to us directly. Your activities and involvement with Harrogate Town Community Foundation will result in personal data being created. This could include details of how you've helped us by being involved with our campaigns and activities.
- When you provide permission to other organisations to share it with us (including Facebook or Twitter)

- When you have given it to a third party. For example, if we are partnering with another organisation (e.g. you provide your information to another charity or organisation that we are collaborating with).
- From publically available sources to keep your information up to date (e.g. from Companies House, news or other media).

4. How we use your information

We will only use your information for the purpose or purposes for which it was collected for (or for closely related purposes). These purposes include:

- Where the information is needed to fulfil your request or to enable us to provide you with a more personalised service. Sometimes, with your consent, we will process your personal data to provide you with information that you have requested about our work or our activities, or that you are expecting.
- We use personal data for administrative purposes (i.e. to carry on our charity work). This can include receiving donations, processing and maintaining a database of supporters and friends and helping us respect your choices and preferences (e.g. if you ask not to receive marketing material, we'll keep a record of this).
- Where we need to do this to fulfil a contract, or where we are required to do this by law or other regulations.
- When it is in our legitimate interests to do this and when these interests do not override your rights. Please see section 9 on 'Legitimate Interest' for more information.
- We evaluate, categorise and profile personal data in order to tailor materials, services and communications, and prevent unwanted material from filling up your inbox.

4a. Marketing

- We use personal data to communicate with people, to promote Harrogate Town AFC CIO Community Foundation and to help with fundraising. This includes keeping you up to date with our news, updates, campaigns and fundraising information. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers information about HTAFC CIO CF and its work within Harrogate and District).
- You can decide not to receive communications or change how we contact you at any time. If you wish to do so, please contact us by emailing community@harrogatetownafc.com, or writing to: Harrogate Town AFC CIO Community Foundation, CNG Stadium, Wetherby Road, Harrogate, North Yorkshire, HG2 7SA, or telephoning 01423 210600 (Lines open 9am – 5pm, Mon – Fri).
- When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect your communication preferences.
- We run events for our supporters or for those whom we believe would be interested in the work of HTAFC CIO CF. We collect information about how you respond to or interact with our invitations, and this may affect your event processes.
- As a Community Foundation, we rely on donations and support from others to continue our work. From time to time, we will contact members and supporters with fundraising material and communications. As with other marketing communications, we'll only contact you specifically about fundraising if you've opted into to receiving marketing from us (and you can, of course, unsubscribe at any time).

4b. Sharing your information

We only disclose information to third parties or individuals when obliged to by law, for purposes of national security, taxation and criminal investigations, and the following:

- If you have agreed that we may do so.
- When we use other companies to provide services on our behalf e.g. sending mail and emails, when using auditors/advisors, or processing credit/debit card payments.
- If we receive a complaint about any content you have posted or transmitted to or from one of our sites, to enforce or apply our Terms & Conditions, or if we believe that we need to do so to protect and defend the rights, property or personal safety of HTAFC CIO CF our websites or our visitors and for other lawful purposes.
- If we merge with another organisation to form a new entity, information may be transferred to the new entity.
- If we run an event in partnership with other named organisations, your details may need to be shared. We will be very clear what will happen to your data when you register.

And we will never sell or rent your personal information to other organisations.

5. Research and Profiling

We evaluate personal data in order to tailor materials, services and communications and prevent unwanted material from filling up your inbox. Understanding our supporters/individuals, their interests and what they care about also helps us provide you with a better experience.

Research can help us target our resources more effectively through gaining an insight into the background of our potential supporters and help build relationships that are appropriate to their interests and capacity to give. This increase in efficiency helps us ensure we are maximizing the good we can do within the district.

To do this we may use additional external sources of data to increase and enhance the information we hold about you. This may include obtaining details of changes of address, telephone numbers and other contact details, and information related to your wealth. It may also include information from public registers and other publicly available sources.

6. How we store and retain your information securely

6a. Retention

We hold your information only as long as necessary for each purpose we use it. We regularly review what information we hold and delete what is no longer required. For successful grant applications, we will retain your data for up to 7 years, in line with financial best practice for our accounting purposes.

If you decide not to support HTAFC CIO CF any longer, or request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials in the future and to ensure that we don't accidentally duplicate information.

6b. Data Security

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of, your personal information.

Electronic data and databases are stored on secure computer systems and we control who has access to information (using both physical and electronic means). Our staff receive data protection training and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

Our electronic data is stored within secure cloud servers. Paper copies of any personal data that are stored in secure locked cabinets.

6c. Payment security

HTAFC CIO CF specific – if you wish to make donations to HTAFC CIO CF, we would never request your bank details directly. BACS payments can be made directly to our business bank account (details of which are available upon request).

Of course, we cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

6d. CCTV

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and HTAFC CIO CF. CCTV will only be viewed when necessary (e.g. to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review, CCTV will be recorded over.

Harrogate Town AFC CIO complies with the Information Commissioner's Office CCTV Code of Practice, and we put up notices so you know when CCTV is in use.

7. Keeping you in control

We want to ensure you remain in control of your personal data. The new General Data Protection Regulations (GDPR), which are being brought into force in May 2018, give everyone a number of very important rights. These include

- the right to ask us to remove your personal data from our records (though this will not apply where it is necessary for us to continue to use the data for a lawful reason)
- the right to have inaccurate data rectified
- the right to request a copy of the information we hold about you
- the right to ask us to stop using your information for marketing or profiling, and
- where technically feasible, the right to obtain and reuse your personal data for your own purposes

Remember, you can change the way you hear from us or withdraw your permission for us to process your personal data at any time by using the contact details in section 11.

8. Cookies and website

We use traffic log cookies to identify which pages of our website are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from our system.

9. Legitimate interest

Under the new GDPR laws starting in May 2018, we have a number of lawful reasons that we can use (or 'process') your personal information. One of these lawful reasons is called 'legitimate interests'.

Broadly speaking, 'legitimate interests' means that we can process your personal information if:

We have a genuine and legitimate reason **and** we are not harming any of your rights and interests.

So, what does this mean?

Some typical examples of when we might use this approach are for preventing fraud; direct marketing; maintaining the security of our system; data analytics; enhancing, modifying or improving our services; identifying usage trends; and determining the effectiveness of our campaigns and fundraising.

HTAFC CIO CF will use various ways to achieve our mission and to support our objectives; we believe that people who share our values would love to know how to support us. We will process the personal information you have supplied to us to conduct and manage our business to enable us to give you the most appropriate marketing, information, service and products and provide the best and most secure experience. These are what we consider to be our 'legitimate interests' for holding and processing your data.

When we process your personal information for our 'legitimate interests', we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent, or are otherwise required or permitted to by law).

Remember, you can change the way you hear from us or withdraw your permission for us to process your personal details at any time by contacting us. For our contact details, please see section 11.

10. Changes to the policy

We'll amend this Privacy Policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our Privacy Policy will always be posted on our website.

11. How to contact us

If you have any questions about the policy or how we use your data, please get in touch using the details below.

Email: community@harrogetownafc.com

Phone: 01423 210600

Harrogate Town AFC CIO Community Foundation
CNG Stadium, Wetherby Road, Harrogate, North Yorkshire, HG2 7SA

Making a complaint or giving positive feedback

If you are dissatisfied with our organisation or our work and would like to raise a concern or make a complaint, or if you would like to leave some positive feedback about any aspect of our work, please get in touch with us.

Reviewed & Updated: September 2019

HTAFC CIO will review this and good practice at least annually.

