



# **PAFC SAFEGUARDING AND CHILD PROTECTION POLICY**

Plymouth Argyle is committed to safeguarding and promoting the welfare of young people and vulnerable adults and expects all staff, volunteers and visitors to share this commitment.

## INDEX

<b>Foreword and endorsement</b>	6
<b>Key Safeguarding Terminology and Definitions</b>	7
<b>Key safeguarding related PAFC policies and reference Material</b>	8
<b>PAFC Safeguarding Organisational Structure</b>	9
<b>Safeguarding policy statement</b>	10
<b>Safeguarding context</b>	10
National framework	
Purpose of this policy	
<b>PAFC safeguarding framework</b>	11
<b>Who will we work with to keep safe</b>	12
<b>Safeguarding legislation and guidance</b>	13
<b>Safeguarding considerations for children with additional vulnerability</b>	14
Cultural sensitivity	
Age sensitivity	
Open age players	
Safeguarding elite players	
Additional vulnerability	
Language and communication	
Children from overseas	
Consultation	
<b>Standards of children behaviour</b>	15
Managing PAFC behaviour	
<b>Good practice and staff conduct</b>	16
Children's activities	
Inclusive good practice (promoting equality and diversity)	
<b>Special Arrangements</b>	17
Young people on work experience	
<b>Photography and video image</b>	17
Celebrating activity	
Data protection law and photography	
Video or photographs as a coaching or management aid	
Consent	
Legitimate interest	
Opt out	
Storage	
Match day, public events, incidental image capture and consent	
Parents, other children and other photographers	
<b>Residential Accommodation</b>	19
Selection of carers	
<b>Safeguarding and PAFC staff</b>	20
Safeguarding – safer working practices booklet	
Safer recruitment	
Staff / child relationships	
Abuse of position of trust	
Helping children keep themselves safe	
Standards of behaviour – adults	
Whistleblowing	

Information and communication technology (ICT)	
Support for those involved in a child protection issue	
<b>Complaints Procedure</b>	22
Concerns about poor practice	
Concerns about a colleague	
<b>Allegations Against staff</b>	22
Historical allegations	
<b>Staff Training</b>	23
New staff	
Safeguarding lead and deputy	
<b>Consent</b>	24
Consent and best interests	
<b>Safer Recruitment</b>	24
Recruitment of all staff	
Pre-selection	
Interview	
Post interview	
Induction	
Training	
<b>Raising Concerns</b>	25
Raising concerns and mandatory reporting	
<b>Reporting</b>	25
Taking action and 'My Concern'	
If a child discloses to you	
How to respond	
Reporting procedures for activities in schools (or other organisations)	
Notifying parents	
Referral to children's social care	
Reporting directly to child protection agencies	
<b>Confidentiality, information sharing and storage</b>	27
Confidentiality	
Information sharing	
Storage of information	
Files on children	
Whistleblowing	
Referral management	
Timeliness and referral routes	
Record keeping and confidentiality	
<b>Reporting procedures for Designated Safeguarding Officer</b>	29
Action by the Senior Safeguarding manager and Designated Safeguarding Officer	
ACT staff and representatives	
Dealing with concerns	
<b>What is abuse and what things may raise concern?</b>	30
Children and abuse	
Neglect	
Physical abuse	
Sexual abuse	
Emotional abuse	

Bullying / discriminatory bullying / cyber bullying	
Poor practice	
Signs and indicators	
Children who may be particularly vulnerable	
Looked after children (LAC) / children in care / Private fostering	
<b>Specific Safeguarding Issues</b>	33
Minority ethnic children	
<b>Additional Child Protection Issues</b>	34
Contextualised safeguarding	
Domestic abuse	
On-line abuse and messaging including sexting	
Peer on peer abuse / Teenage relationship abuse	
Infatuations / fabricated or induced illness	
Children with sexually harmful behaviour	
Grooming	
Forced marriage / honour-based violence	
Female genital mutilation (FGM)	
Child sexual exploitation (CSE)	
Trafficking and modern slavery	
County Lines	
<b>Appendix A – Useful contacts</b>	39
<b>Appendix B – Note and record</b>	40
<b>Appendix C – Safeguarding referral form / notes</b>	41
<b>Appendix D – Version history</b>	43

## **CHILD PROTECTION POLICY**

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**Approved and Endorsed by:** Andrew Parkinson CEO

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## Foreword

The Safeguarding and Child Protection Policy reflects the safeguarding ethos of the Club. PAFC is committed to providing a positive, inclusive experience for young people who come into contact with the PAFC Family. The Board of Directors endorse this document as part of the Club's constitution. Plymouth Argyle is committed to safeguarding and promoting the welfare of young people and vulnerable adults and expects all staff, volunteers and visitors to share this commitment.

A child centred approach is fundamental to safeguarding and promoting the welfare of every child. PAFC's Safeguarding Children Policy and Safeguarding Adults Policy are linked to ensure the safety and protection of vulnerable groups. In combination with our other safeguarding policies we provide robust safeguarding procedures for everyone involved in delivering our activities.

***Andrew Parkinson***

April 2020

Andrew Parkinson CEO,

On behalf of the PAFC board of directors

## Key Safeguarding Terminology and Definitions

- PAFC / the Club – Plymouth Argyle Football Club. Any property or training ground belonging to or where PAFC operate, or where their activities occur.
- ACT – Argyle Community Trust.
- PALFC – Plymouth Argyle Ladies Football Club
- FA – Football Association
- EFL – English Football League
- CEO - Chief Executive Officer
- Staff – paid or unpaid workers, agency or third party workers, volunteers; who provides a service
- DSO – Dedicated Safeguarding Officer
- SSM – Senior Safeguarding Manager
- DLO – Disabled Liaison Officer
- LADO - Local Authority Designated Officer
- The Academy - to the standalone Academy department within PAFC which responsible for nurturing and developing the club's future generations of players.
- Child or young person – Defined by the Children's Act (1989) as any young person under the age of 18.
- Safeguarding - refers to the actions we take to ensure all children are safe from harm when involved in our clubs and activities.
- Child Protection - is a set of activities that are required for specific children who are at risk/or are suffering from significant harm.
- Abuse - refers to the acts of commission or omission that lead to a child experiencing harm.
- Harm - refers to the negative impact or consequences upon the child of those actions.
- Significant Harm - The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children.
- Violence - refers to "all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse." Article 19 UN Convention on the Rights of the Child.

## Key safeguarding related PAFC policies and reference material

- Safeguarding Adults at Risk policy
- Code of Conduct
- Confidentiality Agreement
- Self-Declaration
- Safer Recruitment
- Staff Induction policy
- DBS Central Registry
- 'My Concern' reporting and case management system
- Social Media Policy
- Acceptable IT use policy
- Equal Opportunities Policy
- Information sharing / data protection policy
- Health and Safety policy
- Complaints
- Whistle Blowing
- Staff Handbook
- Young Persons Policy (child friendly including their rights)
- Academy: Elite players; senior appearances and training, House Parents, late collection, travel and trips
- Anti-bullying policy
- Photography / Image consent policy
- Work Experience
- Match Day safeguarding Plan
- Mascots and Flag Bearers
- Ball Assistants
- Furry Mascot
- ACT policies and protocols
- PALFC



## PAFC Safeguarding Organisational Structure

Safeguarding children across PAFC is given a very high priority. Darren Green is employed full-time to promote best practice and create a safer culture across the Club.

At PAFC operational board level, Andrew Parkinson (CEO) leads safeguarding and endorses this Policy and Procedures document.

PAFC has a Safeguarding Panel with senior representatives from around the business to ensure the highest standards are maintained consistently. Actions and decisions made by the Safeguarding Panel are relayed to the Board quarterly.

PAFC use additional documents and policies which give greater detail to this central policy document. Please refer to those and speak to the Safeguarding Team to clarify any queries.

*The organisational structure for Safeguarding at PAFC is as outlined below:*



Argyle Community Trust, who are part of the PAFC family, have their own safeguarding structure. Safeguarding officers are in regular contact and can represent each other as and when required.

## Safeguarding Policy Statement

PAFC takes its responsibilities very seriously regarding providing a safe and positive environment where children are present at any of its PAFC led activities and (under the supervision) of one or more members of our staff. All children, regardless of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion and/or sexual orientation (defined as Protected Characteristics within the Equality Act 2010) have the right to equal protection from all types of harm or abuse

All participants and visitors to PAFC's activities have the right to feel safe and to be safe. Wherever they come into contact with us they will be treated both lawfully and fairly and with both dignity and respect. All the members of our staff have a duty to keep children safe and to help protect them from abuse or harm. All managers must ensure that their staff understand and apply that duty.

Good safeguarding practice takes many forms. It is a thread that weaves throughout all PAFC activities that involve children and other vulnerable people.

This policy applies to all members of PAFC, from both the paid and volunteer staff, and all partner organisations including commercial partners, licence holders, contractors and consultants. For the avoidance of doubt this policy does not apply to the ACT; who operate in accordance with their own policies.

It also applies to individuals not included in this list who may be conducting related work that involves the children in our care. The policy has been written in line with all relevant Government legislation including the "Working Together to Safeguard Children" guidance published in July 2018 and EFL expectations. It will be updated annually by the DSO and submitted for approval to the CEO and the EFL. The policy will be reviewed periodically as per EFL guidance.

