

Safeguarding and Child Protection Policy

1. Context

Luton Town Football Club and Academy (LTFC) are an important part of the local and international community and as such we take our responsibility to safeguard our people extremely seriously. Our staff and volunteers are often closely involved with children and their families and vulnerable adults. In many cases our adults are in a 'position of trust' in their roles especially in the academy. Consequently, we have a critically important role towards the identification, prevention and reporting of harm and abuse that is detailed in this policy.

At Luton Town Football Club, we are committed to providing a safe and inclusive environment where all can thrive. We recognise our responsibility to safeguard and promote the wellbeing of all children, young people and adults at risk. We work collaboratively with our partners and follow robust safeguarding practices to ensure everyone is treated fairly and professionally.

We recognise the following principles which underpin our work with all groups and individuals who may have additional needs for support and protection: **It is every child and adults right to be protected from abuse irrespective of their age, gender identity, faith or religion, culture, ethnicity, sexual orientation, background, economic position, disability or level of ability.**

All staff and volunteers share the responsibility for the protection of children and adults at risk and will show respect and understanding for their rights, safety and welfare. The additional vulnerability of disabled adults or children (including those with invisible disabilities, learning and communication differences) is recognised.

We support all children and vulnerable adults involved in our activities to understand their roles and responsibilities with regards to safeguarding and protecting children and vulnerable adults, including the responsibility to report all concerns to the Head of Safeguarding or Safeguarding Managers.

The policy itself is a practical document that clarifies the roles and duties of **all adults** working or volunteering for LTFC.

This policy does not reiterate extensive sections of statutory guidance, however for clarity and consistent practice, links to relevant statutory guidance are provided throughout this policy. In addition, we welcome our duty to maintain a professional working knowledge of relevant statutory guidance and of local arrangements as determined by Luton Safeguarding Partnership which can be found here: [Safeguarding children \(luton.gov.uk\)](https://www.luton.gov.uk/safeguarding) and the corresponding services for children and adults which can be found here: [Safeguarding Bedfordshire - Safeguarding Bedfordshire home page](#)

Policy Purpose

- To reduce risk and prevent harm to children and vulnerable adults.
- To ensure the identification of, and timely and appropriate responses to, risk and harm to children and vulnerable adults.
- To ensure that all adults in a 'position of trust' at LTFC understand their roles and responsibilities in respect of the above.

Relevant Guidance and Legislation

This policy is also based on the following legislation/guidance:

- Working Together to Safeguard Children
- Protecting Vulnerable Adults
- Keeping Children Safe in Education
- EFL Safeguarding Standards
- Capability Code of Practice
- Charity Governance Code
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- The Care Act 2014 which provides a framework for the care and protection of adults at risk
- Care and Support Guidance (2015)
- The Rehabilitation of Offenders Act 1974
- The Protection of Freedoms Act 2012
- Sexual Offences Act 2003
- The Human Rights Act 1998
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006
- What to do if you're worried a child is being abused', DfE (March 2015)
- Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Mandatory Reporting of Female Genital Mutilation - procedural information' (October 2015)
- The Prevent duty: Departmental advice for schools and childcare providers'
- Child Sexual Exploitation: A definition and guide for practitioners, local leaders and decision makers DfE (2017)

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2. Definitions

Definition Position of Trust:

A position of trust refers to certain roles and settings where an adult has regular and direct contact with children or vulnerable adults and who holds some authority over that group of people by virtue of the role that they play.

Safeguarding is everyone's responsibility.

Definition of Safeguarding: (This applies to all children and vulnerable adults in our care)

Safeguarding is the action that is taken to promote the welfare of children and vulnerable adults to protect them from harm.

It includes:

- protection from abuse and maltreatment
- preventing harm to a person's health or development
- ensuring children grow up with the provision of safe and effective care
- taking action to enable all children and young people to have the best outcomes.

Working Together to Safeguard Children (2023) expands this by saying that safeguarding is *'activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.'*

Definition of Child Protection:

'Child protection' is the activity to protect specific children who are suffering, or who are likely to suffer, significant harm. Therefore, *protection* is a specific element of safeguarding, whereas safeguarding legislation in general is about the promotion of children's needs and the prevention of harm. This emphasises the need for all staff to be able to respond early when they have a concern rather than wait until this is more defined and certain.

At this point (child protection) the involvement of services to protect the child (ren), including Children's Social Care, is statutory. The critical message from legislation that should inform all actions and decisions is that "the child's welfare is paramount".

3. Staff with additional safeguarding responsibilities

Safeguarding Manager: Stuart Cornish: stuart.cornish@lutontown.co.uk

Player Care: Wayne Polson: wayne.polson@lutontown.co.uk

Academy Manager: Paul Benson: paul.benson@lutontown.co.uk

Head of Safeguarding: Sarah Bloomer: sarah.bloomer@lutontown.co.uk

Senior Safeguarding Leader: Jenn Smith: jenn.smith@lutontown.co.uk

4. Local arrangements and useful contacts

Luton Threshold Framework: [Document.ashx \(luton.gov.uk\)](#)

Luton MASH (Multi-Agency Safeguarding Hub): in the event a child is reported to have been *significantly harmed*, including circumstances in which a child has received a mark or injury, you must contact the MASH on **01582 547653**.

Police: If a child is in *immediate danger*, telephone **999** and request the Police.

To contact the police to discuss a child protection or safeguarding concern, when a child is not in immediate danger, telephone 101 or contact the Luton police online at [Contact us | Bedfordshire Police \(beds.police.uk\)](#)

Reporting concerns about children or adults: [Safeguarding Bedfordshire - Report a concern about an adult](#)

All services for children and adults: [Safeguarding Bedfordshire - Safeguarding Bedfordshire home page](#)

Luton Safeguarding Partnership: [Safeguarding children \(luton.gov.uk\)](#)

The Local Authority Designated Officer (LADO): LADO@luton.gov.uk or Paul James Paul.James@luton.gov.uk or 01582 548069

Making a LADO Referral: [Managing allegations about adults working with children referral - Before you start - Luton Council](#)

The FA Safeguarding Team: safeguarding@thefa.com

Mark Derrien, Regional Safeguarding Manager (EFL): mderrien@efl.com

The EFL Safeguarding Team: safeguarding@efl.com

PREVENT National Referral: [National Prevent referral form \(publishing.service.gov.uk\)](#)

Local Response to Radicalisation and Terrorism: [Terrorism in the UK | Bedfordshire Police \(beds.police.uk\)](#)

5. Categories of Harm and Abuse

A useful set of guidance and information on the full range of safeguarding risks and harms can be found in Annex B here: [Keeping children safe in education - GOV.UK \(www.gov.uk\)](#)

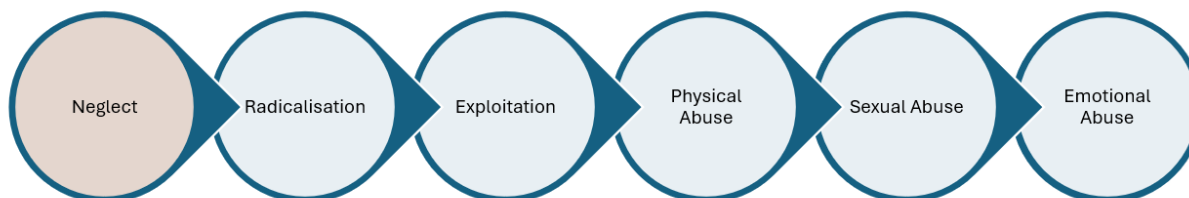
If a child or vulnerable adult is suffering, or is likely to suffer from abuse, neglect, exploitation or radicalisation it is our duty to report the concern through formal structures and processes immediately.