(50) Principles of Recording & Storing Information

Policy statement: HTAFC CIO understands the importance of recording and storing information that meets the requirements of the Data Protection Act 1998. To this end, HTAFC CIO will ensure that all records relating to its work with children adhere to the following principles:

- While HTAFC CIO is required to have a record kept of each contact with a child, that record will always be proportionate to the type of activity/service the child is accessing.
- HTAFC CIO will ensure that records clearly distinguish between fact and opinion.
- HTAFC CIO will ensure that personal information outside of the individual's name will always be kept separate from information about relating to other people.
- HTAFC CIO will ensure that staff and volunteers sign and date any records that they make.
- HTAFC CIO sets time limits in which records must be completed (as soon as possible after contact) and trains staff and volunteers to follow those time limits.
- Through the wide communication its Child Protection Policies and Procedures, HTAFC CIO make children and their parents/carers aware that it keeps records - and the purpose and use of those records.
- Through the implementation of its Data Protection Policy & Procedure, HTAFC CIO permits access by children and parents/carers to records made and kept by the organisation - unless such access would be contrary to a child's best interests.
- HTAFC CIO will ensure that all hard copies of records and any portable electronic equipment that holds or provides access to personal information will be stored securely in a locked cabinet at the offices of HTAFC CIO. Where an HTAFC CIO staff member does not have an office base, then HTAFC CIO's Designated Safeguarding Officer will ensure that any such records are stored at home in equally secure conditions.
- HTAFC CIO will ensure that unauthorised access to electronically stored personal and sensitive information is prevented by the use of appropriate security measures - including the use of user names, passwords and appropriate encryption of files.
- HTAFC CIO will ensure that during any activities, HTAFC CIO staff and volunteers will have ready access to the emergency contact details for a child.
- HTAFC CIO will induct and train staff and volunteers to record and place on file any concerns that a child may be in need, or at risk of abuse. Details of how the concerns have been dealt with will also be recorded.
- HTAFC CIO will ensure that where a referral is made to a statutory agency relating to concerns for a child (as covered by the relevant policy/procedures in this Handbook) this will be confirmed in writing within 48 hours and a copy placed on the child's file.
- HTAFC CIO has a clear policy relating to the retaining and destruction of records.
- All HTAFC CIO staff and volunteers are inducted, trained and re-trained to ensure they are able to implement and follow the organisation's policies and procedures relating to the recording and storage of information. Support is provided by HTAFC CIO's Designated Safeguarding Officer to assist staff and volunteers to meet these expectations.

HTAFC CIO will review this Principles of Recording & Storing Information and good practice at least annually.

(51) Confidentiality Policy

Policy statement: HTAFC CIO believe that the safety, wellbeing and protection of all children - who use our services and facilities - is of the utmost importance in all decisions relating to confidentiality of information. Therefore, the appropriate sharing of information between HTAFC CIO staff and volunteers is essential for ensuring child safety, wellbeing and protection. Trust is an essential element of child protection at HTAFC CIO, as it enables everyone (staff, volunteers, children and their parents/carers) to seek advice and support - both inside and outside of the organisation.

HTAFC CIO's Confidentiality Policy is designed to establish the boundaries of confidentiality to enable everyone to feel safe and comfortable in discussing personal issues and concerns. This policy aims to be easily understood by everyone and to establish trust in the boundaries of confidentiality that HTAFC CIO will adhere to.

- **Aims of HTAFC CIO's Confidentiality Policy:** What must be acknowledged and understood is that HTAFC CIO cannot offer absolute confidentiality in certain prescribed circumstances. Therefore, this **Confidentiality Policy** aims to make clear the situations when information will need to be shared, so that everyone can make informed decisions about who the most appropriate person to speak to - about a particular issue - is.
- **Policy development:** This **Confidentiality Policy** has been developed - and will continue to be so - through consultation with HTAFC CIO staff, volunteers and partner agencies as appropriate. All staff, volunteers, children and parents/carers are informed of this policy through the wide circulation of HTAFC CIO's Children's Safeguarding Handbook and forms the basis of every new starters induction.
- **Definition of confidentiality:** This is defined as "that state of keeping secret or private, something which is spoken or provided in some other form privately".
- **Example:** In practice this could be a child asking for their conversation with an HTAFC CIO staff member to be kept private. If an HTAFC CIO staff member was to offer absolute confidentiality to a child, they would in effect be offering to keep the content of the conversation completely secret and that they would discuss it with no-one.

As may be obvious from the above example, there are actually very few situations where HTAFC CIO should ever be offering absolute confidentiality. The challenge is always to strike a balance between ensuring the safety, wellbeing and protection of all children; furthering HTAFC CIO's ethos of trust; and at the same time ensuring that essential personal information is shared to further child protection and good practice.

- **Limited confidentiality:** The reality is, that in most cases, what HTAFC CIO can actually offer is limited confidentiality. This means that the content of a conversation might well be discussed with other professionals, but in general this would not identify the person who had made the disclosure.

Therefore, HTAFC CIO staff and volunteers should always make it clear at the outset of a conversation that there are limits to confidentiality. It should be reinforced that these limits are in place to ensure children's safety and wellbeing. HTAFC CIO will always ensure that a child will be informed when a confidence has to be broken for this reason and they will be involved in the information sharing.

HTAFC CIO staff members and volunteers must not promise confidentiality. Children do not have the right to expect they will not be reported to their parents or carers and may not, in the absence of an explicit promise, assume that information disclosed outside of that context will therefore be private and confidential. No HTAFC CIO staff member or volunteer should ever give such a promise.

As already stated, the safety, wellbeing and protection of children is the paramount consideration in all decisions that HTAFC CIO staff and volunteers make about confidentiality. However, HTAFC CIO staff and volunteers are **not** obliged to break confidentiality, other than in circumstances where child protection is - or may be - an issue. Notwithstanding this, HTAFC CIO firmly believes that it is vitally important that all HTAFC CIO staff and volunteers are able to share their concerns about relating to a child's safety and wellbeing.

- **Safeguarding training of staff and volunteers:** All HTAFC CIO staff and volunteers undergo full safeguarding training and regular refresher safeguarding training and as such are expected to be able to use their professional

judgement when considering and advising a child about making a disclosure in confidence - and whether such a confidence could then be maintained having heard the information. When an HTAFC CIO staff member or volunteer is exercising their professional judgement they must always consider the best interests of the child - including the need to both ensure trust to provide safeguards for children - and possible child protection issues.

Paramount in all cases of disclosure, is that HTAFC CIO staff and volunteers must at all times follow the organisation's Child Safeguarding Policies and Procedures detailed throughout this Handbook.

All staff, volunteers, children, parents/carers, as well as any other concerned individual can at all times speak with HTAFC CIO's Designated Safeguarding Officer. Any conversation with HTAFC CIO's Designated Safeguarding Officer will be confidential - other than as defined within this Handbook.

Whenever there arises doubt as to whether information should be shared, HTAFC CIO will seek guidance and advice from the Local Authority's Designated Officer.

- **Support of HTAFC CIO staff and volunteers:** Staff and volunteers are encouraged to seek the support of HTAFC CIO's Designated Safeguarding Officer if they have any support needs in dealing with personal issues disclosed by a child. This is important because HTAFC CIO would rather staff and volunteers asked for help than possibly make a poor decision because they don't have all the facts, or the necessary training, or end up taking worries about a child home with them.

Reviewed & Updated: September 2019

HTAFC CIO will review this Confidentiality Policy and good practice at least annually.

(52) Data Protection Policy

Policy statement: HTAFC CIO expects the utmost confidentiality of all records relating to its safeguarding work with children. HTAFC CIO's staff members and volunteers will come into contact with personal and sensitive details about the lives of the children with whom they will work. None of this information - or information about a child's parents/carers - should ever be the subject of gossip, or be passed on to anyone else without good cause or reason. Great care should be taken to ensure that when cases do have to be discussed with colleagues, that the details cannot be overheard by anyone else. For the avoidance of doubt, information of a confidential nature should only be communicated on a need-to-know basis and - in most circumstances - with the consent of the child and/or their parents/carers.

However, not-with-standing the above, HTAFC CIO staff members and volunteers should always be clear that in circumstances where there are concerns about an individual's safety and welfare - or the safety of others - they will always be required to pass on information that may have been received in confidence. In these circumstances, any information should be passed HTAFC CIO's Designated Safeguarding Officer.

HTAFC CIO's Data Protection Policy: The under-pinning principles of HTAFC CIO's responsibility in relation to the gathering, storage, usage and sharing of personal information is in line with the requirements of the Data Protection Act 1998.

Introduction: In the course of a staff members or volunteers work with HTAFC CIO, they will come into contact with, or use, confidential information relating to children. The Data Protection Act 1998 (the Act) contains principles affecting children's information and personal records. Information protected by the Act includes not only personal data held on computer, but also certain manual records containing personal data **e.g.** children's information files that form part of a structured filing system. The purpose of these rules is to ensure that no HTAFC CIO staff member or volunteer breaches the Act. If a staff member or volunteer is in any doubt about what can or cannot be disclosed and to whom, then the default position is not to disclose any personal information until advice has been provided by HTAFC CIO's Data Protection Officer.

