



County Community Trust

Stockport County Community Trust - Safeguarding Procedures

Introduction to The Stockport County Community Trust (CCT)

The County Community Trust is a registered charity (1194114) and company limited by guarantee.

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

Our overall aim is one of prevention and early intervention. We have in place provisions for children, young people 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 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.

A handwritten signature in blue ink, appearing to read 'John Stevenson'.

John Stevenson MBE – Chair County Community Trust (CCT)



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Safer Recruitment Policy

Policy Statement: CCT are committed to promoting the welfare of all children and young people who use and interact with the charities services and for keeping them safe. In line with the Equal Opportunities Policy contained in the staff handbook, CCT is committed to equality, valuing diversity and working inclusively across all of its activities and this applies also to the selection, recruitment and induction of new staff and volunteers. To this end, CCT aims to have a workforce that reflects a variety of backgrounds and cultures and who can provide the relevant knowledge, abilities and skills that are required for the organisation.

All elements of CCT's Safer Recruitment Policies & Procedures apply to any person responsible for the recruitment, selection and induction of employees and volunteers at CCT - as well as those who participate in shortlisting and interview panels.

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

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 Foundation are fully represented.



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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.

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 CCT 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.



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- 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.

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.



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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.

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.

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).



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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.

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.



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Engagement of Ex-Offenders Policy

Policy statement: CCT is an equal opportunity employer and is fully committed to a policy of treating all of its job applicants fairly and equally. CCT aims to select people for employment and volunteering on the basis of their skills, experience, abilities, and qualifications. CCT will therefore consider ex-offenders for employment and volunteering on their individual merits. Having a criminal record will not necessarily bar a person from working for CCT. This will depend on the nature of the job role and the circumstances and background of the criminal offences.

CCT'S approach towards engaging ex-offenders differs depending on whether the job role is, or is not, exempt from the provisions of the Rehabilitation of Offenders Act 1974 (ROA).

Job roles exempt from the Rehabilitation of Offenders Act 1974: If the job role into which the CCT is seeking to recruit is one of the excluded jobs listed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 or, in Scotland, the Rehabilitation of Offenders Act 1974 (Exclusions and Exceptions) (Scotland) Order 2003, CCT will require the applicant to disclose all convictions and cautions, whether spent or unspent. If an applicant has a conviction or caution, CCT may, at its absolute discretion, decline to select the person for the particular role.

If the job role is exempt, once CCT has selected the applicant to whom it wishes to offer employment or volunteering to, it may seek documentary evidence about that person's criminal convictions. CCT may seek the applicant's agreement to make a joint application to the Disclosure and Barring Service or Disclosure Scotland for a Criminal Record Certificate (also known as Standard Disclosure) or an Enhanced Criminal Record Certificate (also known as Enhanced Disclosure), as appropriate. In this case, any offer of employment or volunteering will be made conditional on this documentation being obtained to CCT's satisfaction.

Where there is a requirement for a DBS check, this will be made clear to all applicants early in the recruitment process, for example in the job advertisement, or on the application form.

CCT will always discuss any matter revealed in a disclosure with the applicant, before taking a decision to withdraw a conditional offer of employment.

Spent convictions: CCT will not refuse to employ an applicant just because they have a spent conviction or caution and it acknowledges that, unless the job role is exempt from the Rehabilitation of Offenders Act 1974, job applicants are under no obligation to disclose spent convictions or cautions. Applicants will therefore not be asked any questions about spent convictions or cautions during the recruitment process and, where information on criminal convictions is requested, it will be made clear that spent convictions or cautions do not need to be declared or disclosed.

Unspent convictions: CCT will not automatically refuse employment or volunteering opportunities with an applicant just because they have an existing or unspent conviction or caution. During the recruitment process, applicants may be asked to disclose any unspent convictions or cautions. If an applicant has a conviction that is not spent and if the nature of the offence is relevant to the job for which they have



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applied, CCT will review the particular circumstances of the case and it may, at its absolute discretion, decline to select the person for employment or volunteering.

Failure to disclose information about convictions or cautions when asked to do so during the recruitment process - where either the job role is exempt, or they are unspent - could lead withdrawal of an offer of employment or volunteering with CCT; or alternatively, to termination of the working relationship if the applicant has already commenced work.

Ultimately, although a person's criminal record will not debar that person from being appointed to a post with CCT - where the **Protection of Children Act 1999**, the **Criminal Justice and Court Services Act 2000** and/or the **Care Standards Act 2000** applies - this will be an automatic bar to working for CCT. In addition, discretion will be exercised where it is felt that a recent and/or serious conviction might mean that a person might re-offend or cause harm.

Data protection requirements: CCT is committed to ensuring that all information about a person's criminal convictions or cautions, including any information released in disclosures, is used and processed fairly and stored confidentially and in accordance with the provisions of the **Data Protection Act 1998**. In particular, personal data about a person's criminal convictions will only be held for as long as it is required for employment or volunteering purposes, it will only be seen by those who need to see it as part of the recruitment and engagement process and it will not be shared with or disclosed to any other employer, prospective employer or other unauthorized third party.

CCT will also take guidance from NACRO's **Recruiting Safely & Fairly - A Practical Guide to Employing Ex-offenders**.



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Lone Working Policy

Policy statement: CCT discourages lone working and will avoid the need for staff and volunteers to work alone where reasonably practicable. Where lone working is necessary - whether that be on a regular or occasional basis.

CCT will take all reasonable steps to ensure the health, safety and welfare of staff and volunteers when working alone.

CCT will always undertake a formal health and safety risk assessment to identify the hazards and risks of lone working and use this assessment to devise and implement safe working arrangements - so that the risks are eliminated or adequately controlled, thus enabling lone workers to carry out their work in a safe environment.

Procedure: Lone working can be safe provided staff and volunteers take the following basic precautionary measures:

- Always ensure that another HTAFC staff member (preferably the line manager or CCT's DSO) is aware that lone working is being undertaken; the location; the work being undertaken and the expected finish times.
- There must always be available an effective means of communication with another person in the event of an emergency. This should preferably be a mobile phone or a two-way radio.
- Always ensure there is access to a fully stocked first aid kit.
- When working inside a building, always be familiar with the nearest emergency exits and the local emergency evacuation procedures.
- When working inside a building always ensure that intruders cannot access the premises by checking that windows and external doors are locked.
- Comply fully with any arrangements - or follow any specific guidance - that has been provided by either the line manager or CCT's DSO in relation to the lone working.
- Always take personal responsibility and all reasonable steps to ensure personal safety.
- Inform the line manager and/or CCT's DSO immediately if there are any incidents, or safety concerns connected with the lone working.

Agreed: TBC

CCT will review this and good practice annually.



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Responsibility of CCT's line managers: Line managers should ensure that:

- Lone working is avoided as far as is reasonably practicable.
- Arrangements are always in place so that someone is always aware of a lone worker's whereabouts.
- A check must always be carried out at the end of the lone working period to ensure there have been no problems.
- Emergency procedures are in place so that lone workers can obtain immediate assistance if required.
- Lone workers are provided with adequate information and training to understand the risks; and the safe working procedures associated with working alone are followed.
- A particular CCT staff member or volunteer is capable of undertaking the work by working alone.
- The job in question can be carried out safely by one person.

CCT's Board of Trustees & the DSO will regularly review decisions in which CCT staff and volunteers undertake lone working.

Agreed: TBC

CCT will review this and good practice annually.



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Accident Prevention

Policy statement: CCT aims to ensure that all activities it undertakes are safe; and that the risk of accidents are minimised. All activities will be risk assessed and if an accident does happen CCT will have processes in place to review and learn the necessary lessons to continually avoid accidents and improve the safety of all activities the organisation runs. CCT will adhere to the following principles to assist its goal of avoiding accidents and running safe activities:

- CCT has in place an accident prevention policy and plan in place - that allows for a risk/benefit analysis of all activity that is undertaken children.
- CCT will ensure that there are up-to-date risk/benefit assessments of all venues used to deliver activities to children. Risk assessments will be undertaken prior to activities/outings/events involving children and these assessments will evidence any actions that are required to be taken to manage the identified risks.
- CCT will undertake regular checks on all equipment used by children, staff and volunteers - in accordance with health and safety guidance relevant to the equipment.
- CCT has a clear policy relating to parental consent that is required for activities - and where appropriate, the consent of children.
- CCT will ensure that it collects relevant information relating to each child's medical and dietary needs, allergies and any other specific developmental requirements.
- CCT will ensure that staff and volunteers have the appropriate access to each child's emergency contacts (i.e. parents/carers) whenever children are participating in an activity, or on a group trip out.
- CCT will ensure that there is access to a phone during every activity or meeting attended by a child.
- CCT will ensure that there are first-aid boxes available, regularly checked and properly maintained when working with children.
- CCT has in place a procedure for reporting accidents and "near misses" which includes the use of an accident book and will ensure that all staff and volunteers are trained to use them correctly.
- CCT will ensure that staff and volunteers have the appropriate access to the contact details of local doctors and health facilities whenever children are participating in an activity, or on a group trip out.
- CCT will ensure adequate insurance for all circumstances and activities that it undertakes, and this will be prominently and clearly displayed.
- CCT will train staff and volunteers on the safe use of equipment - and ensure supervision is provided whenever children make use of that equipment, as necessary.
- CCT will induct and train (and refresh that training regularly) all staff and volunteers in accident prevention and health and safety.
- CCT will ensure the full compliance with regulations covering fire precautions, first-aid arrangements, food hygiene, use of hazardous substances, reporting injuries and diseases, adult to child ratios and transport.

Agreed: TBC

CCT will review this and good practice annually.



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Accident Prevention Policy

Policy statement: CCT will - as far as is possible - remove hazards in the working environment (as well as other hazardous practices) that could cause serious injury to children, CCT staff and volunteers. Where such hazards cannot be removed, CCT will put into place procedures and processes that protect children as well as CCT staff and volunteers from potential harm caused by hazards.

CCT will always seek to take a balanced and proportionate approach to accident prevention, so that staff and volunteers can do their work effectively, while enabling children to be adventurous - all the time learning to understand and deal with risks as they grow up.