## Safeguarding Context

The term safeguarding is a shortening of the phrase "safeguarding and promoting the welfare" of children and young people. We follow the 6 principles of safeguarding:

1. **Empowerment:** it is important for a young person to be supported and encouraged to make their own decisions and give informed consent
2. **Prevention:** it is better to take action before harm occurs
3. **Proportionality:** the least intrusive response appropriate to the risk presented
4. **Protection:** support and representation for those in greatest need
5. **Partnership:** local solutions through services working with their communities – communities have a part to play in preventing, detecting and reporting neglect and abuse
6. **Accountability:** accountability and transparency in safeguarding practice

### National & International Frameworks

The PAFC safeguarding programme will seek to work within the guidance provided by the "International Safeguards for Children in Sport" framework and in conjunction with the local frameworks found within any country where our staff are conducting PAFC business.

### Purpose of this Policy

By implementing this policy across all PAFC operations, all members of the staff will understand that they have a responsibility to work together to safeguard children and that:

- the child's safety and welfare is the first consideration;
- all children have a right to enjoy sport, and associated activities of PAFC, free from abuse and all forms of bullying, harassment and discrimination;
- all individuals and organisations involved with PAFC have responsibilities for the welfare of children in our activities and are bound by this policy; and
- All individuals and organisations involved with PAFC must act in accordance with the law in relation to such matters.

For PAFC operations, it also means: supporting 'Safer Recruitment' processes through promoting good practice for those working amongst our staff; supporting them where necessary; ensuring staff are competent, well-managed and challenged when engaged in poor practice; and, finally, taking action where concerns arise.

## **The PAFC Safeguarding framework**

This policy is the basis for a PAFC safeguarding network that seeks to implement a clear and effective programme of work that is embedded across the staff.

Our Safeguarding Vision:

PAFC will:

- Respect and promote the rights, wishes and feelings of children.
- Recruit, train and supervise staff to adopt best practice in order to safeguard and protect from abuse and themselves from false allegations.
- Respond to complaints, concerns and allegations and implement the appropriate disciplinary and appeals procedures.
- Share information with relevant agencies and organisations in a timely manner (as far as the law permits).

Our Safeguarding Aims:

- A safe and welcoming environment for children involved in any PAFC led activities, wherever they are in the world, free from abuse and fear of abuse in all its forms; A culture where safeguarding practice is widely understood, openly discussed and where staff recognise the role they play in keeping children, other vulnerable people, themselves and their colleagues, safe from harm;
- A clear system which promotes and supports: constant vigilance, prevention and early intervention in safeguarding matters and where necessary prompt and thorough action in response to any reported concerns or incidents;
- To apply legislation, government policy & guidance, and football governing body regulations, policy and guidance where applicable; and
- To work closely together with local statutory agencies and other partners to promote and safeguard the welfare of children.
- To realise these aims we will:
  - Work or liaise with relevant football governing bodies, statutory agencies and other child welfare bodies (e.g. Child Protection in Sport Unit, EFL, the FA etc. to ensure we meet all necessary regulations and standards in respect of our safeguarding practice;
  - Listen to children and take them seriously, consult with them when developing processes and react appropriately to ideas, feelings and concerns, then address them in a fair, effective and timely manner;
  - Develop and communicate a series of clear policies, protocols and guidance designed to help deliver sound

governance and good practice across PAFC's activities; including bi-monthly Safeguarding Panel Meetings with representatives from all relevant areas of PAFC.

- Maintain a visible Safeguarding presence across all areas of PAFC including on social media platforms;
- Monitor activities taking place at PAFC facilities and those at off-site locations;
- Provide training, advice and support across all areas of the PAFC where children and other vulnerable people are involved in any PAFC led activity;
- Support and help deliver the PAFC's 'Safer Recruitment' philosophy in accordance with local legislative and regulatory requirements and in partnership with the Human Resources department and relevant managers;
- Maintain confidentiality of all information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with relevant data protection legislation;
- Share sensitive information with the relevant authorities when it is appropriate to do so and in the knowledge that the information will be treated confidentially.
- Prepare annual safeguarding reviews covering each strategic element of PAFC.

## Who we will work with to keep safe

To illustrate the scope of this work, the list below provides an extensive list (though not exhaustive) of examples or situations across PAFC where we need to consider the welfare of children:

- Players involved in Academy or associated development programmes;
- Under-18 players who are part of open-age/senior squads;
- Children taking part in PAFC activities;
- Some disabled supporters contacting PAFC, visiting the stadiums on match days, or visiting for other pre-arranged activities (e.g. stadium tours). The DLO will become involved.
- Young players on tour or living for significant time away from their families in PAFC arranged accommodation;
- Any children visiting the PAFC's stadium for matches, events, concerts or tours;
- Ball assistants, match-day mascots and flag-bearers;
- Support to those who may be vulnerable to bullying or cyber-bullying through their relationship with any of PAFC's activities;
- Participants on commercial football school-type programmes or similar;
- Young people attending as volunteers or on organised work experience;
- Disabled children taking part in any PAFC activity; and
- PALFC development players (are covered by ACT policy)

## Safeguarding legislation and guidance

Safeguarding at PAFC is influenced by a range of legislation and guidance:

- The Children's Act 1989 and 2004
- Every Child Matters (policy) 2003
- The Education Act 2002
- Safeguarding Vulnerable Groups Act 2006 (amended 2012 to DBS)
- Listen and Involving Children and Young People
- DBS Barring Referral Guidance
- NICE Guideline on Child Abuse and Neglect

- Working Together to Safeguard Children (guidance) July 2018
- Keeping Children Safe in Education (guidance) Sept 2020 Information Sharing (advice for safeguarding practitioners) July 2018
- General Data Protection Regulations (GDPR) 2018
- Human Rights Act 1998
- Modern Slavery Act 2015
- Female Genital Mutilation Act 2003
- Anti-social Behaviour, crime and Policing Act 2014 (Forced Marriage)
- Private Fostering Regulations 2005
- SEN Code of practice guidance 2015
- Counter Terrorism and Security Act 2015 (Prevent)
- Health and Safety at Work Act 1974
- Management of Health and safety at Work Regulations 1999
- The Standards for Safeguarding and Protecting Children in Sport – NSPCC CPSU 2016
- The Affiliated Football Safeguarding Policy
- The rights of children and young people (under-18s):
- Whistleblowing advice line NSPCC
- General Data Protection Regulation (GDPR) and the Data Protection Act 2018
- Children have the right to participate in sport and voluntary activities in a safe and enjoyable environment. Their rights are enshrined in the United Nations Convention on The Rights of the Child (1989).

In the UK, more than 50,000 children are annually subject to a child protection plan. Research suggests that one child a week dies from abuse and one child in six is exposed to violence in the home. The prevalence of neglect continues to be a major concern and online abuse is increasing. The sexual exploitation of children is a growing problem and disabled children are three times more likely to be abused and neglected.

Due to their contact with children, staff at PAFC are well placed to observe changes in a child's behaviour and outward signs of abuse and/or neglect.

Children may also turn to a trusted adult at PAFC when they are in distress or at risk. It is vital that all staff are alert to the signs of abuse - as well as identifying additional vulnerability or 'need' in some young people who may need support of services - and understand the procedures for reporting their concerns so that PAFC can take appropriate action.

# Safeguarding Considerations for Children with Additional Vulnerability

## Cultural Sensitivity

We recognise that whilst the law in most countries seeks to protect children, cultural practices may differ markedly. Our staff must be aware of and be sensitive to cultural differences. Where members of PAFC staff are working with children or commissioning others to do so, our safeguarding practice must be applied. We may also use the International Safeguards for Children in Sport to promote appropriate practice.

Where activities are beyond our direct control we may have to use our discretion to address any concerns. It is hoped that our approach may help to influence decision-making in places where children are not afforded the same levels of protection as found in the United Kingdom.

## Age Sensitivity

The term 'children' covers individuals from birth up to their 18th birthday and this policy covers this entire age range. As a general principle we will also be sensitive to the developmental maturity of children in our programmes and ensure that this is taken into account when decisions are made that affect them. We will particularly encourage older children to have more involvement and take more responsibility when decisions are being made that affect them.

## Open-Age Players

From time to time players who are not yet 18 will either train or play in adult or 'open-age' teams. This may be a temporary or developmental arrangement, or it may be a permanent contractual arrangement. The decision to do this is not taken lightly and will be taken based on the physical and emotional capacity of the player and in conjunction with the player's parents. Special care will be taken to monitor the welfare of the players that are placed in these positions.

## Safeguarding Elite Players

PAFC attracts elite players into its talent development programme. Athletes in the high-performance pathway face additional vulnerability due to their position in sport. Others may seek to gain advantage (financial or otherwise) or gratification from their talent or enhanced profile through unscrupulous means; some may abuse or coerce them just because they can (e.g. via social media). The players themselves will experience the constant pressures of being an elite footballer and as such all staff must be vigilant of the signs and symptoms of issues such as: abuse by those in positions of power or influence over the player; poor mental health; homesickness; eating disorders; addiction; self-harm and other conditions that may manifest themselves.

## Additional Vulnerability

'Children' are often easily identifiable. Additional vulnerabilities are not as easy, such as; disability, ethnicity or sexual orientation, for example – and may have the potential to make an individual more vulnerable. Children with additional vulnerability are often even more difficult to identify and provide for. It is a priority for PAFC to safeguard the welfare of children when they are in our care and once a vulnerability has been identified.

## Language & Communication

Some people taking part in our activities may not use English as their first language or may experience difficulty communicating with our staff in the usual ways. As a principle we will always be patient and try to communicate in an individual's chosen way and where necessary and practical we will use an interpreter (i.e. foreign language) or communicator (e.g. sign language).

