

Plymouth Argyle Football Club



Safeguarding Children Policy & Procedures

Plymouth Argyle Football Club Safeguarding Children Policy & Procedures.

Contents	Page
Safeguarding Policy	5.
Policy Aims	5.
Scope of Policy	5.
Key contact details	6.
Information and Procedure	
Roles and Responsibilities	7.
Useful definitions	8.
What is Child Abuse?	8.
Recognising Signs of Abuse	9.
Physical Abuse	9.
Sexual Abuse	10.
Emotional Abuse	11.
Neglect	12.
Bullying	13.
Common Signs of Abuse	14.
Signs and Indicators of Bullying	15.
Action to Help the Victim and Prevent Bullying	16.
Action towards the Bully(ies)	17.
Action if Bullying is Suspected	17

	Page
Promoting Good Practice with Children and Young People	18.
Good Practice Guidelines	18.
Coaching Contact	21.
Practices to be avoided	23.
Practices never to be sanctioned	23.
Home visits	24.
Positions of Trust	24.
When to report suspicions or incidents	25.
Responding to concerns or allegations	26.
Action to be taken when Abuse is suspected.	27.
Action to be taken when a child Discloses Abuse	28.
When to Inform the local authority Designated Officer.	31.
Allegations against members of staff	31.
Internal enquiries and Suspension	31.
Poor Practice	33.
Confidentiality	33.
Information sharing	34.
Support to deal with the aftermath	35.
Allegations of non-recent abuse	35.

List of Other Associated Policies:	Page	37.
Safer Recruitment & Selection		
Dignity at Work		
Equal opportunities, Diversity and Inclusion		
Whistleblowing (Public Interest Disclosure) Policy		
Health & Safety		
Photography & Digital Images		39.
Ball Assistants		42.
Mascots		43.
Lost Children, Searching & Ejecting Children		
Minimum Age of Unaccompanied Children.		
Excursions & Events (including Under 18's travelling as part of the 1 st Team).		45.
Safeguarding Social Media Policy.		47
Academy Specific Policies		
Late Collection of Children		
Preventing Radicalisation and Extremism		59.
Safeguarding within Partnerships		60.
Useful Contact Details		62.
Useful Government Safeguarding Guidance (as per Keeping Children Safe in Education guidance)		63.
Flowchart – Allegation or Incident of Child Abuse		64.
Flowchart – Allegation of Child Abuse/Poor Practice by member of PAFC staff		65.
Flowchart – Making a referral to the F.A.		67.
Related guidance		68.
Policy Review		69.

Safeguarding Policy

Plymouth Argyle Football Club recognises its duty of care to safeguard all children, young people and young players involved in club activities. This policy outlines a strong commitment from the board to the Safeguarding Agenda and the promotion of wellbeing. The club acknowledges that all children have the right to protection, and the needs of those children who may have additional vulnerabilities must be considered and addressed, such as, but not limited to:

- physical disabilities.
- mental health issues.
- special educational needs.
- being a displaced or looked after child.

The club will endeavour to ensure the safety and protection of all children and young people involved in its activities through adherence to the club Safeguarding Policies, Procedures and Guidelines and by adhering to robust safer recruitment procedures.

Policy aims

The aim of Plymouth Argyle Football Club's Safeguarding Policy is to promote good practice and to enable staff, to ensure that we:

- Provide children, young people and young players with appropriate safety and protection whilst in the care of Plymouth Argyle Football Club.
- Provide relevant Safeguarding Guidance and Training, with appropriate training providers, for staff, players and volunteers.
- Allow staff/volunteers to make informed and confident responses to specific Safeguarding issues.
- Provide education and awareness raising, to young players and parents to understand their role in safeguarding.

Scope

This policy covers all activities within the club, Stadium Match Days and events, Academy and any external club managed activities.

PLYMOUTH ARGYLE SAFEGUARDING TEAM

Chairman – Simon Hallett

Safeguarding Lead

Andrew Parkinson

Safeguarding Manager

Andrew Parkinson

Safeguarding Officers – Club

Pete Bellamy Zac Newton

Safeguarding Officer – Academy

Pete Bellamy

Additional contacts:

Plymouth Children's services, Multi Agency Hub 01752 305200 multi-agencyhub@plymouth.gov.uk

Local Authority Designated Officer: 01752 307144 simon.white@plymouth.gcsx.gov.uk

NSPCC Plymouth 01752 422577

Information and Procedure

Roles and Responsibilities

The club has a comprehensive safeguarding structure which ensures the safety and welfare of all children who interact with the club. The Safeguarding Team consists of; the Safeguarding Lead, the Safeguarding Manager and Designated Safeguarding Officers.

All staff working with children will receive safeguarding training, as part of their induction process, will undergo a period of supervision and will also be provided with ongoing safeguarding training, awareness and support, suitable to their role.

Chairman is responsible for all aspects of the club and to ensure safeguarding is a key priority at Board Level.

Safeguarding Lead is responsible for providing club-wide strategic leadership that assists the club to deliver the safeguarding strategy, vision, values, priorities, policies to promote the welfare of vulnerable groups, communicating at Director and Heads of Department level on a weekly basis, or when safeguarding issues arise.

Safeguarding Manager reports directly to the Safeguarding Lead and is responsible for the strategic and operational direction and embedding safeguarding across the club. The Safeguarding Manager is the lead point of contact should safeguarding concerns arise within the club, on Match Days or events within Home Park, Academy or any other PAFC activity and is responsible for maintaining accurate records of safeguarding incidents or concerns. The club Safeguarding Manager is also the Lead Disclosure Officer in respect of Safer Recruitment.

Designated Safeguarding Officers (DSO) are responsible for embedding safeguarding within their own departments as well as being a point of contact should a safeguarding concern arise. DSOs have a duty to accurately record safeguarding concerns or allegations and to report them to the club Safeguarding Manager.

Employees, agency staff, consultants and volunteers are responsible for familiarising themselves with the club's safeguarding policies and procedures, ensuring the safety and welfare of all children as well as promoting best practice and creating a safe and inclusive environment, to prevent harm occurring through awareness of what constitutes abuse and neglect.

Useful Definitions

Child

A child is defined as a person under the age of 18 (The Children Act 1989)

Staff or Employees

Defined as any member of the workforce either paid or unpaid. **DSO**

Designated Safeguarding Officer

DO

Local authority Designated Officer

ICRT

Integrated Contact & Referral Team (Social Services)

DBS

Disclosure & Barring Service

CRC

Criminal Records Checks

What is Child Abuse?

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm.

Child abuse is a generic term encompassing all ill-treatment of children, including cases where the standard of care does not adequately support the child's health or development.

Children may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or in an institutional or community setting. The perpetrator may or may not be known to the child.

Abuse can happen to a child regardless of their age, gender, race or ability. Abusers can be adults (male or female) and other young people, and may be known to and trusted by the child and family.

All staff should maintain an awareness of safeguarding issues. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger. Safeguarding issues can manifest themselves via peer on peer abuse which is most likely to include, but may not be limited to, bullying (including cyberbullying), gender based violence/sexual assaults and sexting.

Recognising Signs of Child Abuse

In U.K. Criminal and Family law there are four specified types of Child Abuse:

- 1. Physical abuse**
- 2. Sexual abuse**
- 3. Emotional abuse**
- 4. Neglect.**

The F.A however regard **Bullying** within Football as the fifth form of child abuse and incidents of bullying should be given equal importance when reporting concerns regarding a child's welfare and safety.

Should you have any concern that child abuse is occurring you should contact a member of the Safeguarding Team immediately.

1. Physical abuse:

Where adults or other young people physically hurt, or injure children, including by hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating or drowning.

This category of abuse can also include when a parent or carer reports non-existent symptoms of illness or deliberately causes ill health in a child they are looking after, known as fabricated and induced illness.

Examples of physical abuse in sport may be:

- When the nature and intensity of training or competition exceeds the capacity of the child's immature and growing body.

- Where the child is given drugs to enhance performance or delay puberty.
- When sanctions imposed by coaches involve inflicting pain.
- When harmful physical initiations or challenges are set by peers. (Hazing)

2. **Sexual abuse:**

When adults (male or female) or other young people use children to meet their own sexual needs.

The following are all examples of sexual abuse:

- Rape, sexual assault.
- Engaging in sexual activity with a child.
- Causing or Inciting a child to engage in sexual activity, such as encouraging them to have sexual activity with another person, or to perform sexual acts on-line.
- Engaging in sexual activity in the presence of a child.
- Causing a child to watch a sex act, which may include pornographic videos or on- line pornography.
- Making, possessing or distributing indecent images of a child.
- Sexual Communication with a Child. This offence criminalises a person aged 18 years or over who, for sexual gratification, communicates with a child under 16 if the communication is sexual or if it is intended to elicit from the child a communication which is sexual. (it will apply to oral communications and written notes as well as to e-mails and text messages).
- Grooming - when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.
- Child sexual exploitation (CSE) - occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact, it can also occur through the use of technology.

- Sexting - sharing sexually explicit images, videos or messages via mobile phones.
- Coaching techniques which involve physical contact with children can create situations where sexual abuse can be disguised or go unnoticed. A child or young person may feel unable to refuse sexual advances if they feel their future within a club could be jeopardised. It is therefore imperative that staff are vigilant to the actions of their colleagues and report any safeguarding concerns they may have regarding the actions or intentions of other members of staff.

3. Emotional Abuse

The persistent emotional ill treatment of a child, likely to cause severe and lasting adverse effects on the child's emotional development. It may involve communicating to a child that they are worthless or unloved, inadequate, or valued only in terms of meeting the needs of another person. It may involve causing children to feel frightened or in danger by being constantly shouted at, threatened or taunted which may make the child very nervous and withdrawn. Living in a home where there is domestic abuse is harmful and can have a serious impact on a child's development and wellbeing.

Ill treatment of children, whatever form it takes, will always feature a degree of emotional abuse.

Examples of emotional abuse in sport include:

- Subjecting children to constant criticism.
- Name-calling.
- Sarcasm.
- Bullying.
- Racism.

- Putting a child under consistent pressure to perform to unrealistically high expectations.
- When a child's value or worth is dependent on sporting success or achievement.

4. Neglect

Neglect occurs when adults fail to meet a child's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the child's health or development. For example, failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or failing to ensure access to appropriate medical care or treatment.

Examples of neglect in sport could include:

- Not ensuring children are safe during day to day activities, when being transported or whilst on residential trips.
- Exposing them to undue cold, heat or extreme weather conditions without ensuring adequate clothing or hydration.
- Exposing them to unnecessary risk of injury by ignoring safe practice guidelines or failing to ensure the use of safety equipment.
- By requiring young people to participate when injured or unwell

5. Bullying

Although anyone can be the target of bullying, children who are perceived as “different” from the majority may be at greater risk of bullying. This includes children from minority cultures or children with disabilities.

Bullying can include:

- Hitting or kicking.
- Taking of possessions.
- Name calling.
- Constant teasing.
- Racist or homophobic taunts.
- Threats or gestures.
- Sexually abusive or insulting comments.
- Online “cyberbullying,” using abusive texts or humiliating images.