CCT's Accident Prevention Policy is informed by the following principles and beliefs:

- CCT recognise that the welfare of the children who use our services and facilities is paramount, and this guides the approach to accident prevention.
- All children - regardless of age, disability, racial heritage or religious belief, sexual orientation, or identity - have the right to equal protection from serious injury.
- Risk assessments at CCT will always take account of children's needs as they grow and develop - and will always be mindful of needs resulting from disability (and other factors) that may make some children more vulnerable than others.
- CCT will work in partnership with children, their parents, and carers as well as other agencies in helping them to be responsible in their approach to accident prevention.
- CCT cannot and will not strive to create a totally risk-free environment, as this would prevent staff and volunteers from being able to carry out meaningful work with children - and would not be in a child's best interests either. CCT's focus will therefore be on preventing serious or avoidable accidents, while managing risk appropriately.

CCT will seek to prevent serious and avoidable accidents by taking the following approach:

- CCT will ensure that it fulfils its responsibilities under health safety and fire regulation.
- CCT will appoint a Health & Safety Officer who is responsible for attending to HTAFC's legal responsibilities in this area, and for accident prevention measures.
- CCT will use its accident prevention plan to assist in the process of assessing, monitoring, and reviewing risks - both on and off CCT's premises - and for taking the appropriate action to eliminate, or manage risks, in a timely and organised way.



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- CCT will involve staff, volunteers, and children - as well as parents and carers - in developing and implementing its accident prevention measures.
- CCT will make sure that all equipment used is safe and stored appropriately.
- CCT will ensure that staff and volunteers - and where appropriate - children, are trained in the correct and safe use of all equipment.
- CCT will ensure - as far as is possible - that staff and volunteers have a child's information relating to any allergies, health or developmental issues that could increase the vulnerability of that child.
- CCT will - where it is applicable to its operations - ensure that food is prepared, served and stored in a way that avoids dangers of food poisoning, burns, scolds, choking and/or accidents caused by such things as shards of glass, or small components from kitchen equipment being mixed up with food.
- CCT will providing effective management for CCT staff and volunteers on accident prevention issues through the process of supervision, support and training.

Agreed: TBC

CCT will review this and good practice annually.



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Accident Prevention Plan

In addition to CCT's Accident Prevention Policy, the following steps form the basis of the organisations Accident Prevention Plan:

- CCT will undertake a risk assessment check on all CCT premises and activities at least every 6 months - and will ensure that points identified for action from the previous check have been followed up and acted upon.
- CCT will keep records of risk assessments and reviews.
- CCT will use a timetable for ensuring that equipment is regularly checked in accordance with legislation - and/or best practice.
- CCT will check and have updated a child's medical records, needs and allergies etc. at least annually.
- CCT will check its records of contact details for parents and carers, as well as the emergency health facilities at least annually.
- CCT will check every 6 months that First Aid Boxes are in working order and are adequately stocked.
- CCT will review the accident book no less than once every 6 months and report any serious accidents to the Board - as well as taking action to prevent similar accidents in the future, as far as this is possible.

Agreed: TBC

CCT will review this and good practice annually.



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Participation Consent

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.

Photography & Video Policy

Policy statement: CCT is committed to ensure that all children are kept safe and that everyone responsible for children within the organisation takes all necessary steps to prevent inappropriate images from being taken; and those innocent images are not used inappropriately. CCT staff and volunteers are best placed to implement this policy and are trained to understand the risks and take the appropriate steps to keep children safe. Parents and carers will not be prevented from taking appropriate pictures or filming their children. CCT believes that this is normal family practice and is incredibly important in marking milestones in a child's life and therefore encourage the taking of appropriate images of their children. However, appropriate photographic and video controls is an essential element of good safeguarding practice.

Understanding the law: It is not an offence to take appropriate photographs in a public space, even if asked not to do so. No one is permitted to decide who can and cannot take images on public land. Therefore, should there ever be concerns about safeguarding in relation to images and footage being taken in a public space and a staff member or volunteer genuinely and in good faith believe that someone is acting unlawfully or putting a child at risk then they should call the Police. Concerns relating to images and footage being taken on CCT premises and land should be raised immediately with CCT's DSO.

When activities are being undertaken on private land, then it is at the discretion of the land or facility owner whether images and footage can be taken. However, whether permission for images or footage to be taken is granted must be made clear to individuals prior to them being allowed access to the private property. If someone then fails to comply with the "no images or footage" instruction they can then be instructed to leave.



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Understanding the risks:

- Images in which children are named can create opportunities for people to groom a child.
- Some individuals use activities undertaken in public places as an opportunity to take inappropriate images and footage of children.
- Images and footage of children can be used inappropriately and be circulated and copied via websites and email.
- Children can be identified and located in circumstances where this would be inappropriate and unsafe for the child and/or parent and carer.

Photography and video use principles:

- Parents and carers will be permitted to take appropriate photographs and footage of their children.
- If CCT wishes to take photographs or footage of a child, a **Parental & Child Consent Form** will always be used - in line with **CCT's Parental & Child Consent Policy**.
- Where possible and appropriate CCT will also obtain a child's permission to use their image.
- No images will be used by CCT - for any purposes - without consent having been provided for that use.

CCT will avoid using children's names (first name or surname) in photograph captions.

- If the child is named, then CCT will avoid using the photograph.
- If the photograph is used, then CCT will avoid naming the child.
- Where permission has been granted CCT will only use images of children in a suitable dress to reduce the risk of inappropriate use.
- CCT is very aware that certain activities **e.g.**, swimming, gymnastics and athletics presents much greater risk of potential misuse and will therefore risk-assess appropriately in relation to permission to photograph such activities.
- CCT will take all steps necessary to ensure that a child who is under care proceedings is protected and ensure that their image is not placed in the public domain. This will be achieved through requesting appropriate information on the **Parental & Child Consent Form**.
- All images and footage taken will focus on the activity and not the child.
- Unsupervised access to children - or a child - on a one-to-one photo shoot will not be permitted.
- CCT will not use authorised images and/or footage where children are wearing jewellery.
- Images and footage will represent the diversity of children at CCT.
- CCT will not permit - and will take all steps necessary to prevent - images or footage being taken in changing rooms, showers or toilets.



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Use of professionals: Where CCT engages with professionals to take images or footage it will be clear at the outset as to the organisations expectations in relation to CCT's **Photography & Video Policy**.

In addition, CCT will:

- Provide the professional with a clear brief about appropriate content and behaviour.
- Provide the professional with a copy of CCT's **Photography & Video Policy** and explain its commitment to safeguarding children.
- Establish who will hold the images and footage and the intended use.
Provide the professional with identification which must be always worn.
- Inform children, parents and carers of the professional being in attendance and explain that no child's safety and safeguarding will be compromised.

Coaching: If CCT should want to utilise images or footage as a coaching aid this will be explained to the child and parents/carers and explicit appropriate consent will be gained prior to the taking of any images or footage. Where consent to utilise images or footage as a coaching aid has been given, CCT will ensure the security of such files in line with its **Recording, Storing and Sharing Information Policies & Procedures**.

Reporting concerns: CCT requires its staff and volunteers to report any kind of behaviour which breaches this **Photography & Video Policy** or causes them concern.

CCT strongly encourages all children, parents, and carers to raise any questions or concerns in relation to this **Photography & Video Policy**.

Questions and concerns should be directed to CCT's DSO.

All elements of CCT's Photography & Video Policy apply to any equipment that is capable of taking photographic images or video footage - and expressly includes the use of mobile phones and tablets.

Agreed: TBC

CCT will review this and good practice annually.



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Code of Conduct for Staff and Volunteers

Participant and Parent Code of Conduct

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

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

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.



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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.



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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, participants 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.

Participants 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.



Anti-Bullying Procedure

Definition of bullying: Bullying is behavior that hurts someone else - such as name calling, hitting, pushing, spreading rumours, threatening, or undermining someone.

Purpose & aim of procedure: This procedure is supported by the CCT anti-bullying policy. Its aim is to:

- Provide detailed guidance to CCT staff members and volunteers, as well as to children who may experience bullying, so that they will know what to do if an incident of bullying occurs between children.
- To ensure that CCT responds fairly and consistently to incidents of bullying, recognising that those who bully often have needs too.

This procedure applies to all children who attend CCT and who may be bullied; behave in a bullying way towards others; or observe someone being bullied. It also applies to all CCT staff members and volunteers who observe bullying between children within CCT and who may have incidents of bullying reported to them - or who may be concerned that a child at CCT is showing signs of being bullied.

If an adult is bullying a child, this should be reported under the child protection procedures.

If a child is bullying another child to the extent that it may cause significant harm, then it will also need to be dealt with under child protection procedures.

This procedure does not cover incidents of bullying among CCT staff members and volunteers. In these circumstances, CCT staff members should use the Grievance Procedure found in the Employee Handbook.

Form's bullying might take: CCT recognises that bullying can happen anywhere - at school, at home or online. It is usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games, and mobile phones, is often called cyberbullying. A child can feel like there is no escape because it can happen wherever they are, at any time of day or night.

Bullying includes the following:

- **Verbal abuse** - such as name calling and gossiping.
- **Non-verbal abuse** - such as hand signs or text messages
- **Emotional abuse** - such as threatening, intimidating, or humiliating someone.



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- **Exclusion** - such as ignoring or isolating someone.
- **Undermining** - by constant criticism or spreading rumours.
- **Controlling or manipulating** someone
- **Physical assaults** - such as hitting and pushing.
- **Making silent, hoax or abusive calls**
- **Online or cyberbullying** - further details are provided below.

Defining online or cyberbullying: Cyberbullying is an increasingly common form of bullying behavior which happens on social networks, games, and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images, or videos. Children may know who is bullying them online - as it may just be an extension of offline peer bullying, they are already experiencing - or they may be targeted by someone using a fake or anonymous account. It is easy to be anonymous online and this may increase the likelihood of an individual engaging in bullying behavior. Because cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - it can feel like there is no escape. **Cyberbullying includes the following:**

- Sending threatening or abusive text messages
- Creating and sharing embarrassing images or videos
- Trolling – which is the sending of menacing or upsetting messages on social networks, chat rooms or online games.
- Excluding children from online games, activities, or friendship groups
- Setting up hate sites or groups about a particular child
- Encouraging young people to self-harm
- Voting for or against someone in an abusive poll
- Creating fake accounts, hijacking, or stealing online identities - with the aim to embarrass a young person or cause trouble using their name.
- Sending explicit messages - also known as sexting
- Pressuring children into sending sexual images or engaging in sexual conversations.



