

# The County Community Trust

## Safeguarding Children & Vulnerable Adults Policy & Procedures

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## **Section 1 Policy Statement**

### **1.1 Introduction to The County Community Trust**

The County Community Trust is a registered charity and company limited by guarantee.

The Board of Trustees of The County Community Trust are fully committed to the safeguarding and welfare of children, young people, adults at risk and all vulnerable groups, and through our respective core values and everyday actions expect all staff, players and volunteers to share this commitment.

Our overall aim is one of prevention and early intervention. We have in place provisions for children and young people, young players and adults at risk through our Policies and Procedures, including a robust recruitment process, ensuring that:

- Safeguarding and promoting the welfare and wellbeing of vulnerable groups are of paramount importance.
- All children and adults at risk, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse, exploitation and poor practice.
- Staff have a responsibility to act on a suspicion or disclosure that may suggest an adult at risk, or a child is at risk of harm. Any concerns will be reported to the Safeguarding Manager and/or Designated Safeguarding Officers.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- The County Community Trust has a responsibility to fully support anyone who in good faith reports their concerns that a child or adult is at risk of, or may be at risk of, being abused or mistreated.

This policy is mandatory for all Foundation Trustees, Staff and Volunteers, whether full or part time on either a permanent or casual basis and from this point onwards will all be referred to as 'Trustees, Staff and Volunteers.

The County Community Trust Board of Trustees approved this policy as dated and it will be reviewed.

- annually
- following changes to relevant legislation
- following significant changes to Foundation management, or
- following a significant incident.

### **1.2 Responsibilities**

The County Community Trust will accept the moral and legal responsibility to implement procedures to provide a duty of care for all young people and vulnerable adults, safeguard their well-being and protect them from abuse irrespective of age, culture, disability, gender, language, racial origin, religious belief and sexual identity. The County Community Trust will:

- Respect and promote the rights, wishes and feelings of young people and vulnerable adults.
- Recruit, train and supervise its trustees, staff and volunteers to adopt best practice to safeguard and protect young people from abuse and themselves against false allegations.
- Respond to any allegations appropriately and implement the appropriate disciplinary and appeals procedures.

### **1.3 Principles**

The procedures within this policy are guided by the following principles:

- The welfare of young people (the Children's Act 1989 defines a young person as under 18 years of age) and vulnerable adults as the primary concern.
- All young people, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse.
- It is the responsibility of the child protection experts to determine whether abuse has taken place, but it is everyone's responsibility to report any concerns.

- All incidents of suspicious or poor practice and allegations should be taken seriously and responded to swiftly and appropriately.
- Confidentiality should be upheld in line with the Data Protection Act 1984 and the Human Rights Act 2000.

The Children's Act 2004 (which built upon the Children's Act 1989) states that anyone who is involved in the care of young people should "do what is reasonable, in the circumstances, for the purpose of safeguarding or promoting the child's welfare". This legal obligation is underpinned by the HM Government guidance 'Working Together to Safeguard Children (2010) which sets out how organisations and individuals should work together.

We want to establish a culture within The County Community Trust whereby we listen to all participants and groups regardless of vulnerability to ensure that we create the positive environment they want and need. In the creation of this culture, we aim to ensure that all participants feel comfortable and that any issues can be disclosed and also, we address any concerns immediately and effectively.

#### **1.4 Definition of Terms and Abbreviations**

The term '**parents**' is used throughout this document as a generic term to represent parents, carers and guardians.

The term '**child, children, young people or young person**' will be used throughout this document to mean children under 18 years of age.

The term '**vulnerable adult**' is a person aged 18 years or over who is or may be in need of community care services by reason of: mental or other disability; age; illness; who is or maybe unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.

Throughout this document the term '**Trustees, Staff and Volunteers**' refers to all paid staff, trustees and volunteers of The County Community Trust, whether full or part time on either a permanent or casual basis who work with or have contact with young people as part of their role.

**The County Community Trust DSO** – The County Community Trust Designated Safeguarding Officer (see appendix for full job description)

### **Section 2 Responsibility, Recruitment, Employment and Deployment of Trustees, Staff and Volunteers and External Organisations and the Supply Chain**

Within the County Community Trust, all trustees, staff members and volunteers have responsibility for ensuring that children, young people and vulnerable adults are always kept safe. However, within the organisation there are dedicated roles that ensure the requirements are met and adhered to. Within the current organisation structure Foundation has the following identified roles:

- Board of Trustees
  - 1 x Trustee with Safeguarding Children and Vulnerable Adults responsibility
- Staff
  - Designated Safeguarding Officer – General Manager

All staff members are to be made aware through induction of the structure and who has the above responsibilities. See Appendix C for contact details.

Furthermore, The County Community Trust works closely with Stockport County Football Club and the Senior Safeguarding Manager and DSOs within the club. The structure within the club is as follows:

- Senior Safeguarding Manager
- DSO – Academy
- DSO – Match Day Operations

To provide an effective functioning and proactive environment The County Community Trust DSO is part of the Stockport County Football Club Safeguarding Committee. The County Community Trust DSO must attend the regular meetings and ensure that Foundations are fully represented.

## **2.1 Introduction**

All reasonable steps will be taken to ensure that only suitable people are recruited to work with young people. The procedures outlined in this policy document are mandatory and will be adopted by The County Community Trust and all Trustees, Staff and Volunteers who work for or on behalf of The County Community Trust. This includes the procedures to engaging with external organisations and those involved in the supply chain.

## **2.2 Pre-recruitment Procedures**

The following pre-recruitment procedures must always be followed:

### **Advertising**

If any form of advertising is used to recruit Trustees, Staff and Volunteers, it should reflect the:

- Aims of The County Community Trust and where appropriate, the programme involved.
- Responsibilities of the role.
- Level of disclosure the post will undertake (If required).
- Level of experience or qualifications required (e.g., experience of working with children is an advantage).
- The County Community Trust 's open and positive stance on child protection.

### **Pre-Application Information**

When an application process is used, pre-application information will be sent to interested or potential applicants and will contain:

- A job description including roles and responsibilities.
- A person specification (e.g., stating qualifications or experience required).
- An application forms.
- A self-disclosure forms.

### **Application Forms**

All applicants, whether for paid, voluntary, full-time or part-time positions must complete a Hatters Project application form, for staff or volunteers. These forms will elicit the following information:

- Name, address and National Insurance Number (to confirm identity and right to work).
- Relevant experience, qualifications and training undertaken.
- Any criminal record.
- Whether the applicants are known to any social services department as being an actual or potential risk to young people, a self-disclosure question to establish whether they have ever had action taken against them in relation to child abuse, sexual offences or violence.
- The names of at least two people (not relatives) willing to provide written references that comment on the applicant's previous experience of, and suitability for, working with young people (previous employer).
- Any former involvement or working with children.
- The applicant's consent to a Criminal Record Bureau check being undertaken.
- The applicant's consent to abide by the Organisation's Child Protection Policy and the Code of Ethics and Conduct appropriate to the position sought (e.g., coach, official etc).

The form will also state that failure to disclose relevant information or any subsequent failure to conform to the Code of Ethics and Conduct (Appendix F) will result in disciplinary action and possible dismissal from The County Community Trust.

## **2.3 Checks and References**

For all Trustees, Staff and Volunteers aged 16 and over (at the time of commencement of work for The County Community Trust) a minimum of two written references must be taken up and if possible, at least one should be associated with former work with young people. Written references should always be followed up and confirmed by telephone. If an applicant has no experience of working with young people, appropriate training will be provided by The County Community Trust.

All Trustees, Staff and Volunteers aged 16 and over (at the time of commencement of work for The County Community Trust) may be subject to an enhanced DBS check based on job description. A decision will be made in each instance, based on the circumstances, as to whether an individual may start to work for The County Community Trust whilst the checking process is ongoing.

When it becomes known that a potential Trustee, Staff or Volunteer has a criminal record, The County Community Trust procedure for 'Recruitment and Retention of Staff and Volunteers with Criminal Records' shall be followed (see appendix J).

Volunteers under the age of 16 (at the time of commencement of work for The County Community Trust), will not be required to undergo a DBS check or have reference taken, but MUST always be supervised by a member of staff/volunteer over the age of 16, who has been DBS checked and MUST NOT be left in sole charge of children at any time.

If a member of staff/volunteer becomes 16 years old whilst working for The County Community Trust, a DBS check should be undertaken, and references should then be sought. The member of staff/volunteer may then work with children without constant supervision of a member of staff/volunteer over the age of 16.

