



Stockport County  
Football Club

# **Safeguarding Children & Young People Policy**

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## Purpose & Aims

The purpose of this policy is to inform all stakeholders of Stockport County's (the "Club") safeguarding related requirements and processes. It also presents our standards and expectations to help make sure that every child and young person is safe and protected from harm, resulting from abuse, harassment, or neglect. (See Appendix 1 for definitions and types of abuse.)

This policy contains strategic safeguards that are proactive and protective, alongside responsive processes for managing any safeguarding-related concerns that arise. Everyone who encounters Stockport County has a responsibility to work together to safeguard children and young people. As such, this policy will highlight how we can all:

- ensure Stockport County is a positive environment where safety, welfare, and protection come first, particularly where children and young people are involved.
- enjoy sport, and the associated activities of Stockport County free from abuse and all forms of bullying, harassment, and discrimination; and
- use the clear pathway and requirement for any individual to report concerns. Every concern is taken seriously. The workforce of Stockport County should also be aware of how to keep themselves and their colleagues safe, maintaining professional boundaries, and avoiding behaviour that may be misinterpreted by others or be considered as 'poor practice'.
- To promote and demonstrate best practice for the safety and wellbeing of children and young people;
- To ensure all staff, whether full time, part time, or voluntary understand their roles and responsibilities with regards to safeguarding at the Club;
- To ensure parents, guardians and other third party adults who may come in contact with children, as positive role models.

The key principles supporting this policy are:

- The safety and wellbeing of children and young people is of the utmost importance and must be prioritised.
- Children and young people have the right to be protected from abuse or neglect, regardless of their age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation. These can also be referred to as the nine protected characteristics, as sighted in the Equality Act 2010.

## Scope

This policy applies to all persons managing, delivering, or engaging with Stockport County activity in all its formats and settings, including our employees, parents / carers and third parties, including commercial partners, licence holders, contractors, consultants, and grantees.

This policy applies to all employees employed by Stockport County, which includes the Community Trust. In addition, all workers including third party suppliers and/or service providers are expected to follow this policy when they are carrying out any services on behalf of CFG.

Where Stockport County enters a commercial or contractual relationship with third parties, including commercial partners, licence holders, contractors, those organisations and/or individuals are also required to uphold the requirements and principles presented in this policy.

The workforce is required to implement the requirements contained in this policy in conjunction with the Safeguarding Code of Conduct (presented as Appendix 4).

This is acknowledged by all workers at the commencement of their employment.

Members of the workforce are required to consider the wellbeing and protection of children in our care. Whilst not an exclusive list, a list of potential settings where safeguarding measures are required is presented below.

- i. Involved in academy or associated player development programmes.
- ii. Under the age of 18 and involved in/have made the transition to senior squads.
- iii. On trips, tours, overnight stays or living for significant periods of time away from their families in Club-arranged accommodation or residential provision.
- iv. Participants on commercial football school-type programs or similar.
- v. Taking part in Community Trust activities.
- vi. Considered homeless people, people with mental health or health issues, or young offenders taking part in community foundation-based programmes.
- vii. Contacting the club, visiting the stadiums on match days, or visiting for other pre-arranged activities e.g., events or concerts.
- viii. Attending promotional or marketing events either on-site or on off-site locations, including those operated by a third party on behalf of the club.
- ix. Ball assistants, match-day mascots, flag-bearers and other children and young people taking part in match day activities.
- x. Children and young people attending as volunteers or on organised work experience.

### **Safeguarding Policy Statement & General Principles**

Stockport County Football Club recognises and accepts the responsibility to safeguard all children and young people who are under the Club's care and supervision or using the Club's facilities. It is fundamental for all adults working at the Club to safeguard and promote the welfare of children and young people and are expected to provide a positive and safe environment for all.

Safeguarding practice is at the heart of all our work with children and young people.

Stockport County has a duty to safeguard and promote the rights and well-being of children and young people, and to protect them from harm or risk of harm resulting from abuse, harassment, maltreatment or neglect.

The wellbeing of children and young people is paramount, and the recommendations and guidelines outlined in this policy are to be adhered to at all times. The onus is on all Club representatives who are in contact with children and/or young people and should therefore make themselves aware of the Safeguarding Policy and adopt this where applicable. The policy and procedures will be widely promoted and are mandatory for everyone involved with Stockport County Football Club. Failure to comply with the Safeguarding Policy may ultimately result in dismissal from the Club and all cases will be dealt with in accordance with the clubs disciplinary procedures.

The workforce (see definitions in appendix 5, has a collective responsibility to ensure the safety and welfare of all children and young people engaging in activities provided by the Club. This includes taking the appropriate steps set out in this policy where there is suspicion or allegations of abuse or

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

Members of the workforce are required to undergo a DBS check prior to taking up their role in accordance with the Clubs DBS procedures. All staff are required, should they receive a conviction whilst employed, to inform the Head of People or Safeguarding Officer as soon as reasonably practicable after the incident. Should they not inform us, this may result in a breach of the Safeguarding Policy which may lead to disciplinary action.

Information, advice, guidance and reporting on Safeguarding matters can be obtained through the Safeguarding Officer at SCFCSafeguarding@stockportcounty.com

## **Rules & Regulations**

Stockport County Football Club seeks guidance from relevant legislations, organisations and governing bodies for all safeguarding matters.

The legislation and guidance relevant to this safeguarding policy includes the following: The Children and Social Work Act (2017), The Children Act (1989 and 2004), Working Together to Safeguard Children (2018), No Secrets (2000), The Crime and Disorder Act (1998), The Health and Social Care Act (2008), the Care Act (2014), Sexual Offences Act (2003) Serious Crime Act (2015), The Football Association and English Football league Rules, Regulations and Guidance & NSPCC Child Protection in Sport Unit published guidance.

## **Roles & Responsibilities**

It is the responsibility of every member of the workforce to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all children and young people. This includes:

- i. the responsibility to provide a safe environment; and
- ii. taking the appropriate steps to ensure any suspicion or allegation of abuse, harassment, maltreatment and neglect is taken seriously and reported appropriately. The clubs workforce's general safeguarding responsibilities are supported and guided by the club safeguarding officer.
- iii. The Safeguarding Officer is accountable for ensuring the effectiveness of this policy and our compliance with it.

The duties and responsibilities of the Safeguarding Officer are detailed below:

- i. the Club Safeguarding Policy is written and then reviewed by the club CEO, published and made available to the public; and is prepared in accordance with all statutory and regulatory requirements; once in place, it is reviewed annually by the safeguarding officer;
- ii. all members of the workforce receive a safeguarding induction and are provided with a copy of this policy and the Safeguarding Code of Conduct.
- iii. safeguarding officer has responsibility for the implementation of the safeguarding strategy;
- iv. all members of the workforce undertake appropriate safeguarding training relevant to their role;

- v. procedures are in place for dealing with allegations against members of the workforce who work with children in line with statutory guidance;
- vi. safer recruitment practices are developed and implemented to prevent individuals who may pose a risk to children from having access to children within, or through, the organisation;
- vii. policies and procedures concerning the referral of cases of suspected abuse and neglect are followed by the workforce;
- viii. all members of the workforce can raise concerns about poor or unsafe or uncomfortable practice by others and such concerns are addressed sensitively in accordance with agreed internal procedures;
- ix. liaison will take place with the Designated Officer for the Local Authority (commonly known as 'LADO') in the event of an allegation of abuse being made against a member of the workforce where their role involves working with children. If necessary, the appropriate referrals will be made in accordance with local protocols and timescales;
- x. relevant referrals are made within timescales to both the FA and Premier League in accordance with the regulations set out by each organisation; and where a concern relates to the Community Trust, referrals are made within timescale to the Charity Commission.

