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**Safeguarding Policy 24/25**

Children, Young People and Adults at Risk

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|   | **Information**  |
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Review The club shall review this Policy and Procedures at the end of every season or whenever there is a change in legislation, guidance, governing body rules or learning from safeguarding cases.

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**Policy Statement and Principles**

Taunton Town Football Club are committed at all levels, from the CEO down, to providing a safe and caring environment where we will always protect all vulnerable individuals under our care.

**The Taunton Town Football Club Commitment**

We will always:

• Act in the best interests of the children, young people and adults at risk.

• Ensure that all staff understand their personal responsibility for safeguarding.

• Protect all vulnerable individuals taking part in any activity connected with the group.

• Comply with all applicable safeguarding legislation and best practise guidance.

• Provide all of our staff with safeguarding training and awareness suitable to their role.

• Maintain an environment where poor practice is challenged, and all safeguarding concerns are reported.

• Ensure that effective safer recruitment procedures and policies are in place and that they are used.

• Ensure that we provide a safe and positive environment for all children, young people and adults at risk to participate in the activities at the stadium and elsewhere, to the best of their abilities for as long as they choose to do so.

This policy is promoted to all new staff, volunteers and participants and via the Club website.

The welfare of children, young people and adults at risk is of paramount importance and all children, young people and adults at risk have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion, belief or age.

Through the application of policy, procedures and best practice, the Club promotes the safety, welfare and well-being of all children, young people and adults at risk enabling them to participate in any Club activity in an enjoyable, safe, and inclusive and child centred environment. This equally applies to the safety and security of those working with and who are responsible for the activities involving children, young people and adults at risk.

Employees, workers, consultants, agency staff and volunteers who come into contact with children, young people and adults at risk in club related activities should be positive role models and display high moral and ethical standards in line with the club’s vision and values.

**Policy Principles**

• The welfare of the child and/or adult at risk is paramount.

• All children and/or adults at risk, regardless of age, ability, culture, race, language, religious beliefs, sexual or gender identity, have equal rights to protection.

• Safeguarding is everybody’s responsibility. All staff and volunteers have a responsibility to respond positively in response to any concerns, suspicion or disclosure that may suggest a child and/or adult at risk is at risk of harm.

• Children, volunteers and staff involved in child protection issues will receive appropriate support.

• Staff and volunteers with roles and responsibilities for children, young people and/or adults at risk will be subject to appropriate safe recruitment checks and safeguarding training.

**Policy Aims**

• To provide all staff and volunteers with the necessary information to enable them to meet their safeguarding and child protection responsibilities.

• To promote consistent good practice.

• To demonstrate the Club’s commitment to safeguarding children and adults at risk.

**Safeguarding Legislation and Guidance**

The following safeguarding legislation and guidance has been considered when drafting this policy:

o Children Act 1989

o Children Act 2004

o Children and Families Act 2014

o Criminal Justice Act 1988 o Education Act 2011

o UN Convention on the Rights of the Child

o The Human Rights Act 1998

o Sexual Offences Act 2003

o Office of the public Guardian Safeguarding Policy 2017

o Safeguarding Vulnerable Groups Act 2006

o Equality Act 2010

o Serious Crime Act 2015

o Counter terrorism and Security Act 2015

o Protection of Freedoms Act 2012

o Working Together to Safeguard Children 2023

o Keeping Children Safe in Education 2023

o What to do if you’re worried a child is being abused 2015

o SEN Code of Practice Guidance 2015

o General Data Protection Regulations 2018

o Female Genital Mutilation Act 2003

o The Children (Private Arrangements for Fostering) Regulations 2005

o Modern Slavery Act 2015

o Management of Health and Safety at Work Regulations 1999

o Health and Safety at Work Act 1974

This Policy is for use across the club and is to be observed by all those working and coming into contact with children, young people and adults at risk to ensure best practice in safeguarding is promoted and adhered to.