## **2.4 Interview and Induction**

All staff, trustees and volunteers must take part in a face-to-face interview. The interview will be carried out according to acceptable protocol and recommendations including provision for interviewing via video conferencing.

Each member of staff/volunteer will undergo an induction process with The County Community Trust, in which:

- Relevant qualifications will be substantiated (e.g., as a coach or official) by providing original copies.
- Provide original identification through photographic identification (passport or driving licence) or birth certificate.
- They complete a competency profile to identify training needs and aspirations.
- They sign up to the organisation's Code of Ethics and Conduct (Appendix F).
- The expectations, roles and responsibilities of the job are clarified (e.g., through a formal or informal work programme or goal-setting exercise).
- They sign up to the organisations child protection policy and procedures, which will be explained fully.

## **2.5 Training**

Checks are only part of the process to protect children from possible abuse. Appropriate training will enable individuals to understand their responsibilities with regard to their own good practice and the reporting of suspected poor practice/concerns of possible abuse.

The County Community Trust will undertake to train all Trustees, Staff and Volunteers working with young people, in the following areas as a priority within the first 6 months of employment:

- Child protection awareness (e.g., The FA' Safeguarding Children' workshop).
- First aid (e.g., The FA Emergency First Aid, St John or St Andrew's Ambulance First Aid qualifications).

And the following areas within the first year of employment:

- Disability (e.g., FA 'Coaching Disabled Footballers' workshop).
- Equity (e.g., FA 'Equity in your Coaching' workshop).

## **2.6 Monitoring and Appraisal**

At regular intervals or following a planned programme, all Trustees, Staff and Volunteers will be given the opportunity to receive feedback e.g., through an appraisal, to identify training needs and set agreed goals. Managers should be sensitive to any concerns about poor practice or abuse and act on them at an early stage. They should also offer appropriate support to those who report concerns/complaints.

## **2.7 Procedures for external organisations and the supply chain**

Here at The County Community Trust, we engage with a variety of different organisations who are involved with The County Community Trust at a variety of levels. Within projects it is necessary to work with those organisations to increase the chance of success and deliver high quality activities. However, as with our own standards and expectations of staff, we must ensure external organisations hold the same expectations and have the correct procedures when it comes to Safeguarding.

Delivery partners will follow their own safeguarding procedures and be aware of the safeguarding procedure of their partner organisation. However, all partners to have (so far as relevant) implemented safeguarding measures equivalent to our own. All delivery partners are subject to a Service Level Agreement when working with The County Community Trust that refers to safeguarding responsibilities and the procedures.

Where safeguarding concerns are raised, the appointed designated safeguarding officer of the relevant organisation will inform the designated safeguarding officer at the partner organisation of developments.

The partner organisation will review each other's safeguarding policies and procedures and should be satisfied that they are fit for purpose.

## **2.8 Complaints Procedures**

The County Community Trust complaints and appeals procedures must be used to deal with any formal complaints and/or appeals. It is the responsibility of The County Community Trust to ensure that parents and young people are aware of the existence of these procedures.

The County Community Trust is committed to providing a safe and stimulating environment ensuring a consistent and accessible service that meets the needs of those attending.

We welcome suggestions on how to improve our service and we will give prompt and serious attention to any concerns about the running of our projects.

It is the hope of The County Community Trust that all issues will reach a satisfactory conclusion for all concerned. To help us to achieve that outcome the following procedure will be followed:

Each stage of the procedure will be fully recorded and signed.

### **Stage 1**

Any parents /carers who are uneasy about an aspect of the provision talks over, first of all their worries and anxieties with the:

- (a) The County Community Trust Coach/Activity Leader (if not available or is regarding the Coach / Leader then speak with the project manager).
- (b) The County Community Trust Manager (if not available or is regarding the Project Manager please speak to The County Community Trust DSO).

Any parents/carers who require a written response to their concerns should request one at this stage.

It is hoped that most complaints should be resolved informally at this stage.

### **Stage 2**

If this does not have a satisfactory outcome, or if the problem recurs, the parent/carer moves on by making a formal complaint in writing (including email) to The County Community Trust Head of Community who will investigate the complaint. The complainant can expect a written reply in acknowledgement of receipt of the complaint, as well as some indication of how and when the complaint will be addressed within 5 working days.

### **Stage 3**

When a formal complaint has been fully investigated, The County Community Trust Head of Community should ensure that the person who made the complaint is informed, in writing, of the outcome within 28 days.

### **Stage 4**

If the person who made the complaint is not satisfied with the outcome of the complaint, they should contact The County Community Trust Board of Trustees.

All complaints will be kept on record for three years including the outcome of the investigation and the action that was taken in response.

The complaints procedure and above details will be displayed prominently at The County Community Trust.

If a child/vulnerable adult appears to be at risk The County Community Trust will follow the procedure of The County Community Trust Safeguarding Children's Policy. In these cases, The County Community Trust Head of Community and The County Community Trust DSO will investigate the complaint and follow the appropriate action.

Any complaints regarding The County Community Trust and/or the staff/volunteers and/or participants involved in our projects will be recorded in detail and kept on record in the Complaints Log.

The County Community Trust Head of Community is responsible for managing complaints.

## **Section 3 Promoting Good Practice with Young People**

### **3.1 Introduction**

Child abuse, particularly sexual abuse, can arouse 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 sporting environment. Some individuals will actively seek employment or voluntary work with young people in order to harm them. A coach, instructor, teacher, official or volunteer may have regular contact with young people and be an important link in identifying cases where a young person needs protection. All cases of poor practice should be reported to The County Community Trust DSO as detailed in this policy (Section 5 and Appendices A and B).

### **3.2 Good Practice Guidelines**

All Trustees, Staff and Volunteers are expected to demonstrate exemplary behaviour to promote the interests of young people and reduce the likelihood of allegations being made. The County Community Trust expects a high standard of behaviour from all staff, participants and spectators; this is set out in the codes of conduct (Appendix F). The following are common sense examples of how staff can create a positive culture and climate within sport:

#### **Good practice means:**

- Always working in an open environment (e.g., avoiding private or unobserved situations and encouraging an open environment (e.g., no secrets).
- Treating all young people equally, and with respect and dignity.
- Always putting the welfare of each young person first, before winning or achieving goals.
- Maintaining a safe and appropriate distance with participants (e.g., it is not appropriate to have an intimate relationship with a young person or to share a room with them).
- Building balanced relationships based on mutual trust which empowers young people to share in the decision-making process.
- Playing sports fun, enjoyable and promoting fair play.

- When delivering activities ratios for coach: participant should meet either National Governing Body or other organisations suggested ratios. At no point should a group exceed a ratio of 1:30.
- Ensuring that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the NGB. Care is needed, as it is difficult to maintain hand positions when a young person is constantly moving. Young people and carers should always be consulted, and their agreement gained.
- Keeping up to date with the technical skills, qualifications and insurance in sport.
- Involving parents/carers wherever possible (e.g., for the responsibility of their young person in the changing rooms). If groups have to be supervised in the changing rooms, always ensure parents/teachers/coaches/officials work in pairs.
- Ensuring that if mixed teams are taken away, a male and female member of staff should always accompany them. (NB However, same gender abuse can also occur).
- Ensuring that at tournaments or residential, adults should not enter young people's rooms or invite young people into their rooms.
- Being an excellent role model – this includes not smoking or drinking alcohol in the company of young people.
- Giving enthusiastic and constructive feedback rather than negative criticism.
- Recognising the developmental needs and capacity of young people – avoiding excessive training or competition and not pushing them against their will.
- Securing parental consent in writing to acting 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 that occurs and details of any treatment given.

#### **Practice never to be sanctioned.**

The following should never be sanctioned. You should never:

- As a member of The County Community Trust staff/volunteer, transport children in your own car.
- Spend excessive amounts of time alone with children away from others.
- Engage in rough, physical or sexually provocative games, including horseplay.
- Share a room with a young person.
- Allow or engage in any form of inappropriate touching.
- Allow children to use inappropriate language unchallenged.
- Make sexually suggestive comments to a young person, even in fun.
- Reduce a young person to tears as a form of control.
- Allow allegations made by a child to go unchallenged, unrecorded, or not acted upon.
- Do things of a personal nature for young people that they can do for themselves.
- Invite or allow young people to visit or stay with you at your home unsupervised.

**NB** It may sometimes be necessary for Trustees, Staff and Volunteers to help with tasks of a personal nature for young people, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and written consent of parents and the participants involved. There is a need to be responsive to a person's reactions. 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 there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

If any of the following incidents should occur, you should report them immediately to another colleague; make a written record of the event and pass this on to The County Community Trust DSO, for information.

Parents should also be informed of the incident:

- If you accidentally hurt a child.
- If a child seems distressed in any manner.
- If a child appears to be sexually aroused by your actions.
- If a child misunderstands or misinterprets something you have done.



### **3.3 Relationships of Trust**

*“The inequality at the heart of a relationship of trust should be ended before any sexual relationship begins.” Caring for Young People and the Vulnerable? Guidance for preventing abuse of trust (Home Office 1999).*

This statement recognises that genuine relationships do occur between the different levels of volunteers and participants in a group but that no intimate relationship should begin whilst the member of staff or volunteer is in a ‘position of trust’ over them. The power and influence that an older member of staff/volunteer has over someone attending a group, activity or event cannot be underestimated. If there is an additional competitive aspect to the activity and the older person is responsible for the young person’s success or failure to some extent, then the dependency of the younger member upon the older will be increased. It is therefore vital for all personnel to recognise the responsibility they must exercise in ensuring that they do not abuse their positions of trust. Young people aged 16-18 can legally consent to some types of sexual activity; however, in some provisions of legislation they are classified as children. In certain circumstances the ‘abuse of trust’ is a Criminal Offence (Sexual Offences Act 2003 UK wide).

### **3.4 Code of Ethics and Conduct**

All Trustees, Staff and Volunteers are required to sign up to The County Community Trust Code of Ethics and Conduct (Appendix F). The Code encourages:

- The development of an open and positive climate in sport.
- Poor practice to be identified.
- Investigations to be carried out.
- Disciplinary action to be taken if appropriate.

### **3.5 Participant and Parent Code of Conduct**

All participants and parents are required to sign The County Community Trust Code of Conduct (Appendix F) which encourages:

- Respect
- Listening to others
- Playing fairly
- Positive behaviour
- Provide outcomes to breaking the code of conduct.

### **3.6 Participant Consents**

To take part in The County Community Trust activities all participants must complete a participation form either electronically or paper based. For all participants under the age of 18, parental or carer consent must be provided. These permissions cover:

- Participation in the activity
- First Aid treatment
- Photographic and Filming
- Data Sharing following GDPR.

### **3.7 Guidelines for Use of Photographic Filming Equipment at Sporting Events**

There is evidence that some people have used sporting events as an opportunity to take inappropriate photographs or film footage of young people in vulnerable positions. The County Community Trust will adhere to the appropriate guidelines detailed in Appendix G.

## **Section 4 Recognition of Poor Practice, Abuse and Bullying**

### **4.1 Introduction**

Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. The County Community Trust Trustees, Staff and Volunteers are not experts at such

recognition. However, they do have a responsibility to act if they have any concerns about the behaviour of someone (an adult or another child) towards a young person or vulnerable adult. The County Community Trust expects Trustees, Staff and Volunteers to discuss any concern they may have about the welfare of a young person or vulnerable adult immediately with The County Community Trust DSO as detailed in Appendices A and B.

It is the policy of The County Community Trust to provide a duty of care for children and vulnerable adults, safeguard their well-being and protect them from abuse. It is therefore essential that all members of Trustees, Staff and Volunteers are aware of the contents of this policy to equip them with a basic understanding of the main forms of abuse, and to enable them to implement the procedures contained within this policy.

#### **4.2 Poor Practice**

Poor practice includes any behaviour that contravenes The County Community Trust Code of Ethics and Conduct (Appendix F), which is constituted around the following:

- Rights – for example of the player, the parent, the coach, the official etc.
- Responsibilities – for example responsibility for the welfare of the players, the sport, the profession of coaching, their own development.
- Respect – for example of other players, officials and their decisions, coaches, the rules.

#### **4.3 Abuse and Bullying**

Abuse can happen wherever there are young people, and young people and vulnerable adults of any age can be abused. The effects of abuse can be so damaging and if untreated, they may follow a person into adulthood. For example, a person who has been abused as a child may find it difficult or impossible to maintain stable, trusting relationships, become involved with drugs or prostitution, attempt suicide or even abuse a child in the future.

There have been a number of studies<sup>1</sup>, which suggest children (or adults) with disabilities are at increased risk of abuse. Various factors contribute to this, such as stereotyping, prejudice, discrimination, isolation and a powerlessness to protect themselves, or adequately communicate that abuse has occurred.<sup>2</sup>

Children from black and minority ethnic groups (and their parents) are likely to have experienced harassment, racial discrimination and institutional racism. Although racism causes significant harm it is not, in itself, a category of abuse. All organisations working with children, including those operating where black and minority ethnic communities are numerically small, should address institutional racism, defined in the Macpherson Inquiry Report on Stephen Lawrence as ‘the collective failure by an organisation to provide appropriate and professional service to people on account of their race, culture and/or religion’.

#### **The Main Forms of Abuse**

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and is an abuse of power or breach of trust. Abuse can happen to a young person regardless of their age, gender, race or ability.

There are four main types of abuse: physical abuse, emotional abuse, sexual abuse and neglect. Abuse of disabled children and vulnerable adults, and instances of bullying also fall within the wider definition of abuse. Moreover, modern forms of abuse have been identified as Female Genital Mutilation (FGM), Radicalisation (Prevent), Human Trafficking, Hate Crime, Child Sexual Exploitation, Child Trafficking, Grooming and Peer on Peer.

Somebody may abuse or neglect a young person by inflicting harm, or by failing to act to prevent harm. Young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger.

Appendix H contains definitions and examples of each of these main’s forms of abuse, plus additional information on the abuse of disabled young people, and bullying.

Appendix I contains guidance on recognising signs of abuse. It is not the responsibility of The County Community Trust Trustees, Staff and Volunteers to decide whether abuse is or has taken place, it is their responsibility to identify poor

practice and possible abuse and act where they have concerns about the welfare of a young person by referring this to the Foundation DSO (as detailed in appendices A and B).

<sup>1</sup> Westcott, H (1993) **The Abuse of Children and Adults with Disabilities**. London, NSPCC

<sup>2</sup> Kerr, A (1999) **Protecting Disabled Children and Adults in Sport and Recreation**. Contact Disability Sport England (Tel: 020 7490 4919)

## **Section 5 Responding to Disclosure, Incidents, Suspicions and Allegations**

### **5.1 Introduction**

If a young person discloses that he/she is being abused, an incident occurs, you suspect abuse or poor practice or receive an allegation of poor practice or abuse, you should report this immediately to The County Community Trust DSO as indicated in appendices A and B – ‘Procedures for Reporting Concerns...’. If you are not able to contact The County Community Trust DSO, advice can be sought from Social Services, the Police or the NSPCC, contact details can be found in Appendix C.

### **Records and Information**

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. Information should be detailed on the Incident Record Form (Appendix E) either by The County Community Trust DSO or the person responding to the disclosure/concern. This form should be forwarded to The County Community Trust DSO immediately and The County Community Trust DSO will be responsible for referring this to Social Services.

If contact cannot be made with The County Community Trust DSO immediately, the referrer should contact Social Services directly. Contact with The County Community Trust DSO and completion of the incident record form should be made as soon as possible afterwards.

Reporting the matter to the Police or Social Services should not be delayed by attempts to obtain more information. Wherever possible, referrals telephoned to the social services department should be confirmed in writing within 24 hours. A record should also be made of the name and designation of the Social Services member of staff or police officer to whom the concerns were passed, together with the time and date of the call, in case any follow-up is needed.

### **5.2 Specific Advice for Responding to Disclosure from a Young Person - Actions to Take**

The person receiving information concerning disclosure should:

- React calmly so as not to frighten or distress the child.
- Tell the child he/she is not to blame and that he/she was right to tell.
- Take what the child says seriously, recognising the difficulties inherent in interpreting what is said by a child who has a speech or communication disability and/or differences in language.
- Keep questions to the absolute minimum to ensure a clear and accurate understanding of what has been said.
- Reassure the child but do not make promises of confidentiality which might not be feasible in the light of subsequent developments.
- Make a full record of what had been said, heard and/or seen as soon as possible.

**NB** Not all young people are able to express themselves verbally. Communication difficulties may mean that it is hard for them to complain or be understood. Sometimes it is difficult to distinguish the signs of abuse from the symptoms of some disabilities or conditions, in relation to the nature of an individual’s impairment. However, where there are concerns about the safety of a young person, record what has been observed in detail and follow The County Community Trust procedures to report these concerns (Appendices A and B).

### **Actions to Avoid.**

The person receiving the disclosure should not:

- Panic.
- Allow their shock or distaste to show.
- Probe for more information than is offered.

- Speculate or make assumptions.
- Make negative comments about the alleged abuser.
- Approach the alleged abuser.
- Make promises or agree to keep secrets.

### **5.3 Specific Advice for Responding to Suspicions**

It is not the responsibility of anyone working for The County Community Trust to decide whether abuse has taken or is taking place. However, there is a responsibility to protect participant in order that appropriate agencies can then make enquiries and take any necessary action to protect the individual.

It is the responsibility of The County Community Trust DSO to inform Social Services of incidents of possible abuse in writing within 24 hours.

#### **Sharing Concerns with Parents**

There is always a commitment to work in partnership with parents/carers where there are concerns about their children. Therefore, in most situations, it will be important to talk to parents/carers to help clarify any initial concerns. For example, if a child seems withdrawn, there may be a reasonable explanation. He/she may have experienced an upset in the family, such as a parental separation, divorce or bereavement.

#### **When not to Share Concerns with Parents**

There are circumstances in which a young person might be placed at even greater risk if concerns are shared (e.g., where a parent/carer may be responsible for the abuse or not able to respond to the situation appropriately). In these situations, or where concerns still exist, any suspicion, allegation or incident of abuse must be reported to the person in charge as soon as possible and recorded.

#### **Expert Advice**

If you are not sure what to do, The County Community Trust DSO may be able to provide advice or contact details for you to get expert advice. Contact details for another useful organisation can also be found in Appendix C.

### **5.4 Allegations against Staff**

Abuse can and does occur outside the family setting. Although it is a sensitive and difficult issue, abuse has occurred within institutions and may occur within other settings (e.g., sport or other social activities). Abuse that takes place within a public setting is rarely a one-off event. It is crucial that those involved in sport are aware of this possibility and that all allegations are taken seriously, and appropriate action taken. It is important that any concerns for the welfare of the child, arising from abuse or harassment by Trustees, Staff and Volunteers, should be reported immediately. Abuse is a disciplinary issue and will be dealt with in accordance with The County Community Trust disciplinary procedures.

In the first instance allegations need to be reported to the Head of Community unless the complaint is against the Head of Community and then a Trustee must be informed. All allegations of an adult who works with children must be reported to Stockport's Local Authority Designated Officer (LADO – see appendix C for contact details). A referral to the LADO is to be made within 24 hours of the reported incident where it will be reported. For emergencies the Police will be called immediately where it is suspected a crime has been committed. For non-emergencies call the Police following a discussion with the LADO.

#### **Seek Advice**

The County Community Trust DSO may be informed of situations where there is uncertainty about whether the concern constitutes abuse and is, therefore, unclear about what action to take. There may be circumstances where allegations are about poor practice rather than abuse, The County Community Trust DSO should always gain advice from Social Services, Police, Football Authorities or the NSPCC if there is any doubt. This is because it may be one of a series of instances which together cause concern.

A referral will be made to the FA, the EFL and DBS following:

- Receiving information from the Police regarding an individual.
- The completion of an internal investigation around conduct and further information has been discovered.

The County Community Trust is under legal obligation to make a Safeguarding Referral to the Disclosure and Barring Service (DBS) if person is dismissed or removed from regulated activity (or may have been had they not left) because they have harmed or posed a risk of harm to a child. The DBS's role is to make barring decisions about people who are referred to it (usually following an employer's disciplinary process), with the possible consequence of the person being barred from working or volunteering with children. The DBS uses a fair, thorough and consistent process that ensures that the decision it reaches is both proportionate and appropriate to the risk the person poses to children. The DBS's website is [www.homeoffice.gov.uk/DBS](http://www.homeoffice.gov.uk/DBS) and provides a range of materials to help when considering or making a referral. This includes a Referral Form, Referral Guidance, FAQs and a series of Fact Sheets. Information and advice about making a referral can also be found by contacting the DBS Helpline on 01325 953795.

### **Support for the Reporter of Suspected Abuse**

It is acknowledged that feelings generated by the discovery that a member of staff/volunteer is, or may be, abusing a child, will raise concerns among other Trustees, Staff and Volunteers. This includes the difficulties inherent in reporting such matters.

The County Community Trust assures all Trustees, Staff and Volunteers that it will fully support and protect anyone who, in good faith (without malicious intent), reports a concern about a colleague's practice or the possibility that a young person may be being abused. The County Community Trust encourages trustees, staff and volunteers to come forward and report concerns and are protected in law as part of the Whistleblowing Policy by being treated unfairly or losing your job.

A disclosure qualifies for protection if you are a worker, and you disclose something about an organisation.

A disclosure must be about something that affects the public such as:

- A criminal offence has been committed, is being committed or is likely to be committed.
- A legal obligation has been breached.
- There has been a miscarriage of justice.
- The health or safety of any individual has been endangered.
- The environment has been damaged.
- Information about any of the above has been concealed.

This is set out in the Public Interest Disclosure Act 1998. The Act applies to England, Scotland and Wales.

For any individual that does not feel confident to talk to a member of staff at Foundation, the NSPCC provides a Whistleblowing Advice Line – 0800 028 0285.

### **Types of Investigation**

Where there is a complaint of abuse against a member of staff/volunteer, there may be three types of investigation:

- Criminal (led by the Police).
- Child protection (led by Social Services and/or the Police).
- Disciplinary or misconduct (led by Foundation).

Civil proceedings may also be initiated by the person/family of the person who alleged the abuse. The results of any Police and Social Services investigation will inform The County Community Trust disciplinary process. Even in the absence of a criminal prosecution, The County Community Trust disciplinary process may still be activated and may result in sanctions being imposed upon the individual.

### **Confidentiality**

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need-to-know basis only. This may include the following people:

- The County Community Trust DSO.
- The parents of the person who is alleged to have been abused.
- The person making the allegation.
- Social services/police.
- When relevant, Designated Officers within the relevant sport's governing bodies.

**The alleged abuser (and parents if the alleged abuser is a child) should only be contacted following Social Services advice.**

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).

It is important to ensure a child or young person understands their personal information will be treated respectfully and confidentially. This provides a safe space for them to be open and honest with the people caring for them. Establishing this form of trust is fundamental for the provision of safe and effective care. But when working with children and young people, it's important to keep in mind two essential factors:

- Timely information sharing is key to safeguarding and promoting the welfare of children. It enables intervention that crucially tackles problems at an early stage.
- If a child is at risk or suffering significant harm, the law supports you to share information without consent.

Case reviews have evidenced that a lack of appropriate and timely information sharing is a key issue. Sharing information will help other professionals who have contact with the family to better understand the risks faced by the child.

For example, staff could have information about issues related to a parent or other adult which may be impacting negatively on the child's wellbeing. This information should be shared with the DSO as it will contribute to building a clear picture of the child's life. The better the picture, the more quickly appropriate action can be taken to protect a child.

Further advice on sharing information for the purpose of providing safeguarding services to children, young people, parents and carers is found in the documents by using the following links:

<https://www.nspcc.org.uk/globalassets/documents/information-service/informationsharingconfidentiality-practitioners.pdf>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/419628/Information\\_sharing\\_advice\\_safeguarding\\_practitioners.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/419628/Information_sharing_advice_safeguarding_practitioners.pdf)

### **Internal Enquiries and Suspension**

The County Community Trust will make an early decision about whether an individual accused of abuse should be temporarily suspended, pending further police and Social Services inquiries. The County Community Trust Head of Community, in line with the organisation's disciplinary procedures, will normally take this decision. Irrespective of the findings of the Social Services or police inquiries, Foundation must investigate and assess each individual case under the appropriate misconduct/disciplinary procedure. In such cases, The County Community Trust must reach a decision based on the available information. The welfare of children should always remain paramount.

## **Support to Deal with the Aftermath**

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

Consideration should be given about what support may be appropriate for the person alleged to have committed the abuse.

### **5.5 Allegations of Previous Abuse**

Allegations of abuse may be made some time after the event (e.g., by an adult who was abused as a child or by a member of staff/volunteer who is still currently working with children). Where such an allegation is made, The County Community Trust should follow the procedures as detailed above and report the matter to the Social Services or the Police. This is because other children, either within or outside sport, may be at risk from this person. Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children. This is reinforced by the Protection of Children Act 1999.

### **5.6 Action for Dealing with Bullying**

If bullying is severe, such as serious physical assault, or if it persists despite efforts to deal with it the same procedure should be followed as set out in Appendices A and B. All settings in which children are provided with services or are living away from home should have rigorously enforced anti-bullying strategies in place.

#### **Action to Help the Victim and Prevent Bullying in Sport:**

- Take all signs of bullying very seriously.
- Encourage all children to speak and share their concerns. Help the victim to speak out and tell the person in charge or someone in authority. Create an open environment.
- Investigate all allegations and take action to ensure the victim is safe. Speak with the victim and the bully(ies) separately.
- 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, by whom, when).
- Report any concerns to the person in charge of the activity (wherever the bullying is occurring).

#### **Action Towards the Bully(ies):**

- Talk with the bully(ies), explain the situation, try to get the bully(ies) to understand the consequences of their behaviour. Seek an apology to the victim(s).
- Inform the bully's parents.
- Insist on the return of borrowed items and that the bully(ies) compensate the victim.
- Provide support for the coach of the victim.
- Impose sanctions as necessary.
- Encourage and support the bully(ies) to change behaviour.
- Hold meetings with the families to report on progress.
- Inform all organisation members of action taken.
- Keep a written record of action taken.

## **Section 6 Implementation and Monitoring Procedures**

### **6.1 Objectives**

The County Community Trust will review the implementation of this safeguarding policy and its procedures and highlight the action that needs to be taken, by whom, how and when. The County Community Trust DSO will be responsible for reviewing and updating the implementation plan at least every six months.

The purpose for the implementation plan is to:

- Disseminate The County Community Trust Child Protection message so that it reaches and influences all related parts of the organisation, to safeguard the welfare of young people and vulnerable adults.
- Operate sound procedures for the recruitment of staff.
- Identify and ensure staff receive appropriate child protection training.
- Keep up to date with updated with legislation related to child protection.
- Monitor and update the implementation plan annually to keep child protection high on the sporting agenda.
- Measure the impact of the policy and procedures on an annual basis.

## 6.2 Other Related Policies

This policy does not sit in isolation and The County Community Trust understands that it works with other policies to safeguard and protect children, young people and vulnerable adults.

## 6.3 Policy Review

The Safeguarding Children and Vulnerable Adult Policy will be reviewed on a yearly basis, following a reported concern/incident or if The County Community Trust has a significant change in the management structure in order to maintain up to date information and procedures and to ensure the latest regulations are adhered to. As part of the practice all previous versions will be kept on file.

Signed on behalf of The County Community Trust:

Date signed:		Document version:	1
Head of Community:	<i>(sign)</i>	Trustee:	<i>(sign)</i>
Date of next review:			

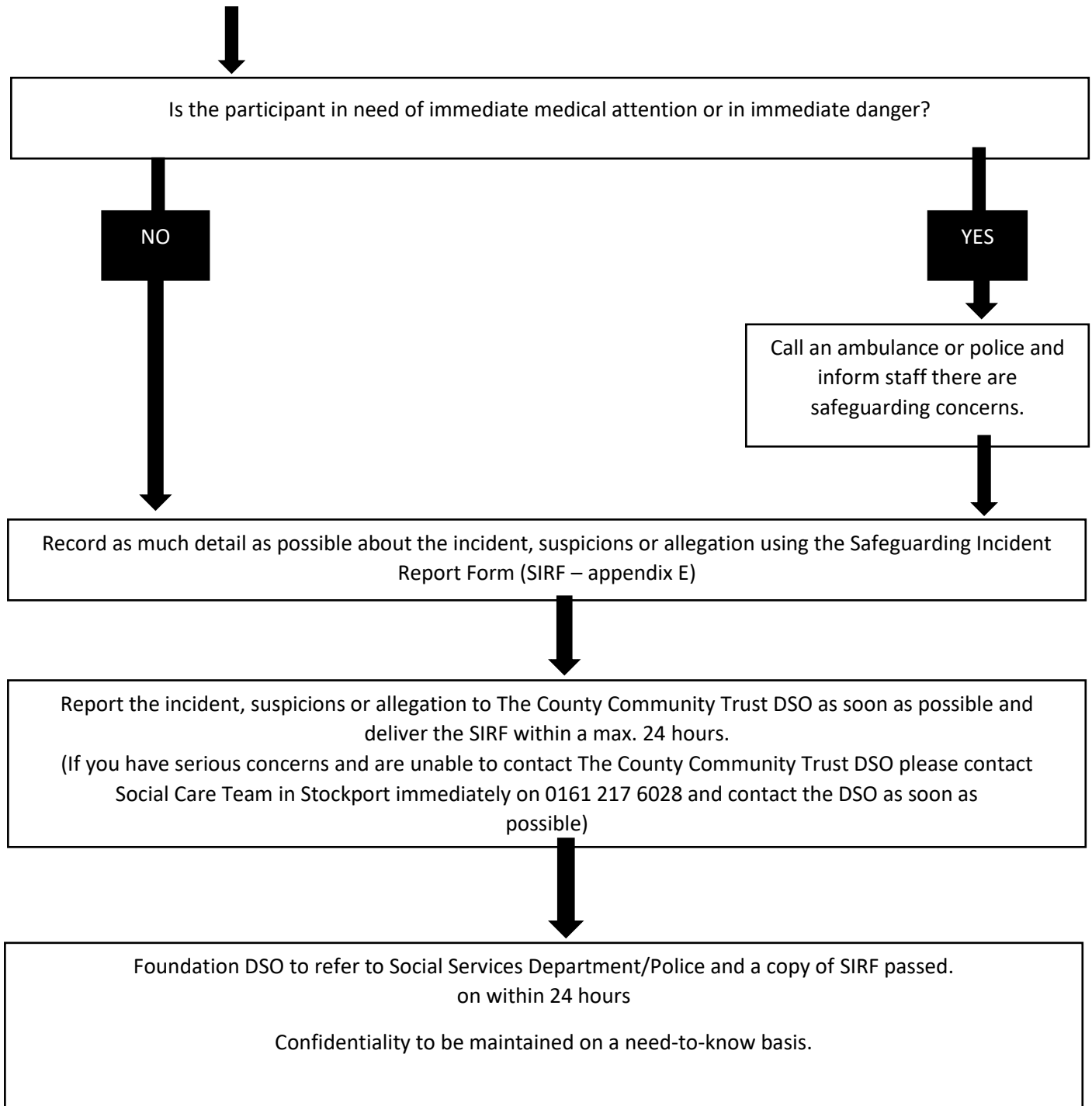
Appendix A

## Procedure for Reporting Concerns About a Participant Outside of The County Community Trust Activities

There is a concern about a participant, outside of The County Community Trust activity through observation, direct disclosure or disclosure from another person.

If you are unsure whether the concern is significant enough to report, contact The County Community Trust DSO for advice



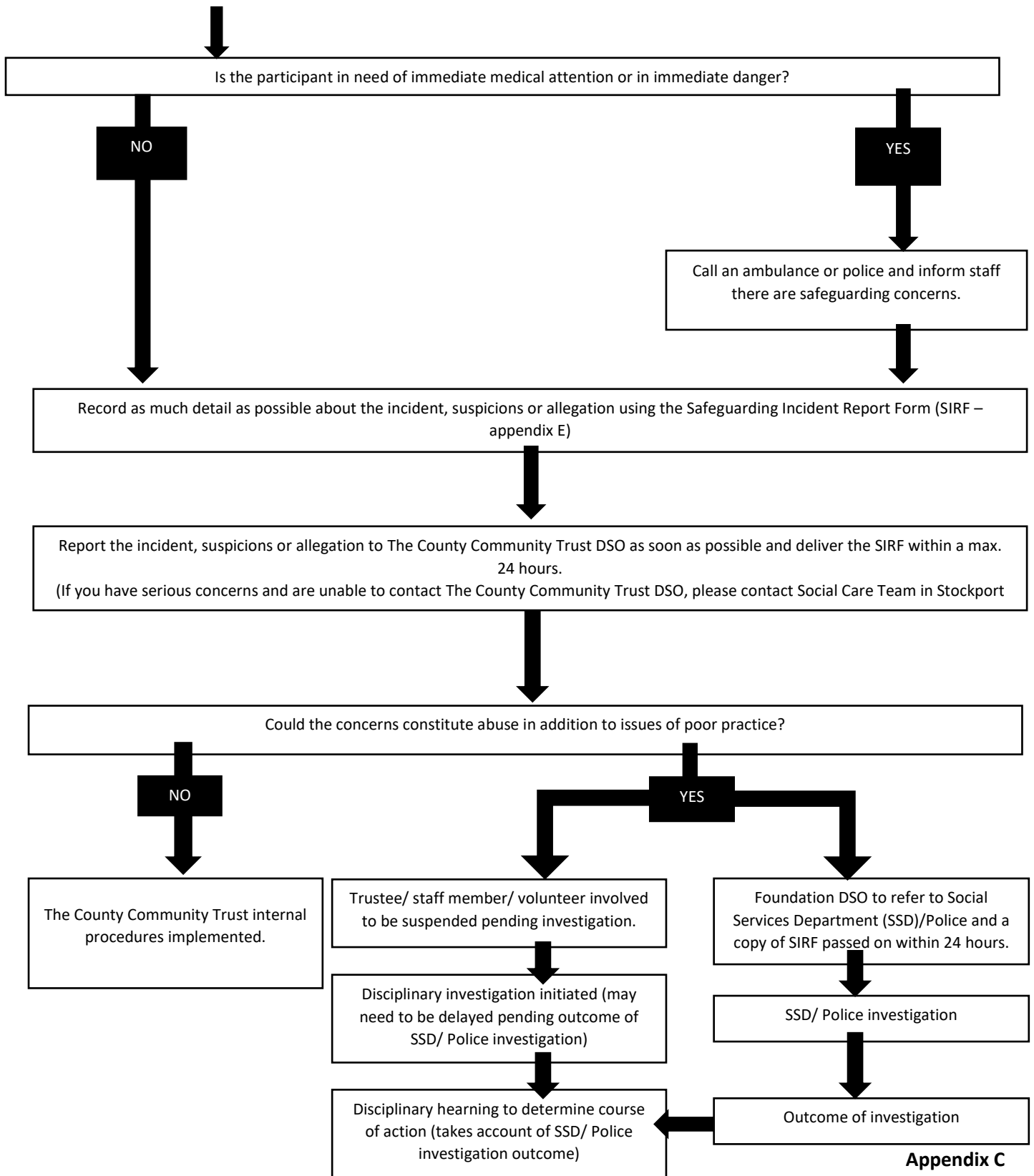


**Appendix B**

**Procedure for Reporting Concerns About a Participant in Relation to The County Community Trust Trustees, Staff and Volunteers**

There is a concern about a participant in relation to The County Community Trust trustees, staff or volunteers through observation, direct disclosure or disclosure from another person.

If you are unsure whether the concern is significant enough to report, contact The County Community Trust DSO for advice



### Essential Contacts

Position / Organisation	Named Person	Contact Details
The County Community Trust Trustee (Responsibility for Safeguarding)		
The County Community Trust Designated Safeguarding Officer		

Stockport County Football Club Senior Safeguarding Manager		
Stockport County Academy Designated Safeguarding Officer		
Stockport County Match Day Designated Safeguarding Officer		
Stockport Safeguarding Children Board	Concerns  Out of office hours contact.  Local Authority Designated Officer (LADO)	
Stockport Safeguarding Adults Board	Concerns  Out of office hours contact.	
Police		999 or 112 in emergencies 101 to report incidents
The NSPCC		Helpline: 08008 005000 Text: 88858 Email: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a>
Manchester FA		
FA Case Management Team		
Childline UK		Tel: 0800 11111
Stockport Children's Services Team		

Appendix D

**CONFIDENTIAL - Safeguarding Reference Form**

Name:

Address:

The above candidate has applied to work at The County Community Trust and has given your name as a referee. Working for The County Community Trust involves substantial access to children, young people and vulnerable adults. As an organisation committed to the welfare and protection of participants, we need to know if there is any reason at all to be concerned about this applicant being in contact with children, young people or vulnerable adults.

If you are happy to complete this reference, any information will be treated with due confidentiality and in accordance with the relevant legislation and guidance. Information will only be shared with the person conducting the assessment of the candidate's suitability to act as an employee of The County Community Trust.

We would appreciate you being candid, open and honest in your evaluation of this person.

1. How long have you known this person?
2. In what capacity?
3. What main attributes and skills does this person have, that you believe will make them suitable for working at The County Community Trust.
4. Working for The County Community Trust involves substantial access to children, young people and vulnerable adults. As an organisation committed to the welfare of and protection of our participants, we need to know if you have any reason to be concerned about this applicant being in contact with children, young people or adults.

YES, I have concerns

I have NO concerns.

If you have answered YES, we will contact you in confidence.

Name: \_\_\_\_\_

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Contact Tel Number: \_\_\_\_\_

Position: \_\_\_\_\_

Organisation: \_\_\_\_\_

Please return in pre-paid envelope provided.

**Appendix E**

### **Recording Safeguarding Concerns Form**

Staff, volunteers, or regular visitors are required to complete this form and pass it to the Designated Safeguarding Officer (DSO) if they have any concerns about a child or young adult they have come into contact with.

Full name of young person	Date of Birth	Team/Group	Your name & position

**Nature of Concern / disclosure**

Please give details of the concern/disclosure, including where you were, what the young person said, what you said, what you saw and who else was there:

Was there an injury? Yes / No

Did you see it? Yes / No

Describe the injury:

Names of any other people who were there / witnesses:

Who are you passing this information to?

Name:

Position:

Date:

Time:

Your signature:

Date:

**Action taken by safeguarding officer:**

Safeguarding officer signature:

Date:

**Action taken by Trustee with Safeguarding Children and Vulnerable Adults responsibility:**

Trustee signature:

Date:

Referral made to...?

Local Authority

Police / LADO

Parent/Carer

the FA

Service (please state:)

\_\_\_\_\_

Parent/Carer informed...? Yes / No (if no state reason:) \_\_\_\_\_

**Appendix F**

## **The County Community Trust Code of Ethics and Conduct**

Staff must comply with these principles of good ethical practice set out below and must abide by this Code of Conduct. Staff must agree to:

1. Respect the rights, dignity and worth of every person and treat everyone equally within the context of their activity.
2. Place the well-being and safety of the participant above the development of performance.
3. Follow all guidelines laid down by the relevant Governing Body and have appropriate insurance cover.

4. Develop an appropriate working relationship with participants based on mutual trust and respect and not exert undue influence to obtain personal benefit or reward.
5. Encourage and guide participants to accept responsibility for their own behaviour and performance.
6. Hold up-to-date and nationally recognised Governing Body coaching qualifications.
7. Ensure the activities they direct or advocate are appropriate for the age, maturity, experience and ability of the individual.
8. At the outset, clarify with participants (and where appropriate with their parents) exactly what is expected of them and what participants are entitled to expect from their coach. A contract may sometimes be appropriate.
9. Cooperate fully with other specialists (e.g., other coaches, officials, sports scientists, doctors, physiotherapists) in the best interests of the participant.
10. Always promote the positive aspects of their sport/ activity (e.g., fair play) and never condone rule violations or the use of prohibited substances.
11. Consistently display high standards of personal behaviour, hygiene and appearance.
12. Discriminatory, offensive and violent behaviour is unacceptable, and all complaints will be acted upon.
13. Arrive in plenty of time to set up the activity and ensure that safety checks and dynamic risk assessments are carried out prior to activity commencing.
14. Keep themselves informed about sound coaching practice and the principles of children's growth and development.
15. Never ridicule a participant for making a mistake or losing.
16. Ensure that participants and coaches have respect for opponents, officials, opposing coaches, supporters and each other.
17. Ensure that participants are adequately supervised at all times in accordance with the relevant NGB guidelines for the activity being delivered.

As a member of staff of The County Community Trust I have read, understood and agree to abide by the above code of ethics and conduct.

Signed:

Name (Print):

Date:

## **Participant Code of Conduct**

At The County Community Trust, we all have a responsibility to promote high standards of behaviour. As a participant, you have a big part to play and that is why you are required to follow the Code of Conduct. Furthermore, we expect you value this opportunity highly and in return we will aim to meet your expectations. Therefore, it is important to us that we work together and deliver a great experience.

When participating with The County Community Trust, I will:

- Respect the views and opinions of other participant and the staff.
- Treat the venue, equipment and kit with respect.
- Listen and respond to what the staff are telling me.
- Treat others the way that you want to be treated
- NOT use foul and abusive language.
- Play fairly, work together as a team and not cheat, waste time or complain unduly.

I understand that if I do not follow the code of conduct, any / all of the following actions could be taken.

I may be:

- Required to apologise to individuals and / or the whole group.
- Receive a formal warning from the coach.
- Suspended from the activity.
- Required to leave the session.

I further understand that my behaviour and attitude will be included as part of the ongoing assessment procedures.

I hereby sign the code of conduct to which I understand I must abide at all times when participating in an activity run by The County Community Trust:

Signed (participant):

Participant's Name:

Date:

Signed (parent / carer if under 18):

Parents / Carer Name:

Date:

## Appendix G

### **Guidelines on Use of Photographic and Filming Equipment at Sporting Events**

There has been much talk about who is allowed to take pictures of children/vulnerable adults playing sport and in particular what parents are permitted to do.

#### **Potential risks**

This guidance is to help 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:
  - (i) A child has been removed from his/her family for their own safety.
  - (ii) Where restrictions on contact with one parent following a parental separation exist e.g., in domestic violence cases.
  - (iii) In situations where a child may be a witness in criminal proceedings; or
  - (iv) Other safeguarding children concerns.

It is important to remember most images taken are appropriate and taken in good faith. If we take the following simple measures, we can help to ensure the safety of children in sport.

### **Common sense considerations to ensure everyone's safety.**

#### **Do:**

- Share our guidance on taking images with all parents, carers and members when they join an activity.
- Ensure The County Community Trust has parental consent to use a player's image if it is to be used in the public domain e.g., website or newspaper article. This is essential in relation to point 3 below.
- Ensure that any child in your activity who is under care proceedings, is protected by ensuring that their image is not placed in the public domain. This can 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 activities e.g., boys and girls, disabled people, ethnic minority communities.

#### **Don't:**

- Publish photographs with the full name(s) of the individual(s) featured unless you have written consent to do so, and you have informed the parents as to how the image will be used.
- Use player 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 clubhouse commemorative picture.
- Allow images to be recorded in changing rooms, showers or toilets – this includes the use of mobile phones that record images.

### **Filming as a coaching aid**

The County Community Trust advises that coaches using videoing as a legitimate coaching aid should make parents/carers and players aware that this will be part of the coaching programme. Care should be taken when storing the videos.

If you are concerned about the inappropriate use of images, please report this to The County Community Trust DSO.

### **Remember**

It is not an offence to take appropriate photographs in a public place even if asked not to do so. No one has the right to decide who can and cannot take images on public land. If you have serious concerns about a possible child protection issue relating to the recording images, then call the Police. This action should only be taken where you believe that someone may be acting unlawfully or putting a child at risk. The land or facility owner can decide whether or not photography and or videoing during activities will be permitted when carried out on private land.

However, you need to make this known before allowing individuals access to the private property. If they do not comply then you may request that they leave.

Try not to use images that include individuals wearing jewellery (as wearing jewellery whilst playing is contrary to the Laws of the Game as well as being a health and safety issue).

### **Commissioning professional photographers and the local media**

If you are commissioning professional photographers or inviting the press to cover an activity, ensure you and they are clear about each other's expectations. The key is to plan ahead and communicate early on.

Provide a clear brief about what is considered appropriate in terms of content and behaviour. Inform them of your club's commitment to safeguarding children and young people. Establish who will hold the recorded images and what they intend to do with them, e.g., place on a website for sale, distribute thumb nails to the club to co-ordinate sales. Issue the professional photographer with identification, which must be worn at all times.

Inform participants and parents or carers prior to the event that a professional photographer will be in attendance and ensure you have established that no under 18s will be compromised due to safeguarding children concerns if their image is taken – remember this can be done by using a Consent Form at the start of the season.

### **To report potentially unlawful materials on the internet please contact:**

The Internet Watch Foundation

Email: [report@iwf.org.uk](mailto:report@iwf.org.uk)

Telephone: 01223 237700

Fax the hotline: 01223 235921

[www.iwf.org.uk](http://www.iwf.org.uk)

**Appendix H**

## **Types of Abuse**

### **Definitions of Abuse**

#### **Domestic Abuse**

The Government defines domestic abuse as any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or

have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of their means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish or frighten their victim.

*\*This definition includes so called 'honour' based violence, female genital mutilation and forced marriage, and is clear that victims are not confined to one gender or ethnic group.*

### **Physical Abuse**

Physical abuse causes harm to a child or young adult. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating or otherwise causing physical harm. It may be done deliberately or recklessly or be the result of a deliberate failure to prevent injury occurring. It can also occur when a parent or carer feigns the symptoms of or deliberately causes ill health to a child or vulnerable adult whom they are looking after.

### **Neglect**

Neglect is the persistent or severe failure to meet basic physical and/or psychological needs, likely to result in serious impairment of their health or development. It may involve a failure to provide adequate food, clothing or shelter, failing to keep them safe from harm or danger, or failure to ensure access to appropriate medical care or treatment. It may also involve neglect of, or inadequate response to their basic emotional needs.

### **Sexual Abuse**

Sexual abuse involves children and vulnerable adults being forced or enticed into participating in or watching sexual activity, not necessarily involving a high level of violence. It is not necessary for them to be aware that the activity is sexual, and their apparent consent is irrelevant. The acts may involve physical contact including penetrative or non-penetrative acts. They may involve non-contact activities such as involving them in looking at, or in the production of, pornographic material or watching sexual activities, or encouraging them to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet).

### **Child Sexual Exploitation**

Child sexual exploitation is a form of child sexual abuse. It 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.

### **Forced Marriage**

Forced marriage is an abuse of human rights, an abuse of the rights of the child and is a form of domestic abuse. There is a clear distinction between a forced marriage and an arranged marriage. In arranged marriages, the families of both spouses take a leading role in arranging the marriage but the choice whether or not to accept the arrangement remains with the prospective spouses. In forced marriages, one or both spouses do not or, in the case of some adults with support needs, cannot consent to the marriage and duress is involved. The Forced Marriage (Civil Protection) Act was enacted in 2007 and came into force on 25 November 2008. The Act forms part of the Family Law Act 1996 and makes provision for protecting children, young people and adults from being forced into marriage without their free and full consent. Victims may only have one chance to speak out (the one chance rule) and thus professionals need to raise the matter immediately with a safeguarding officer if they come across a forced marriage case.

### **Female Genital Mutilation**

Female genital mutilation (FGM) will usually be performed during childhood but there have been reports of young girls or young women undergoing FGM just before a forced marriage. FGM is illegal in the UK, and it is also a criminal offence to take someone overseas for the purposes of FGM.

### **Emotional Abuse**

Emotional abuse occurs where there is persistent emotional ill treatment or rejection, such as to cause severe and adverse effects on behaviour and emotional development, resulting in low self-worth. It may involve conveying to them that they are worthless or unloved, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on the child, young person or vulnerable adult. It may involve causing them frequently to feel frightened or in danger, or their exploitation or corruption. Some level of emotional abuse is present in all forms of abuse.

Additionally, this policy draws to the attention of staff the criminal offences that may be committed in connection with the safeguarding of children and adults at risk, in particular those involving abuse of trust which prohibits staff from engaging in or encouraging sexual activity with students who are under the age of 18 or vulnerable.

### **Further Areas of Consideration for Safeguarding**

Safeguarding action may also be needed to protect students from:

- Racist, disability and homophobic/transphobic abuse.
- Gender-based violence
- The impact of new technologies on sexual behaviour, for example 'sexting' and accessing pornography.
- Teenage relationship abuse.
- Substance misuse.

- Gang activity and youth violence.

## **Other Safeguarding Circumstances**

### **Bullying**

Bullying is persistent behaviour directed against an individual, which is intimidating, offensive or malicious and undermines the confidence and self-esteem of the recipient which may cause him or her to suffer stress. Bullying can take place by direct personal contact, or through digital communication such as mobile phones, social networking sites, email or gaming consoles.

Legitimate, constructive and fair criticism of someone's performance or behaviour in an educational environment is not regarded as bullying.

### **Self-Harm**

Self-harm is defined as self-poisoning or injury, irrespective of the apparent purpose of the act. Self-harm is an expression of personal distress, not an illness, and there are many varied reasons for a person to harm him or herself. Most cases of self-harm do not result in suicide; however, self-harm is known to be a risk factor in suicidal behaviour.

### **Suicide**

Suicide is the intentional and deliberate act of taking one's own life; youth suicide is a major global public health issue. While suicide rates are higher among 20–24-year-olds, suicidal behaviour that may precede suicide is established in the earlier years. Suicide consistently ranks as one of the leading causes of death for adolescents between 15 and 19 years of age. Research suggests that certain situations put children and young people at more risk of suicide, including suffering loss or bereavement, relationship issues, experiencing bullying and/or racism, living in isolated areas and living in unhappy circumstances.

### **Eating Disorders**

Eating Disorders include anorexia nervosa, bulimia nervosa, or other related (or 'atypical') eating disorders (mainly binge eating disorder). In general, eating disorders develop over time, sometimes over years, and often at a point when life brings fear and insecurity.

### **Radicalisation / Extremism**

Students may be coerced into becoming involved with terrorist groups and gangs and be at risk of radicalisation including the vocal or active opposition to fundamental British values such as democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. *See our 'Prevent' Duty statement and policy below in this document.*

Safeguarding is not just about protecting children, learners' and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including:

- Young people's health & safety and well-being, including their mental health.
- Meeting the needs of children who have special educational needs and/or disabilities.
- The use of reasonable force.
- Meeting the needs of children and learners with medical conditions.
- Providing first aid.

- Educational visits.
- Intimate care and emotional well-being.
- Online safety and associated issues.
- Appropriate arrangements to ensure young people's security, taking into account the local context.

### **Peer on Peer Abuse**

This includes all types of bullying (including cyber bullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, hair pulling or otherwise causing physical harm; sexting and initiating/hazing type violence and rituals; CSE; gang activity and youth violence.

Teenage relationship abuse is defined as a pattern of actual or threatened acts of physical, sexual and/ or emotional abuse, perpetrated by an adolescent (between the ages of 13 and 18) against a current or former partner. Abuse may include insults, coercion, social sabotage, sexual harassment, threats and / or acts of physical or sexual abuse.

Sexual violence and sexual harassment can occur between two children of any sex. They can occur through a group of children sexually assaulting or sexually harassing a single child or a group of children.

### **Child Criminal Exploitation**

Children who are trafficked, exploited or coerced into committing crimes are victims in need of safeguarding and support.

Known as "county lines", gangs use children as young as 12 to traffic drugs, using dedicated mobile phones or "lines."

### **Serious Violence**

All staff should be aware of the indicators, which may signal that student are at risk from, or are involved with serious violent crime. These may include increased absence from college, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that students have been approached by, or are involved with, individuals associated with criminal networks or gangs.

**Appendix I**

## **Recognising Signs of Abuse**

Indications that a child may be being abused include the following:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries.
- An injury for which the explanation seems inconsistent.
- The child describes what appears to be an abusive act involving him/her.
- Someone else (a child or adult) expresses concern about the welfare of another child.
- Unexplained changes in behaviour (e.g., becoming very quiet, withdrawn or displaying sudden outbursts of temper).

- Inappropriate sexual awareness.
- Engaging in sexually explicit behaviour.
- Distrust of adults, particularly those with whom a close relationship would normally be expected.
- Has difficulty in making friends.
- Is prevented from socialising with other children.
- Displays variations in eating patterns including overeating or loss of appetite.
- Loses weight for no apparent reason.
- Becomes increasingly dirty or unkempt.

It should be recognised that this list is not exhaustive and the presence of one or more of the indicators is not proof that abuse is taking place. It is not the responsibility of those working in sport to decide that child abuse is occurring, but it is their responsibility to act on any concerns.

## Appendix J

### Recruitment and Retention of Staff and Volunteers with Criminal Records

#### Safe Recruitment and Selection

##### Procedures and Practices

To support our commitment to safe recruitment and selection of employees and volunteers, the following procedures are in place:

- Advertisements make reference to the need for the successful applicant to undertake an Enhanced Disclosure Check including a check of the DBS Barred Lists via the Disclosure and Barring Service where the post holder undertakes regulated activity.
- Job descriptions make reference to the responsibility for safeguarding.
- Person specifications include specific reference to working with children or adults at risk.
- Comprehensive information from applicants is obtained and scrutinised.
- Face-to-face interviews are undertaken by suitably trained staff and used to explore a candidate's suitability to work with children and/or vulnerable adults at risk.
- Previous employment history and experience is checked.
- Qualifications are verified.
- A minimum of two references are obtained for shortlisted candidates prior to appointment; one will be the applicant's current or most recent employer; one will also be from the employer by whom the person was most recently employed to work with children. References will not be accepted from friends. References will cover the candidates last 5 years of employment.
- Proof of identity is requested such as a birth certificate, driving licence or passport combined with evidence of address. Some form of photographic identity will be seen except where for exceptional reasons none is available.
- All staff and volunteers will undergo an Enhanced Disclosure check through the Disclosure and Barring Service.
- All successful applicants are required to demonstrate their eligibility to work in the UK by the provision of the relevant documentation for example: passport, birth certificate, work permit.

##### Photo ID Badges

Security has become increasingly important in recent years, affecting children and young people, parents/carers and members of staff alike. The County Community Trust acknowledges the need to ensure a safe and secure environment for all concerned.

Therefore, The County Community Trust requires all such members of staff, whether full-time, part-time or casual, to be issued with a photographic identification badge, which they must wear at all times whilst working

on any of our programmes or whilst carrying out activities on our behalf, unless there are Health & Safety issues in doing so, in which case, the badge should be carried on their person.

### **Disciplinary Process**

The County Community Trust has the power, as part of their disciplinary procedure, to issue a suspension, pending a risk assessment where any one or more of the following applies:

- The individual fails to comply with any part of The County Community Trust DBS and safe recruitment processes.
- The FA Safeguarding team has imposed a suspension.
- The individual has been barred by the DBS from engaging in 'Regulated Activity' related to children.
- The individual has been convicted of, or made the suspect of caution for, a serious sexual, violent offence or any other offence that The County Community Trust believe to be relevant to the care of young people.
- An allegation has been made against a member of staff requiring investigation.

In all circumstances involving an allegation or disciplinary issue, the action taken will follow the procedures set out in The County Community Trust Disciplinary policy.



## CCT Designated Safeguarding Officer Role Description

### Purpose

The Designated Safeguarding Officer (DSO) will be responsible for monitoring, evaluating and leading improvements in all aspects of safeguarding and behaviour and safety, to ensure that The County Community Trust operates within the legislative framework, recommended guidance and that both participants and staff are safe and cared for. The DSO will be a senior manager within The County Community Trust.

They will be responsible for acting upon safeguarding concerns raised by staff, participants and external stakeholders and ensuring that multi-agency referrals are made and coordinated as necessary, to ensure individuals are safe and protected from harm. The DSO will ensure the education and training of staff in relation to safeguarding, behaviour and safety.

The post holder will act as a role model who leads by example, as a professional who reinforces standards & high expectations and who shares good practice. At all times the post holder will champion inclusive practice by ensuring that timely and effective interventions enable all participants to reach their full potential despite sometimes difficult home or personal circumstances.

### Specific Responsibilities:

#### Raising awareness

- To lead the agenda item at team meetings to share information and concerns.
- Ensure that all staff know the procedures for raising safeguarding concerns.
- Ensure that safeguarding and behaviour and safety information is easily accessible to staff and visitors via posters, leaflets, the website etc.
- Liaise with the Trustee responsible for safeguarding as necessary.

#### Referrals

- Refer cases of suspected abuse or allegations to the relevant investigating agencies.
- Act as a source of support, advice and expertise within the The County Community Trust when deciding whether to make a referral by liaising with relevant agencies.
- To ensure that all child protection cases are swiftly and professionally handled even when delegated to suitably qualified members of the team.

#### Training

- Responsible for ensuring that all staff (including adults who work within The County Community Trust but are not directly employed by The County Community Trust) undertake appropriate and wide-ranging safeguarding, and that this is kept up to date by refresher training as appropriate.

#### Communication and Quality Assurance

- Responsible for monitoring, evaluating and leading improvements in all aspects safeguarding and behaviour and safety, to ensure that the The County Community Trust operates within the legislative framework and recommended guidance.
- Responsible for reporting concerns to the appropriate person or organisation when safeguarding or H&S practices and policies are not being followed by staff.
- Responsible for ensuring the The County Community Trust 's safeguarding policy and other associated policies are implemented, quality assured, reviewed, updated and reflect statutory requirements and best practice guidance.

- Quality assure day to day systems and procedures from a safeguarding and H&S outlook and provide feedback to ensure the smooth and safe running of the The County Community Trust.
- To develop and maintain robust, detailed, accurate records for all aspects of safeguarding including for case files, staff training etc. and to ensure that information is stored and shared within data protection guidelines.
- Responsible for the provision of reports and information as required by the Trustees on the effectiveness of safeguarding, behaviour and safety and ensuring that all statutory reporting procedures are carried out.
- To effectively and efficiently communicate with all staff regarding individual needs of participants e.g., the outcome of referrals, individual/group monitoring, links with parents/carers or external agencies.
- To effectively develop and maintain partnerships with parents, external agencies such as the LADO, social care, police, and service providers.

#### General

- Promote good order and a productive learning environment throughout the The County Community Trust, acting as an effective referral point for issues of concern to safeguarding and behaviour.
- Lead by example on the upholding The County Community Trust policies and modelling good practice.
- Contribute to the life of The County Community Trust and support its agreed ethos and policies.
- Actively engage in Appraisal and Continuing Professional Development activities.
- Participate in the The Hatter's Project recruitment and selection process as required and support the effective induction of new staff in line with The County Community Trust policy.
- Advise on and contribute to the professional development of all staff.
- Undertake such other duties as may be required from time to time commensurate with the level of the post.