



BRISTOL ROVERS
FOOTBALL CLUB

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Safeguarding Adults Policy

Introduction

Bristol Rovers Football Club (BRFC) is committed to creating and maintaining a safe and positive environment and accepts our responsibility to safeguard the welfare of all adults involved in our Club's activities and services in accordance with the Care Act 2014.

BRFC will encourage and support partner organisations to adopt and demonstrate their commitment to the principles and practice of equality as set out in this policy and procedures.

Principles

The guidance given in the policy and procedures is based on the following **six principles of adult safeguarding**:

The Care Act sets out the following principles that should underpin safeguarding of adults:

Empowerment People being supported and encouraged to make their own decisions and informed consent.

"I am asked what I want as the outcomes from the safeguarding process and these directly inform what happens."

Prevention It is better to take action - before harm occurs.

"I receive clear and simple information about what abuse is, how to recognise the signs and what I can do to seek help."

Proportionality The least intrusive response appropriate to the risk presented.

"I am sure that the professionals will work in my interest, as I see them and they will only get involved as much as needed."

Protection Support and representation for those in greatest need.

"I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want."

Partnership Local solutions through services working with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse

Accountability Accountability and transparency in delivering safeguarding.

"I understand the role of everyone involved in my life and so do they."

- All adults, regardless of age, ability or disability, gender, race, religion, ethnic origin, sexual orientation, marital or gender status have the right to be protected from abuse and poor practice and to participate in an enjoyable and safe environment.
- BRFC will seek to ensure that our activities are inclusive and make reasonable adjustments for any ability, disability or impairment, we will also commit to continuous development, monitoring and review.

- The rights, dignity and worth of all adults will always be respected.
- We recognise that ability and disability can change over time, such that some adults may be additionally vulnerable to abuse, for example those who have a dependency on others or have different communication needs.
- We recognise that a disabled adult may or may not identify themselves or be identified as an adult 'at risk'.
- We all have a shared responsibility to ensure the safety and well-being of all adults and will act appropriately and report concerns whether these concerns arise within our Club's activities for example inappropriate behaviour of a coach, tutor or in the wider community.
- All allegations will be taken seriously and responded to quickly in line with the Club's Safeguarding Adults Policy and Procedures.
- BRFC recognises the role and responsibilities of the statutory agencies in safeguarding adults and is committed to complying with the procedures of the Local Safeguarding Adults Boards.

Guidance and Legislation

The practices and procedures within this policy are based on the principles contained within the UK and legislation and Government Guidance and have been developed to complement the Bristol Safeguarding Adults Boards policy and procedures, and take the following into consideration:

- The Care Act 2014
- Criminal Justice Act 1988
- Protection of Freedoms Act 2012
- Domestic Violence, Crime and Victims (Amendment) Act 2012
- Equality Act 2010
- Safeguarding Vulnerable Groups Act 2006
- Mental Capacity Act 2005
- Sexual Offences Act 2003
- Human Rights Act 1998
- Data Protection Act 1994 and 1998
- Serious Crime Act 2015
- Care and Support Statutory Guidance (updated 12 February 2018)
- Counter terrorism and Security Act 2015

Definitions

To assist working through and understanding this policy number of key definitions need to be explained:

Adult at Risk

Adult at Risk of harm is a person aged 18 or over who has needs for care and support (whether or not the local authority is meeting those needs) and is experiencing, or at risk of, abuse or neglect and as a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect. This may include people with learning disabilities, sensory impairments, mental health needs, older people and people with a physical disability or impairment. It may also include people who are affected by the circumstances that they are living in, for example experiencing domestic violence. This list is not exhaustive. An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time.

Abuse

Abuse is a violation of an individual's human and civil rights by another person or persons. See section 5 for further explanation.

Adult

Adult is anyone aged 18 or over.

Adult Safeguarding

Adult safeguarding is protecting a person's right to live in safety, free from abuse and neglect.

Capacity

Capacity refers to the ability to make decisions at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity (MCA 2005).

Types of Abuse and Neglect - Definitions from the Care Act 2014

This is not intended to be an exhaustive list but an illustrative guide as to the sort of behaviour or issue which could give rise to a safeguarding concern.