Under the Act, all HTAFC CIO staff members and volunteers are personally accountable for their actions and can be held criminally liable if they knowingly, or recklessly, breach it. Any serious breach of data protection legislation will also be regarded as misconduct and will be dealt with under the Company's disciplinary procedures. Any access of a children and young people's records - without authority - constitutes a gross misconduct offence and could lead to summary dismissal or termination of a volunteering agreement.

The data protection principles: There are eight data protection principles that are central to the Act. HTAFC CIO and all its staff members and volunteers must comply with these principles at all times in its information-handling practices. **In brief, the principles say that personal data must be:**

- 1. Processed fairly and lawfully and must not be processed unless certain conditions are met in relation to personal data - and additional conditions are met in relation to sensitive personal data.** The conditions are either that the individual has given consent to the processing, or the processing is necessary for the various purposes set out in the Act.
- 2. Obtained only for one or more specified and lawful purposes, and not processed in a manner incompatible with those purposes.**
- 3. Adequate, relevant and not excessive.** HTAFC CIO will only collect essential personal details of children for whom it provides services or activities to. **Essential joining information will include:**
 - The name, address and contact number of all children - and where appropriate their carers, advocates or next of kin
 - Any medical and health issues or particular requirements
 - Contact with other professionals or agencies, if any.

HTAFC CIO will also keep records which reflect the child's ongoing engagement with the organisation. This will

include records on attendance, activities participated in and any incidents, accidents and/or near misses that occur.

4. **Accurate and kept up-to-date.** Where personal information relating to a child changes, HTAFC CIO will need to be informed promptly by so that appropriate records can be updated. HTAFC CIO cannot be held responsible for any errors unless they organisation has been notified of the relevant change.
5. **Not kept for longer than is necessary:** HTAFC CIO will dispose of children's information within the timescales that are in keeping with the requirements of the Data Protection Act.
6. **Processed in accordance with the rights of children under the Act.** The uses that HTAFC CIO anticipates that collected personal data will be used for can include such things as:
 - To better manage, plan and improve the services and/or activities provided
 - To help train and teach HTAFC CIO staff members and volunteers
 - To help with research, but only with the child's agreement
 - To provide statistics about HTAFC CIO services and activities delivered by the organisation - whilst ensuring that personal information will not be disclosed or used in this way and will never be shared with anyone, other than in the circumstances set out below
7. **Appropriate technical and organisational measures will be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data:** All written records will be stored in a secure location and accessed by authorised personnel only. Electronic records held on computers will also be appropriately secured by way of password protection and restricted access.
8. **Not transferred to a country or territory outside the European Economic Area unless that country ensures an adequate level of protection for the processing of personal data.**

HTAFC CIO's staff members and volunteer's obligations in relation to personal information: Any staff member or volunteer - who as part of their job duties and responsibilities - are required to collect personal information about children, must comply with this policy. This includes ensuring the information is processed in accordance with the Act; is only processed for the purposes for which it is held; is kept secure; and is not kept for longer than necessary. **The following guidelines must be complied with at all times:**

All HTAFC CIO staff members and volunteers must:

- Never disclose confidential personal information to anyone except the data subject or to a person authorised by the data subject. In particular, unless the data subject has given their explicit prior written consent, personal information should not be:
 - a) Given to someone from the same family
 - b) Passed to any other unauthorised third party
 - c) Placed on the Company's website
 - d) Posted on the Internet in any form
- Be aware that those seeking information sometimes use deception in order to gain access to it. Always verify the identity of the data subject and the legitimacy of the request, particularly before releasing personal information by telephone
- Where HTAFC CIO provides staff members and volunteers with code words or passwords to be used before releasing personal information **e.g.** by telephone, always strictly follow the Company's requirements in this regard
- Only transmit personal information between locations by fax or e-mail if a secure network is in place **e.g.** a confidential fax machine or encryption is used for e-mail
- Forward all requests for personal information about a child to HTAFC CIO's Data Protection Officer without delay
- Keep all personal data securely, either in a locked filing cabinet or, if computerised, by it being password protected so that it is protected from unintended destruction or change and is not seen by unauthorised persons
- Not access any child's records without authority as this will be treated as gross misconduct and it is a criminal offence
- Never write down (in electronic or hard copy form) opinions or facts concerning a data subject which it would be

inappropriate to share with that data subject

- Never remove personal information from the workplace with the intention of processing it elsewhere, unless this is necessary to enable you to carry out your job duties and has been prior authorised by an HTAFC CIO line manager
- Ensure that, when working on personal information as part of designated job duties when away from HTAFC CIO's workplace - and with the prior authorisation of a line manager – the terms of this policy and the Act continue to be observed at all times, particularly in matters of data security
- Ensure that hard copy personal information is disposed of securely **e.g.** by cross-shredding
- Remember that compliance with the Act is each individual's personal responsibility. If staff members or volunteers ever have any questions or concerns about the interpretation of these rules, they should immediately contact HTAFC CIO's Data Protection Officer.

Reviewed & Updated: September

2019 HTAFC CIO will review this Data Protection Policy and good practice at least annually.

(53) Sharing of Information Policy

Policy statement: When reaching a decision about the sharing of personal information the following three core ethical principles will be upheld:

1. All individuals have a fundamental right to the confidentiality and privacy of information related to their health and social care
2. All individuals have a right to control access to and the disclosure of their own health and social care information by giving, withholding or withdrawing consent
3. For any disclosure of confidential information, those involved should always have regard to its necessity, proportionality and any risks attached to it

HTAFC CIO's policy relating to the sharing of information and working with other organisations will be underpinned by the following seven golden rules of information sharing:

1. The **Data Protection Act 1998** is not a barrier to sharing information, but provides a framework to ensure that personal information about living persons is shared appropriately.
2. HTAFC CIO will always be open and honest with the child - and/or their parents/carers where appropriate - from the outset about why, what, how and with whom information will (or could be shared) and seek their agreement to share, unless doing so would be either unsafe and/or inappropriate.
3. HTAFC CIO will seek advice from appropriate sources if there is ever any doubt about sharing information - and will do so without disclosing the identity of the person, where possible.
4. HTAFC CIO's objective is to always share with consent where appropriate and, whenever possible, respect the wishes of those who do not consent to share confidential information.

Please note: HTAFC CIO will still share information without consent (and in line with HTAFC CIO's Confidentiality Policy) when in HTAFC CIO's Designated Safeguarding Officer's professional judgement, that lack of consent can be overridden in the public interest. Professional judgement will always be based upon the facts of the case.

5. HTAFC CIO will always base information sharing decisions on considerations of the safety and well-being of the person concerned and any others who may be affected by that decision.
6. In line with data protection principles, HTAFC CIO will only share information that is necessary, proportionate, relevant, accurate, timely and secure. This means that any information shared by HTAFC CIO is necessary for the purpose for which it is being shared; only shared with those people who need to have it; that shared information is accurate and up-to-date; shared in a timely fashion; and is always shared securely.
7. When a decision is made about sharing information, HTAFC CIO will ensure that a record is kept of the decision and the reasons for it - whether the decision was to share information or not. When the decision is to share information the record will detail what has been shared; with whom; and for what purpose.

When sharing confidential information and other appropriate management records, HTAFC CIO will adhere to the following standards and procedures:

- **Sharing confidential information within the organisation:** Information will be shared within HTAFC CIO on a need to know basis only. HTAFC CIO line managers will have access to information to check that records are being made and maintained appropriately and to enable them to identify patterns of behaviour emerging from incident reporting.
- **Sharing confidential information with children, parents/carers:** Children - as well as their parents and carers - will always be told how information will be used before they are asked to provide it and will be given an opportunity to discuss such uses. Explanations of how information will be used will always be communicated in a way which is clearly understood - and alternative means of communication will be used where necessary.

When a child's information needs to be shared **e.g.** in the case of an emergency, or of suspected abuse, the child and/or their parents/carers will be told what information was shared as soon as possible, whilst ensuring that this does not expose the child to further risk of harm.

- **Sharing confidential information with external agencies:** While information about children is confidential, it may need to be disclosed to external agencies to ensure the care and safety of an individual, or of others, or where a crime is suspected. Children, in normal circumstances, can expect to see any information held by HTAFC CIO about them - and HTAFC CIO will take steps to inform them of this right to access their information. This right will apply to both paper and electronic records - and will include access to any care records - unless any of the reasons for limiting access set out below apply.

Access will be provided, if requested, to the child and, with their consent to another person acting on their behalf. HTAFC CIO will, where it is possible and reasonable, require all such requests to access records to be made in writing. Regardless of how a request is received HTAFC CIO will maintain records of all requests received and their outcomes.