## **Children from Overseas**

We will come into contact with children who have moved – temporarily or permanently - from their country of origin. This policy applies equally to them. We will ensure that where this situation does arise, international law and football regulations are correctly applied and that the needs of the child are put first and any arrangements are made in conjunction with those with Parental Responsibility for that child. Where we have a concern that a child may be at risk of harm, or may be being exploited or 'trafficked', the appropriate authorities will be informed at the earliest opportunity.

## **Consultation**

Where appropriate we will consult with children and their parents or legal guardians to understand their needs, concerns and wishes so that these may help shape PAFC policy, procedure and practice.

## **Standards of behaviour - Children**

We want children to enjoy themselves when they are attending our activities. We do, however expect children to behave in a way that is appropriate to the age, maturity, type of activity and in a way that does not endanger or upset others. Where possible these expectations will be developed in conjunction with the participants themselves and communicated to all those taking part.

In areas of PAFC where player (or participant) disciplinary procedures are adopted these procedures will be communicated to all those whom they relate to including those with parental responsibility for a child participant.

PAFC does not condone activities such as bullying, abuse or victimisation. Where such activity is suspected, reported or uncovered, this will be fully investigated and dealt with at the earliest opportunity.

## **Managing PAFC Behaviour**

PAFC takes a positive approach to behaviour management and where necessary develops policies that our staff must apply. Such policies will recognise the following general principles:

- Every child is different and as such has individual needs;
- Participants should be encouraged to help develop their own codes of conduct or have clear and well communicated guidance on expectations;
- Behaviour is usually a reflection on how a person is feeling;
- Staff should recognise that many other factors can affect behaviour – weather, hunger, medical conditions, medication and account for these in any action taken;
- Challenging, aggressive or violent behaviour presents risks to the individual and others, and physical intervention with any individual displaying such behaviour is only ever a last resort in exceptional circumstances – any response must be reasonable and proportionate.
- Physical punishments will never be used by our staff, though diffusion and de-escalation techniques may when necessary; and
- All significant incidents should be recorded and passed to the DSO.

## **Good Practice and Staff Conduct**

To meet and maintain our responsibilities towards children we need to agree standards of good practice which form a code of conduct for all staff.

Good practice and staff conduct includes:

- Treating all children with respect.
- Setting a good example by conducting ourselves appropriately.
- Involving children in decisions that affect them.
- Encouraging positive, respectful and safe behaviour among children.
- Being a good listener.
- Being alert to changes in a child's behaviour and to signs of abuse, neglect and exploitation.
- Recognising that challenging behaviour may be an indicator of abuse.
- reading and understanding the PAFC's safeguarding and child protection policy, safe working practice and guidance documents on wider safeguarding issues, for example bullying, physical contact, sexual exploitation, radicalisation and extremism, e-safety and information-sharing.
- Asking a child's permission before initiating physical contact, such as physical support during a sporting activity or administering first aid.
- Maintaining appropriate standards of conversation and interaction with and between children and avoiding the use of sexualised or derogatory language.
- Being aware that the personal and family circumstances and lifestyles of some children lead to an increased risk of abuse.
- Working in an open environment and within sight or hearing of others.
- Reporting concerns about a child's safety and welfare.
- Following the PAFC's policy with regard to relationships with children and communication with children, including on social media.

### **Children's Activities**

Good practice means developing safe working practices based on the PAFC's safeguarding procedures, systems and structures, including 'Good Practice Principles' that safeguard children from harm and potential abuse as well as protecting staff from potential false allegations which can arise from compromising and vulnerable situations.

Examples of Good Practice:

- Securing parental consent in writing for: activities, first aid/emergency treatment and photography.
- Following Codes and Conduct that define appropriate behaviour and relationships
- Record keeping (e.g., accidents/injuries and treatment, consent forms, personal notes, complaints, compromising situations, physical restraint).
- Supervising children to minimise the risk of bullying.
- Risk assessment of an activity and welfare plans for events and tours.
- Promoting and respecting the rights of children.
- Promoting a child-centred perspective and promoting equity. Equity is incorporated into PAFC's Equal Opportunities policy.

### **Inclusive Good Practice (promoting equality and diversity)**

PAFC endeavours to be inclusive and provide opportunities for children and young people of all abilities and regardless of medical conditions, disabilities or allergies which they may have. PAFC will take reasonable steps to accommodate children's needs and will differentiate/adapt activities in order to maximise participation wherever possible. Related document: Safe Working Practice Guide

## **Special Arrangements**

To meet and maintain our responsibilities towards children we need to agree standards of good practice which



form a code of conduct for all staff.

### **Children and Young People on Work Experience**

The Head of HR and the Designated Safeguarding Officer should be informed of work experience placements at PAFC for children of compulsory school age and young people.

- PAFC's Safeguarding Policy and Safer Working Practice Guide.
- Any work experience placements must be approved by the Head of Department and be planned and structure in advanced.
- Work experience placements should not have unsupervised access to children.

PAFC has procedures to safeguard children undertaking work experience, including arrangements which are in accordance with "Work Experience: a guide for Employers" (DFES, 2002).

## **Photography and Video Image**

To meet and maintain our responsibilities towards children we need to agree standards of good practice which form a code of conduct for all staff.

### **Celebrating Activity**

PAFC welcomes photographs and images that celebrate the sport, the values and objectives of the PAFC and positive reflections of our PAFC operations. We understand, however that photography and video imagery and its use can present difficulties, risk and sensitivity in a range of circumstances.

During the course of our activities it is foreseeable that a child's image may be captured by appointed photographers in digital photographs and in film. These images may then be used by PAFC staff and contractors in both internal and external news and marketing publications and on-line via web-sites and social media.

### **Data Protection Law & Photography**

Data protection laws apply to the photography of children or other vulnerable people at PAFC activities. Where it applies and where practical, if images are captured by a member of staff or for PAFC purposes, consent from the parent or carer should be obtained and the option to opt out is available. If in any doubt a picture should not be taken or published.

### **Video or Photographs as a Coaching or Management Aid**

The recording of training or match footage is a legitimate coaching aid and as such parents and players are made aware that this is part of the coaching programme. Similarly photographs of matches or players for management purposes (e.g. ID passes or databases) are regularly taken. Both these types are covered by data protection law. As such all those responsible for the recording of this footage must:

- adhere to this policy;
- take responsibility for the safe storage and distribution of the images;
- give due consideration to the dignity and protection of the players involved; and
- Inform parents where there are changes to the planned use of the footage which will lead to a wider distribution of the images than originally anticipated.

### **Consent**

Where an activity may allow for the capture, and thus use, of a participant's image, the manager responsible must develop appropriate documentation (forms and guidance) and associated processes to allow for the management of parental consent (or participant consent in respect of a vulnerable adult) and ensure that

those individuals understand what they are consenting to and why. Consent must provide a genuine choice in order to be valid.

### **Legitimate interest**

When images are taken for identification or coaching purposes consent is not normally the appropriate condition for capturing and using such images in this way. Parents and children must be aware that images are being used in this way. Should parents or children have any issues arising out of images being processed for the PAFC's legitimate interests they may contact Andy Bradford, PAFC's Data Protection officer, [dataprotection@pafc.co.uk](mailto:dataprotection@pafc.co.uk) Details of all processing activities are documented in the PAFC's privacy notices available from the PAFC website.

### **Opt Out**

Other than on match / public event days (see below), individuals have the right to opt-out (i.e. revoke or not give consent) of being photographed or object to their image being used as part of a legitimate interest. Our staff will endeavour to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal PAFC activities. These arrangements will be agreed in advance with those with guardianship or parental responsibility for the individual and must uphold the dignity of the participant opting out.

### **Storage**

All images, whilst held by PAFC, will be securely stored on PAFC's IT systems and remain the property of PAFC at all times. Where footage is passed to players and parents for training and development purposes this must not be passed on further or published without the written permission of the PAFC's management staff. Families must be made fully aware of this restriction at the point of distribution.

Where consent has not been given but images have been captured, those images should follow the guidelines shown below but also should be of a general nature capturing the activity and not the individual and should not use children's names in resulting public use.

### **Match Day, Public Events, Incidental Image Capture & Consent**

Large crowds may create further questions with consent and image use. At events such as matches, concerts and special public events, explicit consent is not required as there is a reasonable expectation that any person attending may have their image captured or broadcast. In any situations where children may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they should be informed that they may be on camera and have the opportunity to opt out.

Where a person finds that their image or that of their child has been used in these circumstances and they do not wish it to be used then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.

### **Parents, Other Children and Other Photographers**

PAFC recognises that in some circumstance's parents, other family members and friends may wish to take photographs of their children or relatives. Each event will develop clear rules on what is acceptable; by default, photographs are not permitted at private / invitation events. Where a member of staff or child or parent has a concern about the capture and use of images they should report immediately to the activity or site manager. With the advent of smart phones with digital cameras and instant connectivity to the World Wide Web, the scope for the capture and sharing of images has increased dramatically and as such activity managers should take care to apply the policy firmly and fairly.

In general, members of staff capturing images must not:

- using own/personal equipment to capture images of participants;
- capture images taken in changing rooms or where children are not fully clothed;
- images of children who wish not to be in the photograph or whose parent does not wish them to be;

- images where children are more vulnerable – upset, injury, illness;
- images that are sexually suggestive or provocative; or
- The inclusion of young player’s full names in any captions, kit or reports.