Self-neglect

This covers a wide range of behaviour: neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding. *In football this could be a player whose appearance becomes unkempt, does not wear suitable sports kit and deterioration in hygiene.*

Modern Slavery

This encompasses slavery, human trafficking, forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment. *In football you may notice that a participant in a team has been missing from practice sessions and is not responding to reminders from team members or coaches.*

Domestic Abuse

Including psychological, physical, sexual, financial and emotional abuse. It also includes so called 'honour' based violence (see 5.2.2 below) and controlling and coercive behaviour which isolates, undermines and causes distress/harm. Athlete may notice a power imbalance between a participant and a family member. *For example, a participant with learning and communication differences may appear quiet and withdrawn when their brother comes to collect them from sessions, in contrast to their personal assistant whom they greet with a smile.*

Discriminatory

Discrimination is abuse which centres on a difference or perceived difference particularly with respect to race, gender or disability or any of the protected characteristics of the Equality Act. *This could be the harassing of an individual because they are or are perceived to be transgender*

Organisational Abuse

Including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home. This may range from one off incidents to on-going ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation. *In football, this could be training without a necessary break.*

Physical Abuse

Includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. *This could be a coach intentionally striking a player.*

Sexual Abuse

Including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting. *This could be a fellow participant who sends unwanted sexually explicit text messages to a learning-disabled adult they are training alongside.*

Financial or Material Abuse

Including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits. *This could be someone taking equipment from a fan or participant with dementia.*

Neglect

Including ignoring medical or physical care needs, failure to provide access to appropriate health social care or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating. *This could be a coach not ensuring players have access to water.*

Emotional or Psychological Abuse

This includes threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, isolation or withdrawal from services or supportive networks. *This could be a player threatening another player with physical harm and persistently blaming them for poor performance.*

Not included in the Care Act 2014 but also relevant:

Cyber Bullying

Cyber bullying occurs when someone repeatedly makes fun of another person online or repeatedly picks on another person through emails or text messages, or uses online forums with the intention of harming, damaging, humiliating or isolating another person. It can be used to carry out many different types of bullying (such as racist bullying, homophobic bullying, or bullying related to special educational needs and disabilities) but instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

Honour Based Violence

'Honour-Based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

FGM

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by a female of any age about going on a long holiday during the summer vacation period.

Forced Marriage

Forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. **The reporting of any concerns about either suspected forced marriage or FGM is mandatory.**

Arranged Marriage

A forced marriage is not the same as an **arranged marriage**. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Mate Crime

A 'mate crime' as defined by the Safety Net Project is 'when vulnerable people are befriended by members of the community who go on to exploit and take advantage of them. It may not be an illegal act but still has a negative effect on the individual.' Mate Crime is carried out by someone the adult knows and often happens in private. In recent years there have been several 'Serious Case Reviews' relating to people with a learning disability who were murdered or seriously harmed by people who purported to be their friend.

Radicalisation and Extremism

The aim of radicalisation is to attract people to their reasoning, inspire new recruits and embed their extreme views and persuade vulnerable individuals of the legitimacy of their cause. This may be direct through a relationship, or through social media. Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups or activities.

The government defines extremism as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs' (HM Government Prevent Strategy). Many of those who have been subject to radicalisation are acknowledged to have been vulnerable as a result of social isolation, mental health issues, learning and communication difficulties or unstable social circumstances.

Signs and Indicators of Abuse and Neglect

Abuse can take place in any context and by all manner of perpetrator. Abuse may be inflicted by anyone in the Club who a player comes into contact with, Club members, workers, volunteers or coaches may suspect that a participant is being abused or neglected outside of the Club setting. There are many signs and indicators that may suggest someone is being abused or neglected, these include but are not limited to:

- Unexplained bruises or injuries – or lack of medical attention when an injury is present.
- Person has belongings or money going missing.
- Person is not attending / no longer enjoying their sessions.
- Someone losing or gaining weight / an unkempt appearance.
- A change in the behaviour or confidence of a person.
- They may self-harm.
- They may have a fear of a particular group or individual.
- They may tell you / another person they are being abused – i.e. a disclosure.

What to do if you have a concern or someone raises concerns with you?

You may become aware or suspect that abuse or poor practice is occurring, or be told about something that may be abuse or poor practice and you must report this via My Concern online reporting system or report immediately to **Nicola Dartnall-Smith; Designated Safeguarding Officer (DSO) or, in her absence, to Louise Smith; Senior Safeguarding Manager (SSM).**

If you are concerned someone is in immediate danger, contact the police straight away.

It is important when considering your concern that you also consider the needs and wishes of the person at risk, considering the nature of the alert, more information on this is given in Appendix 1 'The Legislative Framework'.

How to Record a Disclosure

- Make a note of what the person has said using his or her own words as soon as practicable. Make a record and share the concern via My Concern (non-emergency registrations only) or with the DSO/SSM without delay in order to seek support and advice.
- If it does not increase the risk to the individual, you should explain to them that it is your duty to share your concern with the DSO/SSM and describe the circumstances in which the disclosure came about.
- Take care to distinguish between fact, observation, allegation and opinion. It is important that the information you have is accurate.
- Be mindful of the need to be confidential at all times! This information must only be shared with the DSO/SSM and relevant services on a need to know basis.