**Venues of Application**

All and any activities undertaken at the following locations/departments are under the remit of this policy including:

• The Wordsworth Drive Stadium;

• Taunton Town FC First Team training ground;

• Taunton Town FC Academy training grounds;

• All matchday event and activities that come into contact with children, young people and adults at risk;

• Travel, Events and Supporter Liaison;

• Youth Development training grounds.

• Any and all other club related entities/activities undertaken in the UK or outside of the UK.

All employees, workers and volunteer staff are made aware of the Policy and Procedures through induction and where appropriate their work with children, young people and adults at risk will be supported by a comprehensive on-going safeguarding training programme.

**Safer Recruitment and Disclosure**

As part of the club’s safer recruitment and selection process, offers of work for positions which come into contact with children, young people and adults at risk are subject to a satisfactory self-declaration and a criminal record check (DBS check) as relevant, CV checks, appropriate references, right to work in the UK checks and a qualification check, if applicable.

• All offers of work are subject to a satisfactory outcome to the rigorous screening process and until such time that all background checks are deemed as acceptable by the club, the person concerned is not permitted to commence work.

• All employees, workers, consultants, agency staff and volunteers in a position of trust are required to undergo regular DBS disclosure clearances.

• All new employees, workers, consultants, agency staff and volunteers working with children, young people and adults at risk at the club are required to complete a self-declaration on commencement of duties and annually thereafter.

• An adverse DBS check will not necessarily be a bar to working at TTFC. However, should any person’s DBS check reveal any cautions, convictions, community resolutions, warnings or final reprimands the club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children, young people and adults at risk. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment is carried out to evaluate the information contained within the disclosure certificate.

• The person may also be required to attend a risk assessment meeting with a Club Welfare Officer (inc Safeguarding responsibility) and/or a member of the club’s Safeguarding Team prior to a recruitment decision being made.

• When the club uses suppliers or agencies to undertake its work, they are be subject to rigorous vetting and safeguarding checks and required to adhere to the club’s policy and procedures as set out in their contracts or service level agreements where relevant.

• When the club engages with schools and organisations in connection with child or young people related activities, where appropriate the club writes to the school or organisation to state the club’s policy and procedures in relation to criminal record checks and safe recruitment.

• The club only discloses the name, date of birth, disclosure and issue numbers of the employees, workers, consultants, agency staff or volunteers criminal record checks. Disclosure information in relation to checks will not be divulged.

• Schools and other organisations are required to comply with the club’s safeguarding arrangements as set out in contracts and/or any service level agreements.

**Induction and training**

During the induction process, employees who work with or come into contact with children, young people and adults at risk are required to attend a briefing from the CWO

• In any case all staff that will be working at Taunton Town Football Club will undertake the EFL online “Safeguarding for All” training.

• Employees will also have access to an online database (SharePoint) where all of the Club Safeguarding policies and procedures are held.

• This policy will form part of the Club Induction Process and staff are required to sign an acknowledgement that they have read and agree to abide by them.

• Workers, consultants, agency staff and volunteers who have roles that work with or come into contact with children, young people and adults at risk *may* be required to undertake both club and The FA training.

• Refresher safeguarding training is provided every three years or earlier as required.

• Additional training will be provided to staff whenever legislation is introduced or amended, good practise is identified or upon specific requirements by statutory agencies or authorities.

• All Designated Safeguarding Officers (in this case the CWO and associated roles) will carry out regular CPD training whenever required, at least annually.

**Roles and Responsibilities**

Taunton Town FC has a safeguarding structure which ensures the safety and welfare of all children and young people who engage with the club.

*Football Operations Manager: Karl Lindsay*

The FOM for TTFC will be the link for Safeguarding contacts direct to the Board. The FOM will ensure that safeguarding is a key priority and standing agenda item at Board Level.

*Board Safeguarding Champion: Karl Lindsay*

To be an active Board member championing the safeguarding of children and young people (under the age of 18) in all TTFC activities and adults at risk in disability football.