## Definitions

Abuse – refers to the maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. A child can be abused by an adult or adults or another child or children.

Activity – refers to any matches, coaching programmes, educational events or other related activity where there are children taking part.

Child/Children – a person whom is under the age of 18.

Child Protection – this refers to the activity undertaken to protect children who are suffering or likely to suffer from harm. Child protection forms part of safeguarding and welfare.

Confidentiality – an assurance that limits access or places restrictions on certain information.

Consent - voluntary permission with knowledge of the purpose, effects and risks involved as well as the likelihood of success and any other consequences. Consent can be given orally or in writing.

Duty of Care - a legal obligation on an individual requiring adherence to a standard of reasonable care while performing any acts that could foreseeably harm others.

Harm – as defined by the Children Act 1989, harm can be defined as the ill treatment or impairment of health and development. This was then developed in the Adoption and Children Act 2002 impairment suffered from seeing or hearing the ill treatment of another. As well as

## Safeguarding Contact Details

Stockport County has a Designated Safeguarding Officer who holds overall responsibility for the safeguarding of children and young people at the Club. The Club also has two Safeguarding leads who represent specific areas of the Club and ultimately report back to the main Safeguarding Officer.

- Safeguarding Officer – Amy Heaton
- Academy Safeguarding lead– Adam Jones
- Stockport County FC Community Trust Safeguarding lead – Matthew Bailey
- Matchday Designated Safeguarding Officer – Amy Heaton
- Board member with safeguarding responsibility – Tom Mahon (Chief Operating Office)

Should anybody have a concern about a child's welfare, the club safeguarding officer should be contacted for advice.

### **Training and Induction**

Individuals joining the workforce at Stockport County are informed of the safeguarding arrangements in place, are given access to a copy of the clubs Safeguarding Policy, presented with the Safeguarding Code of Conduct and given details of the safeguarding officer and procedures for reporting concerns. All members of the workforce are expected to read and apply these key documents.

All new members of the workforce will receive safeguarding training during their induction period. This training will vary dependent on the role and interaction with children and young people.

Safeguarding personnel will receive training across wider areas of the safeguarding landscape, including good practice, e-safety, disability, neglect, domestic abuse, gang culture, substance misuse, exploitation, radicalisation, and human trafficking. In turn the safeguarding team will offer support, guidance, and training to members of the workforce who may be faced with issues and concerns through their day-to-day work with children or other vulnerable people.

### **Safeguarding Code of Conduct**

In addition to the staff code of conduct, there is a safeguarding code of conduct, which is outlined in Appendix 4.

The following points are to be managed by all staff with regards to safeguarding.

- i. Stockport County Staff are to ensure that the health, safety and protection of all persons participating in a Club activity is a high priority;
- ii. Staff are not, where possible, to be in a situation where they are on a one to one situation with a child or young person whilst not in a public area;
- iii. All matters which raise concern must be reported in the correct procedure, which are detailed in the 'Recording Allegations' section.

### **Matchdays**

The club has a matchday safeguarding procedure which outlines the below in further detail.

- i. Under 14's

In line with the ticketing terms and conditions and the ticketing policy, any supporters under the age of 14 must be accompanied by an adult (over 18). This also applies for official Club travel to all away fixtures.

ii. Mascots

On matchdays all mascots meet outside the Club shop at a designated time before kick-off and are supervised throughout by the Mascot Coordinator who is DBS checked.

iii. Ball Persons

Ball persons meet outside the dugout 30 minutes before kick-off and are supervised by the Matchday Safeguarding Officer, who is DBS checked.

### **Data Protection**

In line with the Data Protection Act 1988, we will ensure:

- i. All personal and private documentation is kept in a secure location at all times.
- ii. All such documentation is only accessed by the safeguarding officers.
- iii. All information is accessible to the parent/guardian of the child or young person.
- iv. Any databases kept on PC's are security code locked with access denied to all apart from the safeguarding officers.
- v. The information is not discussed with any member of staff who is not involved.
- vi. Information is not exchanged.

### **Use of Imagery & Videos**

The use of images at Stockport County Football Club is to follow the below guidelines:

- i. Anyone under 18 is to be appropriately dressed in all photographs;
- ii. The person wishing to take images must obtain clearance from the member of staff on duty;
- iii. Photography/images must focus on the group and not the individual where possible;
- iv. Parents/guardians of children who do not wish to have their photograph taken must make themselves known to a member of staff on duty;
- v. We forbid photography in private areas, such as changing rooms, toilets, showers or bedroom or whilst a child is in the state of undress.

### **Matchday Photography**

By entering the Ground, all persons are acknowledging that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom ) may be taken of them and may also be used, by way of example and without limitation, in televised coverage of the game and/or for promotional, training, editorial or marketing purposes by the Club, the EFL or others (including commercial partners and accredited media organisations) and entry into the Ground constitutes consent to such use.



You further acknowledge that photographic images and/or audio, visual and/or audio-visual recordings and/or feeds (and/or stills taken therefrom) may be used (by the Club or by a third party, such as a law enforcement body) to identify you as an individual, where permitted by data protection laws, for the purposes of preventing or detecting crime, or any breach of these Ground Regulations. Information about the Club's use of your personal data will be brought to your attention by the Club (see for example any applicable privacy policy, signage and/or other forms of announcement in or around the ground). For further information please contact the Club.

### **Ratios and the Supervision of Children**

Any activity undertaken by Stockport County will always be given full consideration to the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision.

Regardless of these ratios a minimum of 2 members of staff or delivery partner will always be available to supervise an activity. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).

- i. For children under 5 the recommended ratio should be no more than 1:6.
- ii. For children under 8 the recommended ratio should be no more than 1:8.
- iii. For children over 8 the recommended ratio should be no more than 1:10, but this varies depending on the activity. Advice should be sought from the Designated Safeguarding Officer if unsure.
- iv. For Academy activities, the English Football League's Youth Development Rules prescribe a ratio of 1 Coach to 8 Players (over 8s).
- v. For organised groups of children attending a match day at Edgeley Park, the minimum ratio is 1 responsible adult to 4 Children. The ratio is the same for matchday supporters.

### **Lone Working Guidance**

Working one to one with children should only occur in exceptional circumstances, and if it does, the staff member must seek and follow the specific guidance from the Designated Safeguarding Officer.

### **Identifying & Raising Concerns**

Despite the Safeguarding Policy being in place and the Club encouraging best practice, there may be instances when concern is raised over the maltreatment of a child. Stockport County has adopted the categories of abuse as neglect, physical abuse, sexual abuse, emotional abuse, and bullying.