To report abuse and harm, we must be able to identify them through understanding indicators of abuse and behaviours linked to abuse.

Abuse is the maltreatment of a child or vulnerable adult by another person or people. Somebody may abuse or neglect a child or vulnerable adult by inflicting harm or failing to act to

prevent harm. Abuse, including neglect, and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

All referrals to children's social care will be under one or more of these broad categories of abuse, neglect, exploitation or radicalisation.



5.1 Neglect

Neglect is the persistent failure to meet a child's or vulnerable adult's basic physical and/or psychological needs, likely to result in the serious impairment of that person's health or development. Neglect may also occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's or vulnerable adult's basic emotional needs.

If you are concerned that someone is experiencing neglect, report what you have observed or has been disclosed through MyConcern immediately along with what you have done to reduce the risk of harm so far.

5.2 Prevent Duty and Radicalisation

Radicalisation is the action or process by which individuals, often young people, move from supporting moderate mainstream views to supporting extreme ideologies. This process can occur online through exposure to and engagement with violent ideological propaganda, or offline through extremist networks. Radicalisation makes those susceptible to grooming due to their sense of societal injustice or feelings of isolation more likely to support terrorism and violent acts of extremism, and possibly even commit such criminal acts themselves.

Definitions:

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- (1) negate or destroy the fundamental rights and freedoms of others; or
- (2) undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- (3) intentionally create a permissive environment for others to achieve the results in (1) or (2)."

Terrorism is an action that: endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system.

The use or threat of terrorism is designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We have a duty to prevent children and young adults from being drawn into terrorism. The Safeguarding Manager will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in LTFC being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering and monitoring is in place and equip our participants to stay safe online when using our facilities.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in participants' behaviour. Educate Against Hate provides useful resources to identify indicators of possible radicalisation.

<https://www.educateagainsthate.com>

If you are concerned that someone is susceptible to and experiencing radicalisation, report what you have observed or has been disclosed through MyConcern immediately along with what you have done to reduce the risk of harm so far.

Anyone can call the national police Prevent advice line on **0800 011 3764**, in confidence, to share your concerns with specially trained officers. The advice line is open 9am to 5pm every day.

PREVENT National Referral: [National Prevent referral form \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)

Local Response to Radicalisation and Terrorism: [Terrorism in the UK | Bedfordshire Police \(beds.police.uk\)](https://beds.police.uk)

Guest Speakers – No Platform

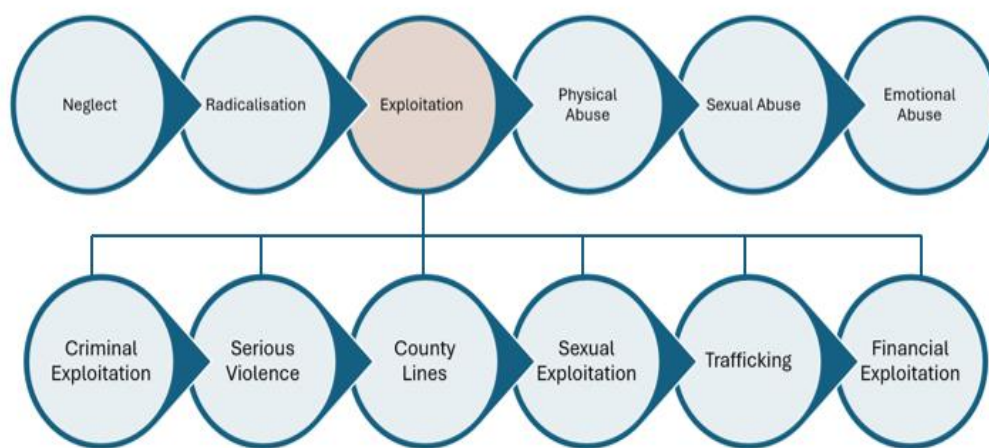
We believe that guest speakers can enrich our programmes and other areas of our business by adding depth and breadth on a range of subjects. In relation to this, it is our policy that guest speakers must:

- Never be left alone with our children and young people
- Undergo relevant checks to ensure that we understand the messages that they intend to share
- Give no platform to any political viewpoint

We will ensure that all guest speakers share the content of the talk with staff prior to the talk. If content is deemed inappropriate, we will revoke the guest speaker's invitation.

For more information and guidance: [Prevent duty guidance: England and Wales \(2023\) - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

5.3 Exploitation



Exploitation is a form of abuse where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive someone else into sexual or criminal activity. It is a process of taking advantage of someone else for a selfish reason or a cause, as such exploitation is linked to the processes of both grooming and radicalisation.

Some specific forms of exploitation can include children or adults being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Exploitative abuse can happen between children and adults, just within groups of children or just between adults. Exploitation is the mechanism for harm.

Those experiencing exploitation often do not recognise that they are in an exploitative relationship, or that they have been groomed to change their views on what is acceptable and right, until they are in such a dangerous position that they cannot withdraw themselves. Once this happens, people often feel tricked or shamed for not knowing what was happening to them, or they are fearful about harms that can be inflicted on their family by their abusers and as such we must recognise how difficult it is for someone to share their experiences with someone in a 'Position of Trust'.

Exploitation and the harms that it can lead to are a significant risk to stakeholders in our community and this combined with the difficulty of disclosing exploitative abuse means that this policy makes special provision for additional information on these topics.

For more information about Luton's response to exploitation and violence: [Safeguarding Bedfordshire - Exploitation](#)

Exploitation usually leads onto additional, interacting harms such as:



Whilst age may be the most obvious, the power imbalance in an exploitative situation can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults.

The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however colleagues should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Victims can be exploited even when activity appears consensual and it should be noted exploitation, as well as being physical, can be facilitated and/or take place online. The power of an online abuser to reach their victims and coerce them to criminal and sexual acts is well documented.



5.3.1 County lines is the police term for urban gangs supplying drugs to suburban areas/market or coastal towns using dedicated mobile phone lines or “deal lines”. It involves *child criminal exploitation* (CCE) as gangs use children and vulnerable people to move drugs and money. Gangs establish a base in the market location, typically by taking over the homes of local vulnerable adults by force or coercion in a practice referred to as ‘cuckooing’.

County lines is a major, cross-cutting issue involving drugs, violence, gangs, safeguarding, criminal and sexual exploitation, modern slavery, and missing persons; and the response to tackle it involves the police, the National Crime Agency, a wide range of Government departments, local government agencies and VCS (voluntary and community sector) organisations. County lines activity and the associated violence, drug-dealing and exploitation has a devastating impact on young people, vulnerable adults and local communities.