*Club Welfare Officer (CWO) inc Designated Safeguarding Officer: James Blackmore*

Responsible for the strategic and operational direction and embedding safeguarding across the Club. The CWO is also the lead point of contact should safeguarding concerns arise and is the Lead Disclosure Officer.

Employees, Workers, Agency Staff, Consultants and Volunteers Responsible for familiarising themselves with the clubs policy and procedure and ensuring the safety and welfare of all children and young people.

**Safeguarding Contacts**

Club Welfare Officer (CWO) inc DSO

*James Blackmore*

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welfareofficer@tauntontown.com

07848044556

Football Operations Manager

*Karl Lindsay*

karl.lindsay@tauntontown.com

07936022171

**Additional Contacts**

DSO - Somerset FA

***Shirley Needham***

**Office**: 01458 837 034

**Mobile**: 07535 664 988

Shirley.Needham@somersetfa.com

DSO - National League

*Martyn Cannon*

Martyn@thenationalleague.org.uk

Somerset Safeguarding Children Partnerships

[Contact Us - Somerset Safeguarding Children Partnership](https://somersetsafeguardingchildren.org.uk/contact-us/)

NSPCC For Adults Concerned About a Child

Tel: 0808 800 5000 For Children and Young People

CHILDLINE

Tel: 0800 1111

**Employee Complaints**

In the event that a complaint is made about a member of the Club’s staff, initial contact should be made with the Football Operations Manager unless the matter is related to Safeguarding in which case the CWO should be contacted.

If any concerns or complaints are to be made about any of the Club’s identified CWO (and Safeguarding Officer), direct contact should be made in the first instance to the Football Operations Manager.

The Club will develop separate Whistleblowing and Complaints Policy during the remainder of the 2024-25 seasons, giving further information. Both policies will be located on the shared drive (SharePoint).

**Abuse and Neglect**

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Children or young people may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child, children, young person or young people.

There are a number of different types of abuse identified in the *“Working Together to Safeguard Children 2023*” document:

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

• Emotional abuse: Any act or other treatment which may cause emotional damage and undermine a person’s sense of well-being, including persistent criticism, denigration or putting unrealistic expectations on vulnerable groups, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

• Sexual abuse: Any act which results in the exploitation of children and adults at risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This may be by an adult or by a young person who is intellectually, emotionally, physically or sexually more mature than the victim. This includes non-contact activities, such as indecent exposure, involving children or adults at risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally Children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.

• Child exploitation: Child exploitation is the act of using a minor child for profit, labor, sexual gratification, or some other personal or financial advantage. Child exploitation often results in cruel or harmful treatment of the child, as the activities he or she may be forced to take part in can cause emotional, physical, and social problems.

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

• Neglect: Ongoing failure to meet the basic needs of children and/or adults at risk. Neglect may involve; failing to provide adequate food, shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger, or the failing to ensure access to appropriate medical care or treatment. It may also include neglect of or unresponsiveness to, basic emotional needs. In an Activity setting, it may involve failing to ensure that children and/or adults at risk are safe and adequately supervised or exposing them to unnecessary risks.

• Grooming: Grooming is defined as developing the trust of an individual and/or their family for the purposes of sexual abuse, sexual exploitation or trafficking. Grooming can happen both online and in person.

• Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of children and/or adults at risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

• Female genital mutilation (FGM): Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and 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.

• Bullying: Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

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

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

**Special Educational Needs**

The “Special Education Needs Code of Practice 2015” guidance, advises that children, young people and adults at risk may be at additional risk of abuse and neglect through some of the additional vulnerabilities they may face which may include having a learning difficulty which calls for a special educational provision to be made for them or they have a disability under the Equality Act 2010.

Taunton Town FC has a duty when carrying out their functions and must have regard to the need to eliminate discrimination, promote equality of opportunity and foster good relations between disabled and non-disabled children and young people.