- If the matter is urgent and relates to the immediate safety of an adult at risk then contact the police immediately.

Managing Concerns, Suspicions or Disclosure

There are concerns/suspicions about a person's behaviour
Or
There has been a disclosure or an allegation about a person's behaviour

WHAT ARE YOUR CONCERNS REGARDING?

ADULT SAFEGUARDING

POOR PRACTICE

DO YOU NEED TO TAKE ACTION TO ENSURE THE IMMEDIATE SAFETY OR MEDICAL WELFARE OF THE ADULT?

NO

IS THE DSO/SSM IMPLICATED?

YES

NO

YES

- CALL AMBULANCE
- TELL DOCTOR THAT THERE MAY BE SAFEGUARDING ISSUE
- CALL THE POLICE

IS THE DSO/SSM IMPLICATED?

YES

MAKE A RECORD AND SUBMIT TO DSO/SSM

MAKE NOTES AND REPORT TO DSO/SSM
DSO/SSM TO BE ALLOCATED TO INVESTIGATE

INVESTIGATED BY DSO/SSM

NO

INFORM THE DSO/SSM

MAKE NOTES AND COMPLETE & SUBMIT ON MY CONCERN

DSO/SSM FOLLOWS THE BRFC POLICY

POSSIBLE REFERRAL TO POLICE/ADULT SOCIAL CARE/LOCAL SAFEGUARDING ADULTS BOARD

Possible outcomes:

- Criminal Proceedings
- Police enquiry
- Adult Care Safeguarding Assessment
- Disciplinary Measures
- Case management group to decide on the management of any remaining concerns
- No further action

Remember to involve the adult at risk throughout the process wherever possible and gain consent for any referrals to social care if the person has capacity

Roles and Responsibilities

The Club is committed to having the following in place:

- A DSO/SSM to develop and disseminate guidance and resources to support the policy and procedures.
- A clear line of accountability within the organisation for work on promoting the welfare of all adults.
- Procedures for dealing with allegations of abuse or poor practice against members of staff and volunteers.
- A Steering Group that ensures that consistent guidance and practice is implemented across, all of the Club's sites and activities, effectively deals with issues, manages concerns and refers to a disciplinary panel where necessary i.e. where concerns arise about the behaviour of someone within the Club (this group is made up of the safeguarding team as set out in Appendix 1,
- A Disciplinary Panel will be formed as required for a given incident, if appropriate and should a threshold be met.
- Arrangements are in place to work effectively with other organisations to safeguard and promote the welfare of adults, including arrangements for sharing information.
- Appropriate whistle blowing procedures and an open and inclusive culture that enables safeguarding and equality and diversity issues to be addressed.

Good Practice, Poor Practice and Abuse

Introduction

It can be difficult to distinguish poor practice from abuse, whether intentional or accidental. It is not the responsibility of any individual involved in Trust activities to make judgements regarding whether or not abuse is taking place, however, all BRFC personnel have the responsibility to recognise and identify poor practice and potential abuse, and act on this if they have any concerns.

Good Practice

BRFC expects that the coaches of adult participants:

Adopt and endorse the Club's Codes of Conduct.

Have completed a course in basic awareness in working with Adults at Risk.

Everyone should:

- Aim to make the experiences of participants positive and enjoyable.
- Promote fairness and playing by the rules.
- Not tolerate the use of prohibited or illegal substances.
- Treat all adults equally and preserve their dignity; this includes giving more and less talented members of a group similar attention, time and respect.

Tutors / Coaches and those working directly with adults at risk should:

- Respect the developmental stage of each participant and not risk sacrificing their welfare in a desire for team or personal achievement.
- Ensure that the training intensity is appropriate to the physical, social and emotional stage of the development of the individual.
- Work with the adult at risk's medical adviser/sports scientists/physio staff and their carers (where appropriate) to develop realistic training and competition schedules which are suited to the needs and lifestyle of the individual, not the ambitions of others such as coaches, team members, parents or carers.
- Build relationships based on mutual trust and respect, encouraging adults at risk to take responsibility for their own development and decision making.
- Always be publicly open when working with adults at risk:
 - Avoid coaching sessions or meetings where a coach and an individual player are completely unobserved.
- Avoid unnecessary physical contact with people. Physical contact (touching) can be appropriate so long as:
 - It is neither intrusive nor disturbing.