Signs to look out for:

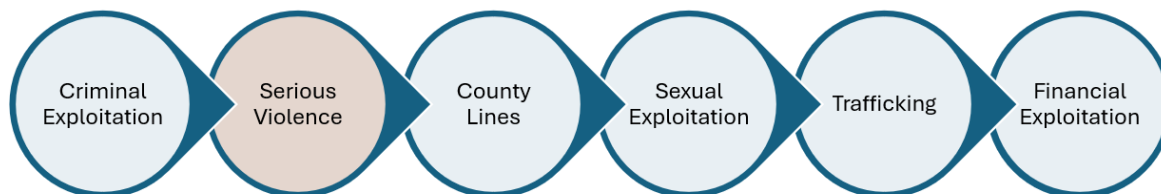
- Going missing from school or home and / or being found out-of-area (though criminal gangs are becoming ‘wise’ to this method of identifying children that have been exploited and are moving to exploit children in the local area to avoid notice)
- Unexplained acquisition of money, clothes, or mobile phones
- Excessive receipt of texts / phone calls
- Relationships with controlling / older individuals or groups
- Leaving home / care without explanation
- Suspicion of physical assault / unexplained injuries
- Parental concerns
- Carrying weapons
- Significant decline in school results / performance
- Gang association or isolation from peers or social networks
- Self-harm or significant changes in emotional well-being

Where staff or volunteers have a concern around county lines, they should inform the safeguarding manager (via MyConcern) immediately, who will follow the local authority safeguarding procedures. Where there is a risk of imminent harm an immediate referral to the police should be made.

Where the police have been called and have deemed it necessary to search a child or vulnerable adult, we must be aware of the legal duty for all professionals to follow [PACE Code C 2019 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/pace-code-c-2019) which is detailed into a process for LTFC in Appendix 3.

5.3.2 Serious Violence

Regardless of gender or the role that they have been made to undertake any child or adult who has experienced criminal exploitation is likely to have experienced or been threatened with **serious violence** to themselves or their family or community.



Serious violence indicators include:

- increased absence from school /clubs
- a significant decline in performance
- changes in friendships or relationships with older individuals or groups
- indicators of self-harm
- a significant change in well-being or signs of assault or unexplained injuries
- unexplained gifts or new possessions could also indicate that children have been approached by or involved with individuals associated with criminal networks or gangs

Staff training will include these signs and indicators in line with the Home Office guidance 'Preventing youth violence and gang involvement' and 'Criminal exploitation of children and vulnerable adults: county lines guidance' (2018) and contextual safeguarding.

Colleagues are also trained on the additional risk factors associated with serious violence such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Preventing youth violence and gang involvement:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/418131/Preventing_youth_violence_and_gang_involvement_v3_March2015.pdf

County Lines:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf

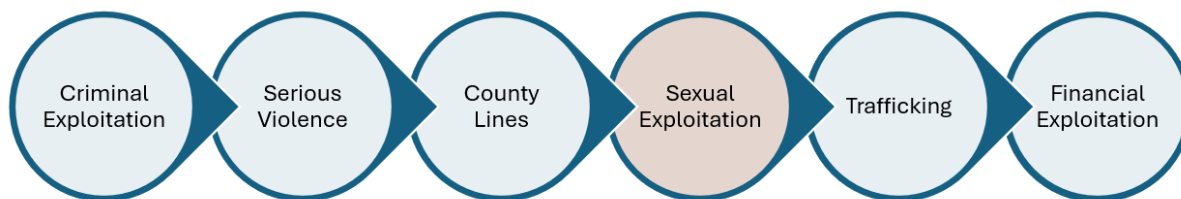
County Lines and Criminal Exploitation Toolkit:

<https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit>

Contextual Safeguarding Network:

<https://www.contextualsafeguarding.org.uk/>

5.3.3 Sexual Exploitation or Child Sexual Exploitation (CSE) is a form of sexual abuse.



Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children or vulnerable adults in the production of sexual images, forcing someone to look at sexual images or watch sexual activities, encouraging them to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. Sexual exploitation can occur over time or be a one-off occurrence and may happen without the child's or vulnerable adult's immediate knowledge e.g. through others sharing videos or images of them on social media.

Sexual exploitation involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. There is always an imbalance of power in the relationship. It is a form of sexual abuse. It is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. A child younger than 13 can never consent to sex.

We are also aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such which can be an additional barrier to disclosure. Colleagues receive training and updates to ensure awareness of and mitigate these additional difficulties to ensure children and vulnerable adults receiving appropriate intervention and support at the earliest opportunity.

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. The perpetrator holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex or sexual bullying including cyberbullying and grooming.

Key indicators of children being sexually exploited may include:

- receiving unexplained gift or gifts from unknown sources
- associating with other young people involved in exploitation
- going missing for periods of time or regularly coming home late (please refer to the academy attendance policy)
- regularly missing education or clubs or not taking part
- displaying inappropriate sexualised behaviour
- having multiple phones
- mood swings or changes in emotional wellbeing
- being seen at strange meeting places (hotels or known places of concern)

- having older boyfriends / girlfriends (where the age difference might create an imbalance of power)
- self-harming / drug or alcohol misuse
- injuries (physical)

For more information on sexual exploitation and a guide for practitioners please go to: <https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

There are three main types of child sexual exploitation:

‘Inappropriate relationships’

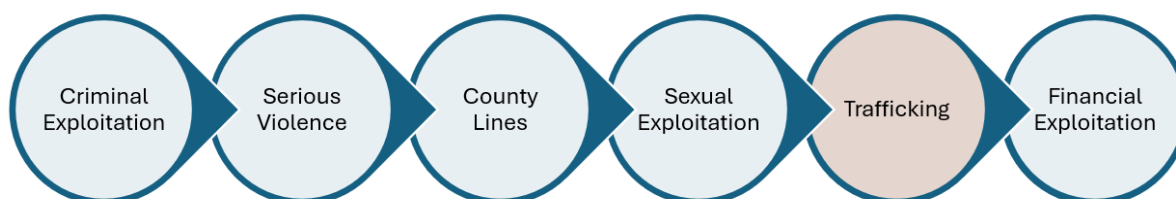
Usually involves just one abuser who has inappropriate power which might be physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

‘Boyfriend’

Abuser grooms the victim by striking up a relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims might be required to attend ‘parties’ and sleep with multiple men and are threatened with violence (directly or against family members) if they try to seek help.

‘Organised exploitation and trafficking’

Victims are trafficked through criminal networks, often between towns and cities and are forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

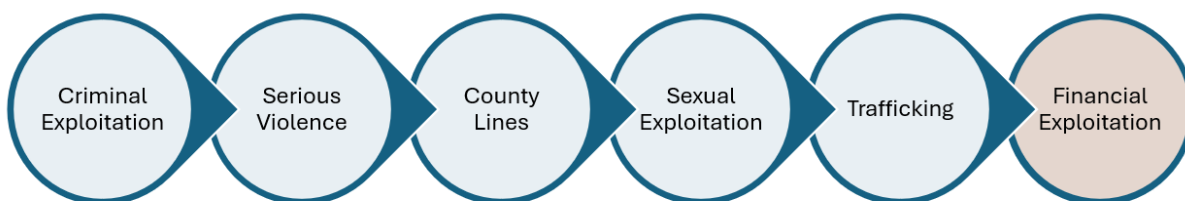


5.3.4 Trafficking

Trafficking is the unlawful act of transporting or coercing people in order to benefit from their work or service, typically in the form of forced labour or sexual exploitation. It involves the recruitment or movement of people for exploitation by the use of threat, force, fraud, or the abuse of vulnerability.