- **Limited access:** Where a request to access of a child's records has to be limited, this decision will always be recorded.

Circumstances in which limited access may be applied could include where any part of a record contains confidential information about other people; or information was provided by another person or agency - such as doctor or other professional - and their permission has not been obtained.

There may also be a requirement to limit access to information in circumstances where a care professional thinks access would cause serious harm to the child's, or someone else's physical or mental well-being.

Sharing information following allegations of abuse: In the first instance, any such allegation against an HTAFC CIO employee or volunteer will be reported immediately to HTAFC CIO's Designated Safeguarding Officer. HTAFC CIO's Designated Safeguarding Officer will immediately notify the named Board Safeguarding Lead and the Senior Safeguarding Manager.

- **Local authority's designated officer reporting time limits:** HTAFC CIO's Designated Safeguarding Officer is accountable for contacting the Local Authority's Designated Officer and informing them of all allegations that have come to their attention **within 24 hours of the allegations being made.**
- **The FA reporting time limits:** HTAFC CIO's Designated Safeguarding Officer is accountable for contacting The FA Case Management Team as soon as possible after the allegations have been made - but in any event **within 72 hours of the allegations being made.**
- **DBS Referral reporting time limits:** Where any HTAFC CIO employee or volunteer - working in regulated activity - is suspended from their duties as a consequence of concerns, allegations and/or internal investigations related to their work with children, then HTAFC CIO's Designated Safeguarding Officer will notify The FA Case Management Team as soon as possible after the suspension takes place - but in any event **within 72 hours of the suspension happening.**

As a provider of Regulated Activity, HTAFC CIO has a legal duty to make a referral to DBS in certain circumstances. HTAFC CIO's Designated Safeguarding Officer - supported by HTAFC CIO's Senior Safeguarding Manager - will seek support, when a DBS referral needs to be made.

Reviewed & Updated: September 2019

HTAFC CIO will review this **Sharing of Information Policy** and good practice at least annually.

(54) Management of Records Policy

Policy statement: In the process of developing HTAFC CIO's safeguarding policies and procedures, the organisation has developed a policy for the management of records - which includes the retention, storage and destruction of records that relate to the welfare of a child, as well as safeguarding records relating to employees and volunteers.

- **Creating records:** When there are concerns relating to a child's welfare or safety, records will be created using HTAFC CIO's **Reporting Concerns about a Child Form** (available for HTAFC CIO's Designated Safeguarding Officer). HTAFC CIO staff and volunteers are trained to complete the relevant sections of the form and to sign against these at each stage of the procedure. Further information relating to creating this record can be found in this Handbook in the section **Procedure for Responding to Signs or Suspicions of Abuse**. As a minimum the following information will be recorded:
 - Date and time of incident/disclosure
 - Parties who were involved, including any witnesses to an event
 - What was said or done and by whom
 - Any action taken by the organisation to look into the matter
 - Any further action taken
 - Where relevant, the reasons why a decision was taken not to refer those concerns to a statutory agency
 - Any interpretation/inference drawn from what was observed, said or alleged should be clearly recorded as such
 - Name of person reporting on the concern, name and designation of the person to whom the concern was reported, date and time and their contact details
 - The record must be signed by the person making it.
- **Retention of records:** Once a record has been created it will be retained and stored in line with the **Principles of Recording & Storing Information** and the **Data Protection Policy** outlined in this Handbook. HTAFC CIO will always ensure that personal information held will be:
 - Adequate, relevant and not excessive for the purposes for which they are held
 - Accurate and where necessary kept up to date
 - Not kept for longer than is necessary for its purposes

HTAFC CIO will use the following good practice guidelines relating to the retention and storage of records:

- Information about concerns, allegations, and referrals will not be kept in one concern log, but will instead ensure that information or items relating to individuals are kept in separate files.
- Compile and label files carefully.
- Files containing sensitive or confidential data will always be locked away and access to the keys will be strictly controlled.
- A key log will be kept so that it is possible to see who has accessed a locked cabinet including when and what files have been accessed.
- Access to records will be limited to HTAFC CIO employees in named safeguarding roles who either need to know about the information in those records and/or who manage the records/files e.g. Senior Safeguarding Manager/Designated Safeguarding Manager.
- When files are to be stored long term, arrangements will be made for the keys to be passed from outgoing named safeguarding role holders to their successors.
- When records are stored electronically files will be password protected, which only limited safeguarding staff will have access to.
- Should any part of HTAFC CIO cease operating - or otherwise close down - arrangements will be made for the ongoing management of records in compliance with this **Management of Records Policy**.
- **Retention periods of records:** HTAFC CIO has developed its retention of records policy by using the guidance contained within the **Data Protection Act 1998: Guidance to Social Services (2000)** which is considered by the **Child Protection in Sport Unit** as best practice. **The guidance states that:**

“Where no legal requirement to retain information beyond the closure of the record exists, an organisation will need to establish its own retention periods. Normally, personal information should not be held for longer than six years after the subjects last contact with the organisation. **Exceptions to the six year period will occur when records:**

- Need to be retained because the information in them is relevant to legal action that has been started
- Are required to be kept longer by law.
- Are archived for historical purposes **e.g.** where the organisation was party to legal proceedings or involved in proceedings brought by a local authority. **Where there are legal proceedings relating to records, HTAFC CIO will seek the appropriate legal advice about the retention period of the particular records.**
- Consist of a sample of records maintained for the purposes of research.
- Relate to individuals and providers of services who have, or whose staff, have been judged unsatisfactory.
- Are held in order to provide, for the subject, aspects of their personal history e.g. where a child might seek access to the file at a later date and the information would not be available elsewhere.”

Where files are kept for longer than the above six year period, HTAFC CIO will clearly mark the file with the reasons for the extension period.

HTAFC CIO will adhere to the retention period guidance provided by the Child Protection in Sport Unit as follows:

Type of Record	Retention Period
Child welfare concerns that HTAFC CIO refers on to children’s social care or the Police e.g. this would include concerns about physical, sexual, emotional or neglect of a child; disclosures from a child about being abused; or information from a third party which might suggest a child is being abused; concerns about a parent or another adult that uses your organisation, or a young person who has been abused by another young person.	The referral should be acknowledged in writing by children’s social care and your organisation keeps this on file. Records will be kept for six years after the last contact with the service user unless any of the exemptions listed earlier apply - or if HTAFC CIO is required to comply with any other statutory requirements.
Child welfare concerns that HTAFC CIO decide, after consultation, do not necessitate a referral to children’s social care or the Police. In such circumstances, HTAFC CIO will make a record of the concern and the outcome e.g. where a child has been bullied, overly pushy parents or a very distressed child where the distress is unrelated to child abuse.	HTAFC CIO will destroy the record a year after the child/adult concerned ceases to use the service, unless the child or adult are continuing to use the services of the organisation.
Concerns about people (paid and unpaid) who work with children, such as allegations, convictions, disciplinary action, inappropriate behaviour towards children e.g. where an employee has breached the code of conduct, a record of the behaviour, the action taken and outcome will be recorded.	HR files and training records - including disciplinary records and working time records - will be retained for 6 years after employment ceases. HTAFC CIO will keep records for a longer period if any of the following apply: <ul style="list-style-type: none"> ▪ There were concerns about the behaviour of an adult who was working with children where they behaved in a way that has harmed, or may have harmed, a child ▪ The adult possibly committed a criminal offence against, or related to, a child ▪ The adult behaved towards a child in a way that indicates that they are unsuitable to work with children. In these circumstances records will be retained at least until the adult reaches normal retirement age, or for 10 years if that is longer.

Disclosure and Barring Service Certificate obtained as part of the vetting process.	DBS certificates have a statutory defined retention period and will therefore must be destroyed after six months, unless specific permission has been given to retain them longer. However, HTAFC CIO will keep a record of the date of the check, the reference number and the decision about vetting and the outcome.
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- **Destruction of records:** When records are due for destruction (by reference to the above table), HTAFC CIO will either incinerate or shred them. This will be carried out in the presence of another HTAFC CIO Safeguarding employee, or be entrusted to a firm specialising in the destruction of confidential material. This action will be taken at the same time as the electronic record is purged from HTAFC CIO systems. If records are not to be shredded immediately, then HTAFC CIO will ensure that all confidential records will be held in a secured plastic bag; labelled as confidential and locked in a cupboard or other secure place.