- The individual's permission has been openly given.
- It is delivered in an open environment.
- It is needed to demonstrate during a coaching session.
- Maintain a safe and appropriate relationship with participants and avoid forming intimate relationships with any participants that you are working with as this may threaten the position of trust and respect present between player and coach.
- Be an excellent role model by maintaining appropriate standards of behaviour.
- Gain the adult at risk's consent and, where appropriate, the consent of relevant carers, in writing, to administer emergency first aid or other medical treatment if the need arises.
- Be aware of medical conditions, disabilities, existing injuries and medicines being taken and keep written records of any injury or accident that occurs, together with details of treatments provided.
- Arrange that someone with current knowledge of emergency first aid is available at all times.
- Gain written consent from the correct people and fill out relevant checklists and information forms for travel arrangements and trips. This must be the adult themselves if they have capacity to do so.

Poor Practice

The following are regarded as poor practice and should be avoided:

- Unnecessarily spending excessive amounts of time alone with an individual adult participant.
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Allowing or engaging in inappropriate touching of any form.
- Using language that might be regarded as inappropriate by the adult and which may be hurtful or disrespectful.
- Making sexually suggestive comments, even in jest.
- Reducing an adult to tears as a form of control.
- Letting allegations made by an adult go un-investigated, unrecorded, or not acted upon.
- Taking an adult at risk alone in a car on journeys, however short.
- Inviting or taking an adult at risk to your home or office where they will be alone with you.
- Sharing a room with an adult at risk.
- Doing things of a personal nature that adults at risk can do for themselves.

Note: At times it may be acceptable to do some of the above because it is felt to be in the best interests of the individual. In these cases, to protect both the adult at risk and yourself, seek written consent from the adult at risk and, where appropriate, their carers, and ensure that the DSO/SSM is aware of the situation and gives their approval. Any risk should be acknowledged, and measures agreed that reduce or mitigate against these risks.

If, during your care, an adult at risk suffers any injury, seems distressed in any manner, appears to be sexually aroused by your actions, or misunderstands/misinterprets something you have done, report these incidents as soon as possible to a member of the safeguarding team and make a brief written note of it.

Relevant Safeguarding Portfolio Policies

This policy should be read alongside our other Club's safeguarding policies & procedures and in conjunction with the Club's whistleblowing and complaints policies:

- Safeguarding Adults Policy
- Photography and digital images policy
- Whistle blowing policy
- Complaints policy
- Anti-bullying procedures
- Staff and Volunteers Code of Conduct
- Data Protection Policy
- Transport Policy
- Equality and Diversity Policy
- Tours and Events Policy
- Health and Safety Policy

- Safer Recruitment policy
- Late collection of Children Policy
- Mascots Policy
- Host Families policy
- Changing Facilities policy
- Scouts Policy

Sharing Concerns and Reporting Contact Details

All concerns should be recorded as soon as possible via the My Concern online reporting portal. Records should include the name, date of birth, date, time relating to the welfare of any child, whether these concerns arise outside of or within Club activities, should be shared and advice sought without delay. Wherever possible, please have as many relevant details to hand e.g. of child, siblings and parents; full details of the concern etc. but do not let a lack of detail block you from reporting.

The following contact numbers are provided for the reporting of concerns:

Roles and Responsibilities

Key personnel

The Senior Safeguarding Manager is

Louise Smith

Email: LouiseSmith@bristolrovers.co.uk

Tel: 07766 022731

Academy Designated Safeguarding Officer is

Nicola Dartnall-Smith

Email: NicolaDartnall-Smith@bristolrovers.co.uk

Tel: 07715 255299

Board Champion

Tom Gorringe

Email: safeguarding@bristolrovers.co.uk

Safety Officer

James Hillier

Email: JamesHillier@bristolrovers.co.uk

Tony Hughes - Security

Email: TonyHughes@bristolrovers.co.uk

Tel: 07828 300092

BRFC Community Trust Safeguarding Officer is

James Lee

Email: JamesLee@bristolrovers.co.uk

Matchday Safeguarding

Louise Smith

Email: LouiseSmith@bristolrovers.co.uk

Tel: 07766 022731

Nicola Dartnall-Smith

Email: NicolaDartnall-Smith@bristolrovers.co.uk

Tel: 07715 255299

The Senior Safeguarding Manager (SSM):

- has the status and authority within the Club to carry out the duties of the post, including committing resources and supporting and directing other staff
- is appropriately trained, with regular updates
- acts as a source of support and expertise to the Club community
- has a working knowledge of LSCB procedures and FA Procedures
- makes staff aware of LSCB training courses and the latest policies on FA safeguarding
- keeps detailed written records of all concerns, ensuring that information-sharing and record storage is secure and compliant with statutory guidance and General Data Protection Regulation
- refers cases of suspected abuse to the Local Authority, FA Case Management Team, ISA and/or police as appropriate
- attends and/or contributes to child protection strategy meetings and conferences