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Bullying (in whatever forms) can also be motivated by a discrimination towards the person being bullied. Further details of these types of bullying are provided below:

- **Racial bullying** - identified by the motivation of the bully, the language used, and/or by the fact that victims are singled out because of the colour of their skin, the way they talk, their ethnic grouping or by their religious or cultural practices.
- **Special educational needs (SEN) & disability bullying** - this is where children are singled out because of a disability and which deaf children can be bullied more than other children with SEN's or disabilities.
- **Sexual bullying** - behaviour, which whether physical or non-physical, is based on a person's sexuality or gender; and is when sexuality or gender is used as a weapon by boys or girls towards other boys or girls. Sexual bullying is more prevalent towards girls than boys.
- **Homophobic/Bi-phobic bullying** - irrational dislike, hatred or fear of individuals that are, or are perceived to be lesbian, gay, or bisexual.
- **Transphobic bullying** - transphobic is an umbrella term to describe people whose gender is not the same as or does not sit comfortably with - the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, cross dresser, non- binary, gender queer.

Changes in behaviour which can indicate a child is being bullied or cyberbullied: It can be hard for adults, including parents, to know whether a child is being bullied. A child might not tell anyone because they are scared the bullying will get worse. They might think that they deserve to be bullied, or that it is their fault. **However, the following should be looked out for by CCT staff members and volunteers:**

- Belongings getting "lost" or damaged.
- Physical injuries - such as unexplained bruises
- Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school.
- Not doing as well at school.
- Asking for, or stealing, money - to give to a bully.
- Being nervous, losing confidence, or becoming distressed and withdrawn
- Problems with eating or sleeping.
- Bullying others



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What to do if you are being bullied: If you are being bullied you should never keep it to yourself. Tell someone you trust. This could be a staff member or volunteer at CTT, a teacher, or someone else. It could also be your parent or carer. You may prefer to tell another child first and ask that person to help you tell an adult. If the bullying is happening at CCT - we will sort it out here. If it is happening somewhere else - maybe at school or near your home - CCT will get other people involved to stop it happening there.

Procedure to follow if an CCT staff member or volunteer observes a child being bullied - or if someone discloses that they are being bullied:

- **If you are a child** and someone tells you that they are being bullied, do not try to deal with it yourself. Talk to the person about getting help from an adult. Try to persuade them to go with you to explain the situation to an HTAFC staff member or volunteer or perhaps a teacher. If they will not do this, the best way to help is to explain that you will have to tell an adult yourself - and then go ahead and tell someone.
- **If you are an adult** and a child tells you that they are being bullied, take the child seriously. Do not tell them to stop being silly or to keep out of the way of the bullies. This will not help and will make the child feel let down and less inclined to tell anyone else. Listen to the child's full account of what is going on and complete the bullying reporting form with the child as soon as possible.

If you observe the bullying directly, act assertively to put a stop to it. Explain to all concerned that the incident would have to be reported properly to stop it happening again. Report the incident to the child's main CCT contact or, if you are that person, talk to the child about the bullying and discuss it with your line manager or CCT's DSO.

Unless the incident is minor and can be dealt with informally, the child's parent or carer should be informed by the child's main CCT contact within one working day.

If possible, there should be a three-way meeting between the child, the CCT staff member and the parent.

If the bullying is taking place in another environment e.g., school, the CCT staff member should ask what support the parent and child would like, to engage with whoever, the responsible agencies might be. The CCT staff member should aim to work in partnership with both parent and child and any other people who may be involved.



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If the bullying is taking place within CCT, the parent and child should be reassured that it will be dealt with as a priority, and they should be asked for their views on what would be helpful to deal with the situation.

The CCT staff member, having spoken to the child who has been bullied and the child's parent/carer, should also speak to the bully (or bullies) and obtain their account of what has happened or is happening. This should be noted in writing and the parents/carers of the bully (or bullies) should be informed. The bully and his or her parents/carers should be asked for their views on what should be done to put a stop to any further bullying and to repair the damage that has been done.

Apart from very minor incidents that have been directly observed by a staff member and dealt with at the time, all bullying that takes place at CCT should be discussed within the staff group within five working days.

At the meeting, the bullying incident should be discussed, and the details of a draft plan drawn up to address the situation, taking into account any suggestions made by the children involved and their parents/carers. **The following areas should be covered:**

- a. Details of any apology that has been or should be offered by the bully (or bullies)
- b. Details of any support for the person who has been bullied e.g., use of buddy scheme, extra input from the key worker and/or referral to another service.
- c. Details of any consequences for the bully, in addition to making an apology, with reference to the behaviour code.
- d. Details of any support for the bully, with reference to the behaviour code
- e. Details of any further discussions or work to be done with others in the group, including children who may have observed or encouraged the bullying.
- f. Details of any changes in how the staff group may handle issues of bullying in future.

The plan should be shared with the children concerned and their parents - and should be reviewed regularly.

Keeping a record of the bullying: Use the Bullying Report Form to make clear notes of any discussions or meetings that take place following the bullying incident. The plan for dealing with the aftermath of the incident should be copied to the child who has been bullied and their parent/carer and to the bullies and their parents/carers. It should also be placed on the file of all the children directly involved.

Agreed: TBC

CCT will review this and good practice annually.



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Travel, Trips, Residential and Tournaments

Trips, Tours & Tournaments Policy

Policy statement: Whenever CCT undertakes trip, tours, or tournaments it will ensure the safety of children it is responsible for. The aim, while ensuring safety, is that children will have fun; grow in confidence and self-esteem; and develop useful skills. All trip, tours and tournaments will be carefully planned, and preparations will ensure that any parental/carer concerns in connection with their child being away will be addressed. CCT will ensure the safety of undertaking trip, tours and tournaments by following all elements of its **Child Protection and Safeguarding Handbook** in relation to **Safer Recruitment**, adhering to all of its Safeguarding Policies & Procedures, as well as following CCT's **Code of Conduct for Staff and Volunteers**.

The following are the core principles of CCT's Trip, Tours and Tournaments Policy which will be followed at all times:

- No child will be permitted to undertake trip, tours or tournaments organised by CCT unless there is a relevant and valid signed consent form on file.
- When undertaking trip, tours, and tournaments HTAFC will ensure that minimum staff ratios are met for the age of the children participating.
- Where same sex children's groups are undertaking trip, tours, and tournaments CCT will always ensure there is the same sex staff member or volunteer with that group.
- All CCT staff and volunteers will have a copy of the Emergency Procedures Guide relevant to the trip, tours or tournament being undertaken.
- Trip, tours, and tournaments will always include 2 CCT staff members who are qualified first aiders and who carry a fully stocked first aid kit.

CCT will ensure the appropriate insurance is in place and which will cover the following:

- Public and civil liability.
- Personal accident.
- Vehicle.
- Breakdown cover for the transport.
- CCT will ensure clear communication about meeting points etc. with children, parents and carers; and this will be confirmed in written schedules and information packs provided to everyone – in a format appropriate to the person receiving them.



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- CCT will work with children to establish and agree rules for the trip, tours or tournament and communicate the consequence of breaking them.
- CCT will commit to meetings with parents and carers to:
 - Introduce staff and volunteers who will undertake trip, tours and tournaments with children.
 - Confirm the roles and responsibilities of those traveling with children; especially the HTAFC person with responsibility for child welfare while away.
 - Provide appropriate information packs.
 - Ensure that up to date consent forms are in place for upcoming events - with all pertinent medical information completed and up to date.
 - That questions or concerns can be raised and addressed.
 - Confirm an HTAFC point of contact for parents and carers and who will not be away with the group.

Agreed: TBC

CCT will review this and good practice annually.



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Late Collection

Policy statement: Late collections of children by parents and carers will create difficult situations for CCT staff and volunteers - and raises safeguarding considerations. Through this policy, CCT intends to outline actions and principles that are designed to minimise the occurrence of late collections and provide clear guidance for staff and volunteers on how to deal with late collections.

Principles underpinning CCT's late collection policy:

No activity can take place with a child without CCT having parent/carer contact details. It is CCT's policy that contact forms provide an alternative contact - in addition to the main parent/carer.

CCT will provide parents and carers with a timetable of activities at the beginning of the initial registration, term or season and will notify parents and carers in writing should a timetable change.

Parents and carers are informed of the procedure they must follow in the event of emergency or delay. All parents and carers are provided with the contact number of the CCT staff member or volunteer responsible for an activity - which enables the parent/carer to make contact when there is an emergency or delay that will impact upon the collection of a child.

Parents and carers are informed that it is not the responsibility of CCT or its staff and volunteers to transport a child in the event of their delay.

When a child is not collected at the communicated time, CCT staff and volunteers have been instructed to:

Attempt to contact the named parent or carer.

Attempt to contact the named person on the alternative number.

To wait with the child at the notified collection point - with at least one other CCT staff member, volunteer, or parents - if possible.

Remind the late collecting parent or carer of CCT's policy on late collection.

CCT staff and volunteers have been instructed:

Not to take the child home or to any other location.

Not to ask the child to wait in a vehicle or building where they would be on their own with the child.

Not to send the child home with any other person without express parental/carer permission.

Not to leave the young person on their own.

In the event that a child is not picked up; no contact can be made with either the parent/carer or alternative named contact; and 30 minutes have elapsed - the responsible CCT staff member or volunteer is required to contact CCT's Designated Safeguarding Officer.



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Complaints & Appeals 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:

The County Community Trust Coach/Activity Leader (if not available or is regarding the Coach / Leader then speak with the project manager).

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.



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Concerns/Safety of a Child or Adult

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.

The following procedure applies to any CCT staff member or volunteer who may be concerned about the safety and protection of a child. The different types of abuse have been detailed in CCT Safeguarding Policy. CCT staff members and volunteers should refer to these sections when reading this procedure.