Reviewed & Updated: September

2019 HTAFC CIO will review this Management of Records Policy and good practice at least annually.

(55) IT Acceptable Usage Policy

Policy statement: HTAFC CIO's Acceptable Usage Policy covers the security and use of all the organisations information and IT equipment. It also includes the use of email, internet and mobile IT equipment. This policy applies to all users of HTAFC CIO's IT equipment - referred to as "individual" within this policy from this point onwards. In addition, this policy applies to all information, in whatever form, relating to HTAFC CIO's business activities - and to all information handled by HTAFC CIO relating to other organisations and individuals with whom it deals.

- **An individual's responsibility for computer access control:** Access to the HTAFC CIO's IT systems is controlled by the use of user ID's and passwords. All user ID's and passwords will be uniquely assigned to named individuals and consequently, individuals are accountable for all actions on HTAFC CIO's IT systems using that user ID and password. **Therefore, individuals must not:**
 - Allow anyone else to use their user ID and password on any IT system.
 - Leave their user accounts logged in at an unattended and unlocked computer.
 - Use someone else's user ID and password to access HTAFC CIO's IT systems.
 - Leave their password unprotected e.g. by writing it down.
 - Perform any unauthorised changes to HTAFC CIO's IT systems or information.
 - Attempt to access data that they are not authorised to use or access.
 - Exceed the limits of their authorisation or specific business need to interrogate the system or data.
 - Connect any non-HTAFC CIO authorised device to the HTAFC CIO network or IT systems.
 - Store HTAFC CIO data on any non-authorised HTAFC CIO equipment.
 - Give or transfer HTAFC CIO data or software to any person or organisation outside of HTAFC CIO without the authority of HTAFC CIO.

HTAFC CIO line managers will ensure that individuals are given clear direction on the extent and limits of their authority with regard to IT systems and data.

- **Internet and email conditions of use:** Use of HTAFC CIO internet and email is intended for use authorised. Personal use is permitted where such use does not affect the individual's performance in what is being undertaken and which is not detrimental to HTAFC CIO in any way; nor in breach of any other policy or procedure and which does not place the individual or HTAFC CIO in breach of statutory or other legal obligations. All individuals are accountable for their actions on the internet and email systems. **Individuals must not:**
 - Use the internet or email for the purposes of harassment or abuse.
 - Use profanity, obscenities, or derogatory remarks in communications.
 - Access, download, send or receive any data (including images), which HTAFC CIO considers offensive in any way, including sexually explicit, discriminatory, defamatory or libellous material.
 - Use the internet or email to make personal gains or conduct a personal business.
 - Use the internet or email to gamble.
 - Use the email systems in a way that could affect its reliability or effectiveness e.g. distributing chain letters or spam.
 - Place any information on the Internet that relates to HTAFC CIO, alter any information about it, or express any opinion about HTAFC CIO, unless they are specifically authorised to do this.
 - Send unprotected sensitive or confidential information externally.
 - Forward HTAFC CIO mail to personal non-HTAFC CIO email accounts e.g. a personal email account.
 - Make official commitments through the internet or email on behalf of HTAFC CIO unless authorised to do so.
 - Download copyrighted material such as music media (MP3) files, film and video files (not an exhaustive list) without appropriate approval.
 - In any way infringe any copyright, database rights, trademarks or other intellectual property.
 - Download any software from the internet without prior approval of the HTAFC CIO person responsible for IT.
 - Connect HTAFC CIO devices to the internet using non-standard connections.
- **Clear screen policy:** In order to reduce the risk of unauthorised access or loss of information, HTAFC CIO enforces a clear screen policy as follows:
 - Personal or confidential information must be protected using security features provided e.g. secure print on printers.
 - Computers must be logged off/locked or protected with a screen locking mechanism controlled by a password when unattended.

- Care must be taken to not leave confidential material on printers or photocopiers.
- All business-related printed matter must be disposed of using confidential waste bins or shredders.
- **Working off-site:** HTAFC CIO acknowledges that laptops and mobile devices (where authorised) will be taken off-site. **The following controls must be applied:**
 - Working away from the office must be in line with HTAFC CIO's remote working policy.
 - Equipment and media taken off-site must not be left unattended in public places and not left in sight in a car.
 - Laptops must be carried as hand luggage when travelling - unless airport security does not permit this.
 - Information should be protected against loss or compromise when working remotely e.g. at home or in public places. Laptop encryption must be used.
 - Particular care should be taken with the use of mobile devices such as laptops, mobile phones, smartphones and tablets. They must be protected at least by a password or a PIN and, where available, encryption.
- **Mobile storage devices:** Mobile devices such as memory sticks, CDs, DVDs and removable hard drives must be used only in situations when network connectivity is unavailable or there is no other secure method of transferring data. Only HTAFC CIO authorised mobile storage devices with encryption enabled must be used, when transferring sensitive or confidential data.
- **Software:** Employees must use only software that is authorised by HTAFC CIO on HTAFC CIO computers. Authorised software must be used in accordance with the software supplier's licensing agreements. All software on HTAFC CIO computers must be approved and installed by the HTAFC CIO person responsible for IT department.
Individuals must not:
 - Store personal files such as music, video, photographs or games on HTAFC CIO IT equipment.
- **Viruses:** HTAFC CIO has implemented centralised, automated virus detection and virus software updates within HTAFC CIO. All PC's have antivirus software installed to detect and remove any virus automatically. **Individuals must not:**
 - Remove or disable anti-virus software.
 - Attempt to remove virus-infected files or clean up an infection, other than by the use of approved HTAFC CIO anti-virus software and procedures.
- **Monitoring and filtering:** All data that is created and stored on HTAFC CIO computers is the property of HTAFC CIO and there is no official provision for individual data privacy, however wherever possible HTAFC CIO will avoid opening personal emails. IT system logging will take place where appropriate, and investigations will be commenced where reasonable suspicion exists of a breach of this or any other policy. HTAFC CIO has the right (under certain conditions) to monitor activity on its systems, including internet and email use, in order to ensure systems security and effective operation, and to protect against misuse.

Any monitoring will be carried out in accordance with audited, controlled internal processes, the UK Data Protection Act 1998, the Regulation of Investigatory Powers Act 2000 and the Telecommunications (Lawful Business Practice Interception of Communications) Regulations 2000.

This **IT Acceptable Use Policy** must be read in conjunction with HTAFC CIO's **Data Protection Policy** and HTAFC CIO's **Recording, Storing and Sharing Information Policies and Procedures**.

It is the responsibility of every HTAFC CIO employee and volunteer to report suspected breaches of this IT Acceptable Use Policy without delay to their line management.

Reviewed & Updated: September

2019 HTAFC CIO will review this IT Acceptable Usage Policy and good practice at least annually.

Part 6: Additional Safeguarding Policies & Procedures

(56) Equity Policy

Policy statement: HTAFC CIO ensures that equity is an under-pinning principle of every policy within its Children's Safeguarding Handbook. In **Safer Recruitment** it is about living and breathing our **Equal Opportunities and Valuing Diversity Policies**. Elsewhere, it is the foundation of how we work and interact with children, parents and carers.

HTAFC CIO staff and volunteers undertake its work in partnership with children, parents and carers - and will ensure that regardless of age, disability, racial heritage or religious belief, sexual orientation or identity, everyone is treated fairly and impartially. HTAFC CIO firmly believes that everyone has a right to an environment that is free from intimidation, harassment and abuse. HTAFC CIO will not tolerate any behaviour that is in breach of this Equity Policy.

- **Definition of equity:** HTAFC CIO believes that "Equity" is concerned with fairness, justice, inclusion and respect for diversity - and about ensuring that unfair discrimination is eliminated.
- **How HTAFC CIO will achieve equity:** HTAFC CIO will achieve its Equity Policy by listening to children, parents and carers - gathering information from them regarding their experiences and priorities - and involving them in decision making. Examples of equity in practice is HTAFC CIO's **Parental & Child Consent Policy** and HTAFC CIO's **Sharing of Information Policy**. All HTAFC CIO's policies and procedures demonstrate the organisations commitment to achieving equity.
- **Expectations of HTAFC CIO staff and volunteers:** Staff and volunteers will receive induction, training and on- going refresher training, to enable them to be the ambassadors of fairness, justice, inclusion and respecting diversity. HTAFC CIO expects all staff and volunteers to oppose discriminatory behaviour and to work to promote equality of opportunity.
- **Reporting breaches of this equity policy:** HTAFC CIO requires its staff and volunteers to report any kind of behaviour which is against the principles of this policy. HTAFC CIO strongly encourages all children, parents and carers to raise concerns about breaches of equity that the encounter within the organisation. HTAFC CIO will always listen when issues are raised and take the appropriate action.