- takes the lead role in development of BRFC's safeguarding framework and coordinates the implementation of the club's approach to safeguarding children and young people
- Coordinates the Club's contribution to child protection plans
- develops effective links with relevant statutory and voluntary agencies including the LSCB
- ensures that Safeguarding policy and linked policies, procedures and practice guidance are reviewed and updated annually
- liaises with and reports regularly to the Senior Safeguarding Manager and Technical Board
- Coordinates dissemination of policy, procedures and resources through each area of Club activity or responsibility
- Promotes the safeguarding policy to all stakeholders and publicly, on the Club's website and by other means
- Advises about safeguarding recruitment/deployment checks, training needs, resources and requirements and ensures all staff have access to and undertake appropriate learning and training opportunities with compliance being reviewed regularly
- Is responsible for the strategic and operational direction and embedding safeguarding across the club. The Senior Safeguarding Manager is also responsible for ensuring that accountability and governance arrangements for the Club are understood and addressed at Board level.

The Designated Safeguarding Officer:

- is appropriately trained, with regular updates
- has a working knowledge of LSCB procedures and FA Procedures
- keeps detailed written records of all concerns, ensuring that information-sharing and record storage is secure and compliant with statutory guidance and General Data Protection Regulation
- refers cases of suspected abuse to the Local Authority, Lead Designated Safeguarding Officer, FA Case Management Team, ISA and/or police as appropriate
- Liaises with and reports regularly to the Lead Designated Safeguarding Officer
- Promotes the safeguarding policy to all within their department
- Is aware of Safeguarding Recruitment Policies/Checks and relevant training required for all positions within their departments and abides

Good Practice Guidelines and Staff Code of Conduct

Good practice includes:

- treating all with respect
- setting a good example by conducting ourselves appropriately
- maintaining a child focus and involving children and young people in decisions that affect them
- encouraging positive, respectful and safe behaviour by all
- being a good listener
- being alert to changes in children's behaviour and to signs of negative impact, abuse, neglect and exploitation
- recognising that challenging behaviour may be an indicator of abuse
- reading and understanding the Club's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues
- being aware that the personal and family circumstances of some children and other issues of diversity (including disability and communication/learning differences) lead to an increased risk of abuse
- sharing all concerns about a child's safety and welfare to the SM / DSO without delay, or, if necessary, directly to police or children's social care

Abuse of Position of Trust

All staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards them must be beyond reproach.

Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual or intimate relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is deemed consensual. This means that any sexual activity between those in a position of trust and a young person under 18 may be a criminal offence and would be reported to the Local Authority Designated Officer (LADO).

Children Who May Be Particularly Vulnerable

Some children may be at increased risk of harm or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to recognise concerning behaviour or to accept that abuse can occur. To ensure that all children involved in Club / Supporter Club activities receive equal protection, we will give special consideration to those who are:

- disabled or have communication and language differences
- young carers
- affected by parental substance misuse, domestic violence or parental mental health needs
- asylum seekers
- living away from home
- vulnerable to being bullied, or engaging in bullying
- living in temporary accommodation
- live transient lifestyles
- living in chaotic and unsupportive home situations
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, gender identity or sexuality
- at risk of sexual exploitation
- do not have English as a first language
- at risk of female genital mutilation (FGM)
- at risk of forced marriage
- at risk of being drawn into extremism.

This list provides examples of additionally vulnerable groups and is not exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages when appropriate and accessible formats for children with communication support needs.

Responding to Allegations, Disclosures or Concerns

All staff, volunteers and players have a responsibility to ensure the safety and welfare of children and to take appropriate steps to ensure that suspicions and allegations of abuse are taken seriously and responded to quickly and appropriately. It is not the responsibility of anyone within the club to decide whether or not child abuse has taken place. It is never an option to do nothing if you become aware of concerns. These should be shared with the appropriate designated individuals or agencies without delay so that advice can be sought, and appropriate action taken. It is however recognised that an individual may need to respond to a situation immediately and prior to such contact if the nature of the suspicion or report is putting the child concerned in immediate danger.

Raising Concerns About a Member of Staff or a Colleague

Staff who are concerned about the behaviour of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount. The Club's whistleblowing code enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.