Stockport County adheres to safeguarding procedures that have been agreed with Stockport Council's Safeguarding Partnership. Stockport County also applies the regulatory safeguarding requirements of the Football Association and the English Football League, in relation to the reporting of relevant allegations, complaints, and incidents.

Everyone at Stockport County is advised to maintain an attitude of 'it could happen here' where safeguarding risk is concerned. When concerned about the welfare of a child, members of the

workforce should always act in the best interests of the child and have a responsibility to take action as outlined in this policy (see Appendix 6 - responding to concerns flowchart).

A person can describe child abuse as harm to a child, or failure with responsibility for a child to provide reasonable care, or both. Abuse may take the form of physical injury, sexual or emotional abuse, or neglect. Anybody in contact with the child may cause harm, for example but not limited to; parents, guardians, relatives. Please see Appendix 1 for definitions and types of abuse).

A child or young person may share with others that they have been abused. This can happen in a variety of ways including.

- Directly: Telling someone what has happened to them
- Indirectly: Inadvertently or deliberately communicating through behaviours, emotions, art, writing, appearance, inquiries, or discussions about fears, concerns or relationships.

We recognise that it takes extraordinary courage for someone to go through the journey of revealing abuse and we will ensure that appropriate action is taken to support and protect.

### **Low Level Concern**

A low- level concern is any concern, even if no more than causing a sense of unease or a 'nagging doubt' that an adult may have acted in a way that: is inconsistent with the Stockport County Staff Code of Conduct, including inappropriate conduct outside of work, and does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO (Local Authority Designated Lead).

### **Responding to Concerns**

Safeguarding concerns usually fall into one of the following categories:

- i. the behaviour of an adult (member of the workforce or otherwise) towards a child or;
- ii. the behaviour of a young person towards other children (including abuse and bullying by peers);
- iii. risks identified through recruitment processes (e.g. criminal records information);
- iv. risks identified through other regulated processes – such as Health & Safety or medical requirements;
- v. information about an individual provided by statutory agencies or other relevant organisation (such as an allegation or conviction related to an individual's private life);
- vi. concerns about harm to a child that has taken place outside of Stockport County activity (e.g. at home or school) but identified within a Stockport County activity.

A referral may be justified by a single safeguarding-type incident, such as harm or risk of harm resulting from an injury (See Appendix 3, for support with responding to a disclosure). However, concerns may also accumulate over a period and are evidenced by building up a picture of harm; this is particularly true in cases of emotional abuse and neglect. In all instances it is crucial that all concerns are passed on in accordance with this policy to allow the safeguarding team and the relevant authorities to respond and intervene with support at the earliest opportunity.

All workers are obliged to report incidents or concerns of malpractice where the law, club policy or protocol has been breached by any member of the workforce. Failure to do so may result in disciplinary action.

It is not the responsibility of any individual to investigate safeguarding or welfare concerns or determine the viability of any disclosure or allegation. All workers are expected to have the ability to recognise potential harm or risk resulting from potential abuse or poor practice and have a duty to share those concerns in accordance with the procedures outlined in this policy.

Anyone who receives a disclosure of abuse or suspects that a child, or young person, is at risk of harm must report it immediately to the safeguarding officer.

Following receipt of any form of safeguarding-related concern, the safeguarding officer will consider the information received and decide what action to take in accordance with this policy. All information and actions taken, including the reasons for any decisions made, will be recorded. If the allegations relate to an employee's conduct, the subsequent action will apply both HR disciplinary processes and safeguarding-related requirements and require a collaborative approach to the management of the concern.

Where serious concerns are raised and/or a criminal offence may have been committed then the relevant authorities will be informed. Where the Police decide that they will not take any further action, the local authority may still proceed with an investigation in conjunction with the club. The initial role of the Safeguarding Officer is to pass the information on to the relevant person or agency, in an efficient, timely and confidential manner. Where both the Police and social care services have decided to take no further action, Stockport County may undertake an internal investigation and involve relevant internal stakeholders.

In these instances, a Referral Management Group ("RMG"), should be convened. See Appendix 2 for information around an RMG. Where serious concerns are raised, the Safeguarding Officer must be informed at the earliest opportunity as well as the Head Of People.

If a member of the workforce is removed (or resigns before being removed) from their role as a result of an allegation or investigation conducted under this policy, and the necessary criteria are met, a referral to the Disclosure and Barring Service will be made in conjunction with the appropriate statutory agencies and the Football Association.

The safeguarding team will always respect the right of a child to have their say when a decision that affects them is being taken and will take their views into account, acting in their best interests when a decision is made, especially when a child is at risk of harm or may have come to harm. A child's parent will also be consulted, and consent obtained as a matter of course before any action is taken unless this may put the child at increased risk of harm. Where a parent or legal guardian cannot give consent at a point where it may be required, Stockport County will always act in the best interests of the child.

If at any point there is serious harm, or risk of serious harm, to a child, anybody can refer to emergency services or statutory agencies and should do so as soon as possible. In such circumstances, consent from the individual (or parent/guardian) to act on concerns is not normally required. Anyone deciding to take this course of action must also inform their line manager and the safeguarding officer at the earliest opportunity.

Any member of the workforce who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Safeguarding Officer or the board member with safeguarding responsibility, which for Stockport County is the Chief Operating Officer. Alternatively, members of the workforce can contact the head of People to raise their concerns. These concerns may potentially be dealt with through the Grievance or Whistleblowing policies. If any member of the workforce does not feel the situation has been addressed appropriately at this point, they should contact the Local Authority Children's Services directly with their concerns.

Stockport County also applies the regulatory requirements of the Football Association and English Football League for the reporting of safeguarding concerns where their thresholds are met – these are further detailed in the relevant regulations. Where any concern reaches statutory (Police and child protective services) referral thresholds, the safeguarding officer at Stockport County is responsible for referring to the Football Association and English Football League. within 24 hours.

Stockport County recognises that children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Such matters are included in the training received by our workforce. These additional barriers can include:

- i. assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition or disability not because of harm because of abusive behaviours by another individual;
- ii. being disproportionately impacted by issues such as bullying without outwardly showing any signs;
- iii. communication barriers and difficulties in overcoming these barriers;
- iv. close relationships and constant presence of carers. As such, constant vigilance is encouraged for any workers who are involved with activities where these participants are present.

We recognise that safeguarding vulnerable people against radicalisation and extremism is vital and within the scope of this policy. Radicalisation is defined in appendix one.

At Stockport County we will ensure that:

- i. through training, the workforce understands what radicalisation and extremism is, why we need to be vigilant and how to respond when concerns arise;
- ii. the safeguarding team has received relevant training in this area and will act as the point of contact for any concerns relating to radicalisation and extremism; and
- iii. the safeguarding team will make referrals to Children's Services and will represent our organisation at meetings as required.