For more information about reporting potential trafficking go to: [Human trafficking: migrant health guide - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/human-trafficking-migrant-health-guide)

Someone who has been trafficked for the purpose of exploitation should **not** be criminalised and thus should be reported to [National Referral Mechanism: What it is and how to use it - Missing People](#) to ensure that when they come into contact with agencies they are treated as a victim of abuse rather than a perpetrator of it.



5.3.5 Financial exploitation

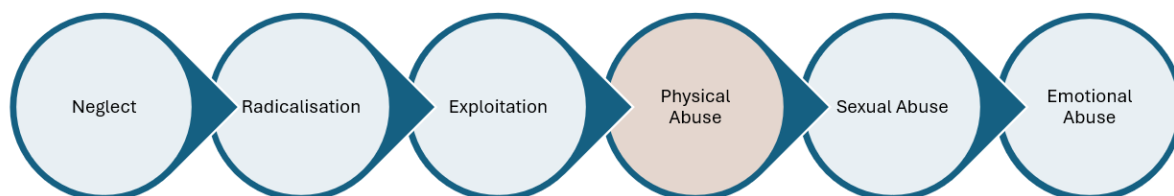
Financial exploitation is the threat of harm or embarrassment to force someone to hand over financial assets or take on another person's debts. This includes unregulated loans, scams, money laundering, debt, blackmail and control over someone else's financial assets. Control over someone else's financial assets is frequently found in abusive relationships linked to domestic abuse and the pursuit of power or control over someone.

Financial exploitation can also be found in the grooming processes leading to county lines, trafficking and serious violence whereby children and vulnerable adults are tricked into believing that they owe money (debt) that must be paid back through criminal activity.

To find out more about financial exploitation go to: [Financial exploitation - Preventing Exploitation Toolkit](#)

If you are concerned that someone is experiencing any form of exploitation, report what you have observed or has been disclosed through MyConcern immediately along with what you have done to reduce the risk of harm so far.

5.4 Physical Abuse



Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child or vulnerable adult.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or vulnerable adult.

The physical signs of abuse may include:

- unexplained bruising, marks or injuries on any part of the body
- multiple bruises- in clusters, often on the upper arm, outside of the thigh
- cigarette burns
- human bite marks
- broken bones
- scalds, with upward splash marks
- multiple burns with a clearly demarcated edge
- A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

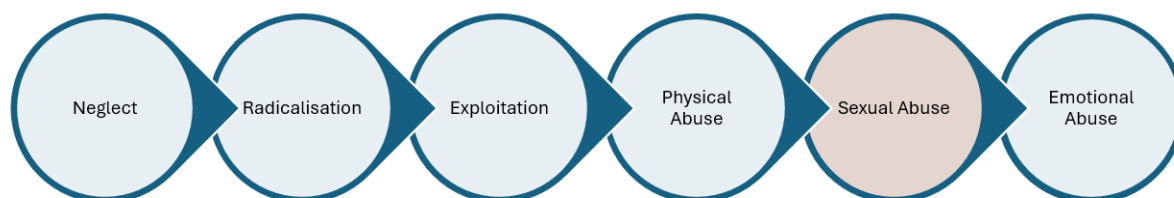
Most children will collect cuts, bruises and injuries and these should always be interpreted in the context of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body.

Some children and vulnerable adults, however, will have bruising that is more than likely inflicted rather than accidental. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks.

Changes in behaviour that can also indicate physical abuse:

- increasingly withdrawn behaviours
- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- running away from home
- reluctance to get changed, for example in hot weather
- depression

5.5 Sexual Abuse



Sexual abuse involves forcing or enticing a child or vulnerable adult to take part in sexual activities (not necessarily involving a high level of violence) regardless of whether the child or vulnerable adult is aware of what is happening.

The activities may involve physical contact or 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).

Physical signs of sexual abuse may include:

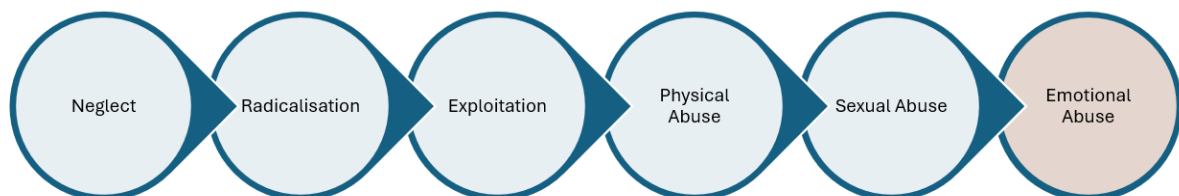
- pregnancy
- pain or itching in the genital area
- bruising or bleeding near genital area
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down

Changes in behaviour which can also indicate sexual abuse include:

- sexual knowledge which is beyond their age (or developmental level) or sexual drawings/language
- saying that they have secrets that they cannot tell anyone about
- sudden or unexplained changes in behaviour e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- running away from home
- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- substance or drug abuse
- suddenly having unexplained sources of money
- not allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults

We must always be aware of societal bias and remember that sexual abuse is not solely perpetrated by adult males. Women also commit acts of sexual abuse, as can other children (peer on peer abuse).

5. 6 Emotional abuse is the persistent emotional maltreatment of a child or adult such as to cause severe and adverse effects on the child or adult's emotional development or wellbeing. Some level of emotional abuse is involved in all types of maltreatment of a child or vulnerable adult, although it may occur alone.



Emotional abuse may involve:

- Conveying to a child or vulnerable adult that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child or vulnerable adult opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child or vulnerable adult participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyberbullying), causing children or vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of children.

5.7 Online Harms

Children and young adult's experiences are increasingly online and they do not distinguish between the two realities. We recognise that all the forms of abuse above may be perpetrated through an online mechanism and understand that there are many online risks and harms that may be experienced and perpetrated by our participants, in particular related to peer on peer abuse.

We understand that it is essential that children are safeguarded from harmful online content through effective filtering and monitoring of our devices and wider online harms and take a strengths-based approach that protects, empowers and educates participants and staff in their safe use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

We work with parents to build an understanding of the shared responsibilities between parents to educate and support their child and of our responsibilities to ensure the welfare of all children and vulnerable adults, including the need for referrals to other agencies in some situations.

If you become aware of a child or vulnerable adult who has experienced harm through an online mechanism, please report your concern immediately through MyConcern as per any other form of abuse.

Additional support for online abuse CEOP works to keep children safe from sexual abuse and grooming online. **CEOP are unable to respond to reports about bullying, fake accounts or account hacking.** You can report to CEOP if you are concerned that a child is being sexually abused or groomed online. This might be from someone they know or someone they have only ever met online. CEOP are here to help and advise you and to make the child safe. If you have already reported your concern to your local statutory service, including children's social care or the police, you do not need to make a report to CEOP.

If you think a child is in immediate danger, please call the police on 999.