## **Residential Accommodation**

PAFC may, in the course of its activities, be required to provide both short and long-term accommodation for young or vulnerable participants. This may occur in a range of settings and may be arranged by or involve PAFC staff, such as:

- trips and tours involving overnight stays for children or other vulnerable players;
- Academy players living in domestic settings with approved host families;
- young players on trial with Academy teams;
- Commercial activities delivered in partnership with third party operators responsible for the provision of accommodation.

It is vital that wherever such situations arise that the highest level of diligence is provided to the arrangements. Managers must ensure that all applicable legislation, regulation and good practice (from that host country) is applied to any of the above settings and that any relevant authorities are consulted with throughout the planning and operation of these provisions.

The same level of diligence is required where a third party is responsible for making accommodation arrangements for children in our care. It is the responsibility of our staff to ensure that third party operators maintain our high standards of care.

### **Selection of Carers**

The appointment of any staff or carers with responsibility for the supervision of children overnight in residential settings must be carried out in accordance with this and Academy Accommodation Plan (House Parent policy) and must apply Safer Recruitment principles adopted in education law to ensure suitable appointments are made. Hosting elite young players (under-18s) for the Academy is regulated activity:

As a minimum these staff must:

- undertake the appropriate criminal record check (Enhanced DBS)
- supply at least two references
- have their qualifications and references checked
- have completed appropriate safeguarding training and/or residential care induction training
- Will be subject to a health and safety risk assessment as part of the host family assessment process. PAFC will ensure electric and gas safety checks are obtained.
- As part of the Academy’s ongoing vigilance, hosts will be regularly monitored and visited by the DSO and Player care team.

Academy host families are recruited under a rigorous and thorough assessment process that culminates in scrutiny and approval from a Host Family Panel. PAFC do not intend to arrange placements for players aged under 16 years. If this changes PAFC will work in partnership with the relevant Local Authority Children’s Social Care team in order to satisfy the requirements of the Private Fostering Regulations (Children Act 1989).

There is a Trips and Tours Policy in place at PAFC. Compliance with the policy will be evident for each tour. An experienced Tour Leader will hold overall responsibility for the tour group and the creation of the Tour Risk Assessment.

## **Safeguarding and PAFC Staff**

Safeguarding is also about ensuring that all staff, volunteers and partners understand the role that they play in protecting vulnerable people. Across PAFC there will be a wide range of employment and deployment arrangements involving full-time or part-time permanent staff, consultants, sessional staff or volunteers. Our staff is what makes this policy 'live'. This means all members of staff who are involved in training, managing, supervising or caring for children must work conscientiously to help keep those in their care safe from harm. They must also be aware of how to keep themselves and their colleagues safe from having allegations made against them by maintaining professional boundaries and avoiding behaviour that may be misinterpreted by others. In turn this has a direct impact on maintaining the reputation of PAFC.

### **Safeguarding – Staff handbook**

PAFC have a staff handbook which outlines safer working processes and applies to all individuals who work or volunteer with children and other vulnerable people on any PAFC activity.

### **Safer Recruitment**

Those who apply for a role that involves working closely with children on any of our activities will be subject to 'Safer Recruitment' principles. As a minimum they will require a criminal record certificate (or check or similar) from the national or local authorities (such as Disclosure & Barring Service checks in the UK if such checks are available). We will also take and follow up on references, check qualifications and licences. The "Safer Recruitment" principles will be followed for all paid and voluntary positions at PAFC that satisfy the necessary requirements.

### **Staff/Child Relationships**

PAFC provides advice to staff regarding their personal online activity and has strict rules regarding online contact and electronic communication with children. Staff found to be in breach of these rules may be subject to disciplinary action or child protection investigation.

- Staff should ensure they maintain healthy, positive and professional relationships with all young people under-18 and adults at risk.
- Staff working with children and their managers are in a position of trust in relation to young people aged 16 and 17 years.
- Staff must not engage in sexual relationships with any person while an unequal power relationship exists.
- Even after the young person has reached the age of 18, PAFC disapproves of relationships between personnel and young people for whom they have previously been responsible.

### **Abuse of position of trust**

All staff are aware that inappropriate behaviour towards children is unacceptable and likely to be unlawful. At all times, their conduct towards children must be professional.

In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff in a position of authority and trust and a child under 18 on any PAFC activity may be a criminal offence, even if that child is over the age of consent. PAFC's staff handbook guide sets out this expectation.

Staff must also report any concern they have about another member of staff to the designated safeguarding officer.

### **Helping children to keep themselves safe**

Children will be expected to comply with a code of conduct and this expectation will be made clear at the start of

the activity by a member of staff.

Children will be encouraged to conduct themselves and behave in a responsible manner.

PAFC participates in safety campaigns such as Anti-Bullying Week and Safer Internet Day and will promote an ethos of respect for children, and children may speak to a member of staff of their choosing about any worries they may have.

### **Standards of behaviour – adults**

Our staff will adopt the highest standards of behaviour at all times in order that they will maintain the confidence and respect of children, parents, customers, supporters and colleagues. Within the scope of their duties their actions should always be reasonable, appropriate, warranted, proportionate, safe and applied equitably.

### **Whistleblowing**

Members of PAFC staff should also act where concerns are raised about the behaviour of others – meaning other members of staff or participants (children or adults) on PAFC activity. Failure to act is contrary to this policy and may be subject to disciplinary action. See PAFC Whistleblowing Policy.

### **Information and Communication Technology (ICT)**

ICT is used across PAFC in many and varied ways. Its use will continue to grow and change with new developments in technology and fashion. It is used to communicate with supporters, customers, players and the media. PAFC will:

- develop and maintain clear policies on suitable and appropriate use of internet, email, SMS, messaging groups, apps and social media;
- Ensure that consent of parents is obtained if staff use SMS, email or other electronic means of communication with a child for programme-related reasons.
- raise awareness amongst young participants (especially Academy players) regarding safer internet/social media use in respect of their position;
- raise awareness, through training and internal communications, with the staff regarding appropriate use of such media and the importance of both professional and personal online activity;
- Have a zero-tolerance approach to 'cyber-bullying', sexting, grooming etc. exploitation.
- Respond quickly and appropriately to inappropriate use of the internet and social media by players, participants and members of staff.

### **Support for those involved in a child protection issue**

Child abuse is devastating for the child and can also result in distress and anxiety for staff who become involved.

We will support children, their families, and staff by:

- Taking all suspicions and disclosures seriously.
- Nominating a link person who will keep all parties informed and be the central point of contact.
- Where a member of staff is the subject of an allegation made by a child, separate link people will be nominated to avoid any conflict of interest.
- Responding sympathetically to any request from children or staff for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Storing records securely.
- Offering details of helplines or other avenues of external support.
- Following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures.
- Co-operating with relevant statutory agencies.

## Complaints Procedure

Our complaints procedure will be followed where a child or parent/carer raises a concern about poor practice towards a child that initially does not reach the threshold for child protection action. This will Poor practice examples include unfairly singling out a child or attempting to humiliate them, bullying or belittling a child or discriminating against them in some way.

- Formal complaints are managed by senior staff
- Complaint and feedback mechanisms should be promoted on all children's activities
- Complaints from staff are dealt with under the PAFC's complaints and disciplinary and grievance procedures
- Complaints which escalate into a child protection concern will be managed under PAFC child protection procedures

### Concerns about poor practice

Poor practice represents unsafe working practice and is a cause for concern and staff should feel able to raise concerns about poor or unsafe practice.

In the first instance, staff should discuss with their line manager. If there are reservations about sharing concerns with the line manager, then any of the following can be contacted directly: Senior Safeguarding Manager, Designated Safeguarding Officer, Head of Department, Head of HR or the NSPCC Helpline.

If a member of staff believes that this route has been ineffective, whistleblowing procedures are in place for such concerns to be raised.

### Concerns about a colleague

If staff members have concerns about another staff member then this should be discussed with their line manager, Designated Safeguarding Officer or the Senior Safeguarding Manager.

- If the Senior Safeguarding Manager is implicated, this would be investigated by either an outside body supervised by the HR Manager.
- In a school/college, concerns about school staff should be reported to the Head Teacher. A follow up must be made with the Designated Safeguarding Officer.

See chart for 'Reporting Procedures'. These guidelines do not prevent anyone from reporting concerns to external agencies such as the Local Authority or the police.

The process for managing concerns, complaints and allegations about staff working with children are outlined in the PAFC's "Managing Allegations against Staff", including the three possible types of investigation:

- a criminal investigation
- a child protection investigation
- a disciplinary or misconduct investigation

## Allegations Against Staff

Any allegations against staff must be reported immediately to the DSO who will refer to the Local Authority Designated Officer (LADO).

When an allegation is made against a member of staff, set procedures must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.

A child may also make an allegation against an innocent party because they are too afraid to name the real perpetrator. Even so, we must accept that some professionals do pose a serious risk to children and we must act on every allegation.

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and

consistently and to be kept informed of its progress.

Suspension is an entirely neutral act and may assist the unfettered investigation of concerns. However, it is not the default option and alternatives to suspension will be considered. In some cases, staff may be suspended where this is deemed to be the best way to ensure that both the staff member and children are protected. In the event of suspension, PAFC will provide support and a named contact for the member of staff.

Staff are reminded that publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law.

Publication includes verbal conversations or writing, including content placed on social media sites.