Monitoring equity: HTAFC CIO will regularly monitor the effects of its Equity Policy in order to assess whether fairness, justice, inclusion and respect for diversity is being achieved. Monitoring will take the form of observation, staff and volunteer input, as well as seeking feedback and input from children, parents and carers. Where changes are required, HTAFC CIO will implement them without delay and further review the impact and effectiveness of those changes.

Reviewed & Updated: September 2019

HTAFC CIO will review this Equity Policy and good practice at least annually.

(57) Late Collection Policy

Policy statement: Late collections of children by parents and carers will create difficult situations for HTAFC CIO staff and volunteers - and raises safeguarding considerations. Through this policy, HTAFC CIO intends to outline actions and principles that are designed to minimise the occurrence of late collections and provide clear guidance for staff and volunteers on how to deal with late collections.

- **Principles underpinning HTAFC CIO's late collection policy:**
 - No activity can take place with a child without HTAFC CIO having parent/carer contact details. It is HTAFC CIO's policy that contact forms provide an alternative contact - in addition to the main parent/carer.
 - HTAFC CIO will provide parents and carers with a timetable of activities at the beginning of the initial registration, term or season and will notify parents and carers in writing should a timetable change.
 - Parents and carers are informed of the procedure they must follow in the event of emergency or delay. All parents and carers are provided with the contact number of the HTAFC CIO staff member or volunteer responsible for an activity - which enables the parent/carer to make contact when there is an emergency or delay that will impact upon the collection of a child.
 - Parents and carers are informed that it is not the responsibility of HTAFC CIO or its staff and volunteers to transport a child in the event of their delay.
- **When a child is not collected at the communicated time, HTAFC CIO staff and volunteers have been instructed to:**
 - Attempt to contact the named parent or carer
 - Attempt to make contact with the named person on the alternative number
 - To wait with the child at the notified collection point - with at least one other HTAFC CIO staff member, volunteer, or parents - if possible
 - Remind the late collecting parent or carer of HTAFC CIO's policy on late collection.
- **HTAFC CIO staff and volunteers have been instructed:**
 - Not to take the child home or to any other location
 - Not to ask the child to wait in a vehicle or building where they would be on their own with the child
 - Not to send the child home with any other person without express parental/carer permission
 - Not to leave the young person on their own.

In the event that a child is not picked up; no contact can be made with either the parent/carer or alternative named contact; and 30 minutes have elapsed - the responsible HTAFC CIO staff member or volunteer is required to contact HTAFC CIO's Designated Safeguarding Officer.

This **Late Collection Policy** should be read in conjunction with the **Code of Good Practice: Promoting Good Safeguarding Practice when Working with Children** in this Handbook.

Reviewed & Updated: September

2019 HTAFC CIO will review this **Late Collection Policy** and good practice at least annually.

(58) Lone Working Policy

Policy statement: HTAFC CIO discourages lone working and will avoid the need for staff and volunteers to work alone where reasonably practicable. Where lone working is necessary - whether that be on a regular or occasional basis - HTAFC CIO will take all reasonable steps to ensure the health, safety and welfare of staff and volunteers when working alone.

HTAFC CIO will always undertake a formal health and safety risk assessment to identify the hazards and risks of lone working and use this assessment to devise and implement safe working arrangements - so that the risks are eliminated or adequately controlled, thus enabling lone workers to carry out their work in a safe environment.

Procedure: Lone working can be safe provided staff and volunteers take the following basic precautionary measures:

- Always ensure that another HTAFC CIO staff member (preferably the line manager or HTAFC CIO's Designated Safeguarding Officer) is aware that lone working is being undertaken; the location; the work being undertaken and the expected finish times.
- There must always be available an effective means of communication with another person in the event of an emergency. This should preferably be a mobile phone or a two-way radio.
- Always ensure there is access to a fully stocked first aid kit.
- When working inside a building, always be familiar with the nearest emergency exits and the local emergency evacuation procedures.
- When working inside a building always ensure that intruders cannot access the premises by checking that windows and external doors are locked.
- Comply fully with any arrangements - or follow any specific guidance - that has been provided by either the line manager or HTAFC CIO's Designated Safeguarding Officer in relation to the lone working.
- Always take personal responsibility and all reasonable steps to ensure personal safety.
- Inform the line manager and/or HTAFC CIO's Designated Safeguarding Officer immediately if there are any incidents, or safety concerns connected with the lone working.

Responsibility of HTAFC CIO line managers: Line managers should ensure that:

- Lone working is avoided as far as is reasonably practicable.
- Arrangements are always in place so that someone is aware of a lone worker's whereabouts at all times.
- A check must always be carried out at the end of the lone working period to ensure there have been no problems.
- Emergency procedures are in place so that lone workers can obtain immediate assistance if required.
- Lone workers are provided with adequate information and training to understand the risks; and the safe working procedures associated with working alone are followed.
- A particular HTAFC CIO staff member or volunteer is capable of undertaking the work by working alone.
- The job in question can be carried out safely by one person.

HTAFC CIO's Designated Safeguarding Officer will regularly review decisions in which HTAFC CIO staff and volunteers undertake lone working.

Reviewed & Updated: September 2019

HTAFC CIO will review this Lone Working Policy and good practice at least annually.

(59) Photography & Video Policy

Policy statement: HTAFC CIO is committed to ensure that all children are kept safe and that everyone responsible for children within the organisation takes all necessary steps to prevent inappropriate images from being taken; and that innocent images are not used inappropriately. HTAFC CIO staff and volunteers are best placed to implement this policy and are trained to understand the risks and take the appropriate steps to keep children safe. Parents and carers will not be prevented from taking appropriate pictures or filming their children. HTAFC CIO believes that this is normal family practice and is incredibly important in marking milestones in a child's life and therefore encourage the taking of appropriate images of their children. However, appropriate photographic and video controls is an essential element of good safeguarding practice.

- **Understanding the law:** It is not an offence to take appropriate photographs in a public space, even if asked not to do so. No one is permitted to decide who can and cannot take images on public land. Therefore, should there ever be concerns about safeguarding in relation to images and footage being taken in a public space and a staff member or volunteer genuinely and in good faith believe that someone is acting unlawfully or putting a child at risk then they should call the Police. Concerns relating to images and footage being taken on HTAFC CIO premises and land should be raised immediately with HTAFC CIO's Designated Safeguarding Officer.

When activities are being undertaken on private land, then it is at the discretion of the land or facility owner whether images and footage can be taken. However, whether permission for images or footage to be taken is granted must be made clear to individuals prior to them being allowed access to the private property. If someone then fails to comply with the "no images or footage" instruction they can then be instructed to leave.

- **Understanding the risks:**
 - Images in which children are named can create opportunities for people to groom a child.
 - Some individuals use activities undertaken in public places as an opportunity to take inappropriate images and footage of children.
 - Images and footage of children can be used inappropriately and be circulated and copied via websites and email.
 - Children can be identified and located in circumstances where this would be inappropriate and unsafe for the child and/or parent and carer.
- **Photography and video use principles:**
 - Parents and carers will be permitted to take appropriate photographs and footage of their children.
 - If HTAFC CIO wishes to take photographs or footage of a child, a **Parental & Child Consent Form** will always be used - in line with **HTAFC CIO's Parental & Child Consent Policy**.
 - Where possible and appropriate HTAFC CIO will also obtain a child's permission to use their image.
 - No images will be used by HTAFC CIO - for any purposes - without consent having been provided for that use.
 - HTAFC CIO will avoid using children's names (first name or surname) in photograph captions.
 - If the child is named, then HTAFC CIO will avoid using the photograph.
 - If the photograph is used, then HTAFC CIO will avoid naming the child.
 - Where permission has been granted HTAFC CIO will only use images of children in a suitable dress to reduce the risk of inappropriate use.
 - HTAFC CIO is very aware that certain activities **e.g.** swimming, gymnastics and athletics presents much greater risk of potential misuse and will therefore risk-assess appropriately in relation to permission to photograph such activities.
 - HTAFC CIO will take all steps necessary to ensure that a child who is under care proceedings is protected and ensure that their image is not placed in the public domain. This will be achieved through requesting appropriate

information on the **Parental & Child Consent Form**.