For more information relating to keeping children safe online from sexual exploitation and abuse you can visit our [CEOP Education website for professionals](#).

5.8 Female Genital Mutilation (FGM) Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, **places a statutory duty on those in teaching work to report to the police** where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18. **This individual responsibility must not be delegated.**

5.9 Safeguarding and Mental Health

Mental health concerns are diagnosed by the doctor in the same way that physical unwellness is diagnosed. When we are made aware of any form of illness, we will respond by being as inclusive and supportive as possible to the participant's individual needs.

In many cases our adults may notice issues to do with wellbeing (that may be indicators of mental unwellness) that are reported on our system in the same way as other safeguarding concerns. We will respond to these in the same way as other risks and harms listed above by seeking to share information with appropriate services if required and offer supportive options

for the participant. Any 'interventions' will be shared with the participant and appropriate care giver and school (if a child) and they will be evaluated for impact and next steps.

Where necessary a referral for external support will be made through the MASH and CAMHS.

5.10 Child on Child (Peer on Peer) Abuse

Child on child abuse is abuse perpetrated by the victim(s) peer or peers. It can constitute any form of abuse listed above and below but takes on a unique additional risk linked to adult professional dangerousness because adults often subconsciously see abuse perpetrated by children as *less* harmful. It isn't. Child on child abuse often goes on for longer without effective intervention, is complex and difficult to get to the root of the issues and requires intervention and support for every child involved. We recognise that children are capable of abusing other children. We also recognise the gendered nature of some forms of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously. **Abuse will never be tolerated or passed off as "banter", "just having a laugh", "just football" or "part of growing up" as this can lead to a culture of escalating unacceptable behaviours and an unsafe environment.**

Child on child abuse can be:

- Bullying (including cyberbullying)
- Prejudice-based violence including, but not limited to, gender-based violence
- Relationship abuse
- Harmful Sexual Behaviours (HSB)
- Exploitation
- Child sexual exploitation
- Child criminal exploitation
- Domestic violence and abuse
- Youth and serious youth violence

We will ensure that we notify the relevant school and agencies where significant harm may have been caused by a child or children to a child or children and this includes contacting the police when a crime has been committed.

Most cases peer on peer abuse will be dealt with under our code of conduct expectations, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put other participants at risk
- Is violent
- Involves participants being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes or semi-nudes).

If you have any concerns that one child might be hurting another, you must take immediate action to create physical safety for all involved and report it immediately through MyConcern.

LTFC recognises the complexities of preventing and responding to the different types of child on child abuse are too vast to document in this safeguarding and child protection policy, so please ensure that you apply the **Anti-Peer-on-Peer Abuse policy** to all potential instances.

For more information about responding to potential harmful sexual behaviours please visit Part 5 of KCSIE: [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/keeping-children-safe-in-education)

For more information about responding to potential bullying please visit: [Preventing and tackling bullying \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/publications/preventing-and-tackling-bullying)

For more information about cyber-bullying please visit: [Cyber bullying: advice for headteachers and school staff \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/publications/cyber-bullying-advice-for-headteachers-and-school-staff) or [UK Council for Internet Safety - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/organisations/uk-council-for-internet-safety)

6. Our personal role in the recognition of needs, harm and abuse

Recognise It is important that everyone working with children should be able to recognise the signs of possible abuse and neglect. It is not adequate to wait for disclosure as the primary means of detecting child abuse. The recognition and identification of signs of potential abuse will form part of our continuous professional development.

Respond All adults employed by LTFC are 'Trusted Adults' and are emotionally available to children and vulnerable adults - a crucial aspect of our safeguarding culture. We will not ignore harmful behaviours or actions. We are prepared to respond appropriately to concerns and disclosures of abuse.

Here is a 2 minute NSPCC video of how to respond when someone is making a disclosure of abuse: [Bing Videos](#)

We must always remember the importance of **reassuring victims that they are being taken seriously and that they will be supported and kept safe**. We must share that they did the right thing in telling us and explain what our next steps are and whom we must share this information with and why.

Record/Report It is our duty to record first-hand, in writing, concerns and disclosures about children and vulnerable adults. This will be done promptly and securely using our safeguarding case management software MyConcern. All staff will be supplied with log-in details for MyConcern and are expected to make appropriate use of the system.

For colleagues that work in schools there is an additional responsibility to report all concerns related to children in that school directly to the Designated Safeguarding Lead (DSL) in that school.

In cases of **serious risk or harm** to a child or vulnerable adult, **an immediate verbal alert** to the safeguarding manager (or DSL if you are in a school) is required. The concern must also be logged onto the online safeguarding system (MyConcern).

Recognise

Signs and indicators of abuse can be found here in Annex B of KCSIE: [Keeping children safe in education 2024 \(publishing.service.gov.uk\)](#)

Respond

NSPCC advice on responding to disclosures of abuse can be found here: [Recognising and responding to child abuse and neglect | NSPCC Learning](#)

Report (Record)

All disclosures or observations linked to risks and harms of participants must be reported on MyConcern.
Where significant harm is possible – it must be reported verbally to the Safeguarding Manager (and potentially school DSL) immediately too.

Refer

For support in what should be referred please call MASH on **01582 547653** or contact [Safeguarding Bedfordshire - Report a concern about an adult](#)

In instances where colleague cannot access either the LTFC Safeguarding Manager or the Head of Safeguarding or a school DSL immediately, they must make a referral to children's services themselves and alert the Safeguarding Manager and DSL that they have done this and share the referral details. [Safeguarding Bedfordshire - Report a concern about an adult](#)

Refer The Safeguarding Manager will triage all concerns promptly against levels of need thresholds guidance: [Document.ashx \(luton.gov.uk\)](#)

In normal circumstances, the safeguarding manager will collaborate with a school DSL and they will decide the most appropriate action.

6.1 Continuous professional development

CPD underpins a healthy safeguarding culture within the LTFC. In the complex and evolving field of safeguarding, effective practice is best ensured through a programme of continuous professional development (CPD).

Professional learning will be continually updated and will:

- Be integrated, aligned and considered as part of our safeguarding approach
- Be in line with advice from the Local Safeguarding Children Partnership
- Have regard to the EFL safeguarding standards to support our expectations for all adults.

Staff, volunteers and trustees will receive regular safeguarding and child protection updates (through emails, e-bulletins and staff meetings).

Staff, volunteers and trustees will receive annual safeguarding INSET and updates.

6.2 Induction

All staff, volunteers and trustees will receive training about safeguarding and child protection as part of their wider induction. This will include:

- Current guidance
- Signs of abuse and neglect
- Policies, including safeguarding
- How to make a safeguarding referral
- The staff code of conduct & Position of Trust
- Allegations of Abuse and Low-Level Concerns policy
- Whistle-blowing procedures

This is to ensure that staff understand our safeguarding systems, their responsibilities, and can identify signs of possible abuse or neglect.