Purpose and aim of procedure: We aim to ensure that those children who attend and/or participate in activities or events organised by CCT, and any other children who may come to the attention of CCT, receive the protection and support they need if they are at risk of abuse or radicalisation. This procedure provides clear direction to staff and volunteers at CCT if they have concerns that a child is in need of protection.

Ways that abuse might be brought to your attention include:

- A child might make a direct disclosure about him or herself.
- A child might make a direct disclosure about another child.
- A child might offer information that is worrying but not a direct disclosure.
- A member of staff or volunteer might be concerned about a child's appearance or behaviour or about the behaviour of a parent or carer towards a child.
- A parent or carer might make a disclosure about abuse that a child is suffering or at risk of suffering.
- A parent might offer information about a child that is worrying but not a direct disclosure.

When talking to a child - who has told you that they are/or another child is being abused - please take account of the following guidance:

Reassure the child that telling someone about it was the right thing to do.



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Tell them that you now have to do what you can to keep them (or the child who is the subject of the allegation) safe.

Let the child know what you are going to do next and who else needs to know about it. Let the child tell his or her whole story - but don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying.

Ask the child what they would like to happen as a result of what they have said, but don't make or infer promises you can't keep.

Give the child the **ChildLine** phone number which is **0800 1111**.

How to help a child in immediate danger or in need of emergency medical attention:

- If the child is in immediate danger and is with you, remain with them and call the Police.
- If the child is elsewhere, contact the Police and explain the situation to them.
- If the child needs emergency medical attention, call an ambulance and while you are waiting for it to arrive, get help from CCT's first aider.
- If a first aider is not available, use any first aid knowledge that you may have yourself to help the child.
- You also need to contact your line manager or CCT's Designated Safeguarding Officer to let them know what is happening.

A decision will need to be made about who should inform the child's family and the Local Authority and when they should be informed. If you have involved the Police and/or the health services, they should be part of this decision. Consider the welfare of the child in your decision making as the highest priority.

Issues that will need to be considered are:

The child's wishes and feelings.

The parent's right to know - unless this would place the child or someone else in danger, or would interfere with a criminal investigation.

The impact of telling or not telling the parent.

The current assessment of the risk to the child and the source of that risk.

Any risk management plans that currently exist.

Once any immediate danger or emergency medical need has been dealt with, follow the steps set out in the Safeguarding Policy flow chart (Appendix B) **Procedure for Reporting Concerns About a Participant in Relation to The County Community Trust, Trustees, Staff and Volunteers.**

Use the **Reporting Concerns about a Child Form** (available for CCT's Designated Safeguarding Officer). The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory child protection authorities if a referral to them is needed.



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The form should be signed and dated by all those involved in its completion and kept confidentially on the child's file and in line with CCT's Data Protection Policy. The name of the person making the notes should be written alongside each entry.



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Allegations against a member of staff or volunteer

Policy statement: CCT has developed clear policies and procedures for dealing with allegations against CCT employees or volunteers who work with children. Examples of allegations that would be covered by this policy, although no intended to be exhaustive, include:

- Behaviour that has, or may have, harmed a child.
- Criminal acts against or related to a child.
- Behaviour towards a child or children in a way that indicates they may pose a risk of harm to children.

Principles: In the first instance, any such allegation against an CCT employee or volunteer must be reported immediately to CCT's Designated Safeguarding Officer. CCT's Designated Safeguarding Officer must immediately make CCT's General Manager aware of the allegation; and the Manager will then be responsible for notifying the named Board Safeguarding Lead and - if different from the Community Manager.

Reporting time limits: CCT's Designated Safeguarding Officer is accountable for contacting the Local Authority's Designated Officer and informing them of all allegations that have come to their attention **within 24 hours of the allegations being made.**

CCT's Designated Safeguarding Officer will notify The FA Case Management Team, where an allegation at CCT results in a safeguarding referral being made to any of the following:

- The Police
- The Local Authority Designated Officer
- Any other statutory agency, social care or Children's Services Directorate
- CCT's Designated Safeguarding Officer is accountable for contacting The FA Case Management Team as soon as possible after the allegations have been made - but in any event **within 72 hours of the allegations being made.**
- **DBS Referral:** Where any CCT employee or volunteer - working in regulated activity - is suspended from their duties as a consequence of concerns, allegations and/or internal investigations related to their work with children, then CCT's Designated Safeguarding Officer will notify The FA Case Management Team as soon as possible after the suspension takes place - but in any event **within 72 hours of the suspension happening.**

Information relating to a DBS referral as well as further advice relating to making a DBS referral being available here:

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>



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Dealing with Allegations made against an Employee or Volunteer

Purpose of procedure: This procedure outlines what should happen if a safeguarding allegation is made against an adult working for or involved in CCT. The procedure provides clear direction to those CCT staff who are called upon to deal with such allegations - and to manage the investigations that may result from them.

The aims of this procedure are:

- To ensure that children who access the services and facilities provided by CCT - and any other children who may come to its attention - are protected and supported following an allegation that they may have been abused by an adult from within CCT.
- To ensure that there is a fair, consistent and robust response to any allegations made, so that the risk posed to other children by an abusive individual is managed effectively.
- To facilitate an appropriate level of investigation into allegations - whether they are said to have taken place recently; at any time, the person in question has been employed by/volunteered with CCT; or prior to the person's involvement with CCT.
- To ensure that CCT continues to fulfil its responsibilities towards members of staff and volunteers who may be subject to such investigations.
- To ensure that individuals can continue in their role if they have been at the centre of allegations that are unfounded or deemed to be malicious in origin.

This procedure applies to:

Any CCT staff member or volunteer to whom an allegation of abuse has been made and which involves another CCT staff member or volunteer.

Anyone in a managerial position (including CCT's Designated Safeguarding Officer, line managers and supervisors) who may be required to deal with such allegations and manage investigations that result from them.

Conducting an investigation: Once any urgent necessary steps have been taken, attention can be given to dealing with the full implications of the allegations. **There are up to three possible lines of enquiry when an allegation is made:**

- A Police investigation of a possible criminal offence.
- Enquiries and an assessment by the Local Authority Children's Social Care Department about whether a child is in need of protection.
- Investigation by CCT and possible disciplinary action being taken against the person in question. This will include implementing a plan to manage any risk posed by the individual to children connected with CCT until the outcome of the other investigations and enquiries are known.



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Reporting an allegation or concern: If the allegation is made by a child or family member to an CCT staff member or volunteer - or if an CCT staff member or volunteer observes concerning behavior by a colleague at first hand - this should be reported immediately to the staff member/volunteer's line manager and CCT's Designated Safeguarding Officer - who will be CCT's lead in relation to handling the allegation.

If a staff member has received an allegation or observed something of concern about their own manager, the staff member should report the allegation or concern to the person more senior to their manager.

If the person who is the subject of the concern is the Designated Safeguarding Officer, the matter should be reported to CCT Board of Trustees Chair John Stevenson.

When to involve the Local Authority's Designated Officer: The Designated Safeguarding Officer **must** report the allegation to the Local Authority's Designated Officer **within 24 hours** if the alleged behaviour suggests that the person in question:

- May have behaved in a way that has harmed or may have harmed a child.
- Has possibly committed a criminal offence against or related to a child.
- Has behaved towards a child in a way that suggests that they may be unsuitable to work with children.

This should also happen even if the individual has volunteered the information themselves.

The Local Authority's Designated Officer may be told of the allegation from another source. If this is the case, then the first information received by CCT may be when the Local Authority's Designated Officer makes contact with CCT's Designated Safeguarding Officer in order to explain the situation.

Whoever initiates the contact, there will be discussion between the Local Authority's Designated Officer and CCT's Designated Safeguarding Officer to share information about the nature and circumstances of the allegation, and to consider whether there is any evidence to suggest that it may be false or unfounded.

If there is any reason to suspect that a child has suffered (or be likely to suffer) significant harm and there are no obvious indications that the allegation is false, the Local Authority's Designated Officer, in cooperation with CCT, will make an immediate referral to the Local Authority Children's Social Care Department to ask for a strategy discussion.



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The Local Authority's Designated Officer and CCT's Designated Safeguarding Officer will take part in the strategy discussion. CCT's Designated Safeguarding Officer - and any other representative from CCT – will co-operate fully with this and any subsequent discussion with the Children's Social Care Department.

CCT will ask from the outset that the Children's Social Care Department shares any information obtained during the course of their enquiries with CCT's Designated Safeguarding Officer where it has any relevance to the person's employment or volunteering with the organisation.

Dealing with a criminal offence: If there is reason to suspect that a criminal offence may have been committed (whether or not the threshold of 'significant harm' is reached), the Local Authority's Designated Officer will contact the Police and involve them in a similar strategy discussion, which will include CCT's Designated Safeguarding Officer.

The Local Authority's Designated Safeguarding Officer - and any other representative from CCT - will cooperate fully with any discussion involving the Police and will ask for similar cooperation from the Police in terms of the sharing of information relevant to the person's employment or volunteering with the organisation.

Discussions with the Police will also explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place - or whether disciplinary action must wait until the criminal process is completed.

Talking to parents about the allegation or concern: If the child's parents/carers do not already know about the allegation, CCT's Designated Safeguarding Officer and the Local Authority's Designated Officer will discuss how they should be informed and by whom.

Talking to the person who is the subject of the allegation: The person at the centre of the allegation will be informed as soon as possible after the initial consultation with the Local Authority's Designated Officer. However, if a strategy discussion with Children's Social Care or the Police is needed, this might have to take place before the person concerned can be spoken to in full. The Police and Children's Social Care Department may have views on what information can be disclosed to the person. Only limited information will be given to the person in question, unless the investigating authorities have indicated that they are happy for all information to be disclosed - or unless there is no need for involvement from these statutory agencies.

CCT's Designated Safeguarding Officer will keep in close communication with the Local Authority's Designated Officer and the other agencies involved, in order to manage the disclosure of information appropriately.



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Taking disciplinary action: If the initial allegation does not involve a possible criminal offence, CCT's Designated Safeguarding Officer and the line manager of the person at the center of the allegation will consider whether formal disciplinary action is needed.