### **Historical Allegations**

Allegations concerning staff who no longer work at PAFC, or historical allegations will be reported to the LADO and the police even if the alleged perpetrator of the abuse is believed to be deceased.

## **Staff Training**

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

New staff will attend a PAFC induction which includes familiarisation with the PAFC's safeguarding policy and safe working practices, reporting and recording arrangements, and details for their Designated Safeguarding Officer and the Senior Safeguarding Manager.

Staff should be aware of systems within PAFC which support safeguarding. This includes:

- PAFC's Safeguarding and Child Protection Policy;
- Safe and Working Practice;
- The Designated Safeguarding Officer and the Safeguarding Team.

All staff members should also receive appropriate child protection information which is regularly updated. The minimum being:

CHECK: For staff working with children in Regulated Activity:

- The FA Safeguarding Children Workshop (or equivalent) every three years. For other staff working with children in a position of authority and trust:
- appropriate safeguarding information and/or training annually; For all other staff:
- Safeguarding awareness through safeguarding emails and other communications.

Staff are responsible for maintaining their certificates and ensuring that their safeguarding training, first aid and criminal records checks are updated every three years.

### **New Staff**

All new members of staff will undergo an induction that includes familiarisation with the PAFC's safeguarding and child protection policy and safe working practices on their activities, as well as identification of their child protection training needs. They will be required to sign the Staff Handbook. We will also work with players and parents to raise awareness of safeguarding issues that may affect them.

### **Designated Safeguarding Officer**

The Designated Safeguarding Officer or Senior Safeguarding Manager will undertake Plymouth Children's Safeguarding Board level 3 safeguarding training or refresher (or equivalent) every two years.

## Consent

PAFC recognise the importance of approaching the individual needs of children and other vulnerable people in the appropriate way and according to the law and statutory guidance.

Where a child is at risk of harm, consent to act on concerns is not normally required in law although consent from and consultation with those with Parental Responsibility is considered good practice unless this would put the child at greater risk of harm.

### **Consent & Best Interests**

We will always respect the right of a child to have their say when a decision that affects them is being taken. We will take their views into account and always act in their best interests when a decision is made, especially when a child is at risk of harm or may have come to harm. A child's parent will also be consulted and consent obtained as a matter of course before any action is taken unless this may put the child at increased risk of harm. Care should be taken to seek and establish the consent of all those with Parental responsibility for that child. Where a parent or legal guardian cannot give consent at a point where it may be required, staff will always act in the best interests of the child.

## Safer Recruitment

PAFC recognises that anyone may have the potential to harm or abuse children in some way and is committed to taking all reasonable steps to ensure that unsuitable people are prevented from working with children or young adults.

### **Recruitment of all staff**

PAFC's full recruitment policy and procedures are available from the Human Resources Department. These include information and guidelines on advertising, selection procedures, and offers of employment, checks and references.

Further policies and procedures relating to employment are available from the HR Department, on the Intranet and in the Employee Handbook.

### **Pre-selection**

When recruiting for a position that involves significant contact with children or young adults, PAFC operates a comprehensive recruitment procedure that includes:

- Completion of a Self-Disclosure Form, which requires any applicant to declare unspent convictions
- Verification of identity and eligibility to work in the UK
- Verification of professional qualifications
- Screening via the Disclosure and Barring Service (DBS).
- Two references, including one from the applicant's most recent post working with children

### **Interview**

Applicants will be required to undergo an interview to acceptable protocol and recommendations that includes questions relevant to safeguarding vulnerable people.

The applicant's qualifications, identity and eligibility to work in the UK are also substantiated, and any areas for concern discussed.

### **Post-Interview**

In the event that the DBS Disclosure reveals undisclosed offences or issues are raised in the references and



pre-employment checks, a risk assessment interview will be convened at the earliest opportunity to include at least two members of the Safeguarding Team. An offer of employment can be withdrawn if this interview fails to satisfy the interviewers of the employee's suitability to work with children.

An applicant must not commence work prior to their DBS Disclosure being received.

This can only be sanctioned by a member of the Safeguarding Team. In such a rare case, a meeting must be held and an agreement documented.

### **Induction**

All employees will receive a formal induction. As part of this induction process they will be required to read and sign the Safer Working Practices Guide.

### **Training**

In addition to the initial safeguarding induction every person in a Position of Trust is required to attend ongoing, regular safeguarding training events.

## **Raising Concerns**

Safeguarding concerns fall into one of the following types:

- the behaviour of an adult towards a child;
- the behaviour of a young person towards other children (including bullying by peers);
- risks identified through recruitment processes (e.g. criminal records information);
- information about an individual provided by statutory agencies or another route;
- allegations of abuse; or
- Concerns about harm to a child that has taken place outside of any PAFC activity (e.g. at home or school) but identified within a PAFC activity.

For members of staff these concerns can apply to both their professional personal lives and poor conduct in either may affect their position in the workplace.

### **Raising Concerns & Mandatory Reporting**

If any member of the PAFC's staff has a concern about a child, they have a duty to refer this to a Safeguarding Officer. The Safeguarding Officer will in turn report any concerns to the Head of Safeguarding. If there is immediate risk of harm, a serious injury, or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity. Every instance will be recorded on 'My Concern' in order to ensure transparency, an audit trail, identify poor practice, lessons learned and themes.

Where a very serious concern is raised that involves a child or adult involved in any PAFC led activity or a member of the staff is involved in an allegation against a vulnerable person, the Operational Board member with responsibility for safeguarding must be informed.

## **Reporting**

If you are concerned about a child's welfare there will be occasions when staff may suspect that a child may be at risk of harm. Staff should give the child the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred.

Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with their line manager, safeguarding officer or Head of Safeguarding. A 'My Concern' report

must be recorded.

If the child does begin to reveal that they are being harmed, staff should follow the advice below. Concerns which do not meet the threshold for child protection intervention will be monitored.

### **Taking action and 'My Concern'**

Any child could become a victim of abuse. It is important to believe the young person and take the matter seriously.

Key points for staff to remember for taking action are:

- Discuss your concern with your line manager and report it your Safeguarding Officer or the Head of Safeguarding – follow the procedure for your activity.
- In an emergency take the action necessary to help the child, if necessary call 999 or 101 for local police.
- Do not start your own investigation.
- Share information on a need-to-know basis only – do not discuss with colleagues, friends or family.
- Make a record and use the Incident Form to guide you. Make an entry on 'My Concern' or confirm one has been made.
- Seek support for yourself if you are distressed.

If the child is in need of immediate medical attention:

- Call for an ambulance.
- Inform parents you are doing this. If the parents are allegedly involved in the abuse, only inform them that you are taking the child to hospital. Do not share any other information.
- Inform doctor of your concerns in relation to child protection issues.
- The doctor will take appropriate action.
- Inform your manager and report your concerns.

### **If a child discloses to you**

If a child discloses about any risks to their safety or wellbeing, the staff member will need to tell the child know, the information will be recorded – staff are not allowed to keep secrets.

### **How to respond**

In the event that a child makes an allegation or disclosure of abuse against an adult or another child or young person, you can use the T.E.D. questions to gain clarity and information: 1. Tell me what happened 2. Explain or 3. Describe

- **Listen** and/or closely observe their presentation and behaviour;
- **Do not** interview, investigate or ask leading questions.
- **Let them know** that you will need to tell someone else in order to help them;
- **Do not** promise to keep what they tell you secret;
- **Do not** speak with the alleged person or parents/carers of the child;
  
- Respond appropriately: make notes and discuss with your line manager;
- Report your concerns: Contact your Safeguarding Officer or the Head of Safeguarding;
- Record your observations: Complete a 'My Concern' entry, this will be automatically submitted to the Head of Safeguarding. Keep your own personal notes in case of criminal investigation.

**IMPORTANT: If a child starts disclosing something but does not continue when he/she is told that it cannot remain confidential, this must be raised as a concern.**

### **Reporting procedure for activities in schools (or other organisations)**

When delivering activities off site, in a school or other organisation, or directly under the supervision/

management of school/organisation staff, the school's/organisation's arrangements for child protection will apply:

- You must inform the designated teacher or person for that school/ organisation, who will follow the Local Safeguarding Children Board (LSCB) procedures.
- You should then inform PAFC DSO.
- When delivering activities in partnership with a school, but on PAFC premises or out of school hours and without supervision from the school/organisation, follow the PAFC procedures.

### **Notifying parents**

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

However, if PAFC believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care.

### **Referral to children's social care**

A member of the Safeguarding team can make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm.

The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

Any member of staff may make a direct referral to children's social care if they genuinely believe independent action is necessary to protect a child.

### **Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy. However, when there is concern about the about the child's immediate safety, they may also share information directly with children's social care, police or the NSPCC if:

The situation is an emergency or out of hours;

The Head of Safeguarding or the deputy are unavailable;

A direct report is the best way to ensure the child's safety at that time;

For any other reason they make a judgement that direct referral is in the best interests of the child. The DSO and SSM should be updated on the course of action taken and the Incident Form and 'My Concern' completed without delay in order to capture the information.

## **Confidentiality, Information Sharing and Storage**

### **Confidentiality**

All matters relating to child protection are confidential and information is disclosed on a need-to-know basis only.

### **Information Sharing**

Data protection legislation permits data information sharing: "If a professional has concerns about a child's welfare and believes they are suffering or likely to suffer significant harm they should share the information with children's social care". This is reflected in the Guidance "Working Together to Safeguard Children 2018".

Information sharing is guided by the following principles: the information is necessary and proportionate; relevant; adequate; accurate; timely and secure.

