

Harrogate Town AFC CIO
Child Protection and Safeguarding Policies and Procedures

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HARROGATE TOWN AFC
**COMMUNITY
FOUNDATION**

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 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. Policies and procedures have also been put in place working alongside the EFL (English Football League) and EFL Trust Safeguarding Codes of Practice – which are reviewed and updated regularly.

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 or external bodies.

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.

Also in light of the recent Sheldon Report, 2021 – Harrogate Town AFC CIO and Harrogate Town AFC will be working hard to implement any recommendations to improve and develop our safeguarding and child protection processes.

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 policies have been put together referencing other policies and procedures. Most notably;

- **The Football Associations (FA) "Safeguarding for All - Raising Awareness":**
<https://thebootroom.thefa.com/learning/qualifications/safeguarding-courses>

Safeguarding For All: A new course as an introduction to safeguarding and is suitable for anyone over the age of 14. This course should be taken by referees, coaches and anyone else working with children who has not yet completed the Safeguarding Children Workshop. Parents and carers and anyone else volunteering or working in football are also encouraged to take this.

In addition, the FA Boot Room offers a number of workshops related to Safeguarding 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 March 2018):** <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>
- **Let's Make Football Safe – Not Sorry - 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/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

- 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
- Keeping Children Safe in Education - Update (2020)
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/954314/Keeping_children_safe_in_education_2020_-_Update_-_January_2021.pdf
- The Sheldon Report – Independent Review into Child Sexual Abuse in Football 1970 - 2005 (2021)
<https://the-fa.com/7ZFDqu>

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

Senior Safeguarding Manager (SSM): 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 (DSO): To support all staff members and volunteers - as well as taking the lead for the day to day safeguarding responsibilities of the organisation. 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.

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 March 2018). Minutes of these meetings will be made and stored in accordance with General Data Protection Regulations (GDPR) 2018 and will be reported to HTAFC CIO's SSM on a regular basis.

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.

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

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

- **HTAFC CIO Senior Safeguarding Manager – Damien Smith**
Email: damiensmith@harrogetownafc.com
Phone: 07500700680

- **HTAFC CIO Designated Safeguarding Officer/Welfare Officer – Iain Service**
Email: iainservice@harrogetownafc.com
Phone: 07465290222

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. Plus any other bodies that may need to be informed (NCS Network, EFL, EFL Trust).

(4) 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 Governments guidance, **Working Together to Safeguard Children March 2015** (updated March 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.

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: March 2021 - HTAFC CIO will review this policy at least annually

(5) 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 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.

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: March 2021 - HTAFC CIO will review this policy at least annually

(6) Recognising the Signs of Child Abuse

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 within our policies - 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". 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

(7) 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

(8) 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: March 2021 - HTAFC CIO will review this policy at least annually

(9) 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.**

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(10) 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

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: March 2021 - HTAFC CIO will review this policy at least annually

(11) Child Abuse: Harmful Sexual Behaviour

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: March 2021 - HTAFC CIO will review this policy at least annually

(12) 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 can often happen on social networks, games and mobile phones and 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 – 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: 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: March 2021 - HTAFC CIO will review this policy at least annually

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

Introduction: 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. 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: HTAFC CIO wants to help reduce such situations from occurring - and which could be viewed from the outside as inappropriate, poor practice, or abusive.

Underpinning Principles of HTAFC CIO's Good Safeguarding Practice: For the avoidance of doubt, the standards and principle that applies to all staff members and volunteers that work with – HTAFC CIO can be seen below;

- 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.

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 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.

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.

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.

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.

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 adults 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 taken 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.

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 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: March 2021 - HTAFC CIO will review this policy at least annually

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

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 Policy document.

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**.

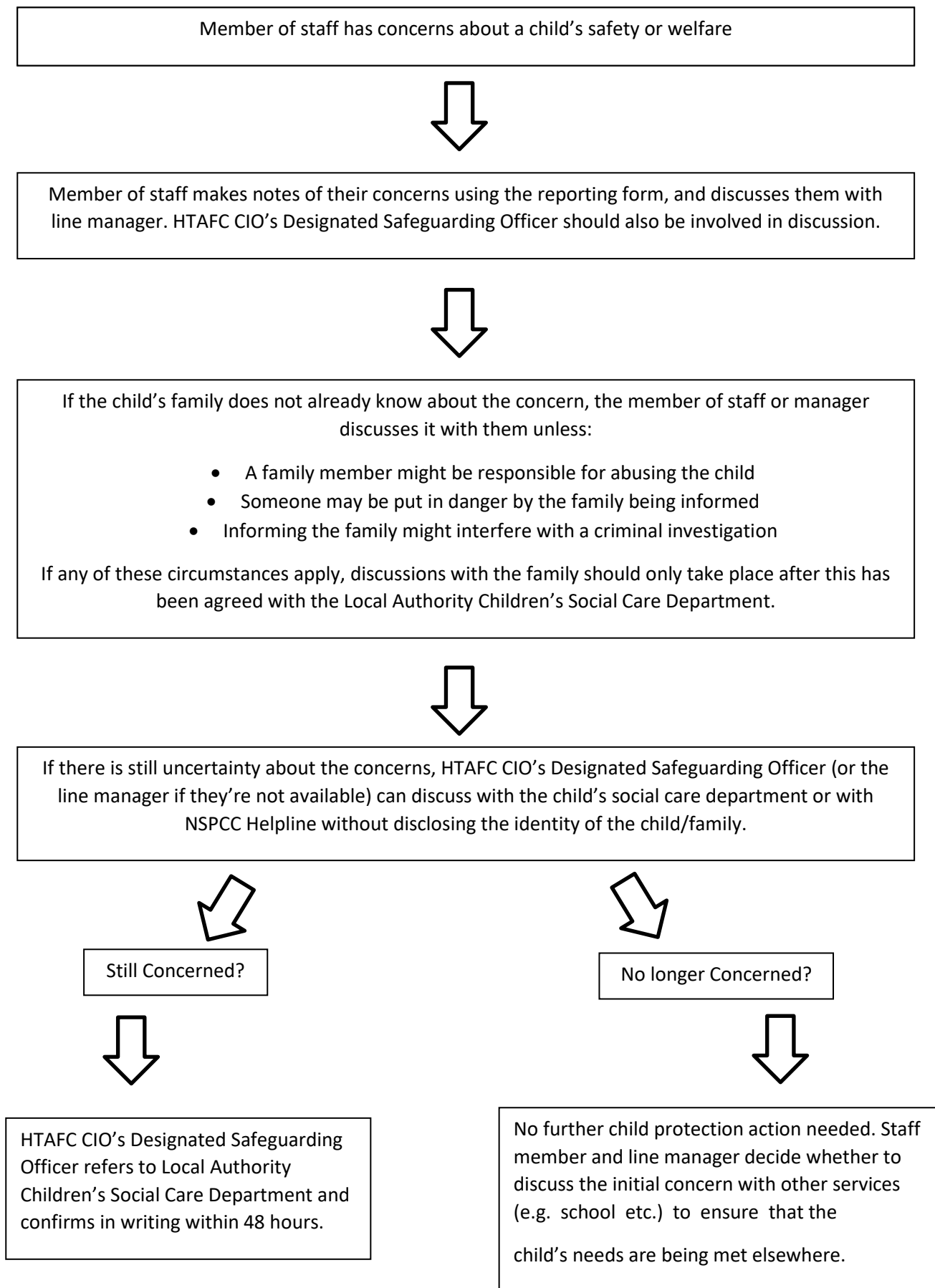
How HTAFC CIO will support employees and volunteers: HTAFC CIO recognises that employees and volunteers working for the organisation and who have become involved in supporting/working with a child who has suffered harm - may find the situation stressful and upsetting.

HTAFC CIO will support all employees and volunteers 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.

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.

Reviewed & Updated: March 2021 - HTAFC CIO will review this policy at least annually

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



(16) Code of Conduct for Children

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: 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 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 with 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: March 2021 - HTAFC CIO will review this policy at least annually

(17) Managing Low Level Concerns

It has been recognised by there is a need to manage issues that fall under the umbrella of safeguarding yet which are of a minor nature. These matters are classified as 'Low Level Concerns'. Handling such concerns appropriately and proportionately will strengthen confidence of staff and volunteers within the Community Foundation.

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

What is a Low Level Concern?

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

Low Level Concerns where no emergency actions are required, should be managed internally and recorded within the CPOMS electronic Safeguarding management system and entitled 'Low Level Concern' in the '**Concern Summary**' section.

Low Level Concerns do not in any way override or replace the Charities 'Whistle Blowing Policy' but compliment and work alongside that process.

Two Examples of Low level Concerns:

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

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

This list is not limited to the above but is extensive and any uncertainty should be discussed with the Head of Safeguarding or Club Safeguarding Officers.

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

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.

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.**

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: March 2021 - HTAFC CIO will review this policy at least annually

(19) 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.

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

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 document.

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 **0800 800 5000**.

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: March 2021 - HTAFC CIO will review this policy at least annually

(21) 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.

Policy statement: HTAFC CIO will have due regard to the Prevent Duty and will look 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:** 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.

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.

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.

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 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.

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 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.

Safeguarding training of staff and volunteers

All HTAFC CIO staff and volunteers undergo full safeguarding training and regular refresher safeguarding training.

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 these policies.

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.
- 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. 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: March 2021 - HTAFC CIO will review this policy at least annually

(22) 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.

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.

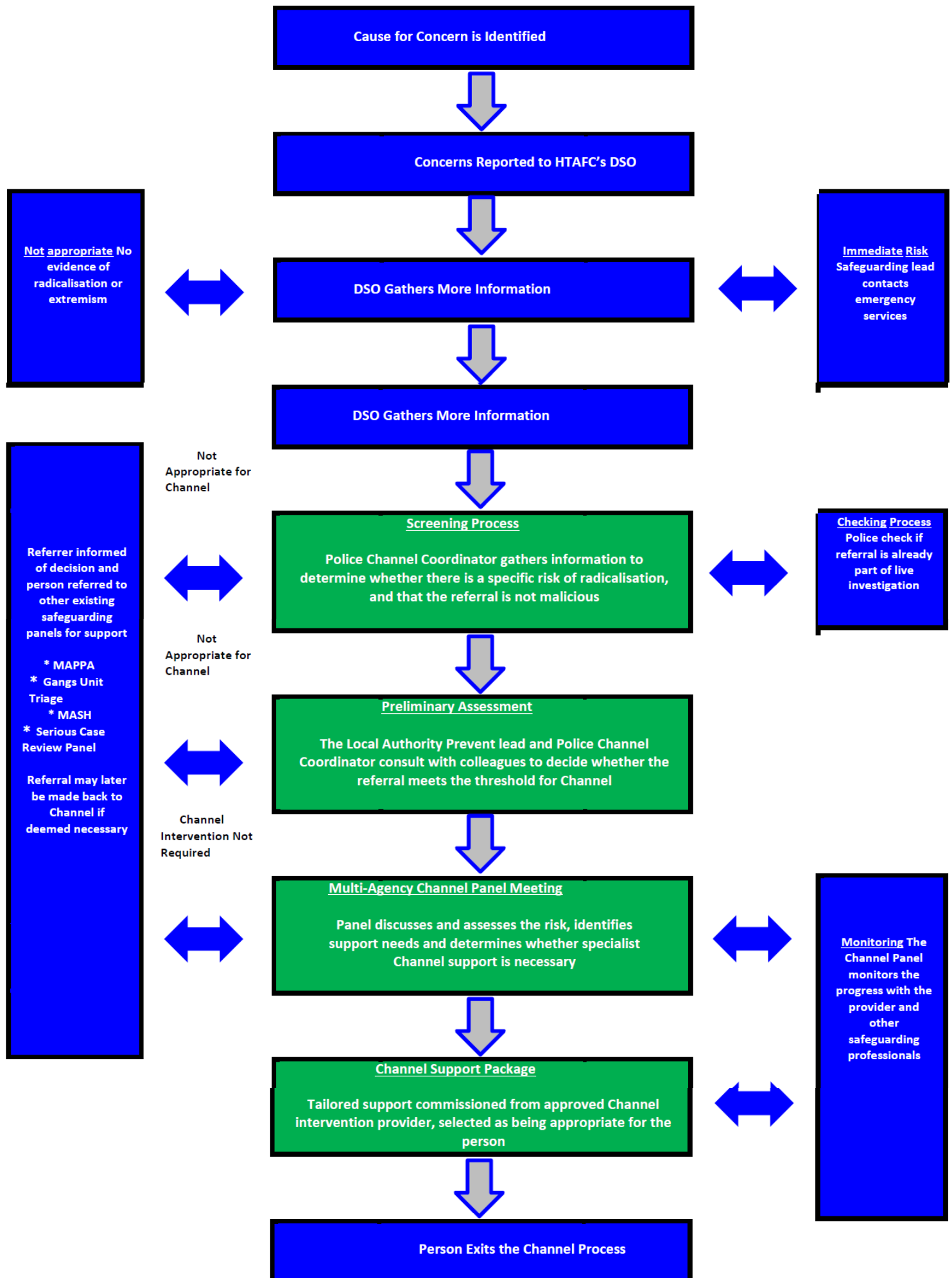
Reviewed & Updated: March 2021 - HTAFC CIO will review this policy at least annually

(23) 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...

(24) The Channel Process within HTAFC CIO



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

Policy statement: 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, 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 within these policies.

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.

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

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

Reviewed & Updated: March 2021 - HTAFC CIO will review this policy 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: March 2021 - HTAFC CIO will review this policy at least annually

(27) 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: March 2021 - HTAFC CIO will review this policy at least annually

(28) 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

IFO (Independent Football Ombudsman)

The IFO was established by the football authorities to receive and adjudicate on complaints which have failed to be resolved by football clubs or football authorities.

Furthermore, if the football bodies have dealt with a complaint in full, then the IFO can review whether due process was followed and the complaint handled properly. In these circumstances, the IFO does not offer an alternative interpretation of the rulings, but an examination of whether a complaint has been handled appropriately.

The vast majority of complaints are resolved at an early stage, but if you feel dissatisfied with the outcome of a complaint you have submitted to a football body, such as a football club or governing body, then you can refer it to the IFO for investigation. Supporters can refer any complaints straight from club to IFO stage, removing the requirement for a formal governing body stage.

Should the IFO consider a complaint warrants further investigation, it will still then seek information from the relevant football governing body concerned in considering any potential adjudication.

The IFO has no remit for incidents which occur on the field of play or for referee performance. Its coverage is limited to the Premier League and English Football League clubs and to the competitions organised under the aegis of the three English Football authorities.

You may wish to communicate your concerns to the IFO by post, phone or email, using any of the contact details below:

The Independent Football Ombudsman Suite 49
33 Great George Street
Leeds
LS1 3AJ
Telephone: 0800 588 4066
Email: Contact@TheIFO.co.uk

Reviewed & Updated: March 2021 - HTAFC CIO will review this policy at least annually

(29) 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: March 2021 - HTAFC CIO will review this policy at least annually

(30) 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: March 2021 - HTAFC CIO will review this policy at least annually

(31) 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: March 2021 - HTAFC CIO will review this policy at least annually

(32) Additional Matchday Operations - Ball Assistants

Harrogate Town AFC CIO and Harrogate Town AFC will endeavour to ensure the safety and protection of all Ball assistants whilst they are at the stadium.

- Ball assistants are aged between 12 and 16 and will be subject to the Code of Conduct issued by the club which must be signed by the child and their parent/guardian
- No ball assistant will be able to attend without the completion of written consent forms from parents/guardians, completion of medical information and emergency contact information
- Ball assistants will be supervised by 2 members of staff who have a DBS certificate and have undertaken the appropriate Safeguarding training
- Ball assistants will be signed in and out of the stadium
- The Ball assistants attend a briefing at the beginning of each match which outlines Health and Safety for the match and Safeguarding

(33) Additional Matchday Operations - Flag Bearers

As with Ball Assistants the Harrogate Town AFC CIO and Harrogate Town AFC will endeavour to ensure the safety and protection of all Flag Bearers whilst they are at the club.

The Club accepts Flag Bearers aged 5 to 17 years of age, in groups at least 12, from schools, businesses and sports clubs. All groups are accompanied at all times by their own "Group Leader" who has overall responsibility for their Group.

Group leaders and parents/carers are given the Flag Bearers policy prior to attendance which includes an outline of the Match Day Experience including Health and Safety and Safeguarding.

(34) Additional Matchday Operations - Mascots

Harrogate Town AFC CIO and Harrogate Town AFC are committed to ensuring that all children who carry out the role of Mascot, whilst in the care of the club, can do so in a safe and enjoyable environment through adherence to the club's Safeguarding Children Policy and Safer Recruitment Policy and process.

- Child mascots must be aged minimum 5 years old to maximum 12 years old.
- All staff escorting match day child mascots will be subject of an enhanced DBS check and must have completed the Safeguarding Induction training.
- Child mascots must be accompanied by a parent/carer at all times, other than when in secure areas e.g. the tunnel, when the mascot will be supervised by Club staff
- If a mascot requires help with dressing this will be done by the parent/carer.
- If an injured or disabled child is used as a mascot a risk assessment will be carried out to establish if that child can safely participate in the Match Day mascot itinerary and to identify what additional safety measures may need to be put in place to allow the child to safely participate.

Every effort should be made to achieve correct staffing ratios and the best level of supervision of match day mascots at all times.

- Staff should avoid any situations where they may be left alone with a mascot e.g. do not use a lift alone with a child mascot.
- Parents/carers will be informed of the club's Images Policy in information sent to them prior to the game; together with the appropriate mascot itinerary and details of the club's Head of Safeguarding
- Should a mascot be subject to a Court Order special reference must be made to the Image Permission form

Reviewed & Updated: March 2021 - HTAFC CIO will review this policy at least annually

(35) 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: 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.

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: March 2021 HTAFC CIO will review this policy at least annually

(36) 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/carer, 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/carer and to the bullies and their parents/carers. It should also be placed on the file of all the children directly involved.

Reviewed & Updated: March 2021 - HTAFC CIO will review this policy at least annually

(37) 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: March 2021 - HTAFC CIO will review this policy at least annually

Appendices - Additional Safeguarding Policies & Procedures

No	Appendices	Page
1	Flow chart when responding to signs of abuse	
2	Channel Process	
3	Incident Report Form	
4	Report your concerns form	

Other related Policies and Guidance Documents

Adults at Risk Safeguarding Policy

Partnership Working Procedures

Safer Recruitment Policy, Procedure and Process

Equality and Diversity

Lone Working Policy

Accident Prevention Policy

Accident Prevention Plan

Health & Safety Policy

General Data Protection Regulation

Photography & Video Policy

IT Acceptable Usage Policy

Social Media Policy

E-Safety Policy

Appendix 1 - Flow chart to follow when establishing signs of abuse

Member of staff has concerns about a child's safety or welfare



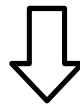
Member of staff makes notes of their concerns using the reporting form, and discusses them with line manager. HTAFC CIO's Designated Safeguarding Officer should also be involved in discussion.



If the child's family does not already know about the concern, the member of staff or manager discusses it with them unless:

- A family member might be responsible for abusing the child
- Someone may be put in danger by the family being informed
- Informing the family might interfere with a criminal investigation

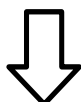
If any of these circumstances apply, discussions with the family should only take place after this has been agreed with the Local Authority Children's Social Care Department.



If there is still uncertainty about the concerns, HTAFC CIO's Designated Safeguarding Officer (or the line manager if they're not available) can discuss with the child's social care department or with NSPCC Helpline without disclosing the identity of the child/family.



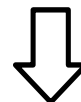
Still Concerned?



HTAFC CIO's Designated Safeguarding Officer refers to Local Authority Children's Social Care Department and confirms in writing within 48 hours.

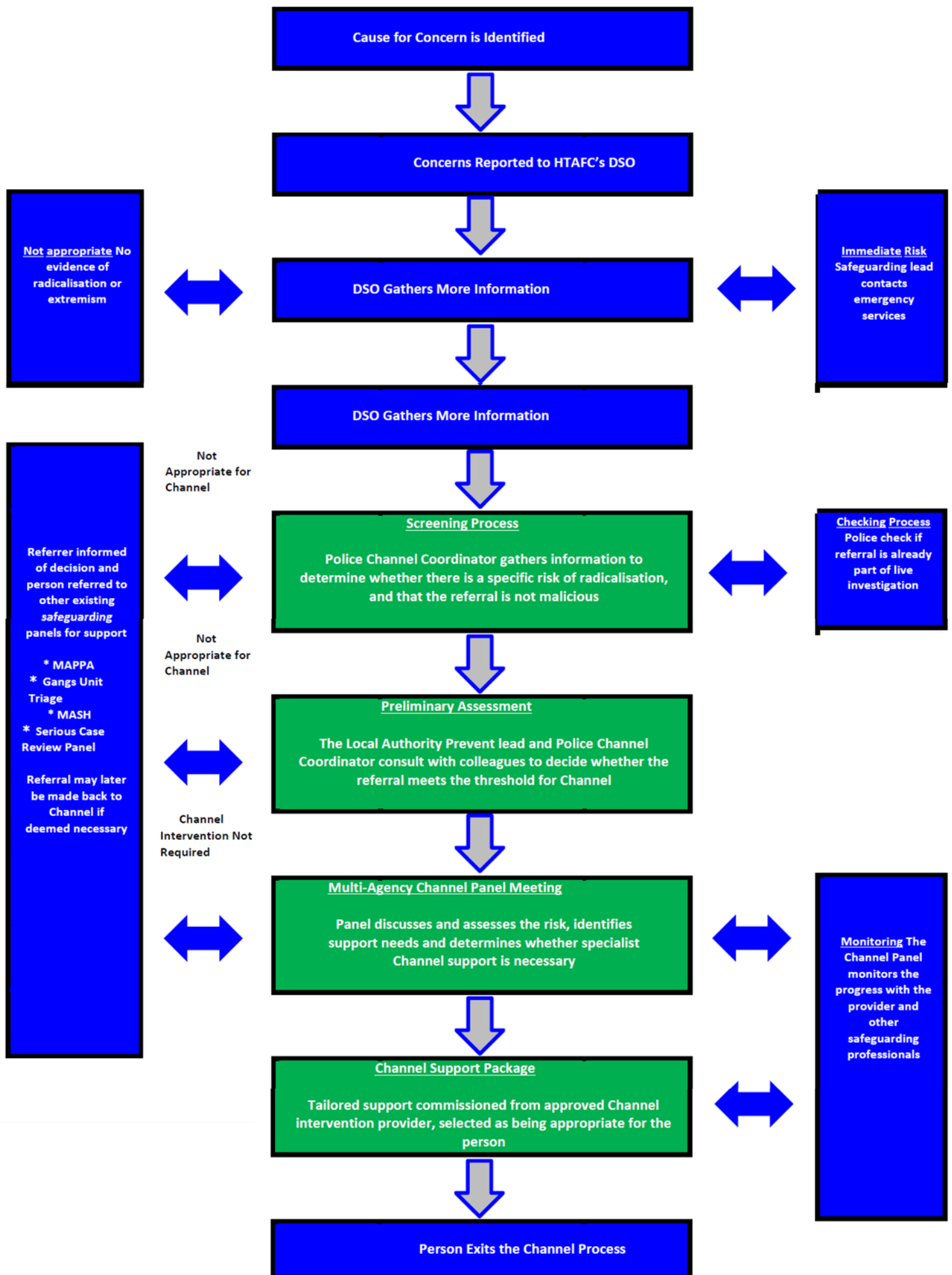


No longer Concerned?



No further child protection action needed. Staff member and line manager decide whether to discuss the initial concern with other services (e.g. school etc.) to ensure that the child's needs are being met elsewhere.

Appendix 2 - The Channel process within Harrogate Town AFC CIO



Appendix 3 - Incident Report Form

HARROGATE TOWN FOOTBALL CLUB & COMMUNITY ACCIDENT & INCIDENT NOTIFICATION FORM

All accident and incident notification forms must be submitted **within 24 hours**.
In the event of **ANY** accident, incident, or Safeguarding Child/Adult issue, please contact your line manager as soon as it is safe to do so in line with the Incident Escalation Process.

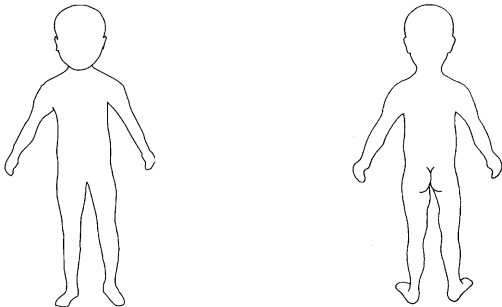
INDIVIDUAL AFFECTED BY THE INCIDENT			
Full Name			
Classification of person involved/affected/injured by incident/accident.	Participant <input type="checkbox"/>	Staff <input type="checkbox"/>	Volunteer <input type="checkbox"/>
	Other:		
Date of Birth and age of individual			
Gender & Ethnicity			
Address & Postcode			

PROGRAMME DETAILS				
Incident Category Please choose the relevant category and type of issue your concern is about.				
Accident	Break	Epi Pen / Asthma	Fall / Trip	Sprain /Strain
	Graze	Hit by Object	Near Miss	Nosebleed
Safety and Wellbeing	Behaviour	Bullying or Cyber Bullying	General Wellbeing	Domestic Violence
	Medical Issues	Home Issues	Female Genital Mutilation (FGM)	Child Sexual Exploitation
	Educational Needs	Mental Health	Ratio Breach	Soiling
Incident	Discriminatory Incident	Travel	Criminal Activity i.e., Drugs or Weapons	Verbal Aggression or Violence
	Other:			
Complaint	Member of Staff	Player/Participant	Supporter/Member of the Public	
Allegation against a professional				

COACHING INFORMATION

Programme Name: (PDC/ Academy, Afterschool Club)	
Date and time of incident:	
Other Staff/Partners Present:	
Programme Manager	

DESCRIPTION OF INCIDENT (PLEASE USE THE CONTINUATION SHEET IF NECESSARY)

<p>Describe the incident / accident. <i>NB: If information is unknown it is still crucial that you share the information that you do have.</i></p> <p>Outline any immediate action taken as a result of any injuries and the details of any first aid given (if applicable)</p> <p>Who was the information formally referred to?</p> <p>Does the child/young person/adult know that a referral is being made? <i>Note: Do not inform parent/carer if there is any suspicion of their involvement.</i></p>	<p><i>Please handwrite in capital letters and report factual information rather than assumption or interpretation. Where an opinion is given this should be clearly stated.</i></p>
<p>If relevant, please indicate where upon the body the injury occurred:</p>	
What was done immediately after the accident / incident?	
Were the emergency services called? If so, what further action was taken	
Who has been notified so far?	

INCIDENT REPORTER SIGN OFF

Signature of HTAFC staff member:	
Signature of parent/carer (<i>if applicable</i>) or another adult (<i>if there is suspicion of parent/carer's involvement</i>):	

Appendix 4 - Safeguarding Children – Report Your Concerns Form

[illegible]



Appendix 5 – Prevent Risk Assessment

Prevent Risk Assessment	
Written By: Dave Riley	Date: April 2021
Monitored By: Garry Plant	Review Date: April 2022

	Key Questions which may highlight a potential risk	Level of Risk (L, M, H)	Action to be Taken to mitigate risk	Owner	RAG
1	<u>Awareness and Understanding of Leadership</u> Do the following people have a good Understanding of their own and academy responsibilities in relation to the prevent duty? <ul style="list-style-type: none"> Academy Leads at WRCFA Senior Management team Designated Safeguarding Lead 	Medium	Prevent Policy and training to be delivered to all Senior Staff	Dave Riley	
2	<u>Policy and Procedure</u> <ul style="list-style-type: none"> Does the clubs safeguarding and child protection policy contain a specific reference to and inclusion of the Prevent Duty? Do Safeguarding and Welfare staff receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism? 	Low	Ensure annual training is delivered to all safeguarding leads	Dave Riley	
3	<u>Staff Training</u> Do all staff have the knowledge and confidence to – <ul style="list-style-type: none"> Understand the Factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas. Have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response. 	High	Prevent presentation to all staff in the next 6 months	Richard Jones	
4	<u>Safety Online</u> <ul style="list-style-type: none"> Does the institution have a policy relating to the use of IT and does contain a specific reference and inclusion of the Prevent Duty? Does the Institution employ filtering / firewall systems to prevent staff/students/visitors from accessing websites and material? 	High	Ensure HTAFC IT infrastructure includes web filtering	Dave Riley	
5	<u>Partnership with other agencies</u>	Low	Ensure all safeguarding leads are aware		

	<ul style="list-style-type: none"> Are Relevant staff clear about the process to follow when making a referral to channel? Des the club know who the LA Prevent lead is and how to contact them? 				
6	<u>Partnership with Parents and Carers</u> <ul style="list-style-type: none"> Does the club work with Parents and Carers to support them in their understanding of the Prevent agenda? 	Medium	Deliver Parent training via Parent Inductions	Paul Stansfield	