In any instance where the Club and relevant authority disagree and escalation of concerns are required, the safeguarding officer will:

- i. contact the line manager in Children's Services, if they consider that the social care response to a referral has not led to the child being adequately safeguarded. This should then be followed up in writing.
- ii. use the Local Authority Escalation Policy if this does not resolve the concern

## Contextual Considerations

This policy considers a child to be someone who is not yet 18 and as such any emotionally dependent relationship (except for a parent-child relationship) or intimate or sexual relationship between a member of the workforce and a child involved in any Stockport County related activity is prohibited and may be subject to:

- i. disciplinary action; and/or
- ii. statutory or criminal referral on the basis of a breach of 'Position of Trust' legislation i.e. Local Authority Designated Officer, children's services, and Police; and/or
- iii. consideration under the FA's Relationship of Trust regulations (The Regulatory position as provided for with Football Association in England can be found here: <https://www.thefa.com/football-rules-governance/safeguarding/section-1-footballs-safeguarding-framework>)

### Relationship of Trust

As a result of the roles and authority that most members of our workforce hold, they are considered to be in a Relationship of Trust as provided for in Football Association regulations and in relation to those in their care. This means that those in a position of power and influence over children and young people, must not abuse their position for personal advantage or gratification or that of others.

### Safeguarding athletes

Stockport County supports players whom others may seek to gain advantage of (financial or otherwise), or gratification from their talent or enhanced profile through unscrupulous means; some may abuse or coerce them just because they can (e.g. via social media). The players themselves are likely to experience the pressures of being footballers and as such we must be vigilant of the signs and symptoms of issues such as:

- i. abuse by those in positions of power or influence over the player.
- ii. poor mental health, for example homesickness or eating disorders or otherwise.
- iii. addiction.
- iv. self-harm:
- v. other conditions that may manifest themselves. The workforce and those of our partners must put the needs of these children first and always remember that anyone who is not yet 18 is a child first, player second. Sexual, physical, and emotional maltreatment is never acceptable.

### Senior Appearances for Players Under 18

From time-to-time players who are not yet 18 (U18) may either train or play with the club's first team. This may be a temporary or developmental arrangement, or it may be a permanent contractual arrangement. The decision to do this is not taken lightly and will be taken based on the physical and emotional capacity of the player and in conjunction with the player's parents. Special consideration will be given to support and monitor the welfare of the players that are placed in these positions and sexual, physical, and emotional maltreatment is never acceptable on any of our programmes. Those responsible for the well-being of such participants will apply the Club's 'Senior Appearances for U18's policy'.

## Residential Accommodation/ Host families

Stockport County is, during its activities, required to provide both short- and long-term accommodation for young or vulnerable participants. This may occur in a range of settings and may be arranged by or involve members of the workforce, these include:

- i. trips and tours involving overnight stays for children or other vulnerable players;
- ii. academy players living in club facilities or in domestic settings with approved host families;
- iii. young players on trial with Academy teams;

It is vital that wherever such situations arise that the highest level of diligence is undertaken to assess and mitigate risk within the arrangements. Managers must ensure that all applicable legislation, regulation, and good practice is applied to any of the above settings and that any relevant authorities are consulted with throughout the planning and operation of these activities. Please see the clubs 'Host family' policy for more information.

All provisions for children and young people to spend time living away from home such as the provision of house parents and tour accommodation will have their own set of policies and procedures. These will include the considerations for safeguarding throughout the provision and the arrangements for all such settings will be guided and supported by the Stockport County safeguarding team.

## Managing Behaviour

We want children to enjoy themselves when they are attending our activities. We do however expect children to behave in a way that is appropriate to the individual, age, maturity, and type of activity and in a way that does not harm, endanger or upset others. We understand that some children will also behave in a way that may appear to be outside of social norms and expectations. The Club adopts a positive approach to behaviour management and where necessary develops policies that the workforce must apply. Such policies will recognise the following general principles:

- i. every person is different and as such has individual needs;
- ii. participants should be encouraged to help develop their own codes of conduct or have clear and well communicated guidance on expectations;
- iii. behaviour is usually a reflection of:
  - a. how a person is feeling;
  - b. how their life away from Stockport County activity is making them feel;
  - c. and may also be related to an emotional, intellectual, medical, or physical condition;
- iv. as such, the workforce should recognise that many other factors can affect behaviour – weather and environment, travel and time away from home, nutrition, medical conditions, medication and account for these in any action taken;
- v. challenging, aggressive or violent behaviour presents risks to the individual and others, and physical intervention with any individual displaying such behaviour is only ever a last resort in exceptional circumstances – any response must be reasonable and proportionate.

- vi. members of the workforce must review issues of poor conduct and consider the multitude of reasons that there may be for the behaviour prior to taking action;
- vii. training will be provided to members of the workforce who may experience serious or significant challenging behaviour;
- viii. physical punishments must never be used by our workforce, though diffusion and de-escalation techniques may when necessary;
- ix. all significant incidents should be recorded and passed to the club Safeguarding Officer

### Information and Communication Technology

ICT is used across Stockport County operations in many and varied ways. The use of ICT will continue to grow and change with new developments in technology. It is used to communicate across the workforce, as well as with supporters, customers, players, and the media. The Club will:

- i. develop and maintain clear policies on suitable and appropriate use of internet and social media.
- ii. expect the workforce to only use Stockport County issued equipment, emails, and software to communicate with participants.
- iii. ensure that consent of parents is obtained if the workforce will use SMS, email, or other electronic means of communication with a child for programme-related reasons.
- iv. raise awareness amongst young participants (especially youth academy players) regarding safer internet/social media use in respect of their position as participants, players, role models and future professional players.
- v. raise awareness, through training and internal communications, with the workforce regarding appropriate use of such media and the importance of both professional and personal online activity.
- vi. have a zero-tolerance approach to 'cyber-bullying' (in line with the club's prevention of bullying and harassment policy).
- vii. respond quickly and appropriately to inappropriate use of the internet and social media by participants, those with parental responsibility and members of the workforce.

### Records & Information Sharing

All safeguarding incidents should be recorded on the club's safeguarding reporting tool, 'My Concern'. If staff or volunteers are unable to access this, a written record should, include the following information:

- Provide a factual account of what you have been told or observed, use the words given to you.
  - Record any questions you asked in the exact words you used.
  - The date and time of what you have witnessed or been told.
- i. Details of those involved: Person/s whose safety and welfare there are concerns about,
  - ii. alleged perpetrator of abuse or person/s whose behaviour or actions there are concerns about
  - iii. witnesses
  - iv. any third party who has raised concerns.

- Action taken and your rationale for taking that actions.
- Date and time of referring the information and to whom the information was referred. • Your details as the referrer. Staff and volunteers are expected to:
  - Provide clear, concise and relevant information.
  - Record information in an objective and professional manner.
  - Record information of fact rather than assumption of what you have witnessed or been told.
  - Record actual words and language. Do not rephrase what you have been told or leave things like insults or intimate vocabulary out.
  - Record observations, for example, a description of visible bruising or injuries. Never ask someone to remove or adjust their clothing to observe bruises, marks, or injuries. If more information is recalled later, this should be added as an addendum. The original record must not be changed.

Staff and volunteers should be aware that such records may be used as evidence for investigations and inquiries, court proceedings, disciplinary procedures and/or quality assurance purposes.

Stockport County takes the matter of data protection and privacy very seriously and particularly the data collected in respect of children. Stockport County complies with the relevant legislation namely the Data Protection Act 2018 (DPA).