6.3 All staff will be aware of: our systems that support safeguarding, including:

- This child protection and safeguarding policy
- The staff code of conduct
- The role of the Safeguarding Manager and Head of Safeguarding
- The staff handbook and policy suite
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.
- The Early Help process and their role in it, including: the identification of emerging problems, liaison with the safeguarding manager, and the sharing of information with other professionals to support early identification and assessment.
- The process for making referrals to local authority social care (and other agencies) and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child or vulnerable adult tells them they are being abused or neglected, including specific issues such as radicalisation or FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child on child abuse and exploitation and indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

Feedback will be gathered from participants as to the quality of the safeguarding training and the impact will be assessed during quality assurance activity.

6.4 Those with extra responsibilities for safeguarding processes will undertake appropriate child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other safeguarding leaders, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

7. Safer Recruitment

We ensure that our workforce is safe to work in a position of trust by following the safer recruitment and selection process to deter and reject unsuitable candidates and followed using the guidance set out in part 3 of : [Keeping children safe in education 2024](https://publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/822412/Keeping-children-safe-in-education-2024.pdf) (publishing.service.gov.uk)

This includes:

- Every interview has at least one member who has a certificate in Safer Recruitment.
- We check on the identity of candidates, follow up references with referees and scrutinise applications for gaps in employment.
- We record the answers to safeguarding questions asked during the interview process on staff personnel files.
- We ensure that safeguarding considerations are at the centre of each stage of the recruitment process through the lens of putting colleagues into a position of trust.
- We ensure that agencies and third parties supplying staff provide us evidence that they have made the appropriate level of safeguarding checks on individuals working on our behalf.
- Every job description and person specification will have a clear statement about the safeguarding responsibilities of the post holder.
- We ensure that all staff involved in recruitment are aware of government guidance on safer recruitment and that its recommendations are followed.
- The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. We will ensure the **correct level of DBS** certificate is sought and ensure a prohibition check is undertaken.¹
(The types of checks undertaken will be in accordance with the guidance given in KCSIE.) Where an enhanced DBS Certificate is required, it will be obtained from the candidate before or as soon as is practicable after the person is appointed and before they begin work with us.
- Any offer of appointment made to a successful candidate (including one who has lived or worked abroad) will be conditional on satisfactory completion of the necessary pre-employment checks as required in the guidance given in the Keeping Children Safe in Education document.
- Leaders will always ask for written information about previous employment history and check that information is not contradictory or incomplete.
- Reference will be sought on all shortlisted candidates, including internal ones, before interview, so that any issues or concerns they raise can be explored with the referee and taken up with the candidate at interview. (Unless in some instances where candidates have expressly denied permission for the employer to approach their referees). In these cases, references will be taken up before the candidate's appointment.
- We will inform all *shortlisted* candidates that online searches may be done as part of due diligence checks.
- We keep a single central record to ensure clarity of oversight of our safer recruitment processes

¹ For those staff and volunteers who have new or historical entries on their DBS that may raise concerns of a safeguarding nature but not exclude them from being able to undertake their role, a risk assessment will be completed and kept on file outlining any measures that will be in place to manage any assessed risk.

- We reserve the right to carry out all relevant and necessary checks if there is concern about an existing member of staff and will refer to the LADO and DBS and other relevant agencies anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

For more information, please check LTFC's Safer Recruitment Policy.

8. Managing Allegations Against Staff and Volunteers

All adult misconduct that constitutes low-level concerns or an allegation of abuse must be reported directly to the Head of Safeguarding and/or the Senior Safeguarding Leader who will then take appropriate action.

We will always believe those making a disclosure and take the matter seriously even if what is heard sounds unlikely and respond formally to it. We will offer reassurance and safety options for those making a disclosure and refer them for support to the Safeguarding Manager as well as to the Head of Safeguarding or Senior Safeguarding Leader who will deploy the adult misconduct processes internally and externally if needed. We will always retain the mind-set of it could happen here.

We recognise the possibility that adults working in LTFC may harm children. Any conduct concerns (allegations or low level) about the conduct of adults (including contractors and volunteers) will be taken to the Head of Safeguarding/Senior Safeguarding Leader without delay (or where that is not possible and the incident meets the harm threshold, to the LADO).

Any concerns that relate to academy staff will be shared with the Academy Manager for effective oversight. Any concerns about the CEO must go to the Senior Safeguarding Leader or Head of Safeguarding who will then liaise with the Chairman and follow statutory processes with the LADO/FA.

Leaders ensure that incidents are referred to the FA and EFL as per the FA Safeguarding Concerns in the Professional Game, Referral and Threshold Document.

We will prevent people who pose risks to children and vulnerable adults from working for the LTFC either as employees or volunteers by ensuring that all individuals have been subjected to safeguarding checks in line with the statutory guidance Keeping Children Safe in Education (see section 7).

We have a clear code of conduct for all adults and a policy that outlines our response to concerns raised or disclosures made about an adult's conduct 'managing safeguarding concerns' or allegations regarding employees or volunteers that covers behaviours that would meet the LADO harm threshold and those that would constitute 'low-level' concerns.

Allegations of harm

If for any reason you cannot make a referral through these routes you have a duty to refer directly to the Local Authority Designated Officer (LADO): Tell: 01582 548069

Making a LADO Referral: [Managing allegations about adults working with children referral - Before you start - Luton Council](#)

The Harm Threshold

LADO

The Local Authority Designated Officer (LADO) is the person who should be notified when there are concerns a professional or volunteer who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children
- Behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child
- As a parent or carer, has a child that has become subject to child protection procedures
- Is closely associated with someone in their personal lives (e.g., partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the member of staff is responsible in their employment/volunteering.

FA Threshold for making a Safeguarding Referral

An allegation of **abuse, harm or exploitation** of a child or adult at risk by an individual who is or has previously been involved in football related activity in any capacity.

An allegation of a **sexual offence of any nature**, against anyone (irrespective of whether that person is a child or an adult at risk), by an individual who is or *has previously* been involved in football related activity in any capacity. This includes any current, prospective or a former employee, volunteer, consultant, player.

A **third** (or subsequent) incident or **allegation of low-level concerns** (as defined in safeguarding policy), whether similar in nature or otherwise, in relation to a child or adult at risk involving the same associated person.

Professional Clubs in the EFL should use this link when making the Safeguarding Referral:

<https://app.smartsheet.com/b/form/8381a936dd8c4eed987ab4338e1c2b49>

9. Low-Level Concerns

Low-level concerns are behaviours which falls below the standard required by Professional Clubs and CCOs as set out in their Codes of Conduct. Whilst the behaviour may not be immediately dangerous or intentionally harmful it does set a poor example and may lead to harm or put a child or adult at risk in danger. To allow low-level concerns to continue unchallenged may result in an environment developing in which abuse may be able to take place. It can also normalise behaviour which is unacceptable and will not be accepted.

The FA provides a non-exhaustive list of examples of low-level concerns that we must report to them:

- When insufficient care is taken to avoid injuries (e.g. by excessive training or inappropriate training for the age, maturity, experience and ability of players)
- Allowing abusive or concerning practices to go unreported (e.g. a coach who ridicules and criticises players who make a mistake during a match)
- Allowing hazing practices to go unreported
- Placing children or young people in potentially compromising and uncomfortable situations with adults (e.g. unprofessional use by a coach on social media with young players)
- Unprofessional use of their own or the Professional Club's social media accounts
- Ignoring health and safety guidelines (e.g. wearing seat belts in club transport)
- Using foul and abusive language to children or other adults (e.g. abusive language towards match officials)
- Giving continued and unnecessary preferential treatment to certain individuals on a regular basis

- Failure to provide safe and appropriate coaching sessions whilst taking into consideration the ages of the players (e.g. overtraining and exerting undue influence over players)
- Putting performance over the safety of players
- Lack of respect for other individuals, such as match officials, opposition coaches, players, managers and spectators
- Allowing rough and dangerous play, bullying, the use of bad language or inappropriate behaviour by players
- Using punishments that humiliate or harm children
- Providing one to one coaching without any supervision or the presence of other club officials
- Allowing children to discriminate on the grounds of religion, race, gender, social class, or lack of footballing ability
- Failure to encourage children to accept responsibility for their own performance and behaviour
- Failure to challenge low-level concerns in other Club Officials
- Allowing allegations of abuse to go unchallenged or unrecorded and failing to report these concerns (e.g. bystanders of abuse)
- Failure to record incidents or accidents
- Failing to address the additional needs of disabled players or other vulnerable groups
- Allowing confidential information to be shared inappropriately
- Failure to respect and listen to the opinions of children and consider the rights and responsibilities of children
- Smoking and consuming alcohol during coaching sessions
- Consuming alcohol whilst named on duty on an official club trip
- Taking children to their own home
- Not adhering to guidance when transporting children including travel abroad

Staff who are the subject of an allegation of abuse or a low level concern have the right to have their case dealt with fairly, quickly and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended where this is deemed to be the best way to ensure that children, vulnerable adults or the staff member are protected.

Where an allegation against an adult within LTFC is made, the allegation will be taken seriously and acted upon immediately. Parents or careers will be contacted as soon as reasonably possible. The person disclosing will be offered support and their wishes will be carefully considered before any actions related to said person begin.

Where any member of staff or any volunteer has concerns that a person has caused harm or poses a future risk of harm to vulnerable groups, including children they must act in accordance with this policy and report their concern to the Head of Safeguarding/Senior Safeguarding Leader, rather than approach their colleague themselves.



Luton Town Football Club Safeguarding and Child Protection Policy

Under our duty of care for our employees, we will ensure that we provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended.

Leaders will ensure its obligations for confidentiality when an allegation has been made.

Appendix 1. Equalities and additional risk factors

Definitions

Vulnerable is a situation in which there is heightened susceptibility to risks and harms alongside the absence of protective factors that can mitigate that harm. The same risks and harms may not affect different people in the same way, so vulnerability is subjective in some cases. We must be mindful that many people experiencing harms and abuse do not see themselves as vulnerable.

A vulnerable adult is someone over the age of 18 who may be unable to protect themselves from harm, abuse or exploitation. This could be due to a number of factors including but not limited to:

- Age
- Disability
- Mental illness
- Physical or mental impairment
- Social isolation
- Dependency on others

A child is someone under the age of 18 however the SEBD Code of Practice is from 0 to 25 years: [SEND code of practice: 0 to 25 years - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/send-code-of-practice-0-to-25-years)

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We will ensure appropriate consideration of children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of abuse and neglect, FGM, exploitation and radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

This is a valuable supplement to our awareness of risk and harm and is available from the link below for frequent reference.

https://www.keepingchildrensafeineducation.co.uk/annex_b.html

Appendix 2. Police and Criminal Evidence Act (1984) – Code C

1. Staff are aware of the requirement for children and vulnerable adults to have an appropriate adult when in contact with Police officers.
2. PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for these purposes.
3. PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.
4. If a police officer arrives on site wishing to speak with a participant, the relevant leader will inform the Safeguarding Manager (or Head of Safeguarding) immediately.
5. The Safeguarding Manager will ensure that arrangements are made to inform parents that this is the case and seek their presence as the appropriate adult. If for any reason the parent cannot attend to be an appropriate adult the Safeguarding Manager or a designated leader will ensure that an appropriate adult is provided.
6. The Safeguarding Manager (through the onsite leader) will communicate any vulnerabilities known by LTFC to any police officer who wishes to speak to a participant about an offence they may suspect. This communication will be recorded on our online safeguarding system (MyConcern).
7. If having been informed of the vulnerabilities, the Safeguarding Manager or onsite leader does not feel that the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate their concerns immediately.
8. A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence,² or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.
9. A Police Officer must not caution a child or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

10. The appropriate adult¹ means, in the case of a child:

- The parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
- A social worker of a local authority or, failing these, some other responsible adult aged 18 or over **who is not:**
 - a police officer;
 - employed by the police;
 - under the direction or control of the chief officer of a police force; or
 - a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

Further information can be found in the Statutory guidance - [PACE Code C 2019 - GOV.UK](https://www.gov.uk/government/publications/pace-code-c-2019)
(www.gov.uk)

¹The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

²A person need not be cautioned if questions are for other necessary purposes, e.g. (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

Appendix 3. Role descriptors of those with additional safeguarding responsibilities

Player Care

Player Care delivers the daily pastoral care to all players and scholars

Head of Safeguarding

The Head of Safeguarding has responsibility for overseeing and directing the safe provision of all activities and associated training relating to children, young people and adults at risk, providing leadership and guidance on all safeguarding matters and relevant legislation.

They are responsible for implementing safeguarding awareness and best practice across all areas of the Club and Community Trust.

Safeguarding Manager

The role holder will principally help to promote and embed an open and safe culture for children and vulnerable adults that reduces incidents from occurring and maximizes reporting of any concerns for appropriate response.

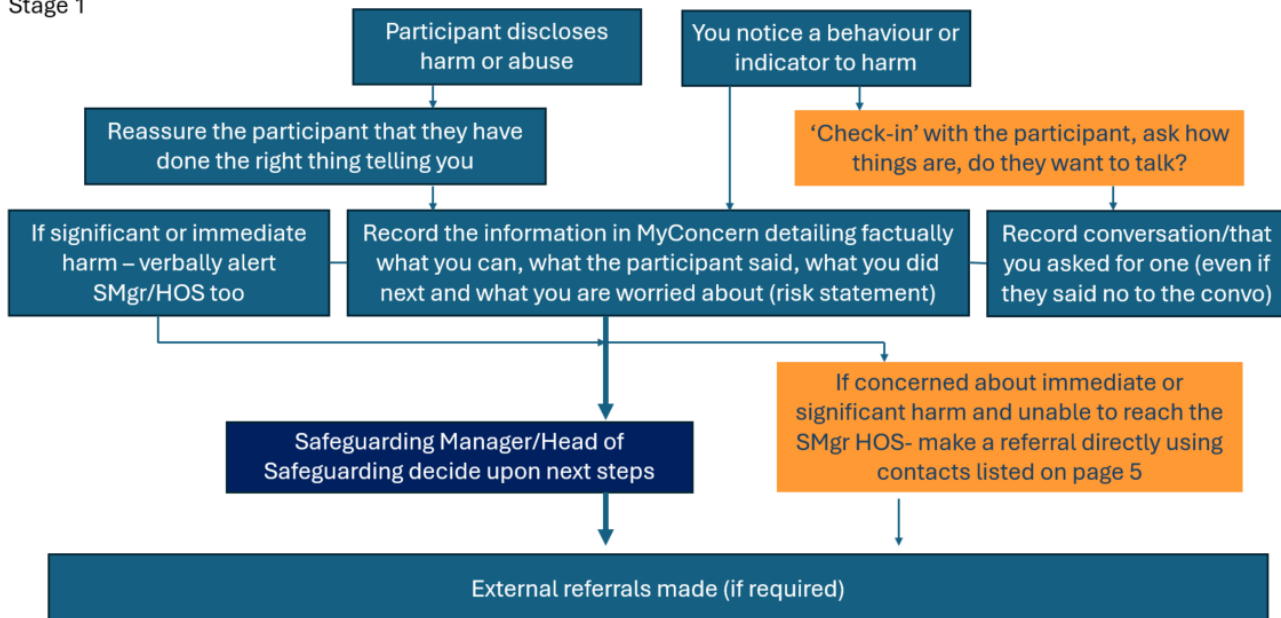
The Safeguarding Manager will report directly to the Head of Safeguarding and have responsibility for operational safeguarding within the Academy as well as oversight of the day-to-day safeguarding requirements of players/scholars including the oversight and maintenance of recording and monitoring of safeguarding and welfare incidents within the LTFC “my concern” system.

Act as disclosure manager for the safer recruitment and DBS system including completing screening and vetting (inc DBS) for all staff and volunteers.

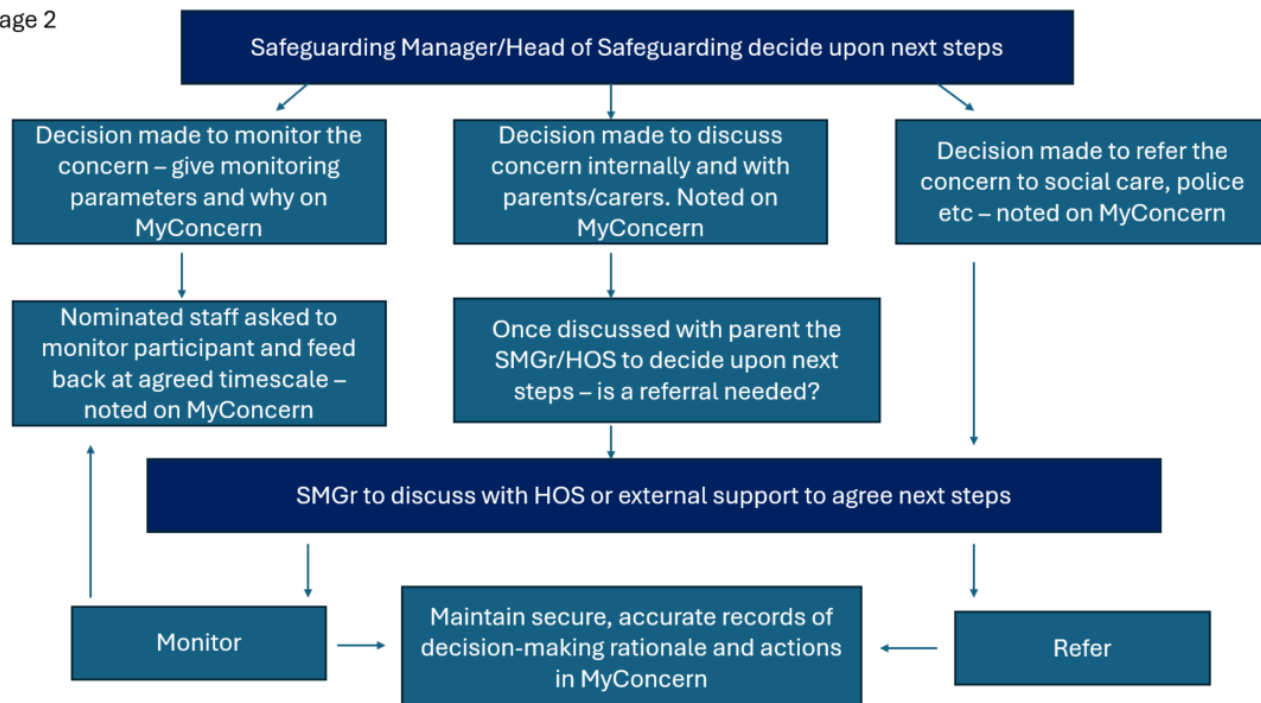
Full role descriptors are available.

Appendix 4 – Flow chart for raising a safeguarding concern

Stage 1



Stage 2



Appendix 5 – Whistleblowing

Whistleblowing

Whistleblowing is an action you can take if you have followed the right reporting procedures in your environment, but still feel things haven't been properly addressed and safeguarding concerns remain.

Email safeguarding@thefa.com to escalate an issue.

Bedfordshire FA

Alan Young

Address: Peter Newton Pavilion, Skimpot Rd, Dunstable LU5 4JU

Tel: 01582 565 111

Website: www.bedfordshirefa.com

Email: info@bedfordshirefa.com

NSPCC

The NSPCC free helpline can be reached on 0808 800 5000.

Advice and support are available from 8am-10pm Monday to Friday, and from 9am-6pm at weekends.

Email support is available 24/7 through help@nspcc.org.uk.

Safeguarding Policy Summary

What is Safeguarding?

Keeping everyone safe and making sure they are happy and healthy is extremely important to the staff working with you at Luton Town Football Club (LTFC).

Why do we have Safeguarding?

In football things can happen that might seem unfair or difficult. Sometimes you might get hurt during training or a match. Sometimes people say unkind things because they are angry or upset. Sometimes things between friends can become difficult and sometimes home is not always the easiest place to be.

It is important to have someone to talk to, who cares about you, if anything happens that you are worried about. Being able to talk to someone can help things get better quicker. LTFC has a Safeguarding team, these people will be there if you need them and also support any adults who need it – but you can speak to anyone who is a trusted adult about things that worry you.

Who is involved in safeguarding?

Everyone: all the coaches, all the players and even parents have a responsibility to make sure they take care of each other and that everyone is emotionally and physically safe from harm. At LTFC we have a **Code of Conduct** for players, staff and parents. We all try to be the best we can be even when we are losing a match or if we are injured by another player.



Stuart Cornish

Safeguarding Manager: Stuart Cornish

Stuart.cornish@lutontown.co.uk

Player Care: Wayne Polson

Wayne.polson@lutontown.co.uk

Head of Safeguarding: Sarah Bloomer

Sarah.bloomer@lutontown.co.uk



Wayne Polson

What do I do if I am worried about something or something bad happens?

Tell a member of staff if you can. All the staff have had training so that if you need to tell them anything they will listen to you and help if they can. They will likely need to contact the Safeguarding Manager to make sure that we have done everything that we can to help.

If you don't want to talk to a familiar adult/coach you can also phone ChildLine who will listen to you and give you help and advice: **0800 1111**

What happens next?

The adults will record the conversation you had on a confidential form that no one except them and the Safeguarding team can see. The Safeguarding team will then talk to you and take any action they feel will help you in the best way possible.

No adult should ever say that they will not tell anyone else if you tell them something because they have a responsibility to share anything they are concerned about with the safeguarding team.