Plymouth Argyle Football Club acknowledges that all settings in which children are provided with services, or are living away from home, should have rigorously enforced anti-bullying strategies in place. Bullying can lead to physical injury, social problems, emotional problems, and even death. Children and adolescents who are bullied are at increased risk for mental health problems, including depression, anxiety, headaches, and problems adjusting to school. Bullying also can cause long-term damage to self-esteem.

Children can be bullied by an adult or by another child(ren). Any allegations of bullying by a member of staff towards a child or young person will be fully investigated and dealt with as a potential breach of Plymouth Argyle Football Club’s code of conduct.

Disciplinary action may be taken and referral to the League Safeguarding Team, FA and Designated Officer will also be made, where appropriate.

In serious cases of bullying, for example where physical or sexual assaults have allegedly occurred, then those cases will be referred to Children’s Services, the Designated Officer and/or the Police by the club Safeguarding Manager.

Common Signs of abuse

Every child is unique so behavioural signs of abuse will vary from child to child. In addition, the impact of abuse is likely to be influenced by the child's age, the nature and extent of the abuse, and the help and support the child receives. However, there are some behaviours that are commonly seen in children and young people who have been abused:

- The child appears distrustful of a particular adult, or a parent or a coach, with whom you would expect there to be a close relationship.
- He or she has unexplained injuries such as bruising, bites or burns - particularly if these are on a part of the body where you would not expect them.
- If he or she has an injury which is not explained satisfactorily or properly treated.
- A deterioration in his or her physical appearance or a rapid weight gain or loss.
- Pains, itching, bruising, or bleeding in or near the genital area.
- A change in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unexpectedly aggressive. Such changes can be sudden or gradual.
- If he or she refuses to remove clothing for normal activities or wants to keep covered up in warm weather.
- If he or she shows inappropriate sexual awareness or behaviour for their age.
- Suffer from depression or anxiety
- Not do as well in education, due to difficulties at home.

Some of the following signs may be indicators of child sexual exploitation.

- children who appear with unexplained gifts or new possessions.
- children who associate with other young people involved in exploitation.
- children who have older boyfriends or girlfriends.
- children who suffer from sexually transmitted infections or become pregnant.

- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

Some disabled children may not be able to communicate verbally about abuse that they may be experiencing, or have witnessed, and so it is important to observe these children for signs other than 'telling'. Remember that the above signs should be seen as a possible indication of abuse and not as a confirmation. Changes in a child's behaviour can be the result of a wide range of factors. Even visible signs such as bruising or other injuries cannot be taken as proof of abuse without expert opinion.

For example, some disabled children may show extreme changes in behaviour, or be more accident prone, because of their impairment. However, if you are concerned about a child or young person you have a responsibility to act on those concerns. A child or young person may also try to tell you directly about abuse. It is very important to listen carefully and respond sensitively.

Signs and Indicators of Bullying

A child may indicate by signs or behaviour that he or she is being bullied. Adults should be aware of these possible signs and that they should investigate if a child:

- says he or she is being bullied
- becomes withdrawn anxious, or lacking in confidence
- feels ill before training sessions
- regularly presents with clothing torn or training equipment damaged.
- has possessions go "missing"
- asks for money or starts stealing money (to pay the bully)
- has unexplained cuts or bruises
- is frightened to say what's wrong
- gives improbable excuses for any of the above.

Action to Help the Victim and Prevent Bullying

Plymouth Argyle Football Club staff have a duty of care and should:

- Take all signs and complaints of bullying very seriously. Bullying is not “banter”.
- Encourage all children to speak and share their concerns. Create an open environment.
- Reassure the victim that you can be trusted and will help them, although you cannot promise to tell no one else.
- Keep records of what is said - What happened? Who is involved? When & Where? (Using the PAFC child concern report form available on SharePoint).
- Report any bullying concerns or allegations to the Safeguarding Manager who will coordinate the investigation and assess whether the circumstances require the involvement of Police or Social Services.
- Seek advice from the Safeguarding Manager/Safeguarding Team as to further action and who is to inform parent/carer of the child.
- With the guidance of the club Safeguarding Manager, assist in the Investigation of allegations and take action to ensure the victim is safe and supported.
- Report any signs of self-harm, or intentions to self-harm, to the club Safeguarding Manager immediately.
- Preserve any evidence e.g. torn clothing, abusive text messages etc.
- Regularly reinforce the club’s anti-bullying stance, and expected level of behaviour, to players and parents.
- Encourage team work, inclusion, tolerance and acceptance of other’s differences and promote communication and collaboration among players.

Action towards the Bully(ies)

Following consultation with the Safeguarding Manager the following actions may be taken in cases of peer on peer bullying, where appropriate:

- The bullying behaviour or threats of bullying will be investigated, risk assessed and steps to stop the bullying behaviour will be put in place immediately.
- If necessary and appropriate, the police and/or Social Services will be consulted
- Parents of the bully(ies) will be informed and asked to come in to a meeting to discuss the problem.
- An attempt will be made to help the bully (bullies) change their behaviour and to understand the consequences of their actions.
- Seek an apology to the victim(s) and, where appropriate, insist on the return of any borrowed items and that the bully(ies) compensate the victim for any loss.
- Issue a warning as to future conduct: If the bullying continues a more severe approach will be taken.
- Hold meetings with the family(ies) involved to report on progress.
- Impose sanctions or exclude the offender(s), where necessary.
- Ensure relevant coaching staff are aware of the outcome and that they monitor the situation to reduce the chances of re-occurrence.
- A written record of action taken and outcome of the complaint will be kept by the club Safeguarding Manager, for future reference.

Action if Bullying is Suspected

If bullying is suspected, the same procedure should be followed as set out in the section of this policy entitled “When to report suspicions or incidents.” (see page 25)

Promoting Good Practice with Children and Young People

Introduction

Child abuse, physical, emotional, neglect and in particularly sexual abuse, can result in strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about any action to take.

Abuse can occur within many situations including the home, school and the footballing environment. Some individuals will actively seek employment or voluntary work with young people/young players in order to harm them. Conversely, a coach, instructor, teacher, official or volunteer may have regular contact with young people/young players and be an important link in identifying cases where a young person needs protection.

All cases of inappropriate behaviour should be reported following the guidelines in this policy. When a child enters the club, having been subject to child abuse outside the footballing environment, football can play a crucial role in improving a child's self-esteem. In such instances, the club must work with the appropriate agencies to ensure the child receives the appropriate support.

Good Practice guidelines

All personnel are encouraged to demonstrate exemplary behaviour to best safeguard children but also to protect themselves from allegations.

The following are common sense examples of how to create a positive culture and climate within Plymouth Argyle Football Club.

Good practice means:

- All staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Treating all children and young people equally, and with respect and dignity.
- Putting the welfare of each young person first and act in their best interest.

- Building balanced relationships based on mutual trust and maintain professional boundaries at all times.
- Give enthusiastic and constructive feedback rather than negative criticism.
Making football fun, enjoyable and promoting fair play.
- Being an excellent role model - this includes not smoking, drinking excessive amounts of alcohol, using drugs or using bad language in the company of children and young people.
- Have access to and be familiar with the club's Code of Code of Conduct and Safeguarding policies and procedures.
- Know who their Safeguarding Manager is and how to contact them.
- Ensure any concerns or allegations pertaining to a child's safety and welfare are recorded and acted upon, in line with the club's safeguarding policies and procedures.
- Promote an environment where poor practice is challenged and reported.
- Help maintain an ethos whereby colleagues, children, young people and their parents/carers feel able to articulate any concerns, safe in the knowledge that effective action will be taken as appropriate.
- Ensure there is always an appropriate staff to participant ratio, determined by: Age
and needs of the participants.

Nature of the activity and environment.

Risk assessments identifying potential behavioural or other issues.

Expertise and experience of the staff involved.

Male and female supervising staff wherever possible for mixed gender participant activities.

Staffing ratios as per NSPCC guidance:

4 - 8 years. 1 adult to 6 children.

9 - 12 years. 1 adult to 8 children.

13 - 18 years. 1 adult to 10 children.

However, regardless of the number of children participating in PAFC activities, staff are expected to work in pairs, particularly if there is a requirement to be in dressing rooms or undertake any personal care.

Where **lone working** is an integral part of a role e.g. an Academy teaching position, or club Driver, then additional risk assessment strategies will be put in place e.g.

- If conducting a one-to-one tutorial staff should aim to have the tutorial take place in a communal area, e.g. canteen or an office with other people present.
- Staff should ensure a colleague is made aware of when and where the tutorial is being held.
- If Staff are on their own in a room with a student the staff member should prop open the door of the room (so long as that does not constitute a fire safety hazard).
- When transporting a lone child, they should be seated in the rear of the vehicle. If several children are being transported, and it is necessary to sit a child in the front passenger seat, then that child must be the first to leave the vehicle so that at no time will the driver be alone with a child in the front of the vehicle.
- Staff should never work alone if they are concerned about risks to themselves or others in the situation.

Potential risks that individuals could be exposed to during lone working include:

- Being the recipient of physical, emotional or sexual abuse.
- Being accused of perpetrating physical, emotional, sexual abuse or neglect.
- Neglecting one's own duties to safeguard children.

Coaching Contact

- Ensure that if any form of manual/physical contact is required, it should be provided openly and according to the guidelines provided within the FA Safeguarding Children Workshop. Care is needed as contact may be difficult to maintain when a child is constantly moving. Young people/young players should always be consulted and their agreement gained. Some parents are becoming increasingly sensitive about manual support and their views should be carefully considered.
- Keeping up to date with the technical skills and qualifications in football to the appropriate level.
- All care givers must be subject to DBS checks at the highest level.
- Ensuring that if mixed teams are taken away they should always be accompanied by a male and female member of staff. NB - however, same sex abuse can also occur.
- All staff should be vigilant and ensure adults around children and young people act in accordance with the standards set by Plymouth Argyle Football Club. Staff are also responsible for those who enter changing rooms etc.
- Ensuring that at tournaments or residential events, adults should not enter children's rooms or invite children or young people into their rooms.
- When coaching giving enthusiastic and constructive feedback recognising the development needs and capacity of young people/young players - avoiding excessive training or competition and not pushing them against their will.
- Being an excellent role model – this includes not smoking, not using bad language, not using drugs or being under the influence of alcohol in the company of young players.
- Secure parental consent in writing to act in loco parentis, if the need arises to give permission for the administration of emergency first aid and/or other medical treatment.
- Keeping a written record of any injury or accident that occurs, along with the details of any treatment given and/or action taken. Advise parents of the incident.

When an injury occurs because of an accident, where the club or an individual's actions could amount to negligence, then an accident report form must be submitted to the club Safety Officer, as per the guidance in the Staff Handbook.

- Request written parental consent if club officials are required to transport children/young people/young players in their cars and ensure that coaches/staff are accompanied by another member of staff. Such transport arrangements should be avoided, unless absolutely necessary.
- Achieve the best level of supervision of children, always
- Record and report any situation which may place a child at risk or which may compromise the club's or the member of staff's own professional standing.
- Adhere to the club policy, guidance and agreed risk management strategies.

