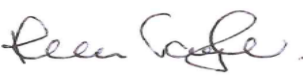
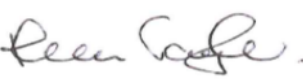




## FGR Community - Safeguarding and Child Protection Policy

<b>Policy prepared by:</b>	Jenny Pead & Sarah Urquhart
<b>Policy approved by Director for governance:</b>	Helen Taylor
<b>Signed by Director for governance:</b>	
<b>Became operational:</b>	1 July 2018
<b>Due for review:</b>	May 2019
<b>Reviewed by and on:</b>	Sarah Urquhart 21.6.19
<b>Reviewed by and on:</b>	Sarah Urquhart 14.10.19
<b>Updated by and on</b>	Sarah Urquhart 3.12.20
<b>Amendments:</b>	Following Level 3 Safeguarding Adults Training. Added in a section to appendix 6, describe what happens. For recruitment and disclosure, I strengthened the statement about agreeing in a SLA/contract whose policies and procedures are followed. Added in a section on training and induction, reference to EFL Trust training route. Updated LADO contacts.
<b>Signed by Director for governance:</b>	

### Principles

FGR Community is committed to safeguarding and protecting children, young people and adults at risk and fully accepts its responsibility for the safety and welfare of all children, young people and adults at risk who engage with the club.

Simple flowcharts on how to respond to a safeguarding concern and what constitutes abuse and neglect can be found in Appendices 1, 2, 3, 4, 5 & 6. Volunteers will report to the Supporter's Liaison Officer or the Safety Officer on match day and on non-match day the DSO for the Community Trust.

The welfare of children, young people and adults at risk is of paramount importance and all children, young people and adults at risk have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion, belief or age.

Through the application of policy, procedures and best practice, the club promotes the safety, welfare and well-being of all children, young people and adults at risk enabling them to participate in any club activity in an enjoyable, safe, and inclusive and child centred environment. This equally applies to the



safety and security of those working with and who are responsible for the activities involving children, young people and adults at risk.

Employees, workers, consultants, agency staff and volunteers who encounter children, young people and adults at risk in club related activities should be positive role models and display high moral and ethical standards in line with the club's vision and values.

This policy should be read in conjunction with all other policies:

- Equal Opportunities Policy
- Anti-harassment and Bullying Policy
- Anti-corruption and Bribery Policy
- Capability Procedure
- Disciplinary Rules
- Disciplinary Procedure
- Grievance Procedure
- Whistle-blowing Policy
- Health and Safety Policy
- Data Protection Policy
- Electronic Information and Communications Systems Policy
- Social Media
- Lone working policy
- Late Collection policy
- Missing Child policy

## Scope

This Policy is for all that use the parent club and the Community Trust and is to be observed by all those working and coming into contact with children, young people and adults at risk to ensure best practice in safeguarding is promoted and adhered to.

Activities undertaken at the following locations/departments are under the remit of this policy including:

- FGR Community;



- Forest Green Rovers First Team training ground;
- Forest Green Rovers Academy training grounds
- All matchday events and activities that encounter children, young people and adults at risk;
- Travel, Events and Supporter Liaison;
- Youth Development training grounds.
- Other club related entities/activities undertaken in the UK or outside of the UK.

All employees and workers are made aware of the Policy and Procedures through induction and where appropriate their work with children, young people and adults at risk will be supported by a comprehensive on-going safeguarding training programme.

### **Definition of a Child**

A child or young person is defined as anyone up to their 18th birthday.

Safeguarding children, young people and adults at risk is defined as:

- Protecting children, young people and adults at risk from maltreatment;
- Preventing impairment of children or young people's health or development;
- Taking action to enable all children, young people and adults at risk to have the best life chances.
- Ensuring that children, young people and adults at risk are growing up in circumstances consistent with the provision of safe and effective care; and Working Together to Safeguard Children 2018

### **Recruitment and Disclosure**

As part of the Trust's recruitment and selection process, offers of work for positions which come into contact with children, young people and adults at risk are subject to a satisfactory self-declaration and a criminal record check (CRB/DBS) as relevant, CV checks, appropriate references, right to work in the UK checks and a qualification check, if applicable.

All offers of work are subject to a satisfactory outcome to the rigorous screening process and until such time that all background checks are deemed as acceptable by the Trust, the person concerned is not permitted to commence work.

All employees, workers, consultants, agency staff and volunteers in a position of trust are required to undergo regular DBS disclosure clearances, normally every three years or earlier if required.

Should any person's DBS disclosures reveal any cautions, convictions, community resolutions, warnings or final reprimands the club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children, young people and adults at risk. In such circumstances, when the nature of any disclosure must be considered, a risk assessment *is* carried out to evaluate the information contained within the disclosure certificate.



The person may also be required to attend a risk assessment meeting with a Designated Safeguarding Officer (DSO) and/or a member of the club's Safeguarding Team prior to a recruitment decision being made.

All new employees, workers, consultants, agency staff and volunteers working with children, young people and adults at risk at the club are required to complete a self-declaration on commencement of duties and repeated on an annual basis.

When the Trust uses suppliers or agencies to undertake its work, they are be subject to rigorous vetting and safeguarding checks and required to adhere to the Trust's policy and procedures as set out in their contracts or service level agreements where relevant.

When the club engages with schools and organisations in connection with child or young people related activities, where appropriate the Trust writes to the school or organisation to state the Trust's policy and procedures in relation to criminal record checks and safe recruitment.

The Trust only discloses the name, date of birth, disclosure and issue numbers of the employees, workers, consultants, agency staff or volunteers criminal record checks. Disclosure information in relation to checks will not be divulged.

Schools and organisations are required to comply with the Trust's safeguarding arrangements and/or we will follow the schools or organisations safeguarding procedure. This should be confirmed at the outset of delivery or contract and should be set out in contracts and/or service level agreements.

### **Induction and training**

During the induction process, employees and trustees who work with or come into contact with children, young people and adults at risk are required to attend the parent club's safeguarding and protection introductory training within one month of starting their employment and where appropriate The FA Safeguarding Children workshop when deemed appropriate.