- All images and footage taken will focus on the activity and not the child.
 - Unsupervised access to children - or a child - on a one to one photo shoot will not be permitted.
 - HTAFC CIO will not use authorised images and/or footage where children are wearing jewellery.
 - Images and footage will represent the diversity of children at HTAFC CIO.
 - HTAFC CIO will not permit - and will take all steps necessary to prevent - images or footage being taken in changing rooms, showers or toilets.
-
- **Use of professionals:** Where HTAFC CIO engages with professionals to take images or footage it will be clear at the outset as to the organisations expectations in relation to HTAFC CIO's **Photography & Video Policy**. In addition, HTAFC CIO will:
 - Provide the professional with a clear brief about appropriate content and behaviour.
 - Provide the professional with a copy of HTAFC CIO's **Photography & Video Policy** and explain its commitment to safeguarding children.
 - Establish who will hold the images and footage and the intended use.
 - Provide the professional with identification which must be worn at all times.
 - Inform children, parents and carers of the professional being in attendance and explain that no child's safety and safeguarding will be compromised.
 - **Coaching:** If HTAFC CIO should want to utilise images or footage as a coaching aid this will be explained to the child and parents/carers and explicit appropriate consent will be gained prior to the taking of any images or footage. Where consent to utilise images or footage as a coaching aid has been given, HTAFC CIO will ensure the security of such files in line with its **Recording, Storing and Sharing Information Policies & Procedures**.
 - **Reporting concerns:** HTAFC CIO requires its staff and volunteers to report any kind of behaviour which breaches this **Photography & Video Policy** or causes them concern. HTAFC CIO strongly encourages all children, parents and carers to raise any questions or concerns in relation to this **Photography & Video Policy**. Questions and concerns should be directed to HTAFC CIO's Designated Safeguarding Officer.

All elements of HTAFC CIO's Photography & Video Policy apply to any equipment that is capable of taking photographic images or video footage - and expressly includes the use of mobile phones and tablets.

Reviewed & Updated: September 2019

HTAFC CIO will review this Photography & Video Policy and good practice at least annually.

(60) Social Media Policy

Policy statement: The purpose of HTAFC CIO's Social Media Policy is to ensure that staff and volunteers do not participate in improper on-line behaviour, or are subjected to improper allegations. Of most importance though, is that this policy is designed to protect children. HTAFC CIO staff and volunteers are in a position of trust and required to act responsibly in their use of electronic communication.

- **Social media definition:** Social media is an interactive online media that allows users to communicate instantly with each other or to share data in a public forum. It includes social and business networking websites such as Facebook, Myspace, Reddit, Twitter and LinkedIn. Social media also covers video and image sharing and blogging websites such as YouTube, Instagram, Google+, Tumblr and Flickr, as well as personal blogs, any posts made on other people's blogs and all online forums and noticeboards. This is a constantly changing area with new websites and apps being launched on a regular basis and therefore this list is not exhaustive.

HTAFC CIO's Social Media Policy applies in relation to any social media that staff members and volunteers may use, regardless of whether it is specifically detailed in the definition above or not.

- **Principles of HTAFC CIO's social media policy:**
 - HTAFC CIO does not approve the use of social networking as the primary communication method between HTAFC CIO staff, volunteers, children and their parents/carers.
 - HTAFC CIO does not permit staff members or volunteers to set up personal social media accounts in the name of the organisation.
 - Where it is considered that the most effective way of communicating with children is via a social media site, then HTAFC CIO will set up the account in the name of the organisation and it will only be able to be used by named HTAFC CIO staff members and volunteers, as well as parents and carers. The use of the account will be solely for the purpose it was set up for.
 - All children will be informed and advised to speak to a parent, carer, another trusted adult - or HTAFC CIO's Designated Safeguarding Officer - if they have received any communication via social media which makes them feel uncomfortable or unsafe.
 - HTAFC CIO will ensure that privacy settings are switched on in the social media site; and are locked so that that the page(s) can only be used explicitly for HTAFC CIO authorised reasons and can in no way be used as a place to meet, share personal details or have private conversations.
 - HTAFC CIO will nominate an XZY staff member to be the authorised person responsible for regularly monitoring the social media page/s - and removing access for anyone behaving inappropriately.
 - HTAFC CIO will publish and make clear who the responsible person is for monitoring the content of the social networking areas - and their contact details will be available to anyone accessing the page/s.
 - No child will be permitted to access the HTAFC CIO's social networking page/s without written permission being provided by a parent or carer.
- **Social media good safeguarding practice:** HTAFC CIO staff members and volunteers must adhere to the following:
 - Never contact or communicate with a child through social media sites; or via any other form of social media app or interface.
 - Never permit a child to be added to your social media feed/s or social media apps.

Where a child requests to be added to any personal social media feed or social media app, staff and volunteers must immediately refuse the request and communicate the attempt to connect with them through social media to HTAFC CIO's Designated Safeguarding Officer.

HTAFC CIO's Designated Safeguarding Officer will explain to the child that staff members and volunteers are not permitted to have child participants on their social media feeds; and that they should not send such requests again. HTAFC CIO's Designated Safeguarding Officer will also explain to the child's parent or carer the reason for making this decision.

This **Social Media Policy** should be read in conjunction with the **Code of Good Practice: Promoting Good Safeguarding Practice when Working with Children** in this Handbook.

Reviewed & Updated: September 2019

HTAFC CIO will review this Social Media Policy and good practice at least annually.

(61) Transport Policy

Policy statement: HTAFC CIO will ensure that whenever children are transported by staff or volunteers it will be done so with regard to the organisations duty to keep children safe. This means that by the implementation of HTAFC CIO's transport policy, safe procedures of transporting children will be followed at all times.

- **Principles for transporting children:**

- HTAFC CIO require every person that drives a child to be in possession of a valid DBS certificate.
 - HTAFC CIO will ensure that there is consent in place when children are to be transported.
 - HTAFC CIO will inform parents and carers of who will be driving their child; the reasons for the journey; and the length of the journey.
 - HTAFC CIO will always ensure that someone other than the HTAFC CIO nominated driver speaks to a child about transport arrangements - to ensure there are no concerns raised by the child.
 - HTAFC CIO will do everything possible to prevent situations where a child is travelling on their own with a staff member or volunteer working alone.
 - HTAFC CIO staff members will possess the parent/carer contact details of children being transported and have access to a mobile phone in the case of emergency, or a breakdown.
 - HTAFC CIO will ensure that children are aware of their rights and that they know who they can raise concerns to in relation to being transported.
 - HTAFC CIO requires that all passengers wear seat belts or appropriate child restraints for their age; and staff and volunteers are informed that they are responsible for ensuring compliance with this.
- **Transport Good Safeguarding Practice:** HTAFC CIO staff members and volunteers must adhere to the following:
 - Never use a mobile phone while driving with a child - whether or not the mobile phone meets handsfree legislation.
 - No adult is permitted to transport a child if they are in an unregulated job category.
 - Never transport a child if not in possession of the relevant licence entitlement; or the relevant insurances.
 - You should not transport a child without another adult being present.

N.B. Best practice advice is always to avoid transporting a child alone. However, HTAFC CIO recognise that in some circumstances this may be unavoidable. Where such a journey is unavoidable, then the staff member or volunteer required to transport the child **must** first speak to their line manager - or HTAFC CIO's Designated Safeguarding Officer - and gain the consent of that other person **prior** to making the journey. The staff member or volunteer must also ensure that they communicate with the parent/carer of the child to ensure that they are also fully aware that their child is being transported without another adult being present.

In all cases where the above procedure is used to transport a child without another adult being present, the staff member or volunteer must complete a journey log and submit this at the end of each week to HTAFC CIO's Designated Safeguarding Officer. HTAFC CIO will monitor journey logs to further reduce situations where a child needs to be transported by a lone adult.

In all cases where a child is transported as a single passenger - without another adult being present - the child should sit in the back seat of the vehicle and wearing their seat belt.

- **Driving licence:** HTAFC CIO will require all staff and volunteers - that drive as part of their role - to supply their original driving licence for HTAFC CIO to inspect, copy and keep on record. No staff member or volunteer will be permitted to undertake driving duties on behalf of HTAFC CIO until it is satisfied that they are permitted to drive. Staff members and volunteers will then be required to supply the original driving licence at least annually - or at such time as requested by HTAFC CIO - while they continue to be required to drive for HTAFC CIO.
- **HTAFC CIO vehicles:** Where HTAFC CIO utilises its own vehicles (cars and minibuses etc.) it will ensure that those vehicles are safe and roadworthy; have road tax and a valid MOT; are correctly insured for their intended purpose and for carrying the number of passengers it is designed for.
- **MiDAS drivers:** Generally, only motorists that passed their car driving test before 1997 are automatically licenced

to drive a minibus. To check whether the correct entitlement is present on a driving licence the following groups should be indicated:

- On older-style licences you will need groups A and E
- On newer-style licences you will need group D1 (restriction 1 or 101, not for hire or reward)

In addition to the above entitlement, should staff members and volunteers be required to drive a minibus as part of their duties, they will also need to hold a current MiDAS certificate which lasts for four years.

For information, motorists that passed their driving test after 1st January 1997 are only permitted to drive a minibus if they meet all of the following conditions:

- Aged 25 or over
 - Have held a full licence (category B) for 2 years
 - Will be driving on a voluntary basis
 - The minibus is used for social purposes, which means in practice that HTAFC CIO will be operating under a Small Bus Permit (Minibus Permit).
 - The minibus in question has a maximum weight of no more than 3.5 tonnes - or 4.25 tonnes where a minibus has a passenger lift or ramp
 - No trailer is being towed
- **Staff and volunteer vehicles:** Where staff and volunteers are authorised and agree to transport children using their own vehicles for HTAFC CIO related matters, they must ensure that their policy of insurance specifically covers using the vehicle for business travel. Upon request, staff and volunteers must produce a copy of their insurance certificate confirming business travel cover.

Roadworthiness and tax: When using their own vehicle for HTAFC CIO reasons, staff and volunteers must ensure that it is maintained in good repair and in an efficient roadworthy condition; that it is serviced at the recommended intervals (in line with the vehicle log book and mileage record); that regular checks are made of tyre tread and pressure, lights, brakes, fuel, oil, water coolant, screen wash and battery; that it conforms with current road traffic legislation; and that the provisions and conditions of the insurance policy are observed, such that the policy is not rendered void or voidable. The vehicle must not be used for HTAFC CIO purposes if the staff member or volunteer knows or suspects it may have a defect - or in any other way not be roadworthy. In addition, the vehicle must have a valid MOT certificate (where this is required) and road tax cover. Upon request, staff and volunteers must submit a copy of the vehicle's MOT certificate.

The following rules apply to all staff and volunteers, regardless of whether they are driving an HTAFC CIO vehicle or their own vehicle.

- **Safe standards of driving:** Staff and volunteers transporting children must drive within the law and abide by all requirements of road traffic law and the Highway Code, including ensuring that:
- They are fit to drive
 - Traffic signs and speed limits are observed
 - The vehicle is properly parked and not in breach of any road traffic regulations.

While driving on Company-related business, it is important that staff and volunteers take regular breaks, because driving when tired can result in accidents.

- **Driving under the influence of alcohol and/or drugs:** Staff and volunteers are prohibited from driving for HTAFC CIO purposes whilst under the influence of any intoxicating substances such as alcohol or drugs. It is illegal to drive if the driver is unfit to do so because they are on drugs, i.e. their driving is impaired due to the influence of drugs, or because they have levels of alcohol or illegal drugs in their blood that exceeds the specified limit for alcohol or the particular drug (even if this has not affected the staff member or volunteer's driving).

Staff members and volunteers who are taking any prescription drugs or other over the counter medication which may cause drowsiness should inform their line manager prior to driving as this may affect their ability to drive. In particular, it is illegal to drive even with legally prescribed drugs in the blood if it impairs the staff member or volunteer's driving and causes them to be unfit to drive.

Finally, it is an offence to drive if the driver has levels of some legal prescription drugs in their blood that exceeds

the specified limit for the particular drug and they have either not been prescribed them or they have not taken them in accordance with the advice of the healthcare professional who prescribed or supplied them and with manufacturer's instructions. These drugs are clonazepam, diazepam, flunitrazepam, lorazepam, methadone, morphine, oxazepam and temazepam. Staff members and volunteers should talk to their doctor about whether they should drive if they have been prescribed any of these drugs.

- **Driving and mobile phones:** Operating a mobile phone whilst driving reduces concentration and increases the likelihood of an accident. It is also a criminal offence in certain circumstances. Staff and volunteers are completely prohibited from using a hand-held mobile phone or similar hand-held electronic device whilst driving as part of their job duties, whether this is to make or receive telephone calls, send or read text or image/picture messages, send or receive facsimiles or to access the Internet or e-mail.

If any staff member or volunteer is discovered contravening this rule, they will face serious action under the Company's disciplinary procedure. If the use of a hand-held mobile phone is essential when driving, then the vehicle must be stopped somewhere safe - with the engine completely turned off - before using the mobile phone. The law regards a person as "driving" if the engine is running, even if the vehicle is stationary. This means a hand-held phone cannot be used while at traffic lights, during traffic jams - or at other times when the engine is still running.

A hands-free phone is one that does not require the user to hold it at any point during the course of its operation. A mobile phone that is attached to fixed speakers and does not require the user to hold it whilst in use (for example, because it is stored in a cradle) would be covered, as would a hands-free mobile phone with voice activation. If the phone needs to be held in the user's hand at some point during its operation, for example to dial the number or to end the call, it is not hands-free.

However, even with hands-free equipment, driving and conducting a telephone conversation are both demanding tasks and therefore HTAFC CIO does not allow a staff member or volunteer - who is transporting a child - to use a mobile phone via hands-free equipment while driving.

Should any driving incident occur that results - or could result - in a driving prosecution, a fixed penalty fine and/or points and/or disqualification being given, staff members and volunteers must immediately notify HTAFC CIO's Designated Safeguarding Officer to ensure that they are still able to drive as part of their duties.

Reviewed & Updated: September 2019

HTAFC CIO will review this Transport Policy and good practice at least annually.

(62) Trips, Tours & Tournaments Policy

Policy statement: Whenever HTAFC CIO undertakes trip, tours or tournaments it will ensure the safety of children it is responsible for. The aim, while ensuring safety, is that children will have fun; grow in confidence and self-esteem; and develop useful skills. All trip, tours and tournaments will be carefully planned and preparations will ensure that any parental/carer concerns in connection with their child being away will be addressed. HTAFC CIO will ensure the safety of undertaking trip, tours and tournaments by following all elements of its **Child Protection and Safeguarding Handbook** in relation to **Safer Recruitment**, adhering to all of its Safeguarding Policies & Procedures, as well as following HTAFC CIO's **Code of Conduct for Staff and Volunteers**.

The following are the core principles of HTAFC CIO's Trip, Tours and Tournaments Policy which will be followed at all times:

- No child will be permitted to undertake trip, tours or tournaments organised by HTAFC CIO unless there is a relevant and valid signed consent form on file.
- When undertaking trip, tours and tournaments HTAFC CIO will ensure that minimum staff ratios are met for the age of the children participating.
- Where same sex children groups are undertaking trip, tours and tournaments HTAFC CIO will always ensure there is the same sex staff member or volunteer with that group.
- All HTAFC CIO staff and volunteers will have a copy of the Emergency Procedures Guide relevant to the trip, tours or tournament being undertaken.
- Trip, tours and tournaments will always include 2 HTAFC CIO staff members who are qualified first aiders and who carry a fully stocked first aid kit.
- HTAFC CIO will ensure the appropriate insurance is in place and which will cover the following:
 - **Public and civil liability**
 - **Personal accident**
 - **Vehicle**
 - **Breakdown cover for the transport**
- HTAFC CIO will ensure clear communication about meeting points etc. with children, parents and carers; and this will be confirmed in written schedules and information packs provided to everyone – in a format appropriate to the person receiving them.
- HTAFC CIO will work with children to establish and agree rules for the trip, tours or tournament and communicate the consequence of breaking them.
- HTAFC CIO will commit to meetings with parents and carers to:
 - Introduce staff and volunteers who will undertake trip, tours and tournaments with children.
 - Confirm the roles and responsibilities of those traveling with children; especially the HTAFC CIO person with responsibility for child welfare while away.
 - Provide appropriate information packs.
 - Ensure that up to date consent forms are in place for upcoming events - with all pertinent medical information completed and up to date.
 - That questions or concerns can be raised and addressed.
 - Confirm an HTAFC CIO point of contact for parents and carers and who will not be away with the group

Reviewed & Updated: September 2019

HTAFC CIO will review this Trips, Tours & Tournaments Policy & good practice at least annually.