Unless a child/young person is a direct relation, coaches, managers, tutors, medics and any club staff acting in a supervisory role of children engaging in PAFC activities should not:

- Accept as a "friend", players or referees who are under 18 years, on social networking sites they are members of or share their own personal social networking sites with children or young people involved in youth football
- Contact children or young people known through football outside of the football context on social networking sites.
- Use internet or web-based communications to send personal messages of a non- football nature to a child or young person.
- Engage in any personal communications, 'banter' or comments.

(For further guidance refer to the club's Safeguarding Social Media Policy)

Practices to be avoided by staff supervising children

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable they should only occur with the full knowledge and consent of someone in charge in the club or the child's parents. For example, a child sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a child up at the end of a session:

- Avoid spending time alone with children and young people away from others.
- Avoid transporting a child or young person in your own vehicle, where they will be alone with you.

Practices never to be Sanctioned

The following should never be sanctioned. You should never:

- Engage in rough, physical or sexually provocative games, including horseplay.
- Share a room with a child.
- Engage in any form of Sexual contact with a child or allow or engage in any form of inappropriate touching.
- Allow children or young people to use inappropriate language unchallenged.
- Make sexually suggestive comments towards, or in the presence of, a child or young person, even in fun.
- Reduce a child or young person to tears as a form of control.
- Allow allegations made by a child or young person to go unacknowledged, unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for children or young people, that they can do for themselves.
- Invite or allow young players or children participating in club activities, who are not directly related to you, to visit or stay with you at your home.
- Lend or borrow money or property from a child.

NB, it may sometimes be necessary for staff or volunteers to do things of a personal nature for children or young people, particularly if they are disabled. These tasks should only be carried out with the full understanding and consent of parents and the players involved. There is a need to be responsive to a person's reaction. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where physical contact, lifting or assisting a child or young person to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained. If you are unsure this must be checked with parents or carers and the Head of Safeguarding/Safeguarding Officers within Plymouth Argyle Football Club.

Home visits

There are circumstances and occasions in which a member of staff's responsibilities may include home visits. Wherever possible such visits should not be undertaken alone. Contact by whatever means and meetings with vulnerable groups outside work arrangements should not take place without the agreement of the club, and in the case of a child, they should not take place without a parent/carer being present.

Positions of Trust – Sexual Offences Act 2003

What does the law say?

The sexual offences legislation in the UK already provides that any sexual activity between adults and children under 16 is illegal and constitutes abuse. The Sexual Offences Act legislation which addresses the abuse of positions of trust relates to the need to protect young people aged 16 and 17 who, despite reaching the age of consent for sexual activity, are considered to be vulnerable to sexual abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with adults who hold a position of trust, responsibility or authority in relation to them and, as a result, have a considerable amount of power and influence in their lives.

The law defines specific roles and settings where sexual activity between 16 and 17 year olds and those in positions of trust, responsibility or authority constitutes a criminal offence. Currently being a coach/official in a sports club is not considered under the law as a specified role, however, this is due to change imminently and new

legislation is anticipated to include coaching roles as a position of trust as defined in the Act.

At present, the club directs that staff should never have an intimate relationship with a child under 18 (even if they are over 16 years old) when they are responsible for that child's supervision, care, support or coaching. A breach of this direction could result in disciplinary action by the club and/or the FA.

When to report suspicions or incidents.

Staff are not expected to be experts in recognising abuse; however, staff should be vigilant and respond swiftly and appropriately.

If any of the following circumstances occur, you should report this immediately to the club Safeguarding Manager or Designated Safeguarding Officers.

Make a written record of the incident or grounds for concern using the PAFC Child Concern Report form (available on the PAFC website).

The PAFC Child Concern Report form is an internal document, designed to record the information necessary to formulate a referral, when necessary, to an outside agency but also to enable the club to maintain accurate records of any concerns or allegations of child abuse which may come to light and to assist in the ongoing review of policy and procedure.

You will be guided by the Safeguarding Manager as to how, when and by whom the parents of the child are to be informed:

- If you suspect a child may be the victim of abuse by any person, including neglect, physical, sexual or emotional abuse.
- If a child appears to have been the victim or perpetrator of bullying, including on-line cyberbullying.
- If you observe any injuries/marks on a child which they cannot account for, their explanation for the injury seems unlikely or you have suspicions as to how the injury may have been caused.

- If there is a sudden change in behaviour, i.e. the child/young person's behaviour alters significantly, they become withdrawn or tearful. If a child voices intentions to self-harm or if you suspect, he/she may be exhibiting signs/symptoms of self-harm or an eating disorder.
- If you suspect a child has been exposed to any inappropriate or indecent images or discloses any inappropriate on-line behaviour.
- If you accidentally hurt a child or young person, or you observe another adult hurting a child.
- If he/she seems distressed in any manner and you have concerns for their emotional state or welfare.
- If a child or young person appears to be sexually aroused by your actions or may have developed an infatuation with you or another member of staff.
- If a child or young person misunderstands or misinterprets something you have done, which may compromise your position or working relationship with that child.

The circumstances of the concern will be fully investigated by the Safeguarding Manager who may decide to refer the concern to Children's Services or other agency.

Do not worry that you may be mistaken. Being worried about doing the wrong thing is not a reason not to act. It is better to have discussed it with somebody with the experience and responsibility to make an assessment.

Responding to Concerns or Allegations

It is not the responsibility of anyone employed by Plymouth Argyle Football Club, in a paid or unpaid capacity to decide whether the alleged harm or abuse has taken place. However, it is the responsibility of all PAFC staff to act by reporting any concerns or allegations of abuse of a child to the PAFC Safeguarding Team or by contacting the appropriate statutory authorities.

Action to be taken when Abuse is Suspected.

The following actions must be carried out when abuse of a child is suspected.

- Any suspicion that a child has been harmed or abused by an adult, peer, member of staff, player or volunteer should be immediately reported to the club's Safeguarding Manager or Designated Safeguarding Officers.
- The member of staff reporting the suspicion of abuse will also record the incident, using the PAFC Child Concern Report form (available on the PAFC SharePoint website) and immediately forward the document to the Safeguarding Manager.
- The Safeguarding Manager, Designated Safeguarding Officer or the member of PAFC staff dealing with the child at that time, must take steps to ensure the immediate safety of the child in question and any other child who may be at immediate risk of harm.
- The parents/carers of the child will be contacted as soon as possible, unless they are suspected to have abused the child in question. In such circumstances, advice will be obtained, by the Safeguarding Manager/ DSO or staff member dealing, from Police or Social Services with regards to when and who should inform the parents of the concern or allegation.
- The Safeguarding Manager will refer the allegation to Together for Children Integrated Contact and Referral Team, who may involve the police.
- If a child is at immediate risk of harm then the Safeguarding Manager/DSO or any staff member dealing may also report the incident directly to the Police and/or Children's Services.
- The Safeguarding Manager should also notify the Chief Executive who will inform the Media and Communications Manager who will deal with any media enquiries.
- If the Safeguarding Manager is the subject of the suspicion/allegations, the report must be made to the Chief Executive who will refer the allegations to Social Services.
- In cases, such as sexual assault, where forensic evidence from a scene or the victim's body or clothing may be available then staff must attempt to preserve any such

evidence e.g. locking a room to prevent other people disturbing the scene, advising the child not to wash, go to the toilet or change clothes if the assault was relatively recent. Staff should also be mindful of documentary or other evidence, which may be present on mobile phones, computers or other devices which may need to be retained.

Advice should be sought from the Safeguarding Manager or DSO as to the preservation of evidence in such cases, pending police involvement.

Action to be taken when a child discloses abuse.

- Stay calm.
- Listen carefully to what is said.
- Reassure the child that they have done the right thing in telling you.
- Do not promise to keep secrets –find an appropriate early opportunity to explain that to keep them safe it is likely that the information they tell you may need to be shared with others.
- Allow the child to continue at her/his own pace.
- Keep questions to a minimum; use the following as a guide to establish the brief, basic facts of the allegation:

WHO? – Names of who is involved.

WHAT? – What happened?

WHERE? – Where did it happen?

WHEN? -When did it happen?

- Make a detailed record of what they have said, using the child's own words, as soon as possible using an PAFC Child Concern Report form recording what actions you have taken so far.

- **There is no requirement to get a lengthy account from the child at this stage.**

Remember that if the child discloses abuse you are only making a record of that child's initial disclosure and it is likely he/she will subsequently be fully interviewed by Police.

- Tell them what you will do next and with whom the information will be shared

Contact the club Safeguarding Manager or a Safeguarding Officer immediately.

If the Safeguarding Manager or Safeguarding Team are unavailable, and you feel the child is in **immediate danger or at immediate risk of harm**, then report your concerns direct to Police on the following contact numbers:

Devon and Cornwall Police Tel: 101 or 999 in an Emergency

You will then be required within 24hrs to complete a Child Protection/Child in Need

Record the name of the person you spoke to and the time at which you made the referral.

- **Do not** contact or confront the alleged abuser.
- If the alleged abuser is a parent, then **do not** immediately inform the parent of the child's disclosure. Seek advice from your Safeguarding Manager, Children's Services or the Police in respect of when and who will contact the parent or alleged abuser.

Information to be recorded

Information passed to social services or the police must be as helpful as possible, hence the necessity for making a detailed record at the time of the disclosure/concern. The PAFC Child Concern Report form will guide you as to what information is needed but, where possible, include the following:

- Name of child.
- Age of child and date of birth.

- Home address and telephone number.
- Details of child's parents/carers, name(s), address(es), date(s) of birth, contact telephone number(s). Indicate who has parental responsibility if known.
- Indicate if the person making the report is expressing their own concerns or those of someone else?
- If it is not the child making the disclosure has the child concerned been spoken to? If so what was said?
- What is the nature of the allegation? Include dates, times, location(s), person(s) involved and any other relevant information.
- Include a description of any visible bruising or other injuries, but do not ask a child to remove or adjust an item of clothing. Record the child's explanation as to how any bruising or other injuries occurred.
- You may include your own observations about the child's behaviour e.g. tearful, shaking, reluctant to make eye contact etc.
- Do not record your own opinion of the incident on the Child Concern Report form e.g. "She appeared genuine", "I doubt they could have been alone together", "why would he have gone into that room?" etc.
- Details of any witnesses to the incident?
- The child's account, if it can be given, of what has happened. Use the child's own words where possible, put significant comments in speech marks.
- Have the parents been contacted? If so what has been said?
- Details of other people consulted.
- Details of the suspect, name, nickname or description and their relationship to the child (e.g. parent/coach/stranger).

When to Inform the Designated Officer (formerly the LADO)

If the allegation relates to a person who works with children (including PAFC members of staff) then the Safeguarding Manager will refer the incident to the local authority's Designated Officer if that person has:

- Behaved in a way that has harmed or may have harmed a child.
- Possibly committed a criminal offence against or related to a child.
- Behaved towards a child in a way that indicates they may pose a risk of harm to children.