Depending on their role, induction and their skills audit they will be signposted to either Local Authority training or EFL Safeguarding workshops. All staff members will be expected to attend an annual update or specific training depending on training needs identified in their supervisions and appraisals. The Senior Safeguarding Lead will attend EFL Trust Board Level Training. Directors will receive specific safeguarding updates via the SSL. Any Directors training needs will be picked up in their induction and the skills audit. The EFL Trust has a recommended training route that can be used to inform CPD needs and requirements.

Employees will also have access to and on request receive a copy of this Policy and Procedures as well as other Trust policies and are required to sign an acknowledgement that they have read and agree to abide by them as part of the induction.



Workers, consultants, agency staff and volunteers who have roles that work with or encounter children, young people and adults at risk may be required to undertake both parent club and The FA training.

They also have access to and on request can receive copies of the Trust's Safeguarding Policies and Procedures and are expected to read and abide by them as set out in their Agreements.

Refresher safeguarding training through the FA is provided every three years or earlier as required.

### **Roles and responsibilities**

FGR Community has a comprehensive safeguarding structure which ensures the safety and welfare of all children and young people who engage with the club. If there is a concern the first point of contact is [safeguarding@fgr.co.uk](mailto:safeguarding@fgr.co.uk)

#### **Director for Safeguarding, FGR Community, named Senior Safeguarding Officer (SSO)**

Responsible for all aspects of the Trust and to ensure that safeguarding is a key priority at Trust Level. Responsible for linking with the parent club to provide club-wide strategic leadership that assist the Trust to deliver the safeguarding strategy, vision, values, priorities, policies, promoting the welfare of vulnerable groups, communicating at Trust level. Please see role job description.

Contact: Helen Taylor [Helen.Taylor@fgr.co.uk](mailto:Helen.Taylor@fgr.co.uk)

#### **Head of Safeguarding for FGR Community, named Designated Safeguarding Officer (DSO)**

Responsible for the strategic and operational direction and embedding safeguarding across the Trust. The Head of Safeguarding is also the lead point of contact should safeguarding concerns arise and is the Lead Disclosure Officer.

Responsible for liaising with other safeguarding leads within the parent club as well as being the point of contact should a concern arise amongst employees, workers, agency staff, consultants and volunteers.

Responsible for familiarising themselves with the Trust's policies and procedure and ensuring the safety and welfare of all children and young people. Please see role job description.

Contact: Sarah Urquhart [Sarah.Urquhart@fgr.co.uk](mailto:Sarah.Urquhart@fgr.co.uk)

#### **Deputy Designated Safeguarding Officer**

This will be the role of the Trust Lead Coordinator and they will take up the responsibilities for recording, reporting and referring in the absence of the DSO. Please see role job description.

### **Abuse and neglect**



Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children or young people 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, children, young person or young people.

There are 4 recognised categories of abuse as defined in Working Together to Safeguard Children 2018:

- Physical abuse;
- Sexual abuse;
- Emotional abuse (includes bullying); and
- Neglect.

Full descriptions of each category of abuse and neglect can be found in Appendix 1 & 2

Children and young people at risk may be at additional risk of abuse and neglect through some of the additional vulnerabilities they may face.

### **Additional vulnerabilities**

If children and young people at risk have additional vulnerabilities when engaging with the club, further safeguards may need to be put in place to reduce the potential risk of abuse and neglect.

### **Radicalisation and extremism**

Radicalisation and extremism of children and young people at risk is a form of emotional abuse. HM Government states that the aim of radicalisation is to attract Children and young people at risk to a particular extremist ideology. In many cases it is with a view to inspiring children and young people at risk eventually to become involved with harmful or terrorist activities.

Radicalisation can take place through direct personal contact, or indirectly through social media. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

### **Looked after children and young people at risk**

Looked after (such as those living in foster care) children and young people at risk may be especially vulnerable to abuse and neglect for several reasons:

- Experienced abuse and neglect previously;
- Living with people who are not their immediate family or friends;
- Less support networks; and Stigma for being in care.

### **Online world**



Although the online world provides many benefits to children and young people at risk, there are also several potential associated risks:

- Inappropriate language or images;
- Online grooming;
- Cyberbullying;
- Sexting.

Further information about the online risks can be found within the Electronic Information and Communications Systems policy.

### **Disabled children and young people at risk**

The Equality Act (2010) defines a person as disabled if they have a physical or mental impairment which has a substantial and long term (has lasted or is expected to last at least 12 months) adverse effect on one's ability to carry out normal day-to-day activities. This definition includes conditions such as cancer, HIV, mental illness and learning disabilities.

Disabled children and young people at risk may be vulnerable to abuse for several reasons:

- Increased likelihood of social isolation;
- Dependency on others for practical assistance in daily living (including intimate care);
- Impaired capacity to resist, avoid or understand abuse;
- Speech and language communication needs may make it difficult to tell others what is happening;
- Limited access to someone to disclose to; and
- Particular vulnerability to bullying.

Children and young people at risk with disabilities may also feel less valued than his/her peers and poor care may be observed but tolerated by others. This might include such things as not speaking directly to the child or young person; not offering choices; not moving and handling them safely; not respecting his/her privacy and dignity; not treating him/her according to his/her age; allowing physical restraint to occur; or using derogatory language.

There is no single route to ensure that children and young people at risk are protected, especially those with additional vulnerabilities. The safest environments, however, are those that help children and young people at risk to protect themselves by helping them to speak out and do their best to stop any abuse and neglect from happening and take responsibility for observing, challenging and reporting any poor practice and suspected abuse and neglect.



Safe environments for children and young people at risk with additional vulnerabilities are also safer for all children and young people at risk.

### **Use of photography and film**

All images on a match day are taken by club photographers who have been briefed by a club Designated Safeguarding Officer (DSO) or by a member of the Communications and Marketing Department responsible for the activity being photographed or filmed in an appropriate way and manner.

The Community Trust will gain appropriate permissions from schools and organisations in line with club policy and GDPR. Where appropriate and possible, parent/carer consent is sought in writing prior to an event. The Trust adhere to the following principles when using photography or film:

- All children or young people featured in Trust publications are appropriately dressed;
- Where possible, the image will focus on the activity taking place and not a specific child or young person;
- Where appropriate, images represent the broad range of people participating safely in the event;
- Designated club photographers will, where applicable, undertake a DBS check and attend the club's and FA Safeguarding workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the 'Use of Images' policies from The FA. Identification is worn on match days;
- Children or young people who are the subject of a court order will not have his/her images published in any Trust document;
- No images of children or young people featured in Trust publications are accompanied by personal details such as his/her home address;
- Recordings of children, young people and adults at risk for the purposes of legitimate coaching aids are only filmed by officials and are stored safely and securely at the Trust's premises;
- Any instances of inappropriate images in football should be reported to the DSO or the club's Safeguarding Team;
- The Trust does not put young players under the age of 16 profiles, images and personal information on its website.