All concerns of poor practice or possible child abuse by colleagues should be reported to the SSM. Complaints about the SSM should be reported to the Board Champion. The LADO will be notified of any concerns relating to staff and

the Club's Designated staff will consult with the police and local authority children's social care as appropriate. Useful contact details are listed at the end of this policy.

Staff may also report their concerns directly to the LADO, children's social care, the police or the NSPCC if they believe direct reporting is necessary to secure action. Where there is a complaint against a member of BRFC staff then one of the following may occur:

- A criminal investigation led by the Police
- A child protection investigation led in a multi-agency approach by the Local Authority
- A disciplinary or misconduct investigation led by the club, which may also involve The Football Association

The club will delay an internal disciplinary or misconduct investigation while a criminal or local authority investigation takes place.

Historical Allegations Against Staff

All concerns will be taken seriously by BRFC and responded to positively irrespective of when they arose. Evidence demonstrates that historic concerns may indicate current risks and therefore the Club encourages anybody with concerns to report them directly to the Police or Lead Designated Safeguarding Officer.

Please see the club's Whistleblowing policy.

Allegations concerning staff who no longer work at the Club, or historical allegations will be reported to the police and/or LADO, FA and EFL.

Staff Training

It is important that all staff receive training to enable them to recognise the possible signs and indicators of abuse, neglect and exploitation and to know what to do if they have a concern.

New staff and Board members will receive a briefing during their induction, which includes the Club's safeguarding policies and procedures, staff behaviour policy, reporting and recording arrangements, and details for the SSM. All staff, including the DSO, SSM and Board will receive training that is regularly updated. All staff working directly with children will be required to attend an FA safeguarding course (managers, club, officials, club mascots medics and other support staff) and coaches will be required to undertake the FA coaches' safeguarding children course ('How we support' level 1 workshop) or the UK Coaching Safeguarding and Protecting Children workshop. Training should be refreshed at least every three years. All staff will also receive safeguarding updates via email, website access and staff meetings throughout the year.

Safer Recruitment

Our Club complies with the requirements of Keeping Children Safe in Education (DfE 2016 and DfE 2018 which is currently subject to consultation) and the LSCB by carrying out the required checks including the take up of references and verifying the applicant's identity, qualifications and work history. The Club's Staff Recruitment policy and procedures set out the process in full and can be found on our website. All staff engaged in any way in activities involving substantial and unsupervised responsibilities in relation to children, young people and adults at risk are required to have a Disclosure and Barring Service check (DBS) and will not be allowed to work in any unaccompanied capacity until clearance has been received by the Club's DSO/SSM.

Volunteers

Volunteers will undergo DBS checks as required prior to commencing volunteering roles. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised with children and adults at risk.

Contractors

The Club checks the identity of contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during times where children/adults at risk are within close proximity.

Site Security

All visitors are expected to observe the Club's safeguarding and health and safety regulations.

Off-Site Arrangements, Trips and Visits

All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where Club activities are provided by and managed by the Club/supporters club, our own child protection policy and procedures apply. If other organisations provide services or activities in partnership with or on behalf of the Club, we will check that they have appropriate procedures in place, including safer recruitment procedures.

When our children are involved in off-site activities facilitated or organised by the Club, including day and residential visits and work-related activities, we will check that effective safeguarding and child protection arrangements are in place.

Staff/Children/Adults at Risk Online and Electronic Communication

The Club provides advice to staff and volunteers regarding their personal online activity and electronic communication. BRFC has strict rules regarding online contact and electronic communication with participants and service users (children/adults at risk). Staff found to be in breach of these rules may be subject to disciplinary action and/or internal/external investigation.

Child Protection Procedures

Recognising abuse

To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.

Abuse may be committed by adult men or women and by other children and young people.

Working Together to Safeguarding Children 2017 (HM Gov) and Keeping Children Safe in Education (DfE 2016) refer to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

Bullying

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures

Taking action

Any child in any family and in any organisation could become a victim of abuse. Staff should always maintain an attitude of "it could happen here".

Key points for staff to remember for taking action are:

- in an emergency take the action necessary to help the child, if necessary, call 999
- report your concern as soon as possible to the SSM or either of the department DSO's definitely by the end of the day
- do not start your own investigation
- share information on a need-to-know basis only - do not discuss the issue with colleagues, friends or family
- complete a record of concern via the online system for those with access.

- seek support for yourself as these issues almost always have an emotional impact.

If you are concerned about a child's welfare

There will be occasions when staff may suspect that a child may be subject to harm or abuse. These concerns may arise as a result of issues within Club/supporters club activities or outside of the Club environment. Their behaviour may have changed, they may show signs of confusion or distress, or physical indicators may have been noticed. In these circumstances, staff should give them the opportunity to talk and ask if they are OK or if they can help in any way.