If the Local Authority Children's Social Care Department has undertaken any enquiries to determine whether a child or children are in need of protection, CCT's Designated Safeguarding Officer will take account of any relevant information from these enquiries when considering whether disciplinary action should be brought against the person at the centre of the allegations.

The following timings should be kept to wherever possible, depending on the nature of the investigation:

If formal disciplinary action is not needed, other appropriate action should be taken within **three working days**. If disciplinary action is required - and can be progressed without further investigation - this should take place **within 15 days**.

If the CCT decides that further investigation is needed in order to make a decision about formal disciplinary action, the CCT's Designated Safeguarding Officer will discuss with the Local Authority's Designated Officer the possibility of this investigation being done by an independent person to ensure that the process is objective.

Whether or not the investigation is handled internally or independently, the report should be presented to CCT's Designated Safeguarding Officer within **10 working days**.

Having received the report of the disciplinary investigation, CCT's Designated Safeguarding Officer should decide **within two working days** whether a disciplinary hearing is needed.

If a disciplinary hearing is needed, it should be held within **15 working days**.

CCT's Designated Safeguarding Officer will continue to liaise with the Local Authority's Designated Officer during the course of any investigation or disciplinary proceedings - and will continue to use the Local Authority's Designated Officer as a source of advice and support.

If a criminal investigation is required, it may not be possible to make decisions about initiating disciplinary proceedings - or about the person's future work arrangements - until this is concluded. The Police are required to complete their work as soon as reasonably possible and to set review dates, therefore CCT's Designated Safeguarding Officer will either liaise with the Police directly or via the Local Authority's Designated Officer to check on the progress of the investigation and criminal process.

The Police are required to inform the CCT immediately if the person is either convicted of an offence or acquitted or, alternatively, if a decision is made not to charge them with an offence, or to administer a caution. In any eventuality, once the outcome is known, CCT's Designated Safeguarding Officer will contact the Local Authority's Designated Officer to discuss the issue of disciplinary proceedings.



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If the allegation is substantiated and if, once the case is concluded, CCT dismisses the person or ceases to use their services, or the person ceases to provide their services, CCT's Designated Safeguarding Officer will consult with the Local Authority's Designated Officer about referral of the incident to the Disclosure and Barring Service (DBS). This should take place within a month.

Managing risk and supporting the person at the centre of the allegation: The first priority of the CCT must always be the safety and welfare of children. However, as an employee or volunteer of CCT, the person who is the subject of the allegation has a right to be treated in a fair, sensitive and non-judgmental manner - and to have their privacy respected - as far as this ensures the safety of the child and other children.

Information about the allegation must only be shared on a need-to-know basis with those directly responsible for supervising and managing the staff member or volunteer. Any other information (for example, explanations to other staff members as to why the person is not at work or working to different arrangements) should be agreed and negotiated with the individual concerned.

If the person is a member of a Trade Union or a professional organisation, they should be advised to contact that body as soon as possible after being informed that they are the subject of an allegation. Arrangements should also be made for them to receive ongoing support and information about the progress of the investigation.

The possible risk of harm to children presented by the person who is the subject of an allegation needs to be carefully managed both during and after any conclusion to the investigation processes following the allegation. This means that the CCT may need to consider suspending the person if there is cause to suspect that a child may be at risk of significant harm, or if the allegation is serious enough to warrant investigation by the Police - or if it is so serious that it could lead to dismissal. However, a decision to suspend should not be taken automatically, as there may be other ways of managing any risk presented by the person.

The situation should be discussed fully between CCT's Designated Safeguarding Officer, the individual's line manager and the Local Authority's Designated Officer - who will seek the views of the Police and the Children's Social Care Department on the question of possible suspension. The conclusions of the discussion should also be carefully documented. Grounds for suspension should be clearly set out if this is the conclusion. If suspension is not the conclusion, then a clear plan should be made as to how any possible risk posed by the individual is to be managed. This could involve, for example, changes to the person's duties so that they do not have direct contact with children, and/or increased levels of supervision whilst at work.

If it is decided, once the case has been concluded, that a person who has been suspended - or who has taken sick leave due to the stress induced by the allegation - is able to return to work, CCT's Designated Safeguarding Officer and the line manager of the person who has been the subject of the allegations should consider how best to support the individual in this process. A plan to facilitate a return will be drawn up in consultation with the individual themselves and should take into account the need to



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manage any remaining child protection risks; as well as supporting the person concerned, after what will have been and will remain a very difficult experience.

If the decision is that the person cannot return to work and has to be dismissed or chooses to resign, the CCT's Designated Safeguarding Officer and the Local Authority's Designated Officer will discuss the need for the matter to be referred to the Disclosure and Barring Service and/or to any professional body to which the person may belong.

CCT does not enter into compromise agreements with individuals who resign following the conclusion of investigations into allegations made against them and will always comply with its statutory obligations to share information about the individual in the interests of protecting children and young people.

If the allegation is found to be without substance or fabricated, the CCT will consider referring the child in question to the Children's Social Care Department for them to assess whether they are in need of services or whether they may have been abused by someone else. If it is felt that there has been malicious intent behind the allegation, CCT will discuss with the Police whether there are grounds to pursue any action against the person responsible.

Keeping a record of the investigation: All those involved in dealing with the allegation should keep clear notes of the allegations made; how they were followed up; any actions and decisions taken; together with the reasons for these.

These notes should be compiled gradually as the situation unfolds, with each entry being made as soon as possible after the event it describes. The notes should be signed and dated by the person making them, and the person's name should be printed alongside.

The notes should be kept confidentially on the file of the person who is the subject of the allegation. Discussion should take place with the Local Authority's Designated Officer to determine whether any aspects of the notes may not be shared with the person concerned. If there are no reasons not to do so, a copy of the records should be given to the individual.

The notes should be held on file for a 10-year period, whether or not the person remains with CCT for this period.

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CCT will review this and good practice annually.



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Procedure for Dealing with Allegations Made Against another Child

Purpose of procedure: The purpose of this procedure is to provide a clear direction to staff that are called upon to deal with allegations made against a child, by another child and to manage investigations and care plans which may result from them.

This procedure applies to:

- Any CCT staff member or volunteer to whom an allegation of abuse has been made which suggests that another child is responsible.
- Anyone in a managerial position, including CCT's Designated Safeguarding Officer, line managers and supervisors who may be required to deal with such allegations and manage investigations and care plans that result from them.

The aims of this procedure are:

- To ensure that children who attend CCT - and any other children who may come to the attention of CCT - are protected and supported following an allegation that they may have been abused by another child involved with CCT.
- To ensure that there is a fair, consistent and robust response to any allegations of this nature so that the risk posed to other children by the child in question is managed effectively.
- To facilitate an appropriate level of investigation into allegations, whether they relate to recent alleged activity, said to have taken place during the time that the child in question has been involved with CCT, or whether they relate to abuse which allegedly took place prior to the child's involvement with CCT.
- To ensure that CCT continues to fulfil its responsibilities towards children who may be subject to such investigations and need support.
- To ensure that there is an appropriate response in situations where allegations are unfounded or deemed to be malicious in origin.

Ways that allegations might be made against another child or young person involved with CCT could include the following:

- A child or parent/carer might make a direct allegation against another child.
- A child or parent/carer might express discomfort with the behaviour of another child that falls short of a specific allegation.
- Another child, CCT staff member or volunteer may directly observe behaviour from one child towards another that gives cause for concern.
- CCT may be informed by a parent, or by the Police, or another statutory authority that a child is the subject of an investigation.



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- A child may volunteer information to CCT that they have harmed another child - or is at risk of doing so - or has committed an offence against or related to a child.

Is this a Safeguarding issue or bullying?

When faced with a situation of one child behaving inappropriately towards another, a decision needs to be made about whether the problem behavior constitutes bullying or a safeguarding concern. This is a decision that needs to be reached by CCT's Designated Safeguarding Officer, in consultation with the staff member/volunteer responsible for the child; the staff member/volunteer's line manager; and, if necessary, the Local Authority Children's Social Care Department. If the conclusion is that the behavior is an example of bullying, and if both children attend CCT, it needs to be dealt with under the Anti-bullying Policy & Procedure detailed in this Handbook.

If, however, it is behavior that could be described as child abuse and has led to the victim possibly suffering significant harm, then it must be dealt with under safeguarding procedures. This should include all incidents of sexual assault and all but the most minor incidents of physical assault.

The following checklist can be used to help inform the decision:

Bullying

The difference of power between the bully and the person being bullied is relatively small.

The bullying behaviour may be from several children/young people acting in a group rather than from one child acting alone. It may also, but not necessarily, be directed towards a group of other children rather than an individual child.

The behaviour involves teasing or making fun of someone, excluding a child from games and conversations, pressurising other children not to be friends with someone, spreading hurtful rumours or circulating inappropriate photographs/images/drawings, cyberbullying, shouting at or verbally abusing someone, stealing someone's possessions, making threats, or harassment based on race, gender, sexuality, or disability.

The behaviour has not previously been a concern and the bully or bullies may have been responding to group pressure.

The behaviour is perceived as bullying by the victim.

Physical or sexual assault, or forcing someone to do something embarrassing, harmful or dangerous is also included in the list of bullying behavior's but are the most likely to constitute a child protection concern if the victim suffers significant harm as a result of the behavior.



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Safeguarding concerns

The difference of power between the child who is abusing, and the person being abused is significant e.g., there is an age difference of more than two years, there is a significant difference in terms of size or level of ability, the abuser holds a position of power (such as being a helper, volunteer, or informal leader) or the victim is significantly more vulnerable than the other child or young person.

The behaviour involves sexual assault or physical assault (other than the most minor physical assault).

The child who is the victim of the behaviour may have suffered significant harm. The behaviour may not necessarily be perceived by the victim as abusive, particularly if it is sexual in nature.

The behaviour is not a one-off incident and is part of a pattern of concerning behaviour on the part of the child who is abusing.

The behaviour, if sexual, is not part of normal experimentation that takes place between children.