### **Good practice and code of conduct**

To ensure all children and young people at risk have the most positive and safe experience when engaging with the club, all employees, workers, consultants, agency staff and volunteers should adhere to the following principles and action (to ensure they role model positive behaviours and so reduce the risk of allegations, abuse and neglect occurring): This list is not exhaustive:





- Listen carefully to children, young people and adults at risk about his/her needs, wishes, ideas and concerns and take them seriously;
- Treat all children, young people and adults at risk equally not showing favouritism;
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);
- Make the experience of the activity fun and enjoyable;
- Promote fairness, confront and deal with bullying;
- Maintain a safe and appropriate distance with children and young people at risk and avoid unnecessary physical contact;
- Where any form of manual/physical support is required it should be provided openly and with the consent of the child or young person;
- If children and young people at risk have to be supervised in changing rooms always ensure coaches etc. work in pairs;
- Request written consent if the club are required to transport children and young people at risk for any activities, events or significant travel arrangements e.g. overnight stays;
- Employees and workers should maintain their qualifications and professional development;
- A qualified first aider is in attendance or readily available;
- Maintain appropriate professional relationships with children and young people at risk, including only engaging with them online with prior approval and through the club's social media channels;
- On trips, ensure that adults should not enter a child or young person's room unless there is a safety concern, in which case two adults should enter and should not invite children or young people into their rooms;
- Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of children and young people at risk;
- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the club's vision and values and be an ambassador for those values;
- Ensure children and young people at risk adhere to his/her relevant Code of Conduct;
- Secure written consent for the club to administer emergency first aid or other medical treatment if the need arises;
- Encourage children and young people at risk to take responsibility for his/her own behaviour and performance;
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the club's Accident and Incident Report Form.

Recording safeguarding concerns directly onto My Concern or if this is not possible due to a remote location on the Safeguarding Concern Form (Appendix 6)

### **Unacceptable practice**

The following are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers:



Unnecessarily spending excessive amounts of time individually with a child or young person away from others; This list is not exhaustive.

- Being alone in changing rooms, toilet facilities or showers used by children and young people at risk;
- Taking children and young people at risk alone in a car or journey unless a club pool car is used, and written consent is sought from the club's Safeguarding Team for emergency situations;
- Taking children and young people at risk to your home or places where they will be alone with you;
- Sharing a room with children and young people at risk;
- Engaging in rough, physical or sexually provocative games, including horseplay;
- Allowing or engaging in inappropriate touching of any form;
- Allowing children and young people at risk to use inappropriate language unchallenged;
- Making sexually suggestive comments to children and young people at risk, even in fun;
- Reducing children and young people at risk to tears as a form of control;
- Allowing allegations made by children and young people at risk to go unchallenged, un-recorded or not acted upon;
- Doing things of a personal nature that children and young people at risk can do for them-selves.
- Not recording safeguarding concerns on My Concern or the Safeguarding Concern Form (SCF);
- Sending inappropriate text messages or social media messages to children and young people and at risk;
- Having children or young people engaged with the club as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram;
- Engaging with children and young people at risk on 'one to one' personal electronic communications;

### **Searching children and young people at risk**

To ensure the safety and security for all club activities all children and young people at risk may be subject to the club's search process. Children and young people at risk are asked to self-search as the preferred method; should the club, however, suspect that the child or young person may be concealing a prohibited item, consent will be sought from their parent/carer before a Steward or Security member of the same sex who is being observed by a Supervisor searches the child.

### **Lost or missing children and young people at risk**

During club activities every effort is made to ensure children and young people at risk remain with their parents/carers or the activity leaders. Should a child or young person become lost or go missing during a club activity every effort will be made to locate the child or young person as quickly as possible. All staff members will be informed and conduct a search. Should a child or young person not be located



within 15 minutes, contact will be made with the DSO or the club's Safeguarding Team. They will contact their parents/carers and the police to file a missing child/young person's report. Please refer to our Missing Child Policy.

### **Children and young people at risk who are not picked up on time**

All parents and carers should collect their child or young person on time in line with the instructions given by the club. Should the child or young person not be collected on time a minimum of two appropriate adults will wait at the venue until the parent or carer arrives.

Should the child or young person not be picked up at all, the staff member should try and contact the parent and if unable to make contact the second emergency contact. The staff member should also contact the DSO or the club's Safeguarding Team. Should thirty minutes pass the Trust member and/or club may contact the police and/or children's services to take care of the child or young person until their parent or carer is contacted. Please refer to our Late Collection of children policy.

### **Risk assessments**

For all Trust activities including, trips, tours, events and activities, thorough risk assessments are completed to identify and minimise potential risks. The Trust's Health and Safety Policy outlines the process to undertake when completing risk assessments as well as how to capture information regarding accidents and incidents and how the Trust learns from such matters.

Where a child or young person is involved in a trip, activity or event, a risk assessment must take account of his/her particular vulnerabilities whilst in the Trusts care. The risk assessment will set out what arrangements are in place for his/her care and supervision and how risks will be minimised.

Activity leaders will be required to continually monitor and amend the controls within the risk assessments whilst leading such activities.

### **Supervision of children and young people at risk**

The Trust adheres to best practise guidance set out by the FA in relation to the supervision of adults to children/young people. Generally, there should always be a minimum of two adults and an adult to child/young person ratio of:

- 0 – 7 years of age, one adult to every ten children;
- 8 – 17 years of age, one adult to every sixteen children/young people.
- Particular activities may require more or less adult to child/young person ratios due to: Age, needs and ability of children, young people and adults at risk; nature of the activity and environment;
- Risk assessments or intelligence information identifying potential behavioural or other issues;
- Expertise and experience of the staff involved;
- Mixed gender children and young people at risk activities will require adults of both genders to supervise where possible.