Staff should record these early concerns via the My Concern online reporting portal or via email or call if not accessible the DSO. If the child does reveal that they are being harmed, staff should follow the advice below and discuss their concerns with the SSM.

If somebody discloses to you

It takes a lot of courage for anybody to disclose that they are being abused and there are even greater blocks for children and young people. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.

If a child talks to a member of staff about anything that indicates a potential risk to their safety or wellbeing, **the staff member will, at the appropriate time, let the child know that in order to help them they must pass the information on to someone who can help or advise (the SSM/DSO)**. The point at which they state that this is a matter for personal and professional judgement. During their conversations with the child staff should:

- allow them to speak freely
- remain calm and not overreact
- give reassuring nods or words of comfort – 'I'm so sorry this has happened', 'I want to help', 'This isn't your fault', 'You are doing the right thing in talking to me'
- not be afraid of silences
- **under no circumstances** ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does their mother think about it. It is fine to say, 'do you want to tell me what has happened?' or 'Can you describe what you mean by [*quote something they have said*]?' in order to clarify what has caused them distress or harm
- at an appropriate time tell the child/adult at risk that in order to help them, the member of staff must pass the information on to the Club's safeguarding lead to get advice and support
- not automatically offer any physical touch as comfort. If the child is upset and initiates the contact themselves, this should be recorded and reported
- tell the child what will happen next
- report via My Concern online reporting system or in an emergency verbally to the SSM/DSO themselves (never assume the child or someone else will or has done so)
- provide reassurance, but false promises of confidentiality should never be made.
- seek support for themselves as managing concerns always has an emotional impact

Notifying parents

The Club will normally seek to discuss any concerns about a child with their parents/legal guardian. This must be handled sensitively, and the SSM/DSO will make contact with the parent in the event of a concern, suspicion or disclosure.

Our focus is the safety and wellbeing of the child. Therefore, if the Club believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Confidentiality and Sharing Information

All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the person and staff involved but also to ensure that information being released into the public domain does not compromise evidence or any subsequent investigation.

Staff should only discuss concerns with the DSO and/or Senior Safeguarding Manager. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

However, any member of staff can contact children's social care if they are concerned about a child

Safeguarding information will be stored and handled in line with the Data Protection Act 1998.

Information sharing is guided by the following rules and principles*:

1. neither data protection legislation and guidance or human rights law are barriers to sharing information in the interests of safeguarding
2. be open and honest
3. seek advice (from designated people e.g. DSO/SSM or statutory agencies)
4. share information with consent where possible
5. always consider safety and wellbeing
6. the information shared is necessary, proportionate, relevant, adequate, accurate, timely and secure
7. a record must be kept of your actions, decision & reasons for it

**Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers.HM Gov. March 2015*

Information sharing decisions will be recorded, whether or not the decision is taken to share.

Records of concern and other written information will be stored in a locked facility with restricted access and any electronic information will be stored in a protected file, transferred securely and only made available to appropriate individuals.

Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request to see child protection records, they will refer the request to the SSM.

The Club's confidentiality and information-sharing policy is available to parents and young people/adults at risk on request.

Referral to Children's Social Care

The SSM will make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. Any member of staff may make a direct referral to children's social care if they believe independent advice and action is necessary to protect a child.

Reporting Directly to Child Protection Agencies

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:

- the situation is an emergency and the DSO and SSM are unavailable
- they are convinced that a direct report is the only way to ensure the child's safety
- for any other reason they make a judgement that direct referral is in the best interests of the child.

Peer on Peer Abuse

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the Club's anti-bullying procedures where necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than antibullying procedures.

Peer on peer abuse can take many forms, including:

- **physical abuse** such as biting, hitting, kicking or hair pulling
- **sexually harmful behaviour/sexual abuse** such as inappropriate sexual language, touching, sexual assault
- **sexting**, including pressuring another person to send a sexual imagery or video content
- **teenage relationship abuse** - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner
- **initiation/hazing** - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them
- **prejudiced behaviour** - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.

Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues may be prevalent when dealing with peer-on-peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

At our Club, we take the following steps to minimise or prevent the risk of peer-on-peer abuse.

- We will seek to promote an open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.
- Induction processes are used to provide a moral framework outlining codes of conduct, acceptable behaviour and stressing the effects of bullying.
- Staff will endeavour always to create surroundings where everyone feels confident and at ease in the Club.
- We will ensure that Club activities are well supervised by appropriate and qualified staff and volunteers.

All allegations of peer-on-peer abuse should be reported to the safeguarding team via My Concern or passed to the DSO/SSM. They will then be investigated and dealt with as follows.

- **Information gathering** - children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess both the impact and whether there was intent to cause harm.
- **Decide on action** - if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSO/SSM will then work with children's social care to decide on next steps, which may include contacting the police.
- **Inform parents** - as with other concerns of abuse, the school will normally seek to discuss concerns about a child with parents. Our focus is the safety and wellbeing of the child and so if the Club believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.

Supporting those involved

The support required for the child who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.

Support may also be required for the child that exhibited harmful behaviour. We will seek to understand why the child acted in this way and consider what support may be required to help the child change behaviours.

Once those needs have been met, the consequences for the harm caused or intended will be addressed with them in partnership with parents and external agencies as required.

Sexting

There is no accepted definition of 'sexting', but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The UK Council for Child Internet Safety defines sexting as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.

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

Guidance for staff and volunteers dealing with sexting incident/disclosure:

- The incident should be reported via My Concern online reporting portal or referred to the SSM/DSO immediately clarify over concerns with any staff involved in reporting and ensure concerns are accurately recorded
- Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g., if a young person has showed it to you before you could ask them not to), report this to the DSO/SSM
- Do not delete the imagery or ask the young person to delete it
- Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the SSM/DSO
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers
- Do not say or do anything to blame or shame any young people involved
- Do explain to them that you need to report it and reassure them that they will receive support and help from the Safeguarding Team.
- If there is a concern a young person has been caused distress, harmed or is at risk of harm a referral will be made to the police immediately. The police do not seek to criminalise young people but take sexting very seriously and will take appropriate action which may include seizure of devices and speaking to the young people involved. On-line abuse through sexting can have very serious consequences and undertaking an investigation at Club level can lead to images and evidence being deleted which prevents appropriate action being taken to support and/or educate those involved or impacted by these issues. Parents will be informed at an early stage and involved in the process unless the police advise against this or there is good reason to believe that involving parents would put the young person at risk of harm.

Sexual Exploitation of Children

Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of opportunities, future career gains, friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

A common feature of sexual exploitation is that the children often don't recognise the coercive nature of the relationship and therefore do not see themselves as a victim. In some cases, parents/guardians also fail to recognise that a relationship is potentially abusive, and both the child and their carers may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately.

Honour-Based Violence

'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.

FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by a girl of any age about going on a long holiday during the summer vacation period.

A **forced marriage** is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales, the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. The reporting of any concerns about either suspected forced marriage or FGM is mandatory.

A forced marriage is not the same as an arranged marriage. In an **arranged marriage**, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in the UK which would make it unlawful in relation to a UK citizen. Relevant Club staff receive training and should be particularly alert to suspicions or concerns raised in relation to a young person who is being taken abroad and may be anxious or prevented from returning to the UK.

Radicalisation and Extremism

Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups or activities.

The government defines extremism as 'vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs' (HM Government Prevent Strategy).

Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form however staff should also remain alert to the risk of radicalisation into white supremacy extremism.

'Prevent' is a cross-Government policy that forms one of the four strands of the UK's strategy for counter terrorism which includes the prevention of radicalisation of vulnerable adults and children. Those who are targeted with a view to radicalise them are often the most vulnerable in society including those with poor networks of support or who are experiencing socially isolated, mental health issues and/or learning and communication issues.

Keeping children safe from these risks is a safeguarding matter and should be approached in the same way as safeguarding children from other risks.

If the behaviour of anybody involved in our activities indicates that they or those around them are at risk of harm, staff should report these concerns immediately to the DSO/SSM. In the event that there appears to be an immediate risk or danger call 999.

Private Fostering Arrangements

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged

under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.

Where a member of staff becomes aware that a child may be in a private fostering arrangement, they will raise this with the DSO/SSM, and the Club will notify the local authority who will check whether the arrangement is suitable and safe for the child. The Club, on very rare occasions, makes arrangements for Academy scholars to stay with a host family. In such circumstances the Club will adhere to its Host Family policy to ensure that all safeguarding considerations are addressed and agreed with the player and his parents. Where any accommodated scholar is aged under 16 arrangements will be agreed in partnership with the local authority and in line with the Children (Private Arrangements for Fostering) Regulations 2005.

Looked After Children

The most common reason for children becoming looked after (taken into care) is as a result of abuse or neglect. Children's early experiences have a significant impact on their development and future life chances. As a result of their experiences, both before and during care, looked after children are at greater risk than their peers.

Appropriate staff will be informed about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the local authority looking after the child. Any indicators or signs that a looked after child may require additional support or protection must be reported without delay to the DSO/SSM who will share concerns with the Local Authority without delay.