Is this sexual abuse or normal experimentation? All children develop an interest in their own sexuality from a young age and seek to learn about sex from their peers. It is important not to label normal, healthy behaviour as deviant or abusive. It is equally important not to allow sexually abusive behaviour perpetrated by one child towards another to go unchecked - as this is harmful both for the victim and the perpetrator. There are ways of assessing whether sexual behaviour between children is abusive or not.

Indicators of abusive behaviour include:

- There is a significant difference in age, dominance or understanding between the children.
- The behaviour was accompanied by the use of threats or bribes.
- The behaviour was carried out in secret.

For the purposes of this procedure however, it is enough to say that if there is any question that the behaviour could be abusive, the matter should be discussed - by CCT's Designated Safeguarding Officer - with the Local Authority Children's Social Care Department or with the NSPCC Helpline which is 0808 800 5000.

What to do if you have Safeguarding concerns

If you believe that the child who has been allegedly abused, or the child who has allegedly perpetrated the abuse, is in immediate danger or requires emergency medical attention you must take the following action:

If either child is in immediate danger and is with you, remain with them and call the Police if you are unable to remove the danger yourself.

If the child is elsewhere, contact the Police and explain the situation to them.

If a child needs emergency medical attention, call an ambulance and while you are waiting for it to arrive, get help from your first aider.



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If the first aider is not available, use any first aid knowledge that you may have yourself to help the child. You also need to contact your line manager or CCT's Designated Safeguarding Officer to let them know what is happening.

A decision will need to be made about when and who should inform the families of both the child who has been abused and the child who has allegedly perpetrated the abuse, as well as the Local Authority Children's Social Care Department.

If the child who is the alleged victim is not known to CCT, it is not the role to inform the child's family.

Even if the child who is the alleged victim is known, the Police and/or the Health Services, should be part of the decision making process if they have been contacted.

The paramount consideration should always be the welfare of the children involved. Issues that will need to be considered are:

- be children's wishes and feelings.
- The parents' right to know (unless this would place the child who has allegedly perpetrated the abuse in danger or would interfere with a criminal investigation).
- The impact of telling or not telling the parents.
- The current assessment of the risk to the child who has been abused and the source of that risk.
- The current assessment of any risk to the child who has allegedly perpetrated the abuse and the source of that risk.
- Any risk management plans that currently exist for either child.

Once any immediate danger or emergency medical need has been dealt with, the procedure set out below should be followed:

The member of staff/volunteer who has been informed of the allegation or who has the concern, should make notes of what they have been told - or their direct concerns - using the reporting form and should discuss these with their line manager within 24 hours. CCT's Designated Safeguarding Officer should also be involved in the discussion.

If both children are known to CCT and if their families do not already know about the allegation or concern, the member of staff/volunteer, line manager or CCT's Designated Safeguarding Officer should discuss it with them unless:

The view is that someone (for example the child who has allegedly perpetrated the abuse) may be put in danger by the family being informed.

Informing the family might interfere with a criminal investigation.



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If either of these circumstances applies, discussions with the families should only take place after this has been agreed with the Local Authority Children's Social Care Department.

If only the child who is alleged to have harmed another child is known to CCT then, subject to the considerations set out above, discussions with only this child's family should take place.

The child who is the subject of the allegation should also be informed of what has been said about them. However, if the view is that Children's Social Care Department or the Police should be involved, the child should only be informed after discussion and agreement with these agencies. These agencies may have views about what information should be disclosed to the child at this stage.

If there is still uncertainty about whether the allegation or concern constitutes a child protection issue, CCT's Designated Safeguarding Officer should discuss with Children's Social Care Department or with the NSPCC Helpline without disclosing the identity of either child/family.

If, having discussed the situation fully and taken advice, if necessary, CCT's Designated Safeguarding Officer concludes that the alleged behaviour does not constitute a child protection issue, then consideration should be given to whether the Anti-bullying Policy and Procedure should be used (if both children are known to the organisation) and whether either or both children should be referred for other services.

If the view is that the behaviour does indeed amount to a child protection issue, then CCT's Designated Safeguarding Officer should refer both children to the Local Authority Children's Social Care Department and confirm the referral in writing within 24 hours.

Pending the outcome of the referral to the Children's Social Care Department and the possible investigation or assessment that may follow from this, any risk that may be posed to other children by the child who has allegedly harmed another child will need to be carefully managed. This should be done on an inter-agency basis in accordance with procedures developed by the Local Safeguarding Children Board for children who display harmful behaviour towards others.

CCT's Designated Safeguarding Officer should enquire of the Children's Social Care Department whether these procedures are being used and, if so, should ask to be involved in or at least kept informed of inter-agency decisions made in accordance with these procedures.

If the procedures are not being used but CCT remains concerned that the child could pose a risk to other children, then CCT's Designated Safeguarding Officer should consider whether the child can continue to be involved with CCT and if so, on what basis. This is a situation that needs to be kept under regular review as the investigation and assessment conducted by the statutory agencies is carried out and reaches a conclusion.

It may also need to be reviewed regularly following the conclusion of the assessment process, as the child may be receiving support that should, with time, reduce the level of risk they present.



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If the allegation is found to be without substance or fabricated, CCT will consider referring the child who was said to have been harmed to the Children's Social Care Department for them to assess whether they need services (for example, the child may have been abused by someone else).

If it is felt that there has been malicious intent behind the allegation, CCT will discuss with the Police whether there are grounds to pursue any action against the person responsible.

How to respond to a child who says that they - or another child - is being abused by another child:

- Reassure the child that they have done the right thing by telling someone about it.
- Tell them that you now have to do what you can to keep them (or the child who is the subject of the allegation) safe.
- Let the child know what you are going to do next and who else needs to know about it.
- Let the child tell their whole story - don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying.
- If possible, explain to the child's parent/carer what has happened. Do this first without the child there, and then summarise it again in front of the child so that it is an open subject between parent/carer and child. This may enable them to talk about it together more easily.
- Check out what the child would like to happen as a result of what they have said, but don't make or infer promises you can't keep.
- Give the child the ChildLine phone number - which is 0800 1111.
- Make sure that the parent/carer has support too.

How to respond to a child who says that they have abused another child:

- Reassure the child that they have done the right thing by telling someone about it.
- Tell them that you now have to do what you can to keep them and the child who has been abused safe.
- Let the child know what you are going to do next and who else needs to know about it.
- Let the child tell their whole story - don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying.
- If there is no risk to the child from the child's parent/carer, then explain to the parent/carer what has happened. Do this firstly without the child there, and then summarise it again in front of the child so that it is an open subject between parent/carer and child. This may enable them to talk about it together more easily.
- Check out what the child expects to happen as a result of what they have said - offer reassurance where appropriate but don't make or infer promises you can't keep.
- Reassure the child that, with help, the problem can be sorted out and that what has happened does not make them an abuser for life.



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- Give the child the ChildLine phone number - which is 0800 1111.

Remember that the child who has behaved in this way is a child in need of support.
Make sure that the parent/carer has support too.

Recording the concerns: Use the Reporting Concerns about a Child Form available from CCT's Designated Safeguarding Officer to record the concern and for clear steps on how you should deal with it. The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory Safeguarding authorities if a referral to them is needed.



Recognising the Signs of Child Abuse

Recognising child abuse is not easy. CCT does not believe it is the responsibility of its staff members or volunteers to decide whether child abuse has taken place - or if a child is at significant risk of harm from someone. However, every CCT staff members and volunteers has both a responsibility and duty - as set out in this Handbook - to act in order that the appropriate agencies can investigate and take any necessary action to protect a child.

This section starts by providing greater detail about the four core categories of abuse detailed in the UK Government's guidance "Working Together to Safeguard Children". This Handbook provides more specific guidance on how to help safeguard and protect children in relation to many of the other recognised types of child abuse. The following information is provided to help all CCT staff members and volunteers to be more alert to the signs of possible abuse.

Sexual abuse: A child is sexually abused when they are forced or persuaded to take part in sexual activities. This does not have to be physical contact and it can happen online. Sometimes the child will not even understand that what is happening to them is abuse - or that it is wrong.

Defining child sexual abuse: There are two different types of child sexual abuse - "contact abuse" and "non- contact abuse". Further information on each type is detailed below:

- **Contact abuse** involves touching activities where an abuser makes physical contact with a child, including penetration. **It includes the following:**
 - a) Sexual touching of any part of the body - whether the child's wearing clothes or not.
 - b) Rape or penetration by putting an object or body part inside a child's mouth, vagina or anus.
 - c) Forcing or encouraging a child to take part in sexual activity.
 - d) Making a child take their clothes off, touch someone else's genitals or masturbate.

- **Non-contact abuse** involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet and flashing. **It includes the following:**
 - a) Encouraging a child to watch or hear sexual acts.
 - b) Not taking proper measures to prevent a child being exposed to sexual activities by others.
 - c) Meeting a child following sexual grooming with the intent of abusing them



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- d)** Online abuse including making, viewing or distributing child abuse images.
- e)** Allowing someone else to make, view or distribute child abuse images showing pornography to a child.
- f)** Sexually exploiting a child for money, power or status (This is known as child exploitation and is covered in further detail later in this section)

Changes in behaviour which can indicate sexual abuse include:

- Staying away from certain people
- Avoiding being alone with people, such as family members or friends
- Seeming frightened of a person or a reluctance to socialise with them
- Showing sexual behaviour that's inappropriate for their age
- Becoming sexually active at a young age
- Being promiscuous
- Using sexual language or knowing information that you wouldn't expect them to
- Having physical symptoms such as anal or vaginal soreness, an unusual discharge, sexually transmitted infection (STI) and/or pregnancy

Emotional abuse: Children who are emotionally abused suffer ongoing emotional maltreatment or emotional neglect. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development as well as causing serious harm.

Defining emotional abuse: Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child.

Children who are emotionally abused are usually suffering another type of abuse or neglect at the same time - but this may not always be the case.

Physical abuse: It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them.

Defining physical abuse: Physical abuse is deliberately hurting a child and causing injuries such as bruises, broken bones, burns or cuts. There is no excuse for physically abusing a child. It causes serious, and often long-lasting, harm - and in severe cases, death. Shaking or hitting babies can cause non-accidental head



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injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell - this is known as fabricated or induced illness (FII).

Neglect: Neglect is the ongoing failure to meet a child's basic needs. It's dangerous and children can suffer serious and long-term harm and neglect is the most common form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents or carers. A child who is neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death.

Defining neglect: There are four specific types of neglect, and each is listed below with further detail:

- 1. Physical neglect:** This is failing to provide for a child's basic needs such as food, clothing or shelter. It is also failing to adequately supervise a child, or provide for their safety.
- 2. Educational neglect:** Failing to ensure a child receives an education.
- 3. Emotional neglect:** Failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, intimidating or isolating them. This form of neglect is often the most difficult to prove.
- 4. Medical neglect:** Failing to provide appropriate health care, including dental care and refusal of care or ignoring medical recommendations.

Neglect can have serious and long-lasting effects. It can be anything from leaving a child home alone to the very worst cases where a child dies from malnutrition or being denied the care they need. In some cases, it can cause permanent disabilities. Neglect can be really difficult to identify, making it hard even for professionals to take early action to protect a child.

Changes in behaviour which can indicate neglect: Having one of the signs or symptoms below doesn't necessarily mean that a child is being neglected. However, if CCT staff members or volunteers ever notice multiple - or persistent - signs then it could indicate that there is a serious problem. Children who are neglected may have:

- Poor appearance and hygiene
- Health and development problems



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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.

Agreed: TBC

CCT will review this and good practice annually.



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Confidentiality Policy

Policy statement: CCT believe that the safety, wellbeing, and protection of all children - who use our services and facilities - is of the utmost importance in all decisions relating to confidentiality of information. Therefore, the appropriate sharing of information between CCT staff and volunteers is essential for ensuring child safety, wellbeing, and protection. Trust is an essential element of child protection at CCT, as it enables everyone (staff, volunteers, children, and their parents/carers) to seek advice and support - both inside and outside of the organisation.

CCT's Confidentiality Policy is designed to establish the boundaries of confidentiality to enable everyone to feel safe and comfortable in discussing personal issues and concerns. This policy aims to be easily understood by everyone and to establish trust in the boundaries of confidentiality that CCT will adhere to.

- **Aims of CCT's Confidentiality Policy:** What must be acknowledged and understood is that CCT cannot offer absolute confidentiality in certain prescribed circumstances. Therefore, this **Confidentiality Policy** aims to make clear the situations when information will need to be shared, so that everyone can make informed decisions about who the most appropriate person to speak to - about a particular issue - is.
- **Policy development:** This **Confidentiality Policy** has been developed - and will continue to be so - through consultation with CCT staff, volunteers, and partner agencies as appropriate. All staff, volunteers, children, and parents/carers are informed of this policy through the wide circulation of CCT's Children's Safeguarding Handbook and forms the basis of every new starter induction.
- **Definition of confidentiality:** This is defined as "that state of keeping secret or private, something which is spoken or provided in some other form privately".
- **Example:** In practice this could be a child asking for their conversation with an CCT staff member to be kept private. If an CCT staff member was to offer absolute confidentiality to a child, they would in effect be offering to keep the content of the conversation completely secret and that they would discuss it with no-one.

As may be obvious from the above example, there are actually very few situations where CCT should ever be offering absolute confidentiality. The challenge is always to strike a balance between ensuring the safety, wellbeing, and protection of all children; furthering CCT's ethos of trust; and at the same time ensuring that essential personal information is shared to further child protection and good practice.



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- **Limited confidentiality:** The reality is, that in most cases, what CCT can offer is limited confidentiality. This means that the content of a conversation might well be discussed with other professionals, but in general this would not identify the person who had made the disclosure.

Therefore, CCT staff and volunteers should always make it clear at the outset of a conversation that there are limits to confidentiality. It should be reinforced that these limits are in place to ensure children's safety and wellbeing. The CCT will always ensure that a child will be informed when a confidence has to be broken for this reason and they will be involved in the information sharing.

CCT staff members and volunteers must not promise confidentiality. Children do not have the right to expect they will not be reported to their parents or carers and may not, in the absence of an explicit promise, assume that information disclosed outside of that context will therefore be private and confidential. No CCT staff member or volunteer should ever give such a promise.

As already stated, the safety, wellbeing and protection of children is the paramount consideration in all decisions that CCT staff and volunteers make about confidentiality. However, CCT staff and volunteers are **not** obliged to break confidentiality, other than in circumstances where child Safeguarding is - or may be - an issue. Notwithstanding this, the CCT firmly believes that it is vitally important that all CCT staff and volunteers are able to share their concerns about relating to a child's safety and wellbeing.

- **Safeguarding training of staff and volunteers:** All CCT staff and volunteers undergo full safeguarding training and regular refresher safeguarding training and as such are expected to be able to use their professional judgement when considering and advising a child about making a disclosure in confidence - and whether such a confidence could then be maintained having heard the information. When an CCT staff member or volunteer is exercising their professional judgement they must always consider the best interests of the child - including the need to both ensure trust to provide safeguards for children - and possible child protection issues.

Paramount in all cases of disclosure, is that CCT staff and volunteers must at all times follow the organisation's Child Safeguarding Policies and Procedures detailed throughout this Handbook.

All staff, volunteers, children, parents/carers, as well as any other concerned individual can at all times speak with CCT's Designated Safeguarding Officer. Any conversation with CCT's Designated Safeguarding Officer will be confidential - other than as defined within this Handbook.

Whenever there arises doubt as to whether information should be shared, CCT will seek guidance and advice from the Local Authority's Designated Officer.



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Support of CCT staff and volunteers: Staff and volunteers are encouraged to seek the support of CCT's Designated Safeguarding Officer if they have any support needs in dealing with personal issues disclosed by a child. This is important because CCT would rather staff and volunteers asked for help than possibly make a poor decision because they do not have all the facts, or the necessary training, or end up taking worries about a child home with them.

Agreed: TBC

CCT will review this and good practice annually.



Whistle Blowing Policy

Policy statement: Whistleblowing is quite simply when an CCT staff member or volunteer reports suspected wrongdoing at CCT. Officially this is called 'making a disclosure in the public interest'. CCT understands that sometimes things go wrong. If they do, then we ask you to tell us.

- **Purpose:** The purpose of this Whistleblowing Policy is to make it clear that CCT staff members or volunteers can whistleblow without fear of victimisation, subsequent discrimination, or disadvantage. This Whistleblowing Policy is therefore intended to encourage and enable everyone to raise serious concerns directly to CCT, rather than overlooking a problem or seeking a resolution of the problem outside of the organisation.

All CCT staff members and volunteers have a responsibility to maintain the highest standards of care towards everyone they come into contact with through their work with and for the organisation. This Whistleblowing Policy aims to ensure that serious concerns can be properly raised and addressed within the organisation and are recognised as a way of enabling the delivery of good practice - and which will help to ensure the protection of every child.

- **Responsibilities:** CCT believes that all staff members and volunteers are professional and skilful in the work and tasks they undertake. However, occasionally it may be that a staff member or volunteer has concerns about another person's conduct or standards of practice **e.g.**, they may be worried that a child is not being cared for properly; is being abused; or even at serious risk. It could be that they have concerns about fraud; financial irregularity; or other issues they have become aware of within while working for the CCT. All CCT staff members and volunteers have a responsibility to raise those concerns so that they can be resolved.

CCT acknowledges that raising concerns can be an extremely difficult and courageous thing to do. Any

It is not **your** responsibility to investigate the matter - this is CCT's responsibility.

- **Procedure for raising concerns:** In most circumstances, staff members and volunteers wishing to raise their concerns, should ideally discuss the matter with their line manager. If this is not possible, perhaps because this person is thought to be involved or colluding in the suspected wrongdoing, another CCT manager or CCT's DSO should be contacted. The person that the staff member or volunteer raises their concerns to, will be responsible for ensuring the concerns are looked into or passed to the most appropriate person within the CCT.



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- **Follow-up:** Depending on the nature of the concern raised, a response regarding the action taken will be supplied to the staff member or volunteer raising it as soon as possible. However, it is important to be aware that it might not always be appropriate to reveal the full extent of the investigation, where this relates to personal issues involving a third party.
- **Never keep quiet about wrongdoing:** CCT staff members or volunteers - who do not report bad practice or abuse, neglect or ill treatment of a child, young person or adult, or for that matter anything else illegal that they are suspicious about - may be seen as colluding with that unacceptable practice. Such collusion constitutes a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure (for staff) and resolving problems with volunteer's procedure (for volunteers) and could result in the termination of the working relationship - as well as the information being forwarded to the appropriate authorities.
- **False and/or malicious allegations:** No CCT staff member or volunteer will ever be penalised for whistleblowing - even if it is not upheld - unless they made a false accusation which they knew was both untrue and made with malice. If it is found that a false accusation was knowingly made, this would be treated as gross misconduct in accordance with the charities disciplinary procedure (for staff) and resolving problems with volunteer's procedure (for volunteers) and could result in the termination of the working relationship.

Agreed: TBC

CCT will review this and good practice annually.



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Privacy Notice

Introduction

CCT operate for the benefit of the local residents of Stockport and the wider community. We form partnerships between community groups that are making a difference and the people who wish to invest in a better future for the local area.

We take our duty to process your personal data very seriously and endeavour to follow the Data Protection principles of “lawfulness, fairness and transparency” at all times. This policy explains how we collect, manage, use and protect any information we collect about you to ensure you remain informed and in control of your information.

In this policy references to County Community Trust or CCT ‘we’ and ‘us’ relates to the official affiliated community trust at Stockport County Football Club.

County Community Trust is the name we use in all our community and fundraising activities, as a trading name of the registered company The Hatters Project Limited.

We may change this document from time to time to reflect the latest regulations on what we should lawfully do with your information. Please check back frequently to ensure that you are happy with any changes.

What information we collect

County Community Trust is what is known as the ‘controller’ of the personal data you provide to us. We will usually collect basic personal data about you like your name, postal address, telephone number, email address if you are supporting us or participating in one of our community activities.

Activities and involvement with CCT will result in personal data being created. This could include details of how you have helped us by volunteering or being involved with our campaigns or events.

We do not normally collect or store sensitive data (such as information relating to health, beliefs, or political affiliation) about participants. However, there are some situations where this will occur including, but not exclusively, if:

- An accident or incident occurs on our property, at one of our events or involving one of our staff (including volunteers).
- If you are attending one of our events and have disclosed specific access or dietary needs.
- If this does occur, we will be very clear with you that we wished to collect such information, our reason for collecting such information, and that we would only do so with your knowledge and



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consent. We will also take extra care to ensure your privacy rights are protected. In respect of personal data regarding children, it may be more appropriate instead to seek the consent of the parent or guardian in order to comply with this promise.

How we collect your information

We collect information about you when you enquire about using any of our services, as part of us providing you with our services, when participating in any event or activity we have arranged, when you register an interest in supporting the County Community Trust or make any financial or non-financial donation to Us.

We collect your personal information in a number of ways:

- When you provide it to us directly. Your activities and involvement with County Community Trust will result in personal data being created. This could include details of how you have helped us by being involved with our campaigns and activities.
- When you provide permission to other organisations to share it with us (for example via Facebook or Twitter).
- When you have given it to a third party. For example, if we are partnering with another organisation (e.g., you provide your information to another charity or organisation that we are collaborating with).
- From publicly available sources to keep your information up to date (e.g., from Companies House, news, or other media).

How we use your information

- We will only use your information for the purpose or purposes for which it was collected for (or for closely related purposes). These purposes include:
- Where the information is needed to fulfil your request or to enable us to provide you with a more personalised service. Sometimes, with your consent, we will process your personal data to provide you with information that you have requested about our work or our activities, or that you are expecting.
- We use personal data for administrative purposes (i.e., to carry on our charity work). This can include receiving donations, processing, and maintaining a database of supporters and friends, arranging and hosting community events and activities, and helping us respect your choices and preferences (e.g., if you ask not to receive marketing material, we will keep a record of this).
- Where we need to do this to fulfil a contract, or where we are required to do this by law or other regulations.
- When it is in our legitimate interests to do this and when these interests do not override your rights.



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- We evaluate, categorise and profile personal data in order to tailor materials, services and communications, and prevent unwanted material from filling up your inbox.

Marketing and Communications

We use personal data to communicate with people, to promote County Community Trust to help with fundraising and to make you aware of any upcoming events and activities you may be interested in. This includes keeping you up to date with our news, updates, campaigns and fundraising information. This includes all our marketing communications (the term marketing is broadly defined and, for instance, covers information about CCT and its work within the community).

You can decide not to receive communications or change how we contact you at any time. If you wish to do so, contact us by emailing countycommunitytrust@stockportcounty.com, or writing to: Stockport County Community Trust, Hardcastle Road, Edgeley, Stockport, SK3 9DD, or telephoning 0161-266-27000 (Lines open 9am – 5pm, Mon – Fri).

When you receive a communication, we may collect information about how you respond to or interact with that communication, and this may affect your communication preferences.

We run events for our supporters or for those whom we believe would be interested in the work of the CCT. We collect information about how you respond to or interact with our invitations, and this may affect your event processes.

As a registered charity, we rely on donations and support from others to continue our work. From time to time, we will contact members and supporters with fundraising material and communications. As with other marketing communications, we will only contact you specifically about fundraising if you've opted into to receiving marketing from us (and you can, of course, unsubscribe at any time).

Sharing your information

We only disclose information to third parties or individuals when we are obliged to by law, for purposes of national security, taxation and criminal investigations, and under the following circumstances:

- If you have agreed that we may do so.
- When providing an activity in conjunction with or under the terms of an appointment by another organisation which you are part of, for example a school, sports club or other similar association.
- When we use other companies to provide services on our behalf e.g., sending mail and emails, when using auditors/advisors, or processing credit/debit card payments.
- If we receive a complaint about any content, you have posted or transmitted to or from one of our sites, to enforce or apply our Terms & Conditions, or if we believe that we need to do so to protect and defend the rights, property, or personal safety of CCT our websites or our visitors and for other lawful purposes.



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- If we merge with another organisation to form a new entity, information may be transferred to the new entity.
- In the event of a health and safety incident at one of our community events or activities.
- If we run an event in partnership with other named organisations, your details may need to be shared. We will be very clear what will happen to your data when you register.
- We will never sell or rent your personal information to other organisations.

Where we collect personal data in connection with an activity arranged with school children, we have an obligation to report on those activities to Premier League Charitable Fund using the Substance impact reporting system ('known as 'Views'). This is the system used by the league to track participating children's progress in those activities. In sharing personal data with the provider of the Views system, We remain the data controller and the provider is a processor of that personal data.

When sharing personal data with any processor partner, we will ensure an agreement is in place to compel that processor to also comply with their own obligations in respect of the GDPR.

Research and Profiling

We evaluate personal data in order to tailor materials, services and communications and prevent unwanted material from filling up your inbox. Understanding our supporters and programme participants, their interests and what they care about also helps us provide you with a better experience.

Research can help us target our resources more effectively through gaining an insight into the background of our potential supporters and help build relationships that are appropriate to their interests and capacity to give. This increase in efficiency helps us ensure we are maximizing the good we can do within the district. To do this we may use additional external sources of data to increase and enhance the information we hold about you. This may include obtaining details of changes of address, telephone numbers and other contact details, and information related to your wealth. It may also include information from public registers and other publicly available sources.

We may collect and process personal data around the ethnic origin, health (including disability), sexual orientation and religious beliefs of participants in our activities for the purpose of monitoring equality of opportunity, provided that doing so is proportionate to the rights and freedoms of those participants and data subjects.

Data Retention

We hold your information only as long as necessary for each purpose we use it, and take reasonable steps to ensure that we only retain personal data that is relevant, accurate and not excessive. We regularly review what information we hold and delete what is no longer required. For successful grant applications, we may retain your data for up to 7 years, in line with financial best practice for our accounting purposes. We may retain some details of participants in our programmes securely in an archive for up to 6 years in case of the need to respond to a complaint against us.



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If you decide not to support the CTT any longer, or request that we have no further contact with you, we will keep some basic information in order to avoid sending you unwanted materials in the future and to ensure that we don't accidentally duplicate information. See also the section titled 'Your Rights' below.

Data Security

We employ a variety of physical and technical measures to keep your data safe and to prevent unauthorised access to, or use or disclosure of, your personal information.

Electronic data and databases are stored on secure computer systems, and we control who has access to information (using both physical and electronic means). Our staff receive data protection training, and we have a set of detailed data protection procedures which personnel are required to follow when handling personal data.

Our electronic data is stored within secure cloud servers. Paper copies of any personal data that are stored in secure locked cabinets.

Payment Security

CCT specific – if you wish to make donations to the CCT, we will never request your bank details directly. BACS payments can be made directly to our business bank account (details of which are available upon request).

We cannot guarantee the security of your home computer or the internet, and any online communications (e.g. information provided by email or our website) are at the user's own risk.

CCTV

Some of our premises have CCTV and you may be recorded when you visit them. CCTV is there to help provide security and to protect both you and CCT. CCTV will only be viewed when necessary (e.g., to detect or prevent crime) and footage is only stored temporarily. Unless it is flagged for review, CCTV will be recorded over.

Stockport County FC complies with the Information Commissioner's Office CCTV Code of Practice, and notices will be displayed so you know when CCTV is in use.

Your rights

We want to ensure you remain in control of your personal data. The General Data Protection Regulations (GDPR), give everyone a number of very important rights. These include:

- The right to ask us to remove your personal data from our records (though this will not apply where it is necessary for us to continue to use the data for a lawful reason).
- The right to have inaccurate data rectified.
- The right to request a copy of the information we hold about you.
- The right to ask us to stop using your information for marketing or profiling, and



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- where technically feasible, the right to obtain and reuse your personal data for your own purposes.

You can change the way you hear from us or withdraw your permission for us to process your personal data at any time by using the contact details provided.

Cookies and website

We use traffic log cookies to identify which pages of our website are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs. We only use this information for statistical analysis purposes and then the data is removed from our system.

Legitimate interest

Under the GDPR, we have a number of lawful reasons that we can use (or 'process') your personal information. One of these lawful reasons is where we consider there to be a 'legitimate interest' in doing so.

Broadly speaking, a 'legitimate interest' means that we can process your personal information if we have a genuine and legitimate reason, for example to provide you with useful and relevant information about activities you have or may participate in, and by doing so we are not harming any of your rights and interests.

Some typical examples of when we might use this approach are for:

- Preventing fraud.
- Direct marketing, where we believe you may be interested based on our previous interactions with you.
- Maintaining the security of our system.
- Data analytics.
- Enhancing, modifying, or improving our services.
- Identifying usage trends.
- Determining the effectiveness of our campaigns and fundraising.

CCT will use various ways to achieve our mission and to support our objectives; we believe that people who share our values would love to know how to support us.

We will process the personal information you have supplied to us to conduct and manage our business to enable us to give you the most appropriate marketing, information, service, and products and provide the best and most safe and secure experience. These are what we consider to be both our and your 'legitimate interests' for us holding and processing your data.



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When we process your personal information for our 'legitimate interests', we will consider and balance any potential impact on you and your rights under data protection and any other relevant law. Our legitimate business interests do not automatically override your interests – we will not use your personal data for activities where our interests are overridden by the impact on you unless we have your consent.

You can change the way you hear from us or withdraw your permission for us to process your personal details at any time by contacting us.

Changes to the policy

CCT will amend this policy from time to time to ensure it remains up-to-date and accurately reflects how and why we use your personal data. The current version of our policy will always be posted on our website.

Making a complaint or giving positive feedback

If you are dissatisfied with our organisation or our work and would like to raise a concern or make a complaint, or if you would like to leave some positive feedback about any aspect of our work, please get in touch with us.

County Community Trust is a separate organisation to Stockport County Football Club. If you want to find out more about the football club's data protection, [their full privacy policy can be found here](#)

How to contact us

If you have any questions about the policy or how we use your data, please get in touch using the details below.

Email: communitytrust@stockportcounty.com

Phone: 0161-266-2700

Stockport County Community Trust

Edgeley Park

Stockport

SK3 9DD

This notice was last updated: 14 July 2021