**Additional vulnerabilities**

If children, young people and adults at risk have additional vulnerabilities when engaging with the club, further safeguards may need to be put in place to reduce the potential risk of abuse and neglect.

**Deaf and disabled children, young people and adults at risk**

The Equality Act (2010) defines a person as disabled if they have a physical or mental impairment which has a substantial and long term (has lasted or is expected to last at least 12 months) adverse effect on one's ability to carry out normal day-to-day activities. This definition includes conditions such as cancer, HIV, mental illness and learning disabilities. Deaf and disabled children, young people and adults at risk may be vulnerable to abuse for a number of reasons:

• Increased likelihood of social isolation;

• Dependency on others for practical assistance in daily living (including intimate care);

• Impaired capacity to resist, avoid or understand abuse;

• Speech and language communication needs may make it difficult to tell others what is happening;

• Limited access to someone to disclose to; and

• Particular vulnerability to bullying.

Children, young people and adults at risk with disabilities may also feel less valued than his/her peers and poor care may be observed but tolerated by others. This might include such things as not speaking directly to the child or young person; not offering choices; not moving and handling them safely; not respecting his/her privacy and dignity; not treating him/her according to his/her age; allowing physical restraint to occur; or using derogatory language.

There is no single route to ensure that children, young people and adults at risk are protected, especially those with additional vulnerabilities. However the safest environments are those that help children, young people and adults at risk to protect themselves by helping them to speak out and do their best to stop any abuse and neglect from happening and take responsibility for observing, challenging and reporting any poor practice and suspected abuse and neglect.

Safe environments for children, young people and adults at risk with additional vulnerabilities are also safer for all children, young people and adults at risk.

**Radicalisation and Extremism**

Radicalisation and extremism of children, young people and adults at risk is a form of emotional abuse. HM Government states that “the aim of radicalisation is to attract children, young people and adults at risk to a particular extremist ideology”. In many cases it is with a view to inspiring children, young people and adults at risk eventually to become involved with harmful or terrorist activities. Radicalisation can take place through direct personal contact, or indirectly through social media. Extremism is defined as vocal or active opposition to fundamental British values including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Taunton Town Football Club values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society’s values. Those we engage with and all employees have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the susceptible or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Taunton Town Football Club is committed to providing a secure environment for all, where children and young people feel safe and are kept safe. Everyone at our club recognise that safeguarding is everyone’s responsibility irrespective of the role they undertake or whether their role has direct contact or responsibility for children and adults at risk or not.

**Use of Photography and Film**

All images are taken by club photographers who have been briefed by the CWO and/or Football Operations Manager, responsible for the activity being photographed or filmed in an appropriate way and manner.

There is implied consent to photographs and video recordings of spectators and supporters and this is notified to community groups containing children, young persons and adults at risk where possible.

For some Club activities where possible, parent/carer consent is sought in writing at the start of the season or prior to an event.

The club adhere to the following principles when using photography or film:

• All children or young people featured in club publications are appropriately dressed; • Where possible, the image will focus on the activity taking place and not a specific child or young person;

• Where appropriate, images represent the broad range of people participating safely in the event;

• Designated club photographers will, where applicable, undertake a DBS check and attend the club’s and FA Safeguarding workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the ‘Use of Images’ policies from the FA.

• Club identification is worn at all times;

• Children, young people or adults at risk who are the subject of a court order that the Club are notified of will not have his/her images published in any club document; • No images of children, young people or adults at risk featured in club publications are accompanied by personal details such as his/her home address;

• Recordings of children, young people and adults at risk for the purposes of legitimate coaching aids are only filmed by club officials and are stored safely and securely at the club’s premises;

• Players under the age of 16 are asked to provide their written consent to their photographs being taken. Any instances of inappropriate images in football should be reported to the CWO. The club does not put young players under the age of 16 profiles, images and personal information on its website.