Allegations against members of staff

Where there is a complaint against a member of staff there may be three types of investigation (internal and external):

- A Criminal Investigation – by Police.
- A Safeguarding Investigation – by Social Services, the club, the League.
- A Disciplinary or Misconduct Investigation – by the club and/or FA.

The results of the police and Safeguarding investigation may well influence the disciplinary investigation, and/or any future action, but not necessarily.

Internal enquiries and Suspension

- The Safeguarding Manager (or Safeguarding Officer dealing) will make an immediate decision in conjunction with the Chief Executive and Head of Human Resources about whether any individual accused of harm, inappropriate behaviour or abuse should be temporarily suspended pending further police and social services enquiries.
- Irrespective of the findings of the social services or police enquiries the Head of HR and Safeguarding Manager, in conjunction with legal advisors, will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases,

the Head of HR, Safeguarding Manager and the legal advisors must reach a decision based upon the available information which could suggest that on a balance of probability, it is more likely than not that the allegation is true.

- The welfare of children should always remain paramount.
- Should the investigation reveal any breaches of the club's Discipline Code of Conduct then those matters will also be subject of an internal investigation and may result in Disciplinary Action/ Dismissal of the individual.
- The FA and EFL Safeguarding Lead should be informed by the club Safeguarding Manager of any serious safeguarding concern or complaint in order that they may consider the risk posed across football.
- If Plymouth Argyle Football Club decides to withdraw permission for a member of staff to engage in regulated activity* with children and/or vulnerable adults PAFC is legally obliged to refer that person to the Disclosure and Barring Service when it is also believed that member staff has caused harm or poses a future risk of harm to vulnerable groups, including children. This includes situations when Plymouth Argyle Football Club would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made. The referral to the Disclosure and Barring Service will be made by the club Safeguarding Manager.

* Regulated activity

Regulated activity refers to certain roles carried out by Disclosure and Barring Service applicants in relation to children and vulnerable adults. It covers various types of activities which, by their nature, would entitle an individual to an enhanced DBS check with applicable barred lists.

Put simply, this is anyone who is **teaching/training/instructing/coaching/caring for or supervising children.**

Poor Practice

Poor practice is behaviour that falls short of abuse but is nevertheless unacceptable. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed or unreported.

- If, following consideration, the allegation is clearly behaviour which amounts to poor practice; the Safeguarding Manager and Head of HR will deal with it as a misconduct issue.
- If the allegation relates to poor practice by the Safeguarding Manager, or if the matter has been handled inadequately and concerns remain, it should be reported to the Chief Executive who will decide how to deal with the allegation and whether to initiate disciplinary proceedings.

Plymouth Argyle Football Club will ensure that all staff/volunteers are fully supported and protect anyone, who in good faith reports his or her concerns that a colleague is, or may be, harming or abusing a child. The club's Whistleblowing (Public Interest Disclosure) Policy will apply to ensure this.

Confidentiality

Plymouth Argyle Football Club will operate on the premise that all information imparted to a member of staff will be treated in confidence. Confidentiality is a key issue in the lives of young people. They may trust a member of staff with issues of a personal nature and wherever possible their confidences should be respected. Staff must not however make promises on confidentiality they may be unable to keep.

Furthermore, staff should always make any complainant fully aware of any situation where confidentiality must not be maintained. Where there is a concern that the child may be suffering, or is at risk of suffering, abuse or significant harm, the child's safety and welfare must be the overriding consideration.

Children and Young people may disclose information that is difficult for the member of staff to deal with without further advice/support, or which must be reported to statutory agencies. In this case the complainant should be told that the situation will be discussed with the Safeguarding Manager or Designated Safeguarding Officer with a speciality in that area, but confidentiality will be maintained if possible.

Information sharing

Plymouth Argyle Football Club is committed to sharing information for the purposes of safeguarding and promoting the welfare of children and young people in line with Working Together (2013), with respect for The Data Protection Act (1998) and compliance with the GDPR (General Data Protection Regulation). Every effort though should be made to ensure that confidentiality is maintained for all concerned.

Information must be shared on a need to know basis, with or without the consent of the child to whom the information relates or the consent of that child's parent, carer or guardian. Whilst it is good practice to obtain **consent** wherever possible, **it is not a prerequisite**. Information may be shared with (but is not limited to) the following people:

- The Safeguarding Manager/Safeguarding Officers.
- The parents of the person who is alleged to have been abused.
- The person making the allegation.
- Social Services/Police.
- The Chief Executive/Media and Communications Manager.
- The alleged abuser (and parents if the alleged abuser is a child)

In the event of a Criminal Investigation the Safeguarding Manager, Designated Safeguarding Officer (or member of staff dealing in their absence) will seek Social Services/Police advice on who should first approach the alleged abuser.

Information should be stored in a secure place with limited access to designated people, in line with data protection laws, e.g. that information is accurate, regularly updated, relevant and secure. Information will be retained for the relevant period as specified in the club's Data Retention Policy and Privacy Policy (available on the pafc.co.uk website).

Support to deal with aftermath

Consideration should be given about what support may be appropriate to children, parents and members of staff. Use of help lines, support groups and open meetings will maintain an open culture and help the healing process.

The British Association for Counselling and Psychotherapy Directory is available from:

British association for Counselling and Psychotherapy

BACP House15

St John's Business Park

Lutterworth

Leicestershire

LE17 4HB

Tel: 01455 883300

e-mail: bacp@bacp.co.uk

Internet: www.bacp.co.uk

- Social Services can signpost children and their families to support services within the community so can be consulted for advice.
- Consideration should also be given about what support may be appropriate to the alleged perpetrator of the abuse.

Allegations of Non-recent abuse (Historic abuse)

Non-recent abuse (also known as historic abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years of age.

Many people who were abused in childhood believe that they are to blame and that the abuse was their fault. But this is never the case - a child cannot consent to abuse.

In countless circumstances children are too young to fully understand or articulate what is happening to them. Some spoke out at the time but weren't believed. Others were too embarrassed to tell anyone or did not know who to turn to.

In some cases, the non-recent allegation may be made against a member of staff who is still currently working with children, either within or outside the club.

Where such an allegation is made to a member of PAFC staff follow the “Action to be taken when abuse is suspected” (see page 27) and report the allegation to the Safeguarding Manager or a member of the club Safeguarding Team. The Safeguarding Manager will then report the allegation to the Designated Officer , social services and/or the police. This is because other children, either within or outside the club, may be at risk of harm from this person.

Advice and Support for victims can be obtained from:

NAPAC – National Association for People Abused in Childhood

Free help-line – 0800 8010331

Office – 0207 614 1801 (9am – 5pm)

NAPAC
Herald House,
Off Bunhill Row,
15 Lamb’s Passage,
London EC1Y 8TQ

Victims of non-recent Sexual Abuse in Football can contact: The

FA/NSPCC Helpline 0800 0232642

The Professional Footballers’ Association – wellbeing@thepfa.co.uk

The FA Directly via safeguarding@thefa.com

The Police, by going to a police station or dialling 101.

This policy should be read in conjunction with other PAFC related policies.

The full policies can be found in the Staff Handbook, the club Seasonal Operational Order or on the PAFC website.

Other Policies

1. Safer Recruitment and Selection Policy (including Recruitment of ex-offenders)
2. Dignity at Work Policy.
3. Equal Opportunities, Diversity and Inclusion.
4. Whistleblowing (Public Interest Disclosure) Policy.
5. Health and Safety Policy.
6. Photography & Digital Images Policy. (see below)
7. Ball Assistants Policy (see below)
8. Mascots Policy. (see below)
9. Lost Children, Searching and Ejecting children & Minimum Age of Unaccompanied Children.

Policies and guidance for the above are included in the:

PAFC Staff Handbook

PAFC Stewards Handbook.

Terms and Conditions of ticket sales.

10. Excursions and Events Policy (including guidance on Under 18's travelling as part of the 1st Team - see below).

11. Academy Specific Policies:

Academy Education & Welfare Performance Plan – (includes guidance on Welfare / Player Philosophy, Promoting the Education of Looked After Children & Substitute Accommodation)

Transport policy – (Transporting Vulnerable Groups)

Academy Handbook – (Academy players on loan or work experience)

Late Collection of Children Policy.

12. Safeguarding Social Media Policy (see below)

13. Preventing Radicalisation and Extremism (see below)

14. Safeguarding Within Partnerships Policy (see below)

Photography & Digital Images Policy

There is evidence that some people have used sporting events as an opportunity to take inappropriate photographs or film footage of children and disabled people in vulnerable positions. It is advisable that all staff/volunteers be vigilant, with any concerns to be reported to the PAFC Safeguarding Manager/Safeguarding Officers.

Plymouth Argyle Football Club utilises designated photographers to record activities and events within the club. Written parental consent must be obtained before any child or young person partaking in Plymouth Argyle Football Club events and activities are photographed, filmed or their image is captured using any device.

The exception to this, when written parental consent will not apply, is when the child enters solely as a spectator at Home Park (including all locations owned, occupied or utilised by the club), at which time the terms and conditions of entry advise that by a parent/carer allowing their child to enter the ground they thereby provide consent for that child's image to be captured/used by the club. This is in line with existing club and EFL Ground Regulations 24 and 26.

In the case of Adults at Risk, participating in an PAFC event, written consent is required and care must be taken to ensure that the adult at risk understands the implications of the images or footage being taken, especially if the images or footage are to be used by the Club (or anyone else) for promotional purposes, or otherwise made publicly available.

If the Adult at Risk lacks capacity then carer consent must be obtained prior to the individual being photographed, filmed or their image is captured using any device for club purposes.

If neither form of consent is provided then the images should not be used, unless the individual cannot be identified from the photograph.

(N.B. the above guidance does not apply when the Adult at Risk enters the Home Park solely as a spectator as by entering they also give consent to their image being captured/used by PAFC).

Any observers to an PAFC event or activity designated as an Under 18 event (primarily involving children under 18 years) will be asked not to photograph or film without having firstly obtained the consent of Plymouth Argyle Football Club. To be given such consent Plymouth Argyle Football Club must be provided with the following:

- Written parental consent of all children involved in the activity.
- A written confirmation of the purpose of the images, how the images may be used (e.g. on a school's website, personal/family use etc.), who the images may be shared with and confirmation of any personal details which may accompany the images.

Please refer any queries or concerns to the club Safeguarding Manager.

Plymouth Argyle Football Club has introduced this Policy in line with guidance from the FA, to avoid the following:

- The inappropriate use, adaptation or copying of images for use on child abuse websites on the internet (often incorrectly referred to as pornography sites)
- The identification of children when a photograph is accompanied by significant personal information that will assist a third party in identifying the child. This can lead, and has led, to children being 'groomed.'
- The identification and locating of children in inappropriate circumstances which include: where a child has been removed from his/her family for their own safety;
 - where restrictions on contact with one parent following a parental separation exist e.g. in domestic violence cases;
 - in situations where a child may be a witness in criminal proceedings; or
 - other safeguarding children concerns.

With the exception of professional photographers employed by Plymouth Argyle Football Club or media cameras brought in to cover an event, no cameras, other than those owned by Plymouth Argyle Football Club and operated by PAFC personnel, are permitted to be used at any PAFC event/activity where children or adults at risk are primarily involved, without the necessary consent as previously outlined.

Plymouth Argyle Football Club **will:**

- Provide guidance on the taking of images to all parents, carers, children and staff participating in PAFC Under 18 events or activities.
- Ensure the club has parental consent to use a child's image if it is to be used in the public domain e.g. club website or newspaper article. (essential in relation to below)
- Ensure that any child who is under care proceedings, is protected by ensuring that their image is not placed in the public domain. This will be done by using a Consent Form, so that parents/carers can identify whether this applies to children in their care.
- Focus on the activity rather than the individual.
- Ensure all those featured are appropriately dressed (a minimum of vest or shirt and shorts)
- Aim to take pictures which represent the broad range of youngsters participating safely in football e.g. boys and girls, disabled people, ethnic minority communities.

Plymouth Argyle Football Club **will not:**

- Publish photographs with the full name(s) of the child(ren) featured without written consent to do so and having informed the parents as to how the image will be used.
- Use players who are under 18 years profiles with pictures and detailed personal information on websites.
- Use an image for something other than that which it was initially agreed, e.g. published in local press when initially produced for a commemorative picture.
- Allow images to be recorded in changing rooms, showers or toilets – this includes the use of mobile phones that record images.

Where video is to be used as a teaching aid, all participants and their parents/carers should be made aware of the proposed use and written consent to a participant being filmed should be sought prior to the start of filming.

Ball Assistants Policy

Plymouth Argyle Football Club will endeavour to ensure the safety and protection of children carrying out the role of ball assistant at the Home Park (including all locations owned, occupied or utilised by the club), through adherence to the club's Safeguarding Children Policy and Procedures and Health and Safety Policy.

In addition, the following rules apply:

- Ball assistants will be a minimum of 11 years of age and written parental consent to take part in the activity must be provided.
- All ball assistants will be subject of the conditions specified within the club's Photography and Digital Images Policy.
- Parents will be asked to provide details of any medical conditions, prior to that child's participation, so that an additional risk assessment can be carried out, where necessary, to ensure that child can safely participate.
- Ball assistants will be supervised by at least two members of PAFC staff. All supervising staff will be subject of Enhanced DBS checks and will have completed the PAFC Safeguarding Children Induction on-line training.
- Male and Female staff, wherever possible, will be used to supervise mixed gender groups.
- Separate gender appropriate changing areas will be made available if required.
- No photographs will be taken in the changing, showering or toilet areas.
- Staff should avoid any situation where they may be left alone with a ball assistant.
- All ball assistants will receive a Health and Safety Induction prior to carrying out their duties, this shall be notified to that child's parent/guardian.
- All ball assistants and their parent/guardian will be provided with the name and contact details of the Safeguarding Manager of the club.

Mascots Policy.

Plymouth Argyle Football Club is committed to ensuring that all children who carry out the role of Mascot, whilst in the care of the club, can do so in a safe and enjoyable environment through adherence to the club's Safeguarding Children Policy and Procedures and Safer Recruitment Policy and process.

The following guidance will be applied to all children visiting Plymouth Argyle Football Club as a Match Day mascot

- Child mascots must be aged minimum 6 years old to maximum 12 years old. (Documentary proof of age will be required).
- All staff escorting match day child mascots must be subject of an enhanced DBS check and must have completed the PAFC Safeguarding Children Induction training.
- There should be a maximum of 5 mascots for any game (this will include the away mascot). In cases of a special match where the number of mascots may exceed the recommended number then authorisation from a club Director to include additional mascots will be required.
- Child mascots must be accompanied by a parent/carer at all times, other than when in restricted areas e.g. the tunnel, when the mascot will be supervised by suitably qualified PAFC chaperones.
- Parents will be advised to bring their child to the Home Park already wearing their Mascot Football strip (worn under warm clothing if appropriate) thereby avoiding the need for the child to change into their strip whilst on club premises, as the club is unable to offer designated changing areas for Mascots.
- If a mascot requires help with dressing this will be done by the parent/carer.
- If a child with an illness, injury or disability is participating as a mascot an additional risk assessment will be carried out by the club Safeguarding Manager to establish if that child can safely participate in the Match Day Mascot itinerary and to identify what additional safety measures may need to be put in place to allow the child to safely

participate. The club Safety Officer will be notified of the risk assessment, who will then advise the Match Day paramedics of any relevant issues.

- Every effort should be made to achieve correct staffing ratios and the best level of supervision of Match Day Mascots at all times. An individual member of suitably DBS checked PAFC staff will be allocated as chaperone to each child with a disability, illness or injury, if they are assessed as requiring additional support.
- Male and Female chaperones, wherever possible, will be used to supervise mixed gender groups of Mascots.
- Staff should avoid any situation where they may be left alone with a mascot e.g. do not use a lift alone with a child mascot.
- Parents/carers will be informed of the club's Photography and Digital Images Policy in information sent to them prior to the game; together with the appropriate Mascot Itinerary and details of the club's Safeguarding Manager.
- Should a mascot be subject to a Court Order special reference must be made to the Image Permission form to ensure the child is able to participate.

Excursions and Events Policy.

Plymouth Argyle Football Club has an ongoing commitment to the safety and protection of children and vulnerable groups who participate in excursions and events organised by the club and recognise that all children and vulnerable groups, regardless of age, any disability they may have, gender, racial origin, religious belief or sexual identity have a right to be protected from harm, abuse and discrimination.

The club will endeavour to safeguard children and vulnerable groups participating in club activities by adhering to the PAFC Safeguarding Children and Adults at Risk Policies, the PAFC Transport Policy, the PAFC Health and Safety Policy, the PAFC Seasonal Operational Order and by the preparation of a Risk Assessment and Safeguarding Plan specific to the trip or event.

The event safeguarding plan will describe how this policy will operate in the context of the specific event and aims to:

- minimise the risk to participants and staff
- encourage the enjoyment of all involved
- maximise the opportunity for children and adults at risk to participate to the best of their ability.

Plymouth Argyle Football Club regards Safeguarding and promoting the welfare and well-being of our young players as of paramount importance. All staff share a responsibility to the players, regardless of the player's ethnic origin, colour, nationality, race, religion or belief, gender, sexual orientation, age or disability and shall recognise that Academy players may be particularly vulnerable when away from home.

Academy staff must therefore ensure detailed planning and careful supervision of players, including under 18s when playing in the first team, when young players are travelling on tours and tournaments, in accordance with the club's Safeguarding Children and Adults at Risk Policies, EFL Trips Tours and Residentials guidance and S.2.1 and the PAFC Trips, Tours and Tournaments guidance. (available on the PAFC website)

Written parental consent will always be required to enable a child under 18 years of age to participate in any trip, tour or tournament or to train or travel as a member of the PAFC First Team.

Under 18's travelling as part of the 1st Team

A First Team or Development Squad Match is not an activity designed for U18s, therefore DBS/CRCs are not required by all the adults involved, however the following additional safeguarding measures must be adhered to:

- Young players U18 are defined in law as a child and adults working with children need to not only protect those young players, but to also demonstrate standards of behaviour which do not leave the adults open to allegations against themselves.
- If the game involves away travel, players U18 should be in a hotel room alone and should not share with an adult over 18. An exception to this would be if two U18s are travelling with the team, in which case they may share a room.
- A safeguarding risk assessment/welfare check will be completed by the Head of Education & Welfare.
- Players and staff should not encourage young players U18 to engage in any inappropriate activities such as gambling; the use of alcohol or other inappropriate or illegal substances; or watching or engaging in any inappropriate adult behaviours.
- Players and all staff should recognise the vulnerability of young players U18 and the risks associated with encouraging young players to engage in inappropriate activities.
- A suitably DBS checked PAFC Chaperone will be appointed to any U18 player in the First team and contact details of the Chaperone will be provided to the player's parent/guardian.
- In the case of an overnight stay the Chaperone will provide the U18 player with instructions to follow in case of an emergency/fire/evacuation, and for checking the young player has no access to a mini-bar, inappropriate pay to view TV etc. in their hotel room.

Safeguarding Social Media Policy

Policy aim

Plymouth Argyle Football Club is committed to safeguarding and promoting the welfare of all children, young people and adults at risk, this includes social media and the online world where risks can have a significant impact.

The purpose of this policy is to set out the procedure that aims to:

- Reduce areas of risk for all children, young people and adults at risk (vulnerable adults).
- Ensure the club responds appropriately and consistently to safeguarding social media concerns.
- Provide good practice guidelines for the safe use of social media.
- Promote safe and responsible use of social media by staff and players.
- Give a clear message that unlawful or unsafe behaviour is unacceptable and that, where appropriate, disciplinary or legal action will be taken.

This policy should be read in conjunction with the Club's:

- Safeguarding Children Policy.
- Safeguarding Adults at Risk Policy.
- Communications Policy.
- Social Networking Guidelines (see Staff Handbook).
- Social Networking and Personal Internet Presence Policy.
- Internet Safety for Academy Players Social Media Guidance.

Scope of Policy

This Policy applies to all PAFC staff and players and all Social Media activities in which children and adults at risk, whilst in the care of Plymouth Argyle Football Club, participate.

The following guidance is provided not as an obstacle to communication but to ensure all staff manage their safeguarding responsibilities effectively. It aims to ensure children, young people, adults at risk and adults in a position of trust are not subjected to improper communications or improper allegations.

Good practice with social media

When working with children, young people and adults at risk you should always encourage them:

- To ensure privacy settings are set as high as possible. Many social networking sites such as Facebook regularly reverse the settings so they are set to basic privacy when updates are made to the site.
- Not disclose personal or confidential information, such as their home address or school.
- To have private profiles on Social Networking Sites, including Twitter, Instagram etc.
- Not to engage in sexting (when someone shares sexual, naked or semi-naked images of themselves or others, or sends sexually explicit messages using a mobile phone, computer or any digital device). Ensure they are aware that Apps like 'SnapChat' do not always destroy the image as other users have the ability to capture the images and store or share them.
- To report any images or communications that make them feel uncomfortable, or where they have been asked not to tell anyone about the image or communication, to a parent, member of PAFC staff or direct to the Club's Safeguarding Team.
- To report any bullying, harassment or images and content that cause offence.
- To behave in a safe and appropriate way online and not put themselves or others at risk.

Don't

Staff must not use personal equipment to take images or footage of vulnerable groups, unless authorised to do so and this will be specified in that person's job description.

Staff should never take or distribute images and/or footage of vulnerable groups, including players under 18 years, without their knowledge and having obtained

appropriate consent/parental consent and without fully complying with the guidance contained in the club's Photography and Digital Images Policy.

The above applies to uploading images or video footage to personal social media sites such as Facebook, LinkedIn, Twitter, Instagram etc.

Images or footage of vulnerable groups correctly obtained, in the course of an individual's role within the club, remain the property of PAFC and are not to be uploaded onto personal digital devices or onto personal social media sites without the express permission of the club.

Unless a child/young person is a direct relation, coaches, managers, tutors, medics and any club staff engaged in a supervisory role of children engaging in PAFC activities should not:

- Accept as a friend, players aged U18 on social networking sites they are members of or share their own personal social networking sites with children or young people involved in youth football.
- Contact children or young people known through football outside of the football context on social networking sites
- Use mobiles or internet or web-based communications to send personal messages of a non-football nature to a child or young person engaging in PAFC activities.
- Respond to communications from young people other than those directly related to club matters (Advise the club Safeguarding Manager of any non-club related communications you receive).
- Use language that is directly (or could be misinterpreted as being) racist, sexist, derogatory, threatening, abusive or sexualised in tone.

Communicating with Young Players

As a general principle, staff should avoid using social networking sites as a way of communicating with young players. However, if it is decided that the most effective way of communicating with Academy Players, for a specified event or activity, is via a social networking site or App then staff are to set up an appropriately named account that is explicitly for use by named players, parents and staff solely about PAFC football matters e.g. fixtures, cancellations and team selection. This decision must be approved by the Academy Manager or club Safeguarding Manager, as appropriate.

Staff should:

- Ensure all the privacy settings are locked so that that the page(s) are used explicitly for PAFC matters and are not used as a place to meet, share personal details, send pictures or jokes, or have private conversations.
- Nominate a club/Academy official to monitor the social networking page regularly and remove access for anyone behaving inappropriately.
- Ensure everyone within the group knows who is responsible for monitoring the content of the social networking areas and how to contact them.
- Ensure a minimum of two members of PAFC staff are included in the communications group.
- Gain written parent/guardian permission before access is given to U18s.
- Only use group texts or emails and always copy in the parent/guardian to all communications with young people.
- Explain to parents/guardians and players, the purpose of the communications group and the method for communication by either text, email or both with their child.
- Parents/guardians will be given the option of all communications going via themselves only, rather than their child being included in the communications group.
- Provide the Academy Manager and club Safeguarding Manager with details of all persons included in the communications group, including identifying who will be acting as monitor.
- Inform the club Safeguarding Manager if you have received or observed any inappropriate communications online, keeping a record of any inappropriate, threatening or offensive material as this may be needed as evidence.
- Make sure communications are only in relation to specific club related activities e.g. informing young people about changes in travel arrangements, training times or venue changes etc.

Online Risks

Most children and adults at risk use the internet positively, but sometimes behave in ways that may place themselves at risk.

Potential risks can include, but are not limited to:

- bullying by peers and people they consider 'friends.'
- posting personal information that can identify and locate a child or vulnerable adult offline.
- sexual grooming, luring, exploitation and abuse contact with strangers.
- exposure to inappropriate content.
- involvement in making or distributing illegal or inappropriate content.
- theft of personal information.
- exposure to information and interaction with others who encourage self-harm.
- exposure to racist or hate material.
- encouragement of violent behaviour, such as 'happy slapping.'
- glorifying activities such as drug taking or excessive drinking.
- physical harm to people in making video content, such as enacting and imitating stunts and other risk-taking activities, including running away from home because of contacts made online.

Areas of Risk:

1. Inappropriate Images, Language or Behaviour.

Children or adults at risk may come across images online which may be harmful and distressing. Children, young people or adults at risk may be sent such images, search for them or create images themselves thus making content, contact and conduct risks.

Research shows that seeing

inappropriate images has the most profound effect on children and young people and unfortunately such images are easily accessible.

Older people are vulnerable, especially those who are frail, unwell, confused and are subject to immobility and are unable to keep track of their affairs. Other adults at risk include those open to abuse because of learning difficulties, physical difficulties or mental illness.

To reduce the risk of vulnerable groups accessing inappropriate materials online, PAFC has robust filtering on its Wi-Fi and internet servers disabling access to such content. Within the Youth Academy setting, youth academy players, and their parents/guardians, receive safe social media training.

All Youth Academy players (and their parents/guardians) will promise to adhere to a Social Media Code of Conduct by signing PAFC's Internet Safety for Academy Players and Parents/carers declaration form. Sanctions may be taken by the club when this agreement is not adhered to.

All staff, including Players 18 years and over, will be subject of the club's Social Networking Guidelines (see Staff Handbook) which sets out the club's expectations regarding responsible use of social media by staff. Inappropriate use of social media by staff/players may lead to disciplinary action, including sanctions or dismissal.

2. Indecent Images of Children (under 18 years).

Making, showing, possessing and distributing any imagery of a child under 18 years which is "indecent" is illegal. (This includes imagery of yourself if you are under 18). The term "indecent" may include for example images of a naked or semi-naked young person, images focusing on their genitals or footage of sexual acts, such as masturbation or oral sex.

The relevant legislation is contained in the Protection of Children Act 1978, S. 160; as amended in the Sexual Offences Act 2003, and the Crime and Justice Act 1988, S. 1.1.a. Any suspected offences involving indecent images of children must be dealt with as a safeguarding concern and reported to the club Safeguarding Manager who will refer the circumstances to the police and/or Children's Services.

Any suspected offences involving a member of staff will be dealt with in accordance with the club's Safeguarding, Whistle-Blowing and Disciplinary Policies and Procedures.

It is important to note that no member of staff should automatically view suspected indecent images of a child as this in itself may constitute an offence. A verbal description from the person reporting the incident to you is enough to warrant action.

Staff should not copy or forward such images in any circumstances but should endeavour to preserve evidence by confiscating the images/device for further investigation by the police.

3. Youth Produced Sexual Imagery (YPSI) and ‘Sexting.’

Youth Produced Sexual Imagery (YPSI) can be defined as images or videos generated by children under the age of 18 that are of a sexual nature or considered “indecent.” These images may be shared between children, or with an adult, via a mobile phone, computer or other digital device.

Legislation dealing with indecent images of children was created to protect children from adults seeking to sexually abuse children or gain pleasure from the sexual abuse of a child. It was not intended to criminalise children. Despite this, however, young people under the age of 18 who share sexual imagery of themselves, or their peers, are breaking the law.

In response to this, a new crime outcome code, “Outcome 21” was introduced which gives the police some discretion when handling cases which involve sexual imagery taken or shared by young people, of young people where there are no exploitative or aggravating factors. The reasoning behind this, is that if the young person responsible for a minor YPSI offence wanted to work with children in the future, it will not show up on their DBS check.

If a young person has shared imagery consensually, such as when in a romantic relationship, or as a joke, and there is no intended malice, it is usually appropriate for the club Safeguarding Team to manage the incident directly. The basis for this decision will be documented by the club Safeguarding Manager. The young person(s) involved will be encouraged to delete the imagery to limit any further sharing.

In contrast, any incidents with aggravating factors, for example a young person sharing someone else’s imagery without consent and with malicious intent, or when the images have been shared with or requested by an adult, will generally be referred to police and/or children’s social care by the club Safeguarding Manager.

All incidents of youth produced sexual imagery (YPSI) will be dealt with as a safeguarding concern and reported to the club Safeguarding Manager using the PAFC Child Concern Report form.

Action by staff

- Establish, where possible, what the image contains (without looking), details of anyone else that might be involved, who may have seen the image and how further distribution may be prevented.
- The incident should be referred to the club Safeguarding Manager as soon as possible
- The club Safeguarding Manager should hold an initial review meeting, with the appropriate staff, to consider the initial evidence and aim to establish: risk, police and/or social care involvement, further information required to decide the best response, how widely the imagery has been shared, whether the images should be deleted or removed, relevant facts about the young person, the need to contact other settings/schools/colleges, whether and how parents should be involved.
- There should be subsequent interviews with the young people involved, if appropriate.
- Parents should be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm
- At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral may be made to children's social care and/or the police by the club Safeguarding Manager. The decision to refer will be automatic if the incident involves an adult, if there is reason to believe the young person has been coerced, blackmailed or groomed, if there are concerns regarding capacity to consent or if the sexual imagery includes acts of violence.

The primary concern in these cases will be the welfare and protection of the young people involved, however, the police will always be informed when there is reason to believe that indecent images involve sexual acts and any child in the imagery is under 13 years old.

Reporting incidents to the police

Once a report is made to the police, the report has to be recorded as a crime and the police will conduct an investigation. This may include seizure of devices and interviews with the young people involved.

If any devices need to be seized and passed onto the police then the device(s) should be confiscated. The device should be turned off and placed under lock and key until the police are able to come and retrieve it.

Sexting

Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, laptops - any device that allows you to share media and messages.

Research suggests one in four children and young people have sent a 'sext' and the impact of such images can be very damaging for the child and may lead to serious bullying and other emotional and physical impacts. The circulation of sexualised images of a child, including those taken and shared by themselves, can lead to a significantly increased risk of further sexual exploitation by online predators.

Sexting between adults, 18 years and over, is not unlawful. Some Adults at Risk however, due to additional vulnerabilities, may be more susceptible to being made to engage in sexting behaviour due to threats, blackmail, dependency or intimidation.

Any unwanted sexual communication may also amount to a criminal offence of harassment and/ or considered by the club as behaviour amounting to professional misconduct. Cases of this nature may be reported to the police and may also result in the club exercising sanctions or undertaking disciplinary action against players or staff.

Referrals to the League, FA or Local Authority may also be made by the club Safeguarding Manager in these instances, where appropriate.

4. Online Grooming and Sexual Exploitation

Potential indicators

The use of social networking services may increase the potential for sexual exploitation of children and young people.

Exploitation can include exposure to harmful content (including adult pornography and indecent images of children), and encouragement for children to post inappropriate content or images of themselves.

There have been many cases where adults have used social networking and user interactive services as a means of grooming children for sexual abuse.

Abusers use a range of techniques to contact and establish relationships with vulnerable groups.

The Home Office Task Force on Child Protection on the Internet identifies that online grooming techniques include:

- gathering personal details, such as age, name, address, mobile number, name of school and photographs
- promising meetings with sports idols or celebrities or offers of merchandise
- offering cheap tickets to sporting or music events
- offering material gifts including electronic games, music or software
- paying young people to appear naked and perform sexual acts
- bullying and intimidating behaviour, such as threatening to expose the child by contacting their parents to inform them of their child's communications or postings on a social networking site, and/or saying they know where the child lives, plays sport, or goes to school
- asking sexually themed questions, such as 'Do you have a boyfriend?' or 'Are you a virgin?'
- asking to meet children and young people offline
- sending sexually themed images to a child, depicting adult content or the abuse of other children
- masquerading as a minor or assuming a false identity on a social networking site to deceive a child
- using school or hobby sites (including sports) to gather information about a child's interests likes and dislikes. Most social networking sites set a child's web

page/profile to private by default to reduce the risk of personal information being shared in a public area of the site

Having contacted a child, abusers may subsequently use that child's contacts or social group to gain online access to other young people.

5. Cyberbullying

The use of electronic and digital media to scare, harass or intimidate another person.

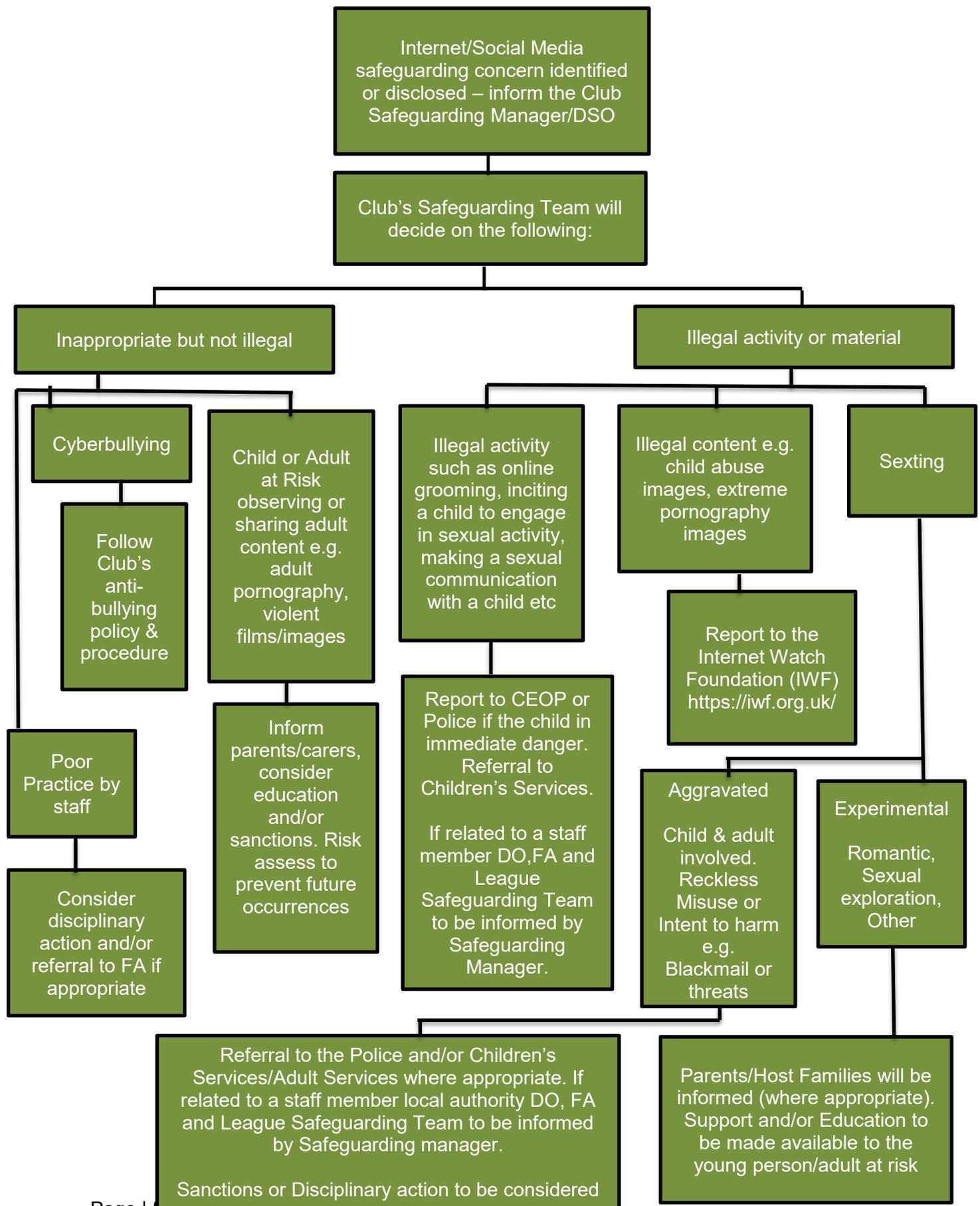
If cyberbullying does take place, records should be kept of the abuse such as texts, e-mails, website or instant messages and texts or e-mails should not be deleted. Staff are advised to take screen prints of messages or web pages and be careful to record the time, date and place of the site.

More information can be found in the club's Anti-Bullying Policy and Procedures.

All incidents of Cyberbullying of a child or Adult at Risk should be dealt with as a safeguarding concern and reported to the club Safeguarding Manager.

Staff should also be clear that any online activity they undertake that may be considered bullying of another person, whether child or adult, or any threatening statements, will be considered a disciplinary matter and may lead to criminal investigation and conviction and/or referral to the local authority Designated Officer, Social Services, League or FA where appropriate.

Action following Internet/Social Media Incident or Concern



Preventing Radicalisation and Extremism Policy

Protecting children from the risk of radicalisation is part of Plymouth Argyle Football Club's wider safeguarding duties and is similar in nature to protecting children from other forms of harm or abuse.

All Safeguarding Staff, Academy Coaching, Education and Medical staff will receive PREVENT and Channel general awareness training and additionally all Academy scholars will be informed about the dangers of radicalisation via the PAFC Life Skills plan.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help and protection. Plymouth Argyle Football Club staff should use their professional judgement in identifying children who may be at risk of radicalisation and report their concerns (using an PAFC Child Concern Report form) to the club Safeguarding Manager, who, if satisfied the concern is valid, will make a safeguarding referral to Children's Services and also share the concerns with the Police.

Referrals should clearly state that a "PREVENT REFERRAL" is being made and should be sent to:

<https://www.togetherforchildren.org.uk/what-we-do/concerned>

or Devon and Cornwall Police on 999 or 101

A multi-agency assessment meeting (MASH) will determine the appropriate response and level of support to the family. Consideration of referrals to the Channel programme may be appropriate in some cases. Response should be proportionate, with the emphasis on supporting vulnerable children and young people, unless there is evidence of more active involvement in extremist activities.

If there is an IMMEDIATE risk of a terror incident taking place you must call 999 or the Anti-Terrorist Hotline on 0800 789321

Safeguarding within Partnerships Policy

Plymouth Argyle Football Club recognises its responsibility to safeguard the welfare of all Children and Adults at Risk participating in club activities and when participating in activities arranged in partnership with an external service provider. The club is committed to working within partnerships to provide a safe environment for all Children and Adults at Risk by utilising Safeguarding Policies and Procedures to protect vulnerable groups from physical, sexual or emotional harm, neglect, bullying or exploitation.

The club commitment to safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to Children or Adults at Risk of Harm.

Partnership agreements will include the following:

- All partners will be fully aware of their areas of safeguarding responsibilities.
- It will be determined which organisation's Safeguarding Policy and Procedures will be followed in the event of a concern arising.
- An agreement confirming safe recruitment procedures have been followed.
- If appropriate level DBS checks and self-declarations have been undertaken.
- Agreement on the level of supervision to be provided by the partner during the activity.
- If the provider has valid public liability insurance.
- What safeguarding training has been undertaken by the deliverers?
- Who is responsible for the induction of staff and volunteers? Health & Safety, Codes of Conduct etc.
- Who has responsibility for completion of consent forms (e.g. medical and image consent), registration, record keeping and risk assessments.
- Details of First Aid arrangements

- Clear guidance on the reporting of Safeguarding concerns or concerns regarding Poor Practice during and outside of normal office hours.
- Name and contact details of staff to whom Safeguarding concerns, or concerns regarding poor practice, should be reported.
- Whether participants and their parents/carers have been provided with details of how to report a Safeguarding concern.
- Guidance about informing partner organisations.
- Arrangements to support whistle-blowers.
- What evaluation procedures are in place to gain the vulnerable groups' views about the activity.
- The period by which the safeguarding arrangements in the agreement will be reviewed

Useful Contact Details

Plymouth local authority Designated Officer: Simon White 01752 307144

Simon.white@plymouth.gcsx.gov.uk

Alexandra Richards EFL Child Protection Advisor 07792284740

arichards@efl.com

Devon and Cornwall Football Association DSO Matt Hodgson 01626 325913

Devon and Cornwall Police Tel: 101 or 999 in an Emergency

Child Line: 0800 1111 Confidential telephone advice for children.

Child Protection in Sport Unit: 0116 2347278/7280 A central point for sport organisations in relation to child protection in sport.

NSPCC Helpline: 0808 800 5000

NSPCC British Sign Language Helpline: ISDN videophone:0208 4631148

Stonewall: 08000 502020 for support and information about lesbian, gay, bisexual and transgender issues and homophobia.

CEOP (Child Exploitation and Online Protection):Go to their website to report concerns about online abuse or grooming <http://www.ceop.uk/>

PAFC Chaplain Arthur Goode arthur@arthurgoode.uk

(The PFA (Professional Footballer's Association) Independent Youth Advisory Service- available to all Academy Players, Trialists and their parents.

youthadvisory@thepfa.co.uk

www.thefa.com/Goal

FA Whistle Blowing Process

Anyone with concerns about a colleague working/volunteering in youth football can use the FA's whistle-blowing process by calling 0800 169 1863 and asking for TheFA's safeguarding team, or via email on safeguarding@TheFA.com.

Government Guidance (Keeping Children Safe in Education Guidance)

Broad government guidance on additional safeguarding issues listed below, can be accessed via the GOV.UK website:

<https://www.gov.uk/government/publications/keeping-children-safe-in-education—2>

- bullying including cyberbullying
- children missing education
- child missing from home or care, missing children and adults
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking
- forced marriage

Allegation or Incident of Child Abuse

Stay Calm – Reassure – Take Seriously – No Promises – Few Questions – Follow Guide

Is the Child in need of Urgent Medical Treatment? Or in Immediate Risk of Harm?

NO

YES

Is a Safeguarding Officer available?

Contact Emergency Services;
Ambulance Service or Police and
inform them of the Safeguarding issue.

YES

NO

Report to Safeguarding Manager or
DSO at earliest opportunity.

Is the matter serious enough to potentially be a
Criminal Offence?

NO

YES/UNSURE

Does the allegation or incident
involve the Child's Parent or Carer?

Does the allegation or incident
involve the Child's Parent or Carer?

NO

YES

NO

YES

Inform Parent/Carer at
earliest opportunity.

Inform Parent/Carer at
earliest opportunity.

Inform Safeguarding Manager/DSO who will
undertake an Assessment of Circumstances.
Referral to Children's Services to be
considered.

Internal Strategy Meeting convened and
Investigation initiated.

Action plan to be determined, including
when to inform parents.

Inform Safeguarding Manager/DSO immediately.

Parent/Carer to be informed after consultation
with Children's Services/Police.

Allegation/incident to be reported to Children's
Services at earliest opportunity.

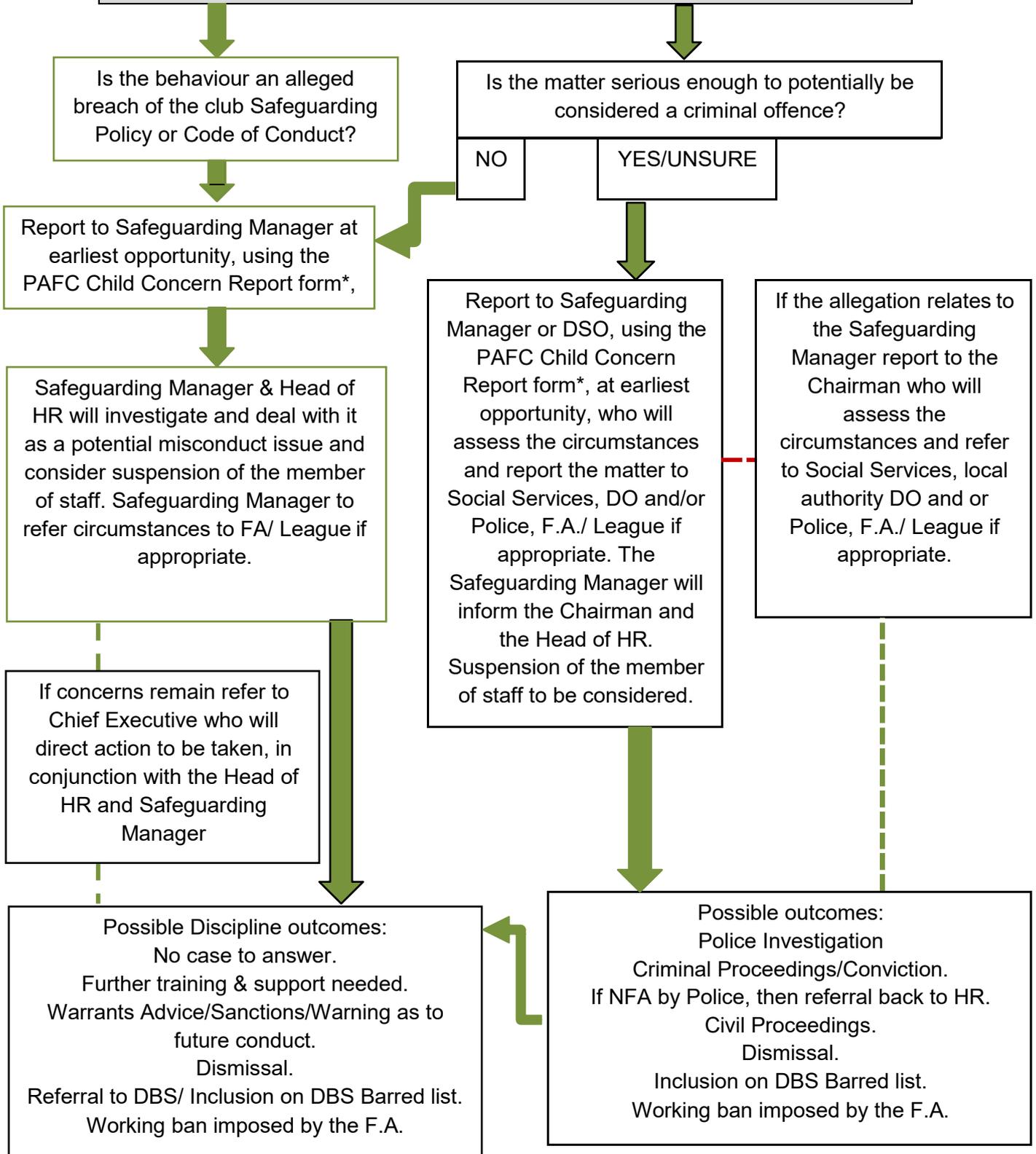
Referral by Safeguarding Manager/DSO to Police,
local authority DO, League/FA, if appropriate.

The person receiving/reporting the allegation or incident must submit a PAFC Child Concern Report
form* to the Safeguarding Manager at the earliest opportunity.

*PAFC Child Concern Report form is available on the PAFC website.

Allegation of Child Abuse or Poor Practice by a Member of PAFC Staff

Stay Calm – Reassure – Take Seriously – No Promises – Few Questions – Follow Guide



*PAFC Child Concern Report form is available on the PAFC website.

Making a Referral to the League / F.A.

On making any referral of an allegation of or incident of suspected abuse of or unsuitable behaviour towards a Child or Adult at Risk to any external agency (including the police, the local authority or the DBS), the Head of Safeguarding shall notify the club Safeguarding Lead in writing and ensure that the Safeguarding Lead is kept fully apprised of the progress of the referral and any subsequent investigation or action.

The club will notify the League and the F.A. of the referral or incident (through the submission of the Affiliated Football Safeguarding Referral Form) and provide them with appropriate updates in respect of:

- Any evidence obtained by the club demonstrating the abuse of, or unsuitable behaviour towards, a Child or Adult at Risk (whether the evidence relates to conduct by a member of Staff in the performance of their duties as a member of Staff, or otherwise);
- A third (or subsequent) incident or allegation of 'poor practice' (as defined in Affiliated Football's Safeguarding Procedures) in relation to a Child or Adult at Risk involving the same member of Staff;
- Any referral of an allegation or incident of suspected abuse or of unsuitable behaviour towards a Child or Adult at Risk the club has made to any external agency.
- Any investigation by an external agency into suspected abuse of or 'unsuitable behaviour' towards a Child or Adult at Risk involved in an Activity of which the club becomes aware.

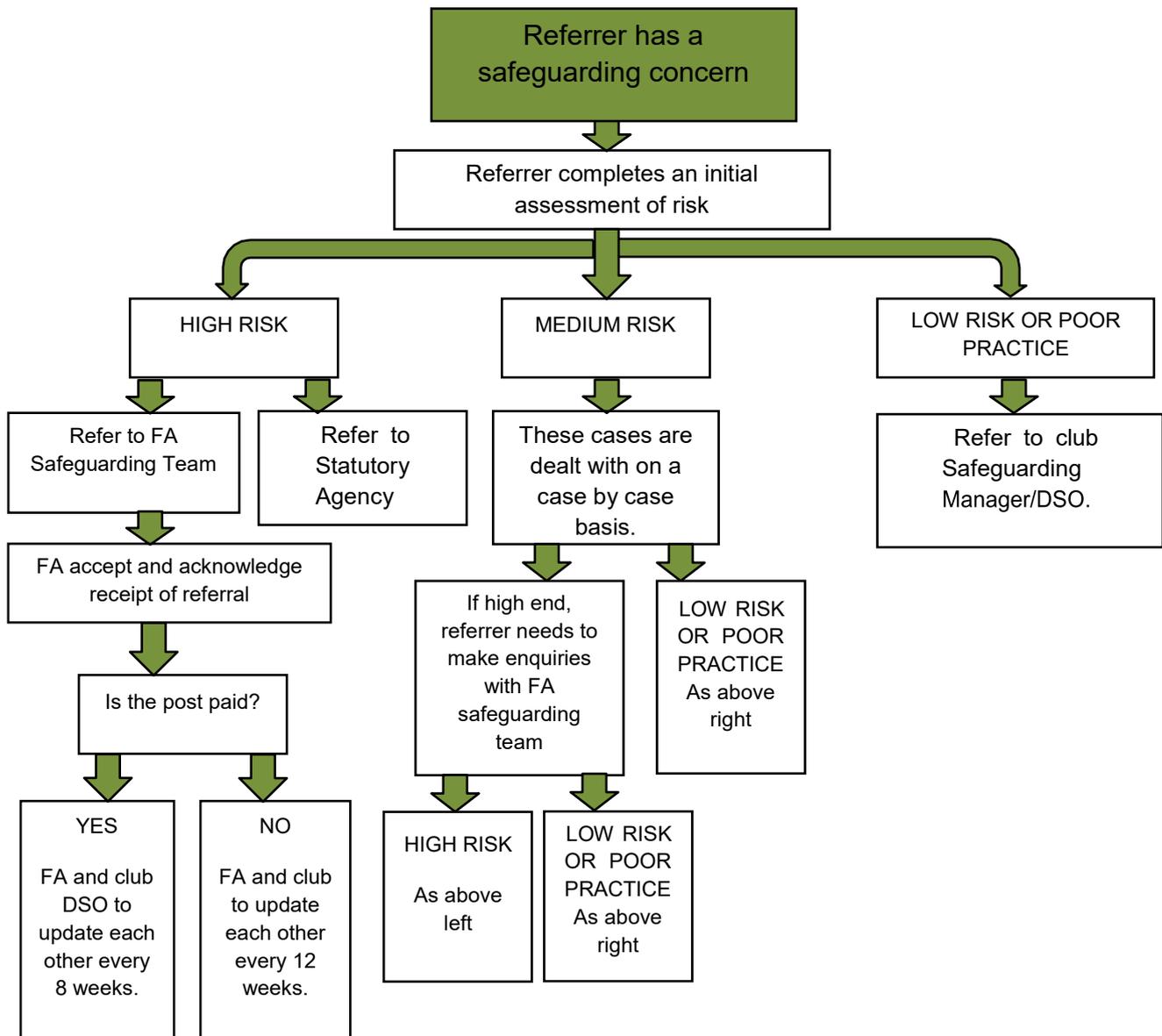
A referral is made by completing an 'Affiliated Football Referral Form' and sent to The FA Safeguarding Team or County FA (depending on level of risk assessed) within 24 hours. Referrals can be made over the phone but a written referral needs to be sent within 24 hours. The FA's Safeguarding Team can be contacted on 0800 169 1863 and ask for the Safeguarding Team Case Manager or email safeguarding@thefa.com

Local Authority Designated Officer 01752 307144

NSPCC 24-hour Helpline can be contacted for advice on 0808 800 5000

Deaf users text phone 0800 056 0566

FA Referral process



Suspensions by the FA

When the FA suspends an individual the FA Safeguarding Team will notify the

Safeguarding Manager of the suspension. This notification will be via a copy of the suspension letter sent to the individual.

For further details of The FA process of investigation and decision making (including the appeals process) please refer to The FA's Safeguarding Rules and Regulations available on

www.theFA.com.

The following legislation and national and local guidance has been used to inform this policy:

Working Together to Safeguard Children 2018.

Protection Act 1998.

Sexual Offences Act 2003.

S. 67 Serious Crime Act 2015

Protection of Children Act 1978

S.160 Criminal Justice Act 1988 Safeguarding

Vulnerable Groups Act 2006 The Human

Rights Act 1998.

UN Convention on the Rights of the Child (UNCRC)

Achieving Best Evidence 2011.

Premier League Guidance for Safer Working Practice.

EFL Youth Development Rules / EFL Safeguarding Children & Young People Guidance 2017.

FA Grassroots Football Safeguarding Children 2016. FA

Safeguarding Rules and Regulations.

The F.A. RESPECT Campaign.

NSPCC Child Protection in Sport Unit guidance.

Keeping Children Safe in Education (Statutory guidance for schools and colleges) July 2015

UK Council for Child Internet Safety (UKCCIS)

GDPR (General Data Protection Regulation)

POLICY UPDATE

This policy will be reviewed annually, or in light of any changes in legislation or guidance, or following any learning outcomes from safeguarding incidents, concerns or allegations.

Author	Nikki Francis	Owner	PAFC
Document Title	Safeguarding Children Policy	Version Number	1.0
Approved by	Board	Approved Date	
Review frequency	Annually	Reviewed Date	First Issue
Circulation	Print, Intranet	Sensitivity	Public

Version History

Version	Amendment	By	Date
1.0	First issue	Nikki Francis	April 2019