- Should the ratio not be suitable, the Trusts Safeguarding and Health and Safety Leads will decide whether the activity or event takes place?

### **Working with external partners**

The Trust always ensures external partners and organisations we engage with promote the safety and welfare of children and young people at risk and this is outlined in contracts and/or service level agreements. External partners and organisations are required to demonstrate competencies in safeguarding and the Trust assesses this through its own safeguarding audits. Where organisations do not have their own satisfactory safeguarding arrangements, they will be expected to comply with the Trust's standards. In the event of working with an external partner it will be decided at the outset who will be lead organisation for Safeguarding, for example in the event of running a programme with a school, FGR Community would follow the schools safeguarding policies and procedures. Our safeguarding policy will be available to these external partners and available to the users/participants to view on our website.

### **Referrals**

If the club has safeguarding concerns in relation to a child, young person or their parents/carers the club may refer these concerns to external agencies. External agencies include, but are not limited to children's social care, adult social care, the police, health agencies, the FA and the English Football League.

### **Confidentiality**

Every effort should be made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a need to know basis only which would not normally include anyone other than the following:

- The Safeguarding Team;
- The child or young person or the person raising the concern;
- The employee, worker, consultant, agency staff or volunteer who received the concern or disclosure;
- The parents/carers of the child or young person who is alleged to have been abused, where appropriate;
- Local Authority and Police;
- Dependent on role, the National Governing Body
- Employees, workers, consultants, agency staff and volunteers may have access to confidential information about children and young people at risk in order to undertake their responsibilities. In some circumstances, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information.

Confidential or personal information about a child or young person or his/her family should not be used for their own or others advantage.



Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the child or young person's identity does not need to be disclosed, the information should be handled anonymously.

There are some circumstances in which an employee, worker, consultant, agency staff or volunteer may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, employees, workers, consultants, agency staff and volunteers have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities (DSO and Safeguarding Team).

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, guidance should be sought from the Trusts DSO.

The storing and processing of personal information about children and young people at risk is governed by the Data Protection Act 2018.

### **Information sharing**

The Trust abides by the 7 guiding principles as set out by HM Government on sharing information:

The Data Protection Act 2018 and human rights laws are not barriers to justified information sharing, but provide a framework to ensure that personal information about children and young people at risk is shared appropriately;

- Openness and honesty with the child or young person (and/or their parents/carers or family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek agreement, unless it is unsafe or inappropriate to do so;
- Advice is sought from the Trusts DSO if there is any doubt about sharing the information concerned, without disclosing the identity of the child or young person where possible;
- Information is shared with informed consent where appropriate and, where possible, there is respect for the wishes of those who do not consent to share confidential information. Information will still be shared without consent if, in the Trust's judgement, there is good reason to do so, such as where safety may be at risk. Judgement will be based on the facts of the case;
- Safety and well-being of the child or young person is always considered;
- Information is only shared when it is necessary, proportionate, relevant, adequate, accurate, timely and secure to do so;

Records of the Trusts decision to share information in relation to any reported concerns, with whom and the reasons are always recorded on My Concern or on the Safeguarding Concern Form Appendix 6

The Trust will share information with the relevant statutory agencies, the English Football League and FA where appropriate in relation to safeguarding cases.

### **Procedure for Review**



FGR Community shall review this Policy and Procedures at the end of every season or whenever there is a change in legislation, guidance or governing body rules. It will be reviewed when there is any learning from safeguarding cases and when starting new projects and programmes. If there any significant organisational change, including changes in staff or programmes this policy will be reviewed. Any changes will be signed off by the Trustees.

### **Consent**

The priority in safeguarding should always be to ensure the safety and welfare of the child or young person. If concerns arise, it is best practice to always gain the consent of the child or young person before an external referral is made. There are several circumstances whereby an external referral can be made without consent and these include:

- The child or young person is at risk of harm;
- Other people are, or may be, at risk, including other children or young people;
- Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent;
- Sharing the information could prevent a serious crime;
- The child or young person lacks the mental capacity to make that decision;
- A serious crime has been committed;
- There is a risk of significant harm and meets the threshold for a multi-agency strategy meeting;
- Employees, workers, consultants, agency staff or volunteers are implicated;

### **What to do if you suspect abuse or poor practice has occurred?**

If you are concerned about the safety or welfare of a child or young person or you are concerned about an adult's behaviour towards a child or young person you must act. Do not assume that some-one else will help the child or young person. Safeguarding children and young people is everyone's responsibility.

It is important that you report your concerns to one of the following:

- Designated Safeguarding Officer, FGR Community
- Senior Safeguarding Manager, Director for Safeguarding, FGR Community

### **Taking no action is not an option.**

### **What to do if you receive a safeguarding disclosure from a child or young person**

Children or young people who may be vulnerable are likely to disclose abuse or neglect to those they trust and how one responds to a disclosure is crucial.

### **Stage 1**

Deal with the disclosure as it happens and ensure that the child or young person's immediate needs are met and that he/she feels supported. When a disclosure is made, it is most important to understand



that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy and Procedure, even if the validity of the disclosure is uncertain. You are not expected to act as a social worker, counsellor, judge, and jury or avenge the abuser; you are however expected to act in the best interest of the child or young person who may be at risk.

**You must:**

- Put your own feelings aside and listen as if the information is not sensational;
- Allow the child/young person to lead the discussion and to talk freely;
- Listen to what the child/young person is saying without investigating. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like being interrogated;
- Allow the child or young person to tell you at his/her own pace;
- Don't worry if the child/young person stops talking for a while, silences are ok. You don't have to rush in to fill the gaps;
- Accept what the child/young person says without challenge;
- Allow the child/young person to talk but protect him/her from sharing the information with too many other people;
- Provide reassurance that you are taking them seriously and he/she have done the right thing by disclosing;
- Let the child/young person know it is recognised how hard it is for him/her to tell you;
- It is ok to let him/her know if you are unable to answer all their questions;
- Avoid asking leading questions, for example "Did the coach hit you?"
- Never ask questions that may make the child/young person feel guilty or inadequate;
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask a child/young person to remove or adjust his/her clothing to observe them and do not take photo-graphs of the injuries, you should make a note of the injuries on the Body Map in the Safeguarding Concern Form Appendix 6

Tell the child/young person who you will be contacting e.g. FGR Community DSO and that you will support him/her through that process;

- If you establish that they he/she has been harmed or is at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure;
- Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting children/young people.

**You must not:**

- Panic or show that you are shocked. It is important to remain calm and in control of your feelings;





- Document the conversation while the child/young person is disclosing. This should be done as soon as possible after the child/young person has disclosed to you;
- After the child/young person has disclosed, the conversation must be documented remembering as accurately as you can, the words and phrases used by the child/young person to describe what happened to him/her; Investigate;
- Give the impression that you might blame the child/young person e.g. don't ask: "Why did you let him?", "What were you doing there anyway?" or "Why didn't you tell me before?"
- Press for details by asking questions such as "What did he/she do next?"
- Ask leading questions;
- Pass judgement on what is said;
- Make false promises and/or promise confidentiality – it should be explained that the child/young person has done the right thing, outline who will need to be told and why;
- Approach the alleged abuser yourself.
- Do remember, when a child/young person discloses they may feel:
  - Guilt: he/she may blame themselves for the abuse and often feel guilt for telling.
  - Ashamed: he/she may feel ashamed about the abuse itself.
  - Confused: he/she may be confused about his/her feelings for the alleged abuser.
  - Scared: he/she may be fearful of the repercussions of telling. He/she may be scared of the alleged abuser.
- Be careful about touching (e.g. hugging or cuddling) the child/young person if they have not initiated the contact. He/she may be upset by physical contact.

## Stage 2

As soon as possible, once the immediate comfort and safety of the child or young person is secured, you must inform your DSO, or the Senior Safeguarding Officer of the disclosure. You may make a referral yourself directly to a statutory agency if you are concerned about the child/young person or adult at risks' immediate safety and/or are having difficulty contacting the designated safeguarding person/s or if the designated safeguarding person is the alleged abuser. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

## Stage 3

You should complete the concern on My Concern or on the Trust's Safeguarding Concern Form (SCF) as soon as possible after the disclosure has been made and if using a paper form, send the SCF Appendix 6 to the Safeguarding Team within 24 hours of the disclosure. Wherever possible, you must record information as it was relayed to you using the language of the child or young person rather than your own interpretation of it.

## What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Trust's DSO what has happened following the re-report being made. If





you do not receive this information, you should be proactive in seeking it out. If you have concerns that the disclosure has not been acted upon appropriately, you should inform the Trust's SSO and then the People Team and ultimately contact the relevant statutory agency.

A disclosure is not the only way that you may be made aware of an issue. Sometimes another adult or even a child or young person may say something about a possible abusive situation. On occasions you may witness an incident that may cause concern or indeed you may pick up on things that cause concern or information may be passed to a coach or manager anonymously by a person or persons who do not want to be directly involved for whatever reason.

### **Raising a concern**

You do not need to have firm evidence before raising a concern. But we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

#### **Step 1**

If you have a concern of any form of safeguarding poor practice or abuse, raise it first with the Trust's Designated Safeguarding Officer (DSO)

#### **Step 2**

If you feel unable to raise the matter with the DSO for whatever reason, raise the matter with the SSO.

#### **Step 3**

If you feel the SSO has not handled the concern appropriately you should contact the club's People Team.

#### **Step 4**

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, you should contact:

**Hugh Feltham, County Welfare Officer at Gloucestershire FA using 01454 615888 option 4 or 07960 500130 or email [Safeguarding@GloucestershireFA.com](mailto:Safeguarding@GloucestershireFA.com)**

**For a flowchart of the process to follow, please see Appendices 3, 4 and 5**

### **Managing allegations against employees, workers, consultant's, agency staff and volunteers**

Should a concern arise about an employee, worker, consultant, agency staff or volunteer's conduct in relation to a child or young person, this should be reported to the Trust's DSO who will take such steps as considered necessary to ensure the safety of the child or young person in question and any other person who may be at risk.

The person raising the concern should complete a concern on My Concern or on the club's Safeguarding Concern Form Appendix 6.

When managing an allegation against an employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:

- The allegation will be referred to the Local Authority Designated Officer (LADO)/Designated Person at the Local Authority and/or the Police;
- The parent/carer of the child or young person will be contacted as soon as possible, following advice from statutory agencies;

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When managing an allegation against an employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:

- The allegation will be referred to the Local Authority Designated Officer (LADO)/Designated Person at the Local Authority and/or the Police;
- The parent/carer of the child or young person will be contacted as soon as possible, following advice from statutory agencies;
- Senior Management will be notified and if applicable the English Football League and the FA;
- If a member of the Safeguarding Team is the subject of an allegation, the report must be made to the who will refer the allegation to the appropriate statutory agencies;
- If required, a full investigation and possible sanction in accordance with the club's Disciplinary Policy for employees will follow. Workers, consultants or agency workers may have their Agreements terminated.
- Referrals as appropriate will be made to the Disclosure and Barring Service (DBS)

These procedures cover handling allegations made against a member of staff or volunteer, as well as against one made by a participant.

For a flowchart of the process to follow, please see Appendix 3, 4 and 5

### **Managing concerns for a child or young person**

Any concern relating to the abuse of a child or young person by another child or young person must be dealt with through this Policy and Procedure. Any such concern should be reported immediately to the DSO who will inform the SSO.

### **Making a referral**

All employees, workers, consultants, agency staff and volunteers should complete the Trust's Safeguarding Concern Form (Appendix 8) after referring any case to the DSO and/or SSO. The Safeguarding Team will contact the relevant Local Authority Children's Services Team completing their Referral Form and update the records on My Concern.



**Appendix 1**  
**Physical and behavioural signs and indicators of abuse and neglect**

Category of abuse and neglect	Physical Signs	Behavioural Signs
<b>Physical Abuse</b>	Unexplained and unusual bruising, fingers and strap marks, injuries, cigarette burns, bite marks, fractures, scalds, missing teeth.	Fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abusing others
<b>Sexual Abuse</b>	Genital pain, itching, bleeding, bruising, discharge, stomach pains, pregnancy, incontinence, urinary infections or STIs, thrush, anal pain on passing motion	Apparent fear of a person, nightmares, running away, sexually explicit knowledge or behaviours beyond their years, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm
<b>Emotional Abuse</b>	Weight change, lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for child's age, gender or culture	Unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulties, few friends
<b>Bullying</b>	Weight change, unexplained injuries and bruising, stomach pains and headaches, bed-wetting, disturbed sleep, hair pulled out	Difficulty making friends, anxiety over school, truancy, withdrawn anger, moodiness, suicide attempts, reduced performance, money and possessions reported as lost, stealing from within the family, distress and anxiety on reading texts or emails
<b>Neglect</b>	Constant hunger, ill-fitting or inappropriate clothes, weight change, untreated conditions, continual minor infections, failure to supply hearing aids, glasses and or inhalers (where appropriate)	Always being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parent or carer not attending or supportive



## Appendix 2

### Categories of abuse and neglect as defined in Working Together to Safeguarding Children 2018

#### Abuse

A form of maltreatment of a child. 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.

<b>Physical abuse</b>	A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.
<b>Sexual abuse</b>	Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
<b>Emotional abuse (including bullying)</b>	The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to



	<p>express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.</p>
<b>Neglect</b>	<p>The persistent failure to meet a child’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 maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"><li>• Provide adequate food, clothing and shelter (including exclusion from home or abandonment);</li><li>• Protect a child from physical and emotional harm or danger;</li><li>• Ensure adequate supervision (including the use of inadequate care-givers); or</li><li>• Ensure access to appropriate medical care or treatment.</li></ul> <p>It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</p>



### Appendix 3

#### Allegations against employees, workers, consultants, agency staff and volunteers

Safeguarding allegation raised about the conduct or behaviour of an employee, worker, consultant, agency staff or volunteer.

Is the concern about a member of the Safeguarding team?

Yes

No

Inform the Senior Safeguarding Manager (SSO) immediately and the person raising the concern should complete the concern on My Concern or use the Safeguarding Concern Forms (SCF) as soon after the incident and send to the (SSO) within 24 hours.

ST or SSO (If allegation is against a member of the ST) decides whether the employee, worker, consultant, agency staff or volunteer has:

- Behaved in a way that has harmed or may have harmed a child, young person or adult at risk
- Possibly committed a criminal offence in relation to a child, young person or adult at risk
  - Behaved towards children, young people or adults at risk in a way that indicated he/she is unsuitable to work with children, young people or adults at risk

ST or SSO completes the relevant sections on My Concern or of the SCF.

ST or SSO contact the Local Authority Designated Officer (LADO) and/or the police for advice, The ST, SSO and the People Team will act on the advice of the LADO and/or police. The Trust will inform the EFL Trust and the The FA and relevant internal colleagues including, Board of Trustees and CEO if appropriate.

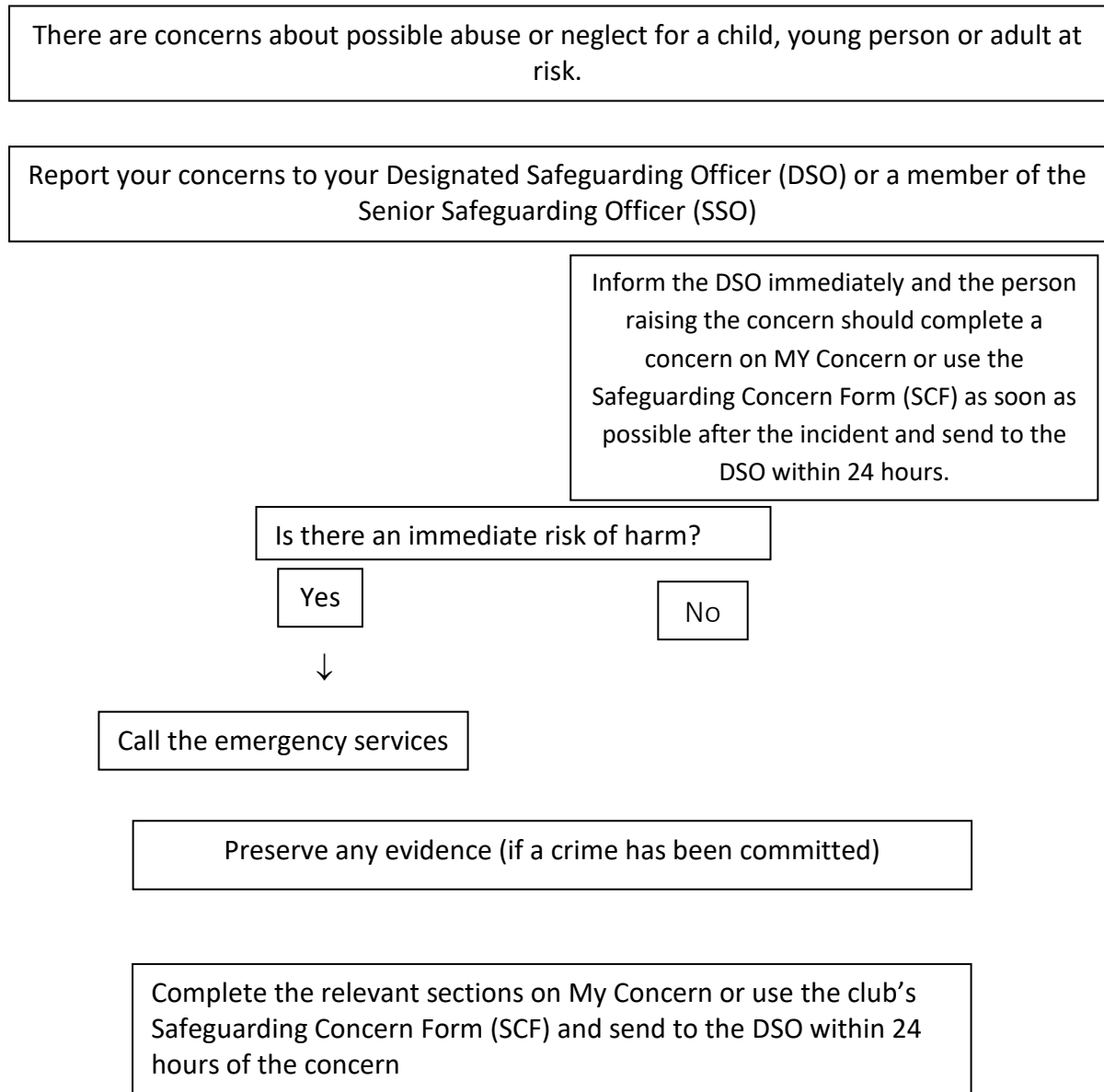
The Trust will decide whether to suspend the employee, worker, consultant, agency staff or volunteer pending the statutory investigations and inform the LADO and/or Police of the Trust's decision.

Once any statutory investigations are concluded, or where appropriate in parallel, the Trust will undertake its own investigation and decide what should be taken against the employee, worker, consultant, agency staff or volunteer. If the employee, worker, consultant, agency staff or volunteer is removed from their role in working with children, young people or adults at risk referral will be made to the Disclosure and Barring Service (DBS)



## Appendix 4

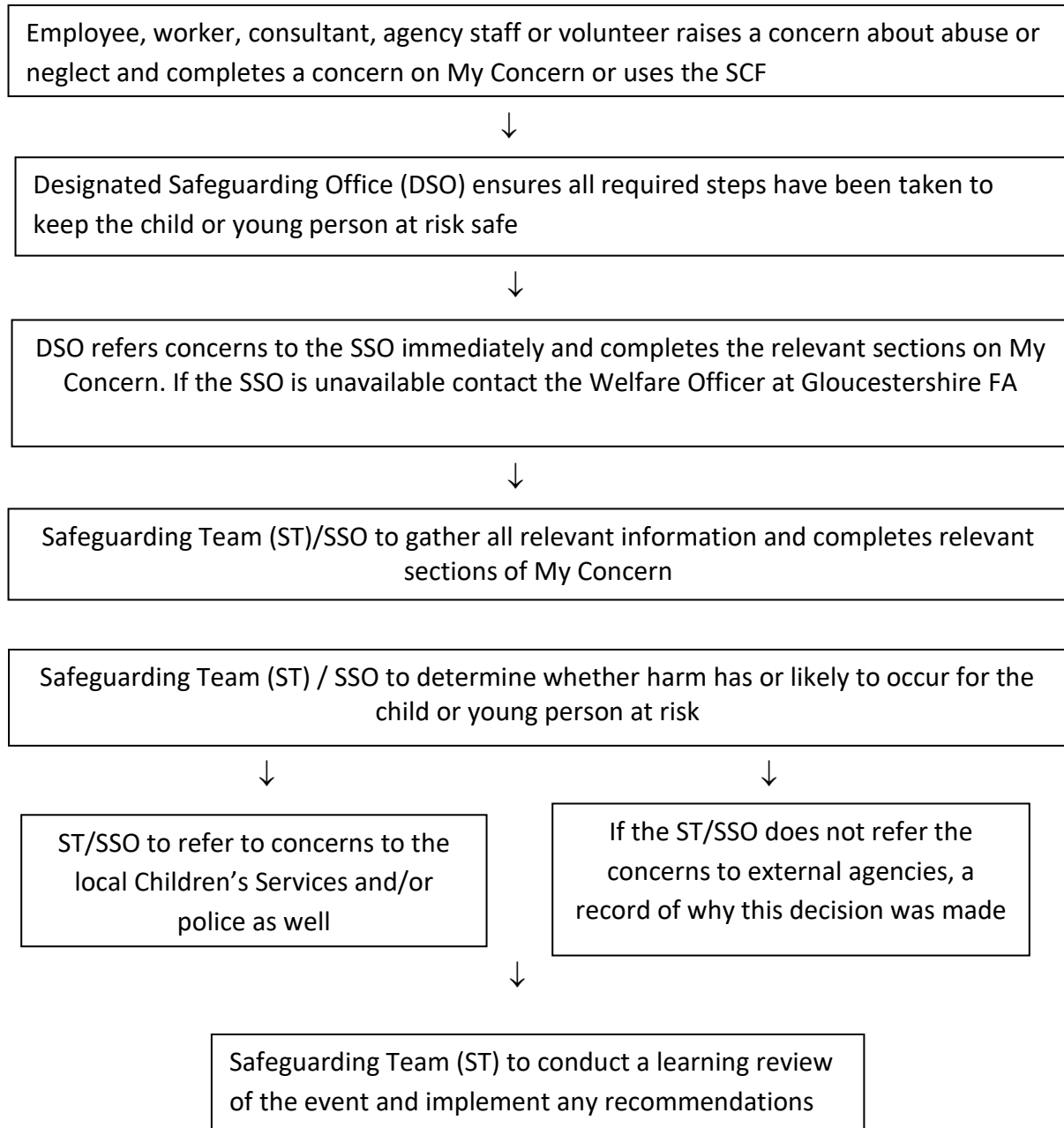
### Flowchart for employees, workers, consultants, agency staff and volunteers who raise concerns about a child or young person





## Appendix 5

### Flowchart for DSO and SSO making a referral







## Appendix 6

Safeguarding concern form, to be used if you cannot access My Concern.

Safeguarding Concern Form	
Private and confidential once complete	
<p>Please complete sections A-H of this form as fully as possible after witnessing a safeguarding incident or if one has been reported to you. Where possible, you should always seek consent of the child/young person at risk before sharing the information. If you are not sure whether you have consent, please contact the Safeguarding team on the numbers below. If there are concerns raised about a club employee, worker, consultant, agency staff or volunteer you should not inform them that a safeguarding allegation has been made until you have sought the advice of the Safeguarding Team. If a person has literacy issues or additional needs and is unable to complete the form, you can complete the form on their behalf but must disclose this in Section F. Please complete the form within 24 hours of disclosure and in black ink and return to <a href="mailto:safeguarding@fgr.co.uk">safeguarding@fgr.co.uk</a>.</p>	
Section A – Your details	
<b>Full name</b>	
<b>Your role at the Trust (if applicable)</b>	
<b>Contact number</b>	
<b>Email address</b>	
<b>Date and time of safeguarding concern</b>	/ /                      Time:
<b>Date and time of the safeguarding concern form completion</b>	/ /                      Time:
Section B – Child or young person at risk details (the child or young person at risk who is potentially at harm)	
<b>Child or young person at risk's name</b>	
<b>Age of child or young person at risk</b>	
<b>Date of birth</b>	
<b>Address</b>	

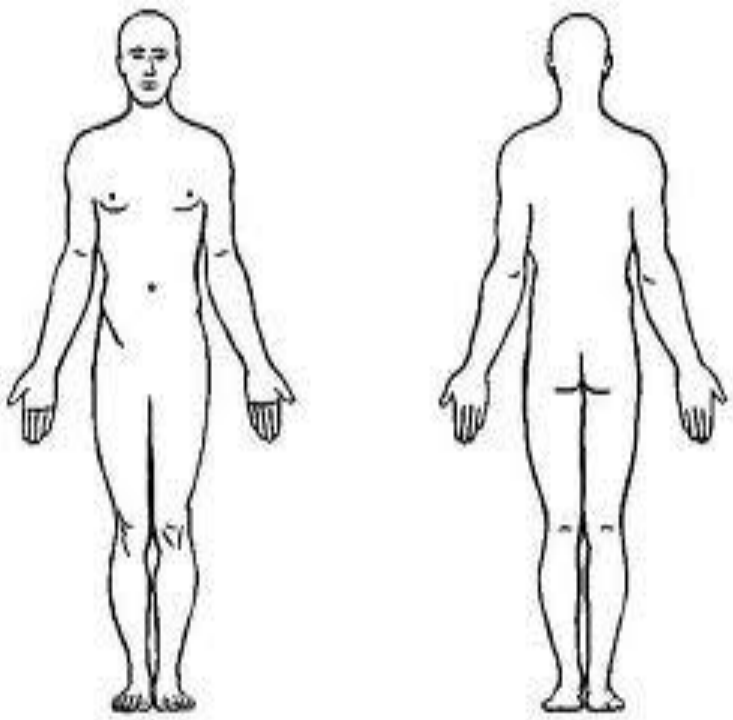


	Postcode:
Telephone number	
<b>Section C – Alleged person to have caused the concern</b>	
Name of the alleged person to have caused the concern	
Address	
Age of the alleged person	
<b>Section D – Confidentiality</b>	
Has the child or young person at risk given consent to share the information?	<p>Yes                      No</p> <p>If not, please state why:</p>
<b>Section E – Your concerns</b>	
<p><b>Facts</b> (Please state facts. For example, the child said to me “I was too scared to go home today” and/or the child/young person/adult at risk had a bruise on their right hand – Please link any injuries to the body map attached – see Section G)</p>	
<p><b>Describe what happened</b> (People, place, time, context, what was observed)</p>	
<p><b>Professional opinions</b> (Please state what is your opinion is the concern. For example, I believe in my position as the Strength &amp; Conditioning Coach/Steward that the child(ren), young person or adult at risk is being groomed online through social media.</p>	



<p><b>Hearsay/witnesses</b> (Please state what has been said by others or overheard regarding an incident. For example, you overheard the child(ren), or young person at risk talking to their friend saying they are scared about going home/school/football because of being bullied etc.)</p>	
<p><b>Section F: Actions</b></p>	
<p><b>What actions did you take?</b> (What did you do, i.e who have you told, did you move the child or young person at risk to a safe place?)</p>	
<p><b>Have the parents/carers of the child or young person been informed of the concern?</b></p> <p>(If you feel that informing the parent or carers about the concern will put the child or young person at risk, you should not inform the parent/carer but need to document here why you feel it would put them at risk)</p>	<p><b>Yes</b>                      <b>No</b></p> <p><b>If not, please state why?</b></p> <p><b>Yes</b>                      <b>No</b>                      <b>N/A</b></p> <p><b>If no please state why:</b></p>
<p><b>Date and time parents/carers were informed of the concern</b></p>	<p style="text-align: center;">/   /                      <b>Time:</b>    :</p>
<p><b>Parent/carers response (please state facts)</b></p>	
<p><b>Have parents/carers given consent to share the information</b></p>	<p><b>Yes</b>                      <b>No</b></p>
<p><b>Parent/carers address</b></p>	<p><b>Postcode:</b></p>
<p><b>List the name and contact details of any witnesses to the concern:</b></p>	<p><b>Name:</b>                      <b>Contact details:</b></p>



	<b>Name:</b>	<b>Contact details:</b>
	<b>Name:</b>	<b>Contact details:</b>
<b>Section G: Acknowledgement</b> All information recorded on the Safeguarding Concern Forms is accurate to my knowledge		
<b>Sign &amp; date</b>		/ /
<b>If completing on behalf of another person, please ensure they sign above, and you provide your name and contact details</b>		
<b>Section H: Body Map (If applicable)</b>		
<p>Record any physical injuries or marks that you notice on the body map. Place a mark where the injury is and then a line out to a written number. Write a corresponding description of the nature of the injury in section I.</p> <div style="text-align: center;"></div>		
<b>Section I: Body map injury description</b>		



<p><b>Write a corresponding description of the nature of any injury annotated in section H.</b></p> <p><b>Care should be given to state:</b></p> <ul style="list-style-type: none"><li>- <b>Specific location (right elbow)</b></li><li>- <b>Description of the injury (colour of the bruise, bleeding, scabbing, shape etc)</b></li><li>- <b>Approximate size of the injury by relating to standardised objects</b></li><li>- <b>Sign name</b></li><li>- <b>Date</b></li></ul> <p><b>Example: Open wound above right eye which was bleeding, approximate size of a 10p coin. Steve Smith. 01/07/2017</b></p>	
<b>Injury description 1:</b>	
<b>Injury description 2:</b>	
<b>Injury description 3:</b>	
<b>Injury description 4:</b>	
<b>Injury description 5:</b>	
<b>Injury description 6:</b>	
<b>Injury description 7:</b>	
<b>Section J: What next</b>	
<p><b>Please ensure that the completed form is returned to your DSO on <a href="mailto:safeguarding@fgr.co.uk">safeguarding@fgr.co.uk</a> within 24 hours of the concern being raised.</b></p>	



## Helpful numbers

### Designated Safeguarding Officer, FGR Community

Sarah Urquhart

01453 837 431/07419333746

### Gloucestershire Safeguarding Children Board

<http://www.gscb.org.uk/>

Gloucestershire LADO – Nigel Hatten 01452 426320

Helpdesk for serious concerns only – 01452 426565

### Gloucestershire Domestic Abuse

0845 602 9035

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

### Gloucestershire Families Directory

<http://www.glosfamiliesdirectory.org.uk>

### Gloucestershire healthy living and learning

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

01452 427208

### NSPCC

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

0808 800 5000