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

### **Storage of Information**

Child protection information will be stored and handled in line with the Data Protection Act 2018 and GDPR.

Information will be stored separately from other records and in a secure place with limited access to designated

people, in line with the NSPCC Guidance on Child Protection Records Retention and Storage and data protection laws (e.g., that information is accurate, regularly updated, relevant and secure).

Written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

The Designated Safeguarding Officer will normally obtain consent from the child and/or parents/carers to share sensitive information within PAFC or with outside agencies. Where there is good reason to do so, the Designated Safeguarding Officer may share information without consent, and will record the reason for not obtaining consent.

Child protection records may be exempt from the disclosure provisions of the Data Protection Act, which means that children and parents/carers may not have an automatic right to see them. If any member of staff receives a request from a child or parent to see child protection records, they will refer the request to the Safeguarding Officer or the Head of Safeguarding.

The Data Protection Act and the PAFC's Data Protection Policy does not prevent staff from sharing information with relevant agencies, where that information may help to protect a child.

### **Files on children**

Concerns are recorded securely and confidentially on an individual basis on 'My Concern', which is overseen by the Designated Safeguarding Officer as part of the case management system. The case management process records how and when concerns are received, responded to - together with details on how the concerns have been dealt with.

### **Whistleblowing**

PAFC views the reporting of concerns by members of staff as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents of malpractice where the law, Cub policy or protocol has been breached by another member of staff. Such reports may be made to the People department, to a safeguarding officer or a line manager and, where appropriate, the information will be shared. Failure to do so may result in disciplinary or criminal action.

### **Referral Management**

Where a concern is raised relating to the behaviour of a member of staff towards a child or another vulnerable participant, there is a need to manage that referral in a swift and confidential manner. Concerns raised relating to peer on peer abuse or parent/carer abuse should also be managed in a swift and confidential manner. Where the concerns could be of a serious nature a referral to the police or social services should be made at the earliest opportunity.

### **Timeliness / Referral Routes**

Where a concern is raised to a member of the safeguarding team the concern will be dealt with as a matter of urgency, usually within one working day of the referral being received. The investigation will then take one of three paths, the first being internal disciplinary investigation conducted by the organisation. An internal investigation led by a member of the safeguarding team and for low level concerns the team will often implement an ongoing support strategy for the relevant individual.

### **Record Keeping & Confidentiality**

The company will keep a record of all incidents and concerns reported to its Safeguarding team. Any such reports will be taken seriously, carefully recorded, acted upon where appropriate, and confidentially retained. Records will be regularly reviewed to identify patterns of behaviour that may give rise to concern. All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with data protection legislation. They may be required to report or refer these matters to another agency such as a sport governing body or local authority.

## Reporting Procedure for the DSO

### Action by the Head of Safeguarding and Safeguarding Officer

PAFC is not an expert in child protection and refers issues to appropriate agencies. Upon being notified of an allegation of abuse against a member staff:

- The Designated Safeguarding Officer will ask for a written factual statement (using the Incident Form and / or the 'My Concern' report) from the person making the report – this must be signed and dated.
- If any statement has been made by the child, this should be reported in the child's own words. These reports should be confined to facts and should not include any opinion, interpretation or judgement.
- If the report involves an allegation about a member of staff, this will be referred out to the appropriate LADO (Local Authority Designated Officer) within one working day (See Managing Allegations Policy for allegations against staff).

Otherwise, if abuse is suspected, the Head of Safeguarding will make contact with children's social care where the incident occurred or where the child lives. Children's social care may involve the police.

The Head of Department will be informed of the referral and Head of HR will also be notified.

The parents/carers of the child will be contacted as soon as possible following advice from children's social care or the police.

- The Safeguarding Officer or line manager will ensure that any child concerned is immediately removed from any possible risk of harm.
- Once children's social care has been informed and the incident accepted as a referral or notification, the Head of Safeguarding will notify PAFC's CEO, in writing.

If the allegation relates to a member of staff, the Designated Safeguarding Officer and CEO will inform the Head of Communication and Media in order to liaise with the FA media department and agree a holding statement.

On confirmation that a referral has been accepted:

- The Head of Safeguarding will notify the FA Safeguarding Team, using the FA's Affiliated Football Referral Form (E: [safeguarding@thefa.com](mailto:safeguarding@thefa.com)). The FA will deal with any media enquiries.
- The Head of Safeguarding will also notify the Safeguarding Lead at the EFL (E: [safeguarding@efl.com](mailto:safeguarding@efl.com)).

If the Head of Safeguarding is implicated, the People Director and Head of HR should be contacted who will inform children's social care in line with the procedure in this section.

### ACT staff and representatives

If the referral relates to an ACT member of staff, worker, consultant, third party or volunteer then the ACT safeguarding officer must be informed. All information will be dealt with confidentially and shared only with the people on a need-to-know or who-must-know basis.

### Dealing with concerns

If you become aware of a poor practice and/or possible abuse situation whether or not in a football setting involving a child or young person who participates in football activities, follow this process:

Is the young person in need of medical attention?	If yes – call for an ambulance / take them to hospital. Inform the parents you are doing this*. Inform the Doctor of your concerns.
Is anyone else at immediate risk of harm?	If yes call the police 999.
Act professionally. Do not judge or give opinions.	This gives confidence to the young person to ensure the best information is disclosed.
Does the abuse involve a member of PAFC's safeguarding team?	No – contact the DSO. Yes – contact EFL safeguarding officer And if appropriate ACT DSO.
Record your observations and factual information. Make a 'My concern' entry. Keep any notes safe.	The DSO will take advice from NSPCC / Children's Social Care / Police depending on urgency and danger posed to child.
Do not question the young person.	Every allegation is to be taken seriously and any questions may hinder the confidence of the young person or any investigation.
Only inform those who need to know.	Confidentiality is very important.
Do you need support?	Speak to the DSO / Welfare officer on how you are feeling, it is not unusual to need assistance.

\*If the parents are allegedly involved in the abuse, only inform them the child is going to hospital and needs medical attention. Do not share any other information.

## What is Abuse and What May Raise a Concern

### Children and Abuse

In respect of children, the Football Association of England defines abuse into five categories. These help to explain what abuse and harm is. The categories are based on the Working Together 2018 mandatory guidance published by the UK Government. They also form the foundation of the "International Safeguards" framework and are: neglect, physical abuse, sexual abuse, emotional abuse, and bullying. PAFC also considers financial abuse and fraud as further risks that may apply to young professional players. Listed below are the 5 types of child abuse plus other definitions to give clarity on child care:

**Neglect** - Not being looked after properly, not being fed enough or having warm clothes or a place to sleep or needing medication when you are ill and not getting it.

Ongoing failure to meet the basic needs of children and/or adults at risk. Neglect may involve; failing to provide adequate food, shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger, or the failing to ensure access to appropriate medical care or treatment. It may also include neglect of or unresponsiveness to, basic emotional needs.

In football, neglect could occur if young people do not have proper supervision, clothing or are allowed or encouraged to play whilst injured. It could occur if a child or young person's needs are disregarded before, during, or after a game or training.

**Physical abuse** - Being hit, shaken, thrown, poisoned, burned or being given harmful drugs or alcohol.

Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.

In football, physical abuse could happen where training methods are inappropriate for the developmental age of the young person, where they are allowed to play with an injury or where inappropriate drugs or alcohol are offered or accepted. It would clearly happen if a young person is hit or physically restrained or manhandled by those supervising the game or training session.

**Sexual abuse** - Being touched in a way that feels wrong, being forced or encouraged to have sex or made to touch an adult sexually even if you don't understand what is happening or being shown sexual films or pictures. Any act which results in the exploitation of children and adults at risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This may be by an adult or by a young person who is intellectually, emotionally, physically or sexually more mature than the victim. This includes non-contact activities, such as indecent exposure, involving children or adults at risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally Children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.

Sexual abuse can occur in football settings. For example, where there is inappropriate touching, or where sexually-explicit jokes occur between adults and young people or if indecent images are taken or adapted and placed on child pornography sites.

**Emotional abuse** - Being bullied or threatened, not being loved but made to feel stupid and worthless. Any act or other treatment which may cause emotional damage and undermine a person's sense of well-being, including persistent criticism, denigration or putting unrealistic expectations on vulnerable groups, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats. In football, coaches or parents emotionally abuse young people if they constantly criticise, abuse their power, or impose unrealistic pressure to perform to a high standard. It may also occur if a club allows members to deride people with disabilities or from minority cultures and use derogatory language about them.

**Bullying** - Being hit or kicked, called names, being left out, being threatened, having things stolen, being made to give someone money, being shouted and laughed at or being made to feel stupid/different. It can happen via text or social networking sites. Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

Football's competitive nature can create and even support an environment for the bully if individuals and clubs are unaware. The bully in sport can be a parent who pushes too hard, a coach or manager who has a win-at-all costs philosophy; a child or young person intimidating another; or an official who places unfair pressure on a child or young person. The victim is often weaker and less powerful and the outcome is usually painful and distressing.

Young people who are perceived as "different" from the majority may be at greater risk of bullying. This includes children and young people from minority cultures or children and young people with disabilities. Victims are often shy and sensitive and perhaps anxious or insecure. Bullying can be defined as; physical, verbal, emotional or sexual. Bullying can take place anywhere but is more likely to take place where there is inadequate supervision. In football it is more likely to take place in the changing rooms, on transport or on the way to and from the pitch - but can also take place at a training session or in a competition. The bullying can involve coercing, requiring, forcing or wilfully tolerating any humiliating, unwelcome or dangerous activity that serves as a condition for joining a group or being socially accepted by a group's members.

**Bullying as a result of any form of discrimination** - Bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

**Cyberbullying** - The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among Children. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.

**Poor practice** - This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of the child and/or adult at risk are not afforded the necessary priority compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing them in potentially compromising and uncomfortable situations, failing to ensure their safety, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals.

### **Signs and indicators**

Children and young people are reluctant to tell someone when they are being abused, so it is essential that every adult is aware of the possible signs and indicators that a child and young person's welfare or safety is being threatened. However, there is rarely a clear sign and you may often have to piece together various snippets of information and rely on your instinct that something does not seem quite right. Never allow a child or young person's disability or cultural difference to explain away concerns.

You may have one piece of information that, when added to that of others, forms a clear picture of abuse. This is often compared to fitting pieces of a jigsaw together. Only when you have a few pieces can you start to see the true picture. Remember, it is not your job to decide whether or not a child or young person is being abused - however it is your responsibility to share your concerns.

**Children who may be particularly vulnerable** - All children must receive the highest standards of protection. Special consideration must be given to children who are:

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

This list provides examples of additionally vulnerable groups and risk of abuse or exploitation is increased - it is not exhaustive. Special consideration includes the provision of safeguarding information and resources



in accessible formats and language for children with communication needs.

**Looked After Children (LAC) / Children in Care** - The most common reason for children becoming looked after is as a result of abuse or neglect. Staff should have extra vigilance to keep Looked After Children safe. The Safeguarding Team should be informed of activities involving Looked After Children. The Project Manager should have details of the child's social worker and the name and contact details of the social worker, along with escalation contacts when people are not contactable (e.g., out of hours, on leave/half term or holiday periods, in meetings). It may be necessary for staff to have information about a child's Looked After legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child.

**Private Fostering** - A privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent or close relative where the child is to be cared for in that home for 28 days or more. Close relative is defined as "a grandparent, brother, sister, uncle or aunt (whether of the full blood or half blood or by marriage or civil partnership) or step-parent". A child who is Looked After by a local authority or placed in a children's home, hospital or school is excluded from the definition. In a private fostering arrangement, the parent still holds Parental Responsibility and agrees the arrangement with the private foster carer. A child (as per definition above) placed with a host family for 28 days or more is in a private fostering arrangement and therefore Clubs with host families should inform and work with their local authority ensuring that they meet legislative and local procedural requirements.

## Specific Safeguarding Issues

PAFC will refer to experts and professional organisations that are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. Broad government guidance on the issues listed below can be accessed via the GOV. UK website or from the NSPCC website ([nspcc.org.uk](http://nspcc.org.uk)):

- contextual safeguarding
- bullying including cyberbullying
- domestic violence
- drugs
- fabricated or induced illness
- female genital mutilation (FGM)
- forced marriage
- mental health
- radicalisation sexting
- teenage relationship abuse
- gender-based violence/violence against women and girls (VAWG)
- trafficking
- gang membership

**Minority ethnic children** - Working Together identified a range of emerging child protection issues prevalent in children from minority ethnic backgrounds, including:

- Forced marriage
- Honour-based violence
- Child abuse linked to belief in 'spirit possession'
- FGM
- Child Sexual Exploitation
- Child victims of trafficking

## **Additional Child Protection Issues**

**Contextualised Safeguarding** - As well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside their families. These extra- familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including: exploitation by criminal gangs and organised crime groups such as county lines; trafficking, online abuse; sexual exploitation and the influences of extremism leading to radicalisation. Extremist groups make use of the internet to radicalise and recruit and to promote extremist materials. Any potential harmful effects to individuals identified as vulnerable to extremist ideologies or being drawn into terrorism should also be considered.

Assessments of children in such cases should consider whether wider environmental factors are present in a child's life and are a threat to their safety and/or welfare.

Children who may be alleged perpetrators should also be assessed to understand the impact of contextual issues on their safety and welfare. Interventions should focus on addressing these wider environmental factors, which are likely to be a threat to the safety and welfare of a number of different children who may or may not be known to local authority children's social care. Assessments of children in such cases should consider the individual needs and vulnerabilities of each child. They should look at the parental capacity to support the child, including helping the parents and carers to understand any risks and support them to keep children safe and assess potential risk to child.

**Domestic Abuse** - Domestic abuse is any incident of threatening behaviour, violence or abuse (psychological, physical, sexual, financial or emotional) between adults who are or have been intimate partners or family members, regardless of gender or sexuality. Domestic abuse rarely exists in isolation: many parents also misuse drugs or alcohol, experience poor physical and mental ill health and have a history of poor childhood experiences themselves. Children suffer both directly and indirectly if they live in households where there is domestic abuse. There are different types of domestic abuse: physical, sexual, emotional or mental. Research evidence indicates a strong link between domestic abuse and all types of child abuse and neglect. Children who are victims of domestic abuse may have feelings of guilt and self-blame. They may be nervous and exhibit behaviour that includes destructiveness, disobedience and withdrawal. Abuse in the domestic context includes physical violence, emotional or psychological abuse, sexual abuse, financial control, and social isolation or movement restriction.

**On-line Abuse and Messaging; including 'sexting'** - Modern use of the mobile devices, social media, private messaging and on-line games is a concerning area within safeguarding. Once a message or image has been shared, the sender has no control about how it is used. This can leave a young person vulnerable to bullying, blackmail, grooming or abuse. The danger from on-line abuse should not be underestimated. It is a criminal offence to create or share explicit images of a child, even if the person doing it is a child. If a young person tells you about being involved with on-line abuse or sexting, remain calm and ensure the Safeguarding Lead is informed as soon as possible. Never view the images, delete or send them. Isolate the device immediately. Only search the device if a young person is at immediate risk of harm. In every case where a young person is at risk of immediate harm call the police 999.

**Peer-on-peer abuse** - Children and young people can be taken advantage of or harmed by adults and by other Children. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between Children and within Children's relationships (both intimate and non-intimate).

**Teenage Relationship Abuse** - A recent NSPCC survey showed that a quarter of girls and 18 per cent of boys have experienced physical violence in a relationship. Abuse in teen relationships covers more than physical violence. Other examples of this type of abuse include: pressuring a partner into having sex; controlling behaviour; unnecessary jealousy or anger.

**Hazing** - Any rituals, initiation activities, action or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of Vulnerable Groups.

**Infatuations** - Vulnerable Groups may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware, that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. Staff should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child or Adult at Risk may be infatuated with him/ her, or with a colleague, should discuss this at the earliest opportunity with the Club Designated Safeguarding Officer (or the Club Senior Safeguarding Manager in his/her absence).

**Fabricate or induced illness** - Fabricated or Induced Illness is easiest understood as illness in a child which is fabricated by a parent or person in loco parentis. The child is often presented for medical assessment and care, usually persistently, often resulting in multiple medical procedures. Acute symptoms and signs of illness cease when the child is separated from the perpetrator.

**Children with sexually harmful behaviour** - Children may be harmed by their peers (other children or young people). Staff will be aware of the harm caused by bullying and will use the PAFC's anti-bullying procedures where necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than anti-bullying procedures. Research suggests that up to 30 per cent of child sexual abuse is committed by someone under the age of 18. Of all adult sex offenders, approximately half had committed their first offence as a juvenile with subsequent escalation in frequency and severity. Many young people do not continue their sexually harmful behaviour into adulthood, but without intervention, may develop alternative antisocial behaviours as they mature. Children have been found to engage in a wide range of sexually harmful behaviours both contact (touching, masturbation, penetration) and non-contact (exhibitionism, obscene communication, and voyeurism). Sexually harmful behaviour by children must be recognised as harmful both to the victim and the child who abuses. Staff who become concerned about a child or young person's sexual behaviour, including any known online sexual behaviour, should discuss with their line manager and speak to a Safeguarding Officer as soon as possible. The management of children and young people with sexually harmful behaviour is complex and PAFC will work with other relevant agencies. Young people who display such behaviour may be victims of abuse themselves and any sexualised behaviour on the part of a child or young person will be responded to.

**Grooming** - Grooming is when someone builds an emotional connection with an individual to gain their trust for the purposes of abuse or exploitation. Grooming can happen both online and in person. Many children or other vulnerable people don't understand that they have been groomed, or that what has happened is abuse. Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time (this could be years) gaining an individual's trust. They may also try to gain the trust of the whole family so they can be alone with the person.

Grooming activity may include:

- offering advice or understanding
- buying gifts
- giving the child attention

- using their professional position or reputation
- taking them on trips, outings or holidays.
- using secrets and intimidation to control children

Once they have established trust, groomers will exploit the relationship by isolating the individual from friends or family and creating a dependent relationship. They will use any means of power or control to make the individual believe they have no choice but to do what they want.

Groomers may introduce 'secrets' as a way to control or frighten the individual. Sometimes they will blackmail them, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

**Forced Marriage** - A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced (pressured or bullied) into it – going against their will. Coercion may include physical (including threats, actual physical violence and sexual violence), psychological (for example, when someone is made to feel like they're bringing shame on their family), financial (taking wages or not giving any money), sexual and emotional pressure. Children may be married at a very young age, and well below the age of consent in England. Staff should be particularly alert to suspicions or concerns raised by a child about being taken abroad and not be allowed to return to England. In England and Wales, forced marriage is a criminal offence. A forced marriage is not the same as an arranged marriage: an arranged marriage will have the consent of the prospective spouses.

**Honour-Based Violence** - An honour crime involves violence committed by those who aim to protect the reputation of their family or community.

Honour crimes are usually incidents or crimes which are, or may have been, committed to protect or defend the honour of the family and/or community - these can include physical assaults, abduction and even murder.

**Female Genital Mutilation (FGM)** - There is a range of potential indicators that a child or young person may be at risk of FGM, which individually may not indicate risk but if there are two or more indicators present this could signal a risk to the child or young person. Victims of FGM are likely to come from a community that is known to practise FGM. Professionals should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. High Risk Time: This procedure often takes place in the summer, as the recovery period after FGM can be six to nine weeks. High Risk Groups: FGM affects girls particularly from North African countries, including Egypt, Sudan, Somali, Kenya, Ethiopia, Sierra Leone, Nigeria, Eritrea, Yemen, Indonesia and Afghanistan.

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM and any concerns of FGM must be reported.

Indicators before FGM happens:

A girl at immediate risk of FGM may not know what's going to happen, but she might talk about:

- Being taken 'home' to visit family for a special occasion to 'become a woman'.
- An older female relative visiting the UK.
- She may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.
- Signs and Symptoms:

A girl or woman who has had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet

- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear.

**Child sexual exploitation** - A form of Child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may be sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.

**Trafficking and Modern Slavery** - Human trafficking is a modern-day form of slavery involving the illegal trade of people for exploitation or commercial gain. Human trafficking is: movement or recruitment by deception or coercion for the purpose of exploitation. The main forms of slavery are: forced labour; forced criminality; forced marriage; sexual exploitation; domestic servitude; child slavery. Child trafficking is child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold. Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another. Modern slavery involves exploitation; deception and coercion; movement and recruitment, but in child trafficking the elements of deception and coercion are not needed. Child trafficking is also linked to Child Sexual Exploitation (CSE).

**County Lines** - County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and adults at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines, and includes for instance children forced to work on cannabis farms or to commit theft.

**Radicalisation** - Radicalisation is a term that refers to a process by which a person comes to support terrorism and forms of extremist ideology leading to terrorism. Anybody from any background can become radicalised. During that process, it is possible to intervene to prevent children being drawn into terrorist-related activity. Radicalisation is also described as the process where someone has their vulnerabilities or susceptibilities exploited towards crime or terrorism - most often by a third party with their own agenda. Some people (children or adults) more vulnerable to radicalisation include those who may be isolated/ marginalised in society (e.g., through mental health or learning disability) and have no one to turn to. Vulnerable people, including children, young people and adults at risk can be exploited by people who seek to involve them in terrorism or activity in support of terrorism.

Protecting vulnerable groups at PAFC from the risk of radicalisation is part of the wider safeguarding duties and similar in nature to protecting children from other forms of harm (e.g. gangs, sexual exploitation). During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

- Who is vulnerable? Factors associated with a person who becomes vulnerable to being drawn into terrorism include: Peer pressure
- Influence from other people
- Bullying
- Crime and anti-social behaviour

- Lack of self-esteem or identity
- Race or hate crime
- Personal or political grievances
- Family tensions

Some children more vulnerable to radicalisation include those who may be isolated or marginalised in society (e.g. through mental health or learning disability) and have no one to turn to.

Signs of someone 'at risk':

- someone may talk a lot about a new friend;
- You may notice the person is 'out of character' or notable changes in behaviour or mood;
- a cluster of signs, such as: - changes dress/appearance, behaviour, language and peer relationships;
- secretive behaviour;
- more on-line activity, including gaming;
- losing interest in friends and activities;
- showing sympathy for extremist causes or ideology;
- glorifying violence;
- Possessing illegal or extremist literature.

The person may have a misguided view and need good advice and support (intervention).

PAFC is responsible for the welfare of all children and young people that partake in the sport. PAFC supports the Prevent Strategy to ensure the safeguarding of all.

If there is any concern that a child, young person or vulnerable adult is being radicalised or displaying signs of radicalisation the first point of contact is the PAFC Safeguarding Team.

Alternatively Devon and Cornwall Police can be contacted via the 101 system, or you can call on 01392 226514 or email: [prevent@devonandcornwall.pnn.police.uk](mailto:prevent@devonandcornwall.pnn.police.uk).

## APPENDIX A – USEFUL CONTACTS

**Andrew Parkinson**  
**Senior Safeguarding Manager**  
[andrew.parkinson@pafc.co.uk](mailto:andrew.parkinson@pafc.co.uk)  
**T: 01752 562561**

**Zac Newton**  
**Head of HR**  
[Zac.newton@pafc.co.uk](mailto:Zac.newton@pafc.co.uk)  
**T: 01752 562561**

**Darren Green**  
**Designated Safeguarding Officer**  
[safeguarding@pafc.co.uk](mailto:safeguarding@pafc.co.uk)  
**T: 07933 751103**

**Phil Stokes**  
**Head of Academy**  
[phil.stokes@pafc.co.uk](mailto:phil.stokes@pafc.co.uk)  
**T: 01752 562561**

**Alison Lowman**  
**ACT Safeguarding Officer**  
[alison@argylecommunitytrust.co.uk](mailto:alison@argylecommunitytrust.co.uk)  
**T: 01752 562561**

**EFL**

[safeguarding@efl.com](mailto:safeguarding@efl.com)

**FA**

[safeguarding@thefa.com](mailto:safeguarding@thefa.com)

**Devon and Cornwall Police**  
**Prevent office**

**101 / 999**  
**01392 225130**

**Plymouth Safeguarding Children Partnership**  
**Out of hours**

**01752 668000**  
[gateway@plymouth.gov.uk](mailto:gateway@plymouth.gov.uk)  
**01752 346984**

**Childline**  
**NSPCC Child Protection Helpline (10.00am-6.00pm)**

**0800 1111**

## **APPENDIX B - NOTE AND RECORD**

**STEP 1** Nature of the concern / what was said or witnessed

**STEP 2** Describe injuries / change of behaviour

**STEP 3** Give dates, times and other factual information

### **SAFEGUARDING AND CHILD PROTECTION**

- Safeguarding is pro-active to keep children safe
- Child protection is reactive to protect individual children from harm

### **CHILD PROTECTION**

- **RECOGNISE** possible harm or abuse
- **LOOK FOR SIGNS** Has something you have heard or seen caused you concern?
- **RESPOND** appropriately and keep calm
- **OPEN QUESTIONS ONLY**, allow them to clarify
- **LISTEN**, make notes and discuss concern with your line manager
- **REPORT** your concerns, do not investigate or take your own actions
- **CONTACT** your Safeguarding Officer or Head of Safeguarding
  
- **RECORD** your observations
- **COMPLETE** 'My Concern' report. Keep your own personal notes

If a young person is at risk of immediate significant harm; call 999. If you are not sure or if staff at PAFC are not contactable call the NSPCC Helpline (0808 800 5000)



## APPENDIX C – SAFEGUARDING CONCERN REFERRAL FORM

'MY CONCERN' is the PAFC data base that it is essential to completed. This form may give assistance in obtaining the event details. If used it will subsequently need to be scanned into 'My Concern'.

Date of referral:

Safeguarding Lead:

Reference number:

PERSON OF CONCERN			
Name		Telephone No.	
Address		Parents Details (if known)	
Postcode		Programme(s) enrolled on / Team plays for	
D.O.B			
Gender			
REFERRER'S DETAILS			
Name		Relationship to Child / Vulnerable Adult	
Address			
Who made the disclosure?			
When was the disclosure made?		Telephone No.	
Postcode		E-mail Address	
Job Title		Further information	What was said and by whom?
Department			
PROFESSIONAL NETWORK (please provide name, contact no. and e-mail for any person who you have received advice from in relation to this referral)			
LADO	What is the impact of the concern / incident on the young person / adult in question?		
Social Services			
Police			
Other (e.g. NSPCC)			

DETAILS OF CONCERN(S)			
Type of Abuse (Please tick as appropriate)	Sexual Abuse	Emotional Abuse	Bullying
	Neglect	Physical Abuse	Other (specify)
<b>Incident(s) Details</b>  Please summarise the incident in as much detail as possible. Please ensure to clearly highlight the reason for concern and make reference to any specific dates, times and events.	<input type="checkbox"/>  <input type="checkbox"/>	<input type="checkbox"/>  <input type="checkbox"/>	<input type="checkbox"/>  <input type="checkbox"/>
Do you think that this referral relates to:	High Level Poor Practice	Risk of harm to Child / V. Adult	Not Sure
<b>Action Taken</b>  Please specify if you have referred the case onto a statutory agency or any other organisation.	Has consent been obtained?  <input type="checkbox"/>	Have the parents / guardians been informed? What time/ when?  <input type="checkbox"/>	<input type="checkbox"/>

OTHER RELEVANT INFORMATION	
<b>Further Information</b>  Please include any additional information that you think may be relevant to the investigation.	

## APPENDIX D –VERSION HISTORY

Version	Date	Author	Status	Comment
1.0	April 2020	D Green DSO	Draft	New policy required as per EFL plan
1.1	August 2020	D Green DSO	Draft	To CEO for approval
1.2	September 2020	D Green DSO	Draft	Required crest / tidy text / amend KCSIE to 2020
1.3	September 2020	D Green DSO	Final	Further edit / text tidy / CEO authorised publish