**Good Practise and Code of Conduct**

To ensure all children, young people and adults at risk have the most positive and safe experience when engaging with the club, all employees, workers, consultants, agency staff and volunteers should adhere to the following principles and action (to ensure they role model positive behaviours and so reduce the risk of allegations, abuse and neglect occurring):

• Listen carefully to children, young people and adults at risk about his/her needs, wishes, ideas and concerns and take them seriously;

• Treat all children, young people and adults at risk equally not showing favouritism;

• Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);

• Make the experience of the activity fun and enjoyable;

• Promote fairness, confront and deal with bullying;

• Maintain a safe and appropriate distance with children, young people and adults at risk and avoid unnecessary physical contact;

• Where any form of manual/physical support is required it should be provided openly and with the consent of the child or young person;

• If children, young people and adults at risk have to be supervised in changing rooms always ensure coaches etc. work in pairs;

• Request written consent if the club are required to transport children, young people and adults at risk for any activities, events or significant travel arrangements e.g. overnight stays;

• Employees and workers should maintain their qualifications and professional development;

• A qualified first aider is in attendance or readily available;

• Maintain appropriate professional relationships with children, young people and adults at risk, including only engaging with them online with prior approval and through the club’s social media channels;

• On trips, ensure that adults should not enter a child or young person’s room unless there is a safety concern, in which case two adults should enter and should not invite children or young people into their rooms;

• Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of children, young people and adults at risk;

• Always give enthusiastic and constructive feedback rather than negative criticism;

• Promote the club’s vision and values and be an ambassador for those values;

• Ensure children, young people and adults at risk adhere to his/her relevant Code of Conduct;

• Secure written consent for the club to administer emergency first aid or other medical treatment if the need arises;

• Reward effort as well as performance;

• Challenge unacceptable or inappropriate behaviour;

• Encourage children, young people and adults at risk to take responsibility for his/her own behaviour and performance;

• Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the club’s Accident and Incident Report Form.

• Recording safeguarding concerns on the ‘MyConcern’ system and/or Safeguarding Concern Form.

• This list is not exhaustive.

**Unacceptable Practice**

The following are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers:

• Unnecessarily spending excessive amounts of time individually with a child or young person away from others;

• Being alone in changing rooms, toilet facilities or showers used by children, young people and adults at risk;

• Taking children, young people and adults at risk alone in a car or journey unless written consent is sought from the club’s CWO for emergency situations;

• Taking children, young people and adults at risk to your home or places where they will be alone with you;

• Sharing a room with children, young people and adults at risk;

• Engaging in rough, physical or sexually provocative games, including horseplay;

• Allowing or engaging in inappropriate touching of any form;

• Allowing children, young people and adults at risk to use inappropriate language unchallenged;

• Making sexually suggestive comments to children, young people and adults at risk, even in fun;

• Reducing children, young people and adults at risk to tears as a form of control;

• Allowing allegations made by children, young people and adults at risk to go unchallenged, unrecorded or not acted upon;

• Doing things of a personal nature that children, young people and adults at risk can do for themselves.

• Not recording safeguarding concerns according to the Club’s arrangements;

• Sending inappropriate text messages or social media messages to children, young people and adults at risk;

• Having children or young people engaged with the club as ‘friends’ or ‘followers’ within social networking sites such as Facebook, Twitter and Instagram;

• Engaging with children, young people and adults at risk on ‘one to one’ personal electronic communications;

This list is also not exhaustive….

**Searching Children, Young People and Adults at Risk**

To ensure the safety and security for all club activities all children, young people and adults at risk may be subject to the club’s search process. Children, young people and adults at risk will be asked to self-search as the preferred method; however should the club suspect that the child or young person may be concealing a prohibited item, consent will be sought from their parent/carer before a Steward or Security member of the same sex who is being observed by a colleague searches the child.

