



## Safeguarding Children and young people

### **Policy Statement.**

Luton Town Football Club, its Staff, Management and Board of Directors 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.

Gary Sweet CEO

### **Safeguarding Principles**

The club recognises 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 young person's 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 young people and will show respect and understanding for their rights, safety and welfare.

The additional vulnerability of disabled children (including those with invisible disabilities, learning and communication differences) is recognised.

Allegations of abuse or concerns about the welfare of any child or young person will be treated seriously and will be responded to swiftly and appropriately.

Luton Town FC recognises the responsibilities of the statutory agencies and is committed to complying with the Local Safeguarding Adult Board (SAB) procedures and the Care and Support statutory guidance (2015)

Luton Town FC will support all children and young people involved in the Club to understand their roles and responsibilities with regards to safeguarding and protecting children and young people, including the responsibility to report all concerns to the Club's Senior Safeguarding Manager

Luton Town FC ensures access to training/direct provision of learning opportunities for all staff/volunteers involved in the organisation or delivery of activities appropriate to their role to enable them to make informed and confident responses to safeguarding concerns and adult protection issues.

All participants involved in the Club's activities have the right to be listened to with respect and heard.



## Safeguarding Children and young people

### Key Contacts

Kim Pearce	Senior Safeguarding manager	07539122607	<a href="mailto:kim.pearce@lutontown.co.uk">kim.pearce@lutontown.co.uk</a>
Wayne Polson	Academy Player Care	07538871502	<a href="mailto:wayne.polson@lutontown.co.uk">wayne.polson@lutontown.co.uk</a>
Stuart Cornish	Safeguarding Manager	07939589542	<a href="mailto:stuart.cornish@lutontown.co.uk">stuart.cornish@lutontown.co.uk</a>

### External contacts

The FA	Safeguarding team	<a href="mailto:safeguarding@thefa.com">safeguarding@thefa.com</a>
The EFL	Safeguarding team	<a href="mailto:safeguarding@efl.com">safeguarding@efl.com</a>
NSPCC	0808 800 5000	<a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>

### Purpose and aims

The purpose of Luton Town Football Club's safeguarding children policy is to ensure any child or young person taking part in any activity linked to the club is safe and protected from harm. This means we will always work to:

- Protect children and young people from maltreatment.
- Prevent impairment of children and young people's health or development.
- Identify children and young people who may be in need of extra help.
- Ensure that our services assist, children and young people to be safe.

This policy will give clear direction to staff, volunteers, those in receipt of our services and parents/guardians about expected behaviour and our responsibilities to safeguard and promote the welfare of all children and young people.

Luton Town Football Club fully recognises the contribution it can make to protect children and young people by supporting and promoting the welfare of those coming into contact with our organisation.

The key elements of our policy are prevention, protection and support.

This policy applies to all those receiving services from or providing services on Luton Town Football Club.

We will aim to ensure that all staff, partners or volunteers are trained to recognise and acknowledge their safeguarding commitment to children and young people, and the expectations we have for them to promote children and young people's welfare.

As a club we recognise our responsibility to making sure that each and every child who takes part in any activity within our Club is safe, protected and supported.



## Safeguarding Children and young people

### Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance

Keeping children safe in Education 2023

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

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- 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)

### Roles and responsibilities

The role of the Safeguarding team

#### The Senior Board Lead for Safeguarding

- The Senior Lead for Safeguarding at Luton Town Football Club is accountable for ensuring the effectiveness of this policy and our compliance with it.
- A senior member of staff is designated to take the lead responsibility for safeguarding.

#### The Senior Lead for Safeguarding will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available to the public and has been written in line with statutory guidance
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct.
- All staff undertake appropriate safeguarding training relevant to their role.
- Procedures are in place for dealing with allegations against members of staff and volunteers who work with children in line with statutory guidance.
- Safer recruitment practices are followed to prevent individuals who may pose a risk to children from having access to children within the organisation.
- Any weakness with regard to safeguarding arrangements that are brought to their attention will be remedied without delay.
- Policies and procedures, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff



## Safeguarding Children and young people

### **Definitions**

Children includes everyone under the age of 18.

Adults includes everyone aged 18 and over.

Abuse is a form of maltreatment of a child or .

Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Neglect is a form of abuse and is the persistent failure to meet a child or adult's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of material 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 or adult from physical and emotional harm or danger.
- Ensure adequate care (including the use of inadequate care-givers) or
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Physical Abuse includes hitting, slapping, pushing, kicking, misuse of medication, restraint or inappropriate sanctions. 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 child cannot or has not consented or was pressured into consenting.

Modern Slavery 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.

Organisational Abuse – including neglect and poor care practice within an institution or specific setting for example, whilst in the care of Luton Town Football Club 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.

### Discrimination

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.

### 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.



## Safeguarding Children and young people

### Training and inductions

When new staff join our organisation, they will be informed of the safeguarding arrangements in place.

They will be given a copy of Luton Town Football Club's safeguarding policy along with the staff code of conduct and told who our Senior Safeguarding Manager and Designated Safeguarding Lead (DSL) are.

All staff are expected to read these key documents.

Every new member of staff or volunteer that comes into regular contact with children will receive safeguarding training during their induction period.

This programme will include information relating to how to manage a disclosure from a child, how to record concerns, and the remit of the role of the DSL.

The training will also include information about whistleblowing in respect of concerns about another adult's behaviour and suitability relating to their work with children.

Guidance about acceptable conduct will also be given to all staff during induction. These are sensible steps that every adult should take in their daily professional conduct with children.

All staff are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

Staff will also be asked to read the club's Safeguarding allegations against staff policy which outlines how the club will manage any concerns or allegations that are made.

In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities.

In order to achieve this, we will ensure that:

- All staff members undertake appropriate safeguarding training based on their role
- All staff members receive safeguarding updates (for example, via email, e-bulletins, staff meetings), as required to provide them with the relevant skills and knowledge to safeguard children effectively

All regular visitors, temporary staff and volunteers will be given a set of our safeguarding procedures. They will be informed of whom our Senior Safeguarding Manager is

Our Senior Safeguarding Manager will also undertake appropriate training to ensure they are able to carry out their duty to safeguard all of the children coming into contact with the club.



## Safeguarding Children and young people

### Recording incidents

#### PROCEDURES FOR MANAGING PATHWAYS TO HELP AND SUPPORT

Luton Town Football Club adheres to safeguarding procedures that have been agreed locally with the local Safeguarding children board.

Where we identify vulnerable children and families in need of support, we will carry out our responsibilities in accordance with their guidance.

Every member of staff (including volunteers) working at Luton Town Football Club is advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.

When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy.

All staff members are encouraged to report and record any worries and concerns that they have and not see these as insignificant.

On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse.

More often however, worries and concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect.

All staff, have a duty to recognise concerns and pass the information on in accordance with the procedures outlined in this policy

Any member of staff or visitor who receives a disclosure of abuse or suspects that a child may be subject to harm must report it immediately to the Senior Safeguarding Manager. In the absence of the Senior Safeguarding Manager, the matter should be brought to the attention of a DSL

All concerns about a child should be reported without delay and recorded in writing using the agreed procedures.

Following receipt of any information raising concern, the SSM will consider what action to take. All information and actions taken, including the reasons for any decisions made, will be fully documented.

The SSM will decide whether to make a referral to the Police or Children's Services when there are safeguarding concerns.

If a referral to Children's Services has not met the threshold for support or statutory intervention, the SSM will make a full written record of the decision and outcome.

If, at any point, there is a risk of immediate serious harm to a child, a referral should be made to the Police . Anybody can make a referral.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the Police if:

- The situation is an emergency and the SSM is unavailable
- They are convinced that a direct report is the only way to ensure the child's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Senior Safeguarding Manager.

If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's Services directly with their concerns.

We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings.

Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour.



## Safeguarding Children and young people

Such abuse will always be taken as seriously, and staff must never tolerate or dismiss concerns relating to peer on peer abuse.

We recognise that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. These additional barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the adult or child's disability
- Children with SEND can be disproportionately impacted by issues such as bullying without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

Luton Town Football Club recognise that our staff are well placed to identify concerns to help prevent child sexual exploitation and have a vital role in identifying signs that sexual exploitation may be taking place.

Any staff member that has a concern regarding sexual exploitation should inform the SSM who will liaise with Police and Children's Services. We also recognise that our staff may be placed to identify concerns to prevent children from becoming victims of Female Genital Mutilation (FGM) and other forms of so-called 'honour-based' violence (HBV).

If staff have a concern regarding a child or adult that might be at risk of HBV they should inform the SSM who will liaise with the Police and Children's Services.

We recognise that safeguarding against radicalisation and extremism is no different to safeguarding against any other form of vulnerability in today's society.

At Luton Town Football Club, we will ensure that:

- We train our staff and volunteers to have an understanding of what radicalisation and extremism is, why we need to be vigilant and how to respond when concerns arise.
- The SSM and DSL's have received relevant training in this area and will act as the point of contact for any concerns relating to radicalisation and extremism.
- The SSM will make referrals to Children's Services and will represent our organisation at meetings as required.

### RECORDS AND INFORMATION SHARING

If staff are concerned about the welfare or safety of any child at Luton Town Football Club, they will record their concern on the agreed reporting procedure.(my concern) Any worries or concerns should be passed to the SSM without delay.

Any information recorded will be kept electronically. These files will be the responsibility of the Senior Safeguarding Manager/DSL. The information will only be shared on a basis of 'need to know in the adult's or child's interests' and on the understanding that it remains strictly confidential

#### Safer recruitment

At Luton Town Football Club we will use the recruitment and selection process to deter and reject unsuitable candidates.

- We require evidence of original academic certificates. We insist on taking up references prior to confirmation of post.
- We will question the contents of application forms if we are unclear about them, we will undertake Disclosure and Barring Service checks where required to do so and use any other means of ensuring we are recruiting and selecting the most suitable people to work with vulnerable adults or children that receive services from our organisation.
- We will maintain a record of all safer recruitment checks carried out in line with statutory requirements.
- We will ensure that those responsible for recruiting staff have completed appropriate 'safer recruitment' training.





## Safeguarding Children and young people

- At all times we will ensure that safer recruitment practices are followed in accordance with our statutory requirements.
- 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.

### Allegations against staff and volunteers

Our aim is to provide a safe environment which secures the wellbeing of children who take part in any activity within our organisation.

We do, however, recognise that sometimes allegations of abuse are made.

We recognise that allegations, when they occur, are distressing and difficult for all concerned. We also recognise that some allegations are genuine and that there are individuals who deliberately seek to harm or abuse children or young people.

We will take all possible steps to safeguard children and to ensure that those working for or on behalf of our organisation are safe to work with children.

We will always ensure that the procedures outlined by Working Together to Safeguard Children 2018 are adhered to and will seek appropriate advice from the Designated Officer for the Local Authority where appropriate.

If an allegation is made or information is received about any member of staff (or volunteer) who works with children (both within our organisation or outside our organisation) who 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.

The member of staff receiving the information should inform the SSM immediately. This includes concerns relating to agency and supply staff, trainees and volunteers. We may also seek consultation with the LADO where we believe that an individual has behaved in a way in their personal life that raises safeguarding concerns. These concerns do not need to directly relate to a child. Should an allegation be made against the SSM, this will be reported to the Board Level safeguarding lead or the FA Safeguarding children team

The Senior Safeguarding Manager will seek advice from the Designated Officer for the Local Authority where appropriate within one working day.

No member of staff will undertake further investigations before receiving further advice.

Any member of staff or volunteer who does not feel confident to raise their concerns within the Organisation should contact the Designated Officer for the Local Authority directly.

Luton Town Football Club will refer to the Disclosure and Barring Service (DBS) any member of staff who has harmed, or poses a risk of harm, to a children or vulnerable adults. This referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from our Human Resources department.





## Safeguarding Children and young people

### Links to policy

This policy forms part of an overall set of policies and procedures that fall under our safeguarding umbrella. Please see below the additional policies in place that underpin our safeguarding practice:

Safeguarding Adults at risk policy  
Safeguarding allegations against staff policy  
Safer recruitment policy  
Confidential reporting policy  
Whistleblowing policy  
Academy mental health and wellbeing policy  
Strategic safeguarding plan 2022 – 2025  
Safeguarding Lone working policy / risk assessment

### Reporting a Safeguard Concern:

[Safeguarding@lutontown.co.uk](mailto:Safeguarding@lutontown.co.uk)  
[myvoice@lutontown.co.uk](mailto:myvoice@lutontown.co.uk)

### Safeguarding Team Contact Details

Senior Safeguarding manager – Kim Pearce  
[Kim.pearce@lutontown.co.uk](mailto:Kim.pearce@lutontown.co.uk) contact number 07539122607  
Safeguarding Manager – Stuart Cornish  
[Stuart.cornish@lutontown.co.uk](mailto:Stuart.cornish@lutontown.co.uk) Contact number 07939539542  
Academy Player care / Safeguarding – Wayne Polson  
[Wayne.polson@lutontown.co.uk](mailto:Wayne.polson@lutontown.co.uk) - 07538871502  
Local Authority Designated Officer -  
LOCAL AUTHORITY DETAILS Designated Officer for the Local Authority:  
Luton LADO – [lado@luton.gcsx.gov.uk](mailto:lado@luton.gcsx.gov.uk)  
Children's Services Details:  
Luton Children Services 01234 718700 or 0300 3008123(out of hours)  
FA Safeguarding team:  
[Safeguarding@thefa.com](mailto:Safeguarding@thefa.com)  
EFL Safeguarding team  
[Safeguarding@efl.com](mailto:Safeguarding@efl.com)  
CEOP (Child exploitation and online protection) team  
(link on website)  
NSPCC  
0808 8005000 [help@nspcc.org.uk](mailto:help@nspcc.org.uk)  
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