Where data is collected (in writing or electronically) relating to children, or children are asked for personal details or other information, we will make every effort to obtain consent for its use from those with parental responsibility, unless the child is old enough to provide valid consent in accordance with the Data Protection Act. We will seek parental consent if the collection or use of information about a child is likely to result in:

- i. disclosure of a child's name and address and other sensitive information to a third party, for example as part of an investigation or the terms and conditions of a competition entry and/or
- ii. use of a child's contact details for marketing purposes; and/or
- iii. publication of a child's image on a website that the public can view; and/or
- iv. the collection of personal data about third parties, for example where a child is asked to provide information about his or her family members or friends.

In exceptional circumstances where a child may be at immediate risk of harm it would not be appropriate to seek consent prior to sharing information, if seeking consent from a parent or carer would increase the risk to that individual.

Stockport County will keep a record of all incidents and concerns reported to its Safeguarding team. Any such reports will be taken seriously and carefully recorded, acted upon where appropriate, and confidentially retained. Records will be regularly reviewed to identify patterns of behaviour that may give rise to concern. The Safeguarding Officer may be required to report or refer these matters to another agency such as the English Football League, Football Association, or Local Authority. Any information sharing of safeguarding concerns will be undertaken in accordance with the statutory guidance (July 2018) Information sharing advice for safeguarding practitioners - GOV.UK ([www.gov.uk](http://www.gov.uk)).



## Recording Allegations

All allegations made against staff should be reported immediately to the Safeguarding Officer and The Head of People. Complaints about the Head of People or Safeguarding Officer should be made to the Clubs COO who is the Safeguarding board member. The COO will then contact the Local Authority Designated Officer (LADO).

Staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague's career. All staff must remember that the welfare of the child is paramount and must report their concerns immediately.

The Safeguarding Officer will contact the FA safeguarding team, the EFL safeguarding team and the LADO and a discussion will take place to decide whether:

- more information is required; or
- no further actions are needed; or
- a strategy discussion should take place; or
- there should be immediate involvement of the police or social care.

The club will share available information with the FA safeguarding team designated officer about the allegation, the child or young person, and the person against whom the allegation has been made and consider whether a police investigation or a strategy discussion is needed. Representatives from other agencies may be invited to the discussion and could include representatives from health, social care and police.

For any concerns that do not involve staff members, the concern should be passed to the club safeguarding officer within 24 hours.

The safeguarding officer will analyse the situation and make an evaluative decision with regards to the subsequent action to be taken; the parent/guardian of the child are to be informed at the earliest opportunity by the safeguarding officer. Under no circumstance should the child be questioned by anybody other than the safeguarding officer, with the approval and in the presence of the child's parent/guardian. If required, necessary action will be taken to inform the relevant authorities under the law. An independent advisor from the local Social Services will also be informed who will make assessment on the case and the necessary further action to be taken under the law.

## Good Practice

### Keeping Records

Accurate records are to be kept of any concerns or incidents at the club. All staff have access to record or report a concern and must inform the safeguarding officer, who will ensure records have been completed appropriately. The safeguarding officer will have over riding access to all concerns or incidents that are recorded. All staff have training on appropriate record keeping and all new staff will access this training as part of their induction to safeguarding.

### Confidentiality

The purpose of confidentiality is to protect both staff and the child or young person, by providing privacy. In accordance with the Data Protection Act, all information whether written or verbal, should be held in confidence.

All child protection records should be kept separately from all other records, accessible only by the designated people.

#### Appropriate Questioning

#### Your Own Feelings

Staff are to ensure that personal terminology is not used which may be adopted by a child. It is imperative that the member of staff remains impartial but supportive.

#### Never Make Promises

Be honest and realistic and never make promises that cannot be met. It is the duty of every member of staff at the Club to adhere to the confidentiality aspects of this document, however all incidents of conversations, meetings or written statements are to be passed to the safeguarding officer.

#### Urgency

Prompt action needs to be taken in all instances where abuse is suspected or discovered. The policies set in this document will afford all staff the necessary procedures to effect prompt action.

#### Ongoing Correctional Practice

All staff are encouraged to constantly update their training and evaluation techniques to ensure good practice and that the most current up to date legislation is being enforced.

#### Acceptable Risk

In all aspects of work at the Club, there will be situations where a degree of professionalism must be adopted with regards to safeguarding. All members of staff must be aware of the repercussions that a scenario may have, where staff professionalism is put in question. To ensure that this statement protects children and staff, there may be situations where the term 'acceptable risk' is to be understood. An example of this could be if a child requires hospital treatment on match day but the parent/guardian is not at the venue, it is acceptable risk to transport the child in an ambulance until the arrival of the parent/guardian.

### **Support for Staff & Volunteers Dealing with Safeguarding Information**

Dealing with a safeguarding incident may have an impact on the wellbeing of all those involved. It is important that anyone affected seeks help if they feel that they need support. Staff and volunteers can contact a club Mental Health First Aider who will help in signposting to access appropriate support.

### **Disclosure & Barring Service**

Our duty to refer to the Disclosure and Barring Service (DBS) is met when we have dismissed or removed a person from regulated activity (defined in the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012) or would or may have if the person had not left, resigned, retired, been made redundant or moved to another position because the person has:

- Been cautioned or convicted for a 'relevant offence'. A 'relevant offence' for the purposes of DBS is an offence that would result in the individual's automatic inclusion in the Children's or Adult's barred list.
- Engaged in 'relevant conduct'. 'Relevant Conduct' is that which endangers or is likely to endanger children and young people.
- Satisfied the 'harm test'. The 'harm test' is met when an employer believes that an individual may harm, may cause to be harmed, may put at risk of harm, may attempt to harm, or may incite another person to harm a child or young person.

Referrals to the DBS should be made once investigations and disciplinary processes are complete, (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.

### **Discriminatory Abuse**

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

Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

### **Kick it Out**

We will refer all race discriminatory abusive incidents within our environment to Kick it Out in line with existing EFL protocols. This organisation will provide the necessary support to anyone affected by the incident.

### **Charity Commission**

The Charity Commission is the statutory regulator of charities in England and Wales. Our Community Trust is required to report serious incidents, which include safeguarding issues, to the Charity Commission. Government guidance states that if a serious incident takes place, a charity needs to report what happened and explain how they are dealing with it, even if they have reported it to the police. The Charity Commission's priority is to ensure that Trustees meet their legal requirements and obligations.

### **Key Contacts & Resources**

Club Safeguarding Officer and Matchday Safeguarding Officer  
Amy Heaton  
safeguarding@stockportcounty.com / amy.heaton@stockportcounty.com

Academy Head of Player Care (Academy Designated Safeguarding Lead)

Adam Jones

Adam.jones@stockportcounty.com

Community Trust Community Partnerships Manager (Community Trust safeguarding Lead)

Matthew Bailey

m.bailey@stockportcounty.com

Chief Operating Officer (Board member with Safeguarding responsibility)

Tom Mahon

Tom.mahon@stockportcounty.com

### Other Useful contact numbers

Stockport Police	Emergency 999/ Non-Emergency 101
Stockport Council Multi Agency Safeguarding Hub	0161 217 6028
Stockport Council – Out of hours	0161 718 2118
NSPCC	0808 800 5000
Childline	0800 1111

### Resources

Children Act 2004 Children Act 2004 (legislation.gov.uk)

Working Together to Safeguard Children 2015 Working together to safeguard children  
GOV.UK ([www.gov.uk](http://www.gov.uk))

Child Protection in Sport Unit

<https://thecpsu.org.uk/>

The Football Association

<http://www.thefa.com/football-rules-governance/safeguarding>

The NSPCC

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

Safeguarding and Social Care for Children

<https://www.gov.uk/topic/schools-colleges-childrens-services/safeguarding-children>

### Links with Other Policies

This policy forms part of an overall set of policies and procedures that fall under our safeguarding umbrella. Please see below additional policies in place that underpin our safeguarding practice:

- i. Whistleblowing Policy

- ii. Safer Recruitment Policy
- iii. Safeguarding Code of Conduct (Appendix 4)
- iv. Anti-bullying and harassment Policy
- v. Managing Allegations against Staff Policy
- vi. Social Media Policy
- vii. ICT Acceptable Use Policy

### Date and Review

This safeguarding policy is reviewed annually, the next review will be in 2024.

Effective Date	October 2023 – First version
Written By	Amy Heaton – Safeguarding Officer
Approved By (Board)	Jonathan Vaughan - CEO
Review Date	October 2024
Update responsibility	Safeguarding Officer

### Review History

Number	Date	Review details	Authorised by (Board)
1	October 2023	Development & Creation of Document	JV Oct 23

## Appendix One – Definitions & Types of Abuse

### Neglect

Neglect takes place if an adult with responsibility for the care or supervision of a child fail to meet a child or young person's basic physical needs, e.g. for food, warmth and clothing, or emotional needs such as attention or supervision (and in the care of a parent affection). It occurs if children or young people are left alone or inadequately supervised or where they are exposed to danger, injury, or extreme situations, such as weather conditions.

In Stockport County activities, an example could be (but not limited to) children or young people who do not have proper supervision or clothing or are allowed/ encouraged to play whilst injured.

### Physical abuse

Physical abuse occurs if people physically hit, burn, poison, shake or in some way hurt or injure children and young people, or fail to prevent these injuries from happening.

In sport, physical abuse could happen where training methods are inappropriate for the developmental age of the child or young person, where they are allowed or forced to play with an injury or where inappropriate drugs, or alcohol are offered or accepted.

It would clearly happen if a child or young person is hit or physically restrained or manhandled by those supervising the game or training session.

### Female Genital Mutilation (FGM)

The practice of FGM involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls or women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK, or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country. FGM is mostly carried out on young girls sometime between infancy and adolescence. The practice is mainly concentrated in the Western, Eastern, and North-Eastern regions of Africa, in some countries the Middle East and Asia, as well as among migrants from these areas. FGM is therefore, a global concern.

### Sexual Abuse including Sexting and Sexual Exploitation

Sexual abuse is any form of sexual activity that occurs without consent of another person and is often the result of another person seeking sexual gratification. This includes any form of sexual behaviour with a child or young person (by an adult or another child or young person), the use of sexually explicit language and jokes, inappropriate touching, and exposure to pornographic material.

Sexual abuse can occur in sporting settings and sport participation, by those with malicious intent, may be used as a method to facilitate access to children, facilitate grooming-type practices, and to isolate children from their parents, other workers or other participants.

Signs of sexual abuse can be, but are not limited to the following;

- Injuries, cuts, or soreness in the anal or genital area;
- Unusual or excessive sexual knowledge;
- Sexualised behaviour;
- Change in mood and demeanour
- Use of devices increasing or decreasing

What is 'sexting'?

Sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts.

'Sexting does not include the sharing of sexual photos and videos of under-18-year-olds with or by adults. This is a form of child abuse and must be referred to the police.

What to do if an incident involving 'sexting' comes to your attention?

**Report it to your Designated Safeguarding Officer immediately**

**Never** view, download or share the imagery yourself, or ask a child to share or download – this is illegal.

If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the safeguarding officer.

**Do not** delete the imagery or ask the young person to delete it.

**Do not** ask the young person(s) who are involved in the incident to disclose information regarding the imagery, this is the responsibility of the police.

**Do not** share information about the incident to the young person(s) it involves, their parents and or/carers or any other person.

**Do not** say or do anything to blame or shame any young people involved.

**Do** explain to them that you need to report it and reassure them that they will receive support and help from the Safeguarding Officer.

Child sexual Exploitation (CSE)

CSE is a type of sexual abuse. Children in exploitative situations and relationships receive something such as gifts, money, or affection as a result of performing sexual activities or others performing sexual activities on them.

Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed and exploited online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

## Child Criminal Exploitation (CCE)

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (County Lines), forced to shoplift or pickpocket, or to threaten other young people.

Criminal exploitation is a geographically widespread form of harm that is a typical feature of County Lines criminal activity; drugs networks or gangs, groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. County Lines, like other forms of abuse and exploitation;

- can affect any child or young person (male or female) under the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults; and is typified form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

## Emotional Abuse

This refers to actual or likely severe adverse effects on the emotional and behavioural development of a child or young person, caused by persistent or severe ill treatment. Examples of emotional abuse include frequent threatening, taunting or sarcastic behaviour, along with with-holding affection or being extremely over-protective. It includes racist or sexist behaviour and demeaning initiation ceremonies.

It can be inflicted by other children and young people as well as by adults. Children and young people who are being abused or bullied in other ways will often also experience emotional abuse. In sport, coaches or parents emotionally abuse children and young people if they constantly criticise, abuse their power, or impose unrealistic pressure to perform to a high standard. It may also occur if a club allows members to deride people with disabilities or from minority cultures and use derogatory language about them.

All abuse involves some emotional ill treatment, of which examples are as follows. This list is not exhaustive.

- i. Rejection;
- ii. Lack of praise or encouragement;
- iii. Lack of attachment;
- iv. Lack of stimulation i.e. fun and play;



- v. Lack of appropriate handling relative to age;
- vi. Segregation;
- vii. Punishment or given work tasks as a punishment.

### Child on Child Abuse

It should be recognised that physical, sexual and emotional abuse might be carried out on a child by another child. Physical and emotional abuse may be recognised by:

- i. Planned abuse;
- ii. Calculated selection of a victim;
- iii. Persistent physical, emotional or verbal abuse;
- iv. Difference in age, size, physical strength or status;
- v. Racial or other forms of discriminatory abuse.

Flare ups and spontaneous fighting should not be considered as abuse providing they do not become persistent.

### Bullying

Although anyone can be the target of bullying, children and young people who are perceived as “different” from the majority may be at greater risk of bullying. This includes children and young people from other ethnic groups or children and young people with disabilities. Victims are often shy and sensitive and perhaps anxious or insecure.

Bullying can be defined as:

- Physical: hitting, kicking and theft. Verbal: name calling, constant teasing, sarcasm, racist or homophobic taunts and, threats Emotional: tormenting, mobile text messaging, ridiculing, humiliating and ignoring Sexual: unwanted physical contact or sexually abusive comments.
- Bullying can take place anywhere, but is more likely to take place where there is inadequate supervision. In sport it is more likely to take place in the changing rooms, or on the way to and from the pitch - but can also take place at a training session or in a competition.
- Sport’s competitive nature can create and even support an environment for the bully if individuals and clubs are unaware. The bully in sport can be a parent who pushes too hard, a coach or manager who has a win-at-all costs philosophy; a child or young person intimidating another; or an official who places unfair pressure on a child or young person.

The victim is often weaker and less powerful and the outcome is always painful and distressing.

### Grooming

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

be alone with the person for the purpose of committing abusive behaviour. Grooming activity may include:

- offering advice or understanding
- buying gifts
- giving the child attention
- using their professional position or reputation
- taking them on trips, outings, or holidays
- using secrets and intimidation to control children

Once they have established trust, groomers will exploit the relationship by isolating the individual from friends or family and creating a dependent relationship. They will use any means of power or control to make the individual believe they have no choice but to do what they want. Groomers may introduce 'secrets' or threats to control or frighten the individual. Sometimes they will blackmail them, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

### Radicalisation

Radicalisation is the process by which individuals come to support terrorism or violent extremism. Young people may express extremist ideas, be in possession of extremist literature or express extremist views. They may associate with known extremists or seek to recruit others to an extremist ideology. Concerns that a child's behaviour indicates involvement with extremist ideas should be considered a safeguarding issue and reported as such.

### **Appendix Two – Referral Management Group**

Stockport County requires those involved with the club to develop clear procedures for the response to concerns reported to the safeguarding team, as a result the club have developed its own policy for the management of reported safeguarding concerns and/or allegations.

The Referral Management Group (RMG) process is one key element of that which draws together relevant stakeholders from across the business to allow for an effective response in these circumstances.

#### Criteria:

- Where a concern is raised relating to the behaviour of a member of the workforce, there is a need to manage that referral in a swift and confidential manner.
- Serious concern that requires swift and confidential input from across the club.

#### The RMG will:

- not replace an immediate referral to the emergency or statutory agencies where a potentially criminal offence has taken place;
- not replace, but work in tandem with, the club's staff disciplinary policy;
- meet at the earliest convenience and need not necessarily meet face-to-face;
- comprise a minimum of three people from;
- - Safeguarding Officer.

- Line Manager.
  - Head of people.
  - Board member with Safeguarding Oversight.
- Protect the identity of the complainant where requested or appropriate (though this is not always possible for the complete duration of the disciplinary process or where criminal investigation is required);
  - Consider the suspension of any member of the workforce (through Head of People and note any actions taken by the Football Association);
  - Keep the complainant informed over the progress of the referral unless this may jeopardise the fairness of the process; and
  - Record and store in a confidential manner, the details of the matter and any meetings relating to the referral.

The RMG will consider the facts of the concern or allegation and may either:

- refer to Head of People or line manager, and/or to the clubs disciplinary policy process; and/or
- conduct its own investigation (and where the 'accused' is not permanent staff) using an independent member of staff; and/or
- make an external referral to statutory agencies or regulators; or
- take no further action.

Where an investigation has taken place and the RMG must consider the evidence presented to them, the burden of proof used to decide on an outcome will be 'balance of probability' (i.e. more likely than not)

### **Appendix Three – Responding to a Disclosure**

When working with children and young people, all members of the workforce need to be alert to the possibility that safeguarding concerns may arise. A child needs to have someone they can trust to feel able to disclose abuse they may be experiencing. They need to know they will be believed and will get the help they need. Without these things they may be vulnerable to continuing abuse.

You should deal with disclosures of abuse sensitively and professionally. The following approach is suggested as best practice for dealing with these disclosures. The role of any workers having potential abuse, bullying or poor practice, is to pass it on to the appropriate person.

#### **Recognise**

Appreciate that you are in receipt of a disclosure. Ensure that you create a space in which the individual disclosing can feel comfortable and safe to explain their concerns.



#### **Respond**

- React calmly

- Listen carefully and attentively
- Take the child seriously
- Reassure the child that they have taken the right action in talking to you
- Do not promise to keep anything secret
- Ask questions for clarification only. Do not ask leading questions
- Check back with the child that what you have heard is correct and understood
- Do not express any opinions about the alleged abuser
- Ensure that the child understands the procedures that will follow



### Refer

- Contact a member of the safeguarding team
- Where the child is at immediate risk of harm keep them with you until advised otherwise by a member of the safeguarding team, emergency services or the Local Authority.



### Record

- Make a written record of the conversation as soon as possible, in as much detail as possible
- Record concern on 'My Concern' and alert the Safeguarding Officer within 24 hours.

## Appendix Four – Safeguarding Code of Conduct

Everyone plays a role in safeguarding the welfare and development of children and the protection of other vulnerable people. As an individual responsible for children or other vulnerable people taking part in a Stockport County activity you have a duty to:

- **Ensure that the safety and welfare of all participants is your priority** and ensure that any planning, preparation, delivery, or review reflects this duty, and all actions are in the best interests of those in your care.
- **Treat children and other vulnerable people with respect**, regardless of their gender, ethnic or social background, language, religious or other beliefs, disability, sexual orientation, or other status and encourage them to treat others the same way. Always consider the age, maturity, understanding and emotional condition of participants when working with them.
- **Listen carefully to children and vulnerable people** about their needs, wishes, ideas and concerns and take them seriously.
- **Reward effort** as well as performance.
- **Only use physical contact with participants where necessary**. If contact is necessary, (e.g. for the purposes of coaching or first aid), then explain to the child

what the contact is for, and change your approach if he or she appears uncomfortable and conduct this in an open and transparent way.

- **Establish clear codes of conduct for participants and apply disciplinary policies equally and fairly** in respect of poor behaviour. Physical punishment or discipline or use of aggressive physical force of any kind towards any participant in your care is strictly prohibited.
- **Always use language or behaviour towards participants and others that is appropriate** and do not use language or behaviour that is or could be considered harassment, abuse, sexually provocative or demeaning. You are a role model to both participants and other members of the workforce, your appearance, attitude, behaviour, and language has a direct effect on your role.
- **Not supervise or care for others whilst under the influence of alcohol or illegal drugs** or any medication that may impair your ability to ensure a player's welfare.
- **Not appear to favour one child** or show interest in one child more than another.
- **Wherever possible, ensure that more than one member of the workforce is present** when working in the proximity of children or other vulnerable people. It is inappropriate to spend excessive time alone with those children you supervise or care for or to take them to your home.
- **Always maintain professional boundaries in person and online.** Do not engage in physical 'horseplay' with any participants and where possible avoid personal involvement in the activity you are responsible for. Be careful when engaging participants in 'banter' as this can easily be misunderstood. Recognise the danger to self and others when online.
- **Not engage in any form of sexual activity with or involving a child or vulnerable person in your care.** Such activity is prohibited regardless of the legal age of consent and is considered a breach of this Policy.
- **Report any concerns you have over a person in your care or the actions of a member of the workforce.** If you witness or are told about any incident or issue that may put a vulnerable person at risk or harm, or may breach this policy, you have a duty to report it to the appropriate person (and only share the information with those who need to know) This may be your line manager or designated safeguarding officer.

**It is everyone's responsibility to uphold this Code. Any breach of the Code is likely to lead to disciplinary action and in some cases a criminal prosecution.**

#### **Appendix Five: Definitions**

**Abuse** is the improper treatment of others. Harm will often be related to or arise from abuse or maltreatment of children and young people. There are several forms of abuse provided for in UK law, many relating to both children and adults. The types of abuse against children and young people recognised by Stockport County are detailed in Appendix One.

**Activity** (or activities) refers to any Stockport County business operation or setting including football matches, events, coaching or education programmes, medical or sports science programme, football tours or other related activities where the Club has a responsibility (both direct or indirect) for the welfare and safety of individuals taking part.

**Adult** refers to any person aged 18 and over.

**Capacity** refers to the ability to decide at a particular time, for example when under considerable stress. The starting assumption must always be that a person has the capacity to make a decision unless it can be established that they lack capacity under the Mental Capacity Act 2005.

**Child / Children** includes everyone under the age of 18.

**Child protection** is the process of protecting individual children identified as either suffering, or likely to suffer, significant harm because of maltreatment, abuse, or neglect. It involves measures and structures designed to prevent and respond to abuse and neglect. Child protection is part of an effective Safeguarding framework and any measures or action would involve intervention from statutory agencies

**Consent** is the agreement or permission to do or allow something. Most activities involving children require the consent or approval of the child's parent.

**Harm** means injury, loss or damage or the impairment of health or development of an individual by action or omission in respect of another (such as abuse or maltreatment). Harm may be physical, intellectual, emotional, social, or developmental and for the purpose of this Policy it may also mean the threat or risk of harm.

**Parental Responsibility (PR)** refers to those individuals with legal responsibility for a specific child. Where consent is required in respect of a child taking part in Stockport County related activities, or reporting a concern, we will take all reasonable steps to identify the person(s) with legal PR for that child. Where identifying PR is complex or disputed (not all parents have PR and not all people with PR are parents), we will also encourage all relevant information to be shared amongst all individuals involved in the care of that child, by those with PR.

**Participant(s)** refers to any person who takes part in a Stockport County-related activity and may include (but not limited to) being a spectator or a player at a match or event, taking part in a sport coaching or educational activity, engaging with the club through social media, or being part of a junior membership scheme.

**Regulated Activity** refers to certain roles that involve working with children, such as teaching and providing care. Anyone who is on the Disclosure and Barring Service (DBS) barred lists cannot work in these roles.

**Safeguarding** is a term used in the UK and is a shortening of the phrase 'safeguarding and promoting the welfare of children and refers to:

- i. protecting children from harm resulting from abuse, neglect, harassment, or maltreatment.
- ii. ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- iii. taking action to enable all children to have the best outcomes.

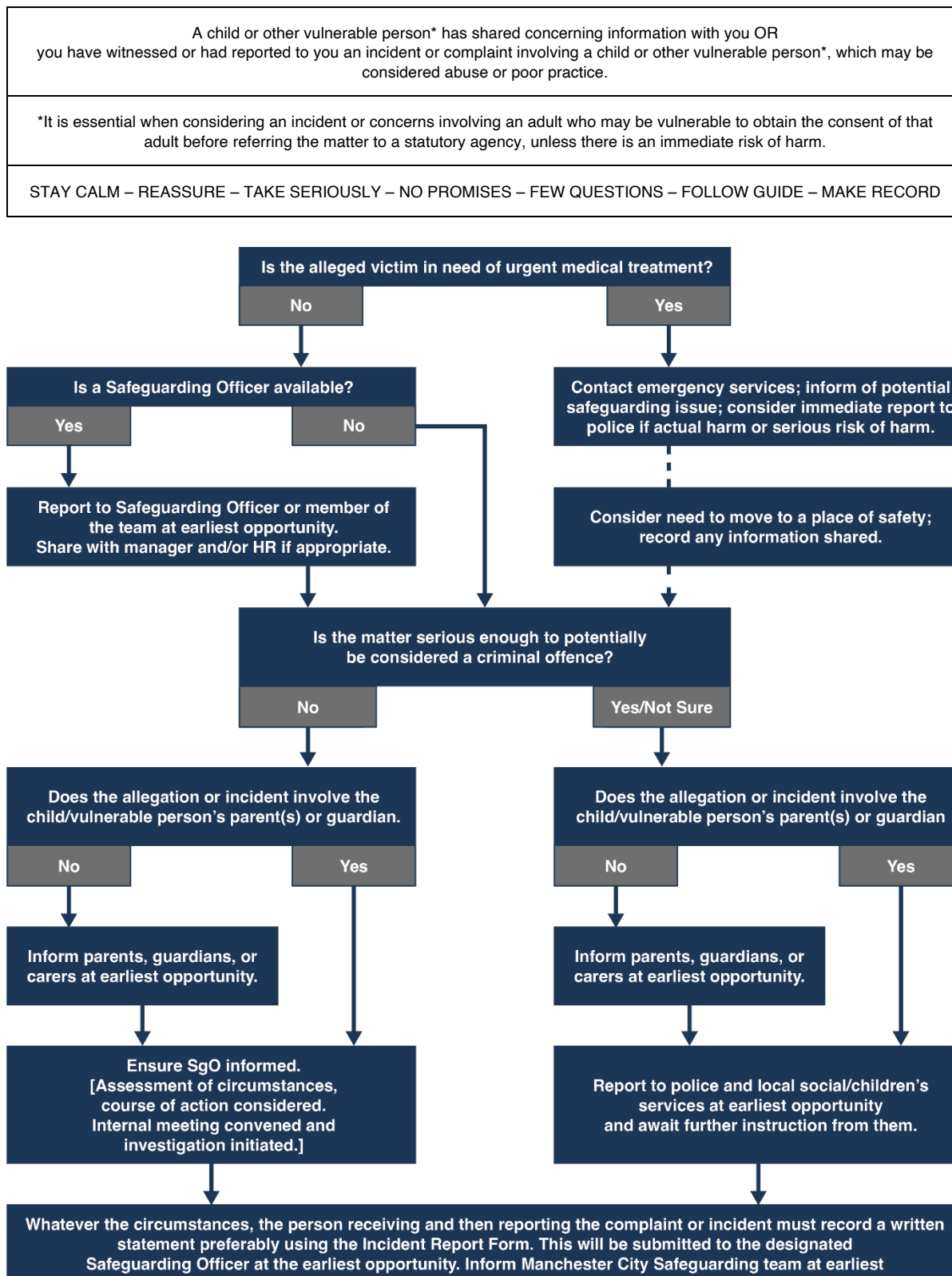
**Stakeholder** is a term used to refer to any persons who have an interest or involvement in the activity and or the delivery of the activity or the welfare of those taking part in the activity. This may include (but not exhaustively): participants, workers, managers, partners, parents and family members,

supporters, those who engage through social media channels, statutory agents, and regulatory agents. These may vary from setting to setting.

**Workforce (Worker)** refers to any person, employed or deployed, by managers to work in a paid or voluntary capacity on a Stockport County activity (or Group activity linked to the Club). Such individuals may be full or part-time, permanent, fixed term, temporary or casual staff employed directly by Stockport County; or they may be volunteers deployed by management; they may be deployed via a third party contractor, grantee, licence holder, or partner.

**Appendix Six – Responding to a concern, incident or an allegation flowchart**

The flowchart presented below details the immediate response to an incident or concern involving a child or other vulnerable person.





## Appendix Seven – Safeguarding Hierarchy