**Lost or missing children, young people and adults at risk**

During club activities every effort is made to ensure children, young people and adults at risk remain with their parents/carers or the activity leaders. Should a child or young person become lost or go missing during a club activity every effort will be made to locate the child or young person as quickly as possible. Should a child or young person not be located within a reasonable timeframe, contact will be made with their parents/carers and the police to file a missing child/young person’s report.

**Children, young people and adults at risk who are not picked up on time**

All parents and carers should collect their child or young person on time in line with the instructions given by the club. Should the child or young person not be collected on time a minimum of two appropriate members of staff will wait at the venue until the parent or carer arrives.

After 15 minutes and if the designated contact for the child, young person or adult at risk following the end of the activity hasn’t arrived, the appropriate adult will make contact with the emergency contact.

The CWO will be contacted and made aware. If contact is made the two appropriate adults will remain with the child, young person or adult at risk until the parent, carer etc. arrives.

After 60 minutes following the end of the activity further attempts will be made to contact the parent or carer. Should no contact be made a referral should be made to the CWO in order that contact be made with Somerset Council Children’s Safeguarding Service and if necessary, Avon and Somerset Police.

**Risk Assessments**

For all club activities including, matchday, trips, tours, events and any other club related activity, thorough risk assessments are completed to identify and minimise potential risks.

The club’s Health and Safety Policy outlines the process to undertake when completing risk assessments as well as how to capture information regarding accidents and incidents and how the club learns from such matters.

Where a child, young person or adult at risk is involved in a trip, activity or event, a risk assessment must take account of his/her particular vulnerabilities whilst in the club’s care.

The risk assessment will set out what arrangements are in place for his/her care and supervision and how risks will be minimised. Activity leaders will be required to continually monitor and amend the controls within the risk assessments whilst leading such activities.

**Supervision of children, young people and adults at risk**

The club adheres to best practise guidance set out by the F.A. in relation to the supervision of adults to children/young people. Generally, there should always be a minimum of two adults and an adult to child/young person ratio of:

0 – 7 years of age, one adult to every ten children;

8 – 17 years of age, one adult to every sixteen children/young people.

Activities may require more or less adult to child/young person ratios due to:

• Age, needs and ability of children, young people and adults at risk;

• Nature of the activity and environment;

• Risk assessments or intelligence information identifying potential behavioural or other issues;

• Expertise and experience of the staff involved;

• Mixed gender children, young people and adults at risk activities will require adults of both genders to supervise where possible.

• Should the ratio not be suitable, the club’s FOM and CWO decide whether the activity or event takes place.

**Working with external partners**

The club always ensures external partners and organisations we engage with promote the safety and welfare of children, young people and adults at risk and this is outlined in contracts and/or service level agreements. External partners and organisations are required to demonstrate competencies in safeguarding and the club assesses this through its own safeguarding audits. Where organisations do not have their own satisfactory safeguarding arrangements they will be expected to comply with the club’s standards.

**Referrals**

If the club has safeguarding concerns in relation to a child, young person, adult at risk or their parents/carers the club, via the CWO, will refer these concerns to external agencies.

External agencies include but are not limited to the Somerset Safeguarding Children Board, Children’s Social Care, Adult Social Care, the Police, Health Agencies, the FA and the National League.

**Confidentiality**

Every effort should be made to ensure that confidentiality of safeguarding cases is maintained for all concerned. Information should be handled and disseminated on a need to know basis only which would not normally include anyone other than the following:

• The Safeguarding Team;

• The child or young person or the person raising the concern;

• The employee, worker, consultant, agency staff or volunteer who received the concern or disclosure;

• The parents/carers of the child or young person who is alleged to have been abused, where appropriate;

• Local Authority and Police;

• Dependent on role, the National Governing Body Employees, workers, consultants, agency staff and volunteers may have access to confidential information about children, young people and adults at risk in order to undertake their responsibilities.

In some circumstances, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information.

Confidential or personal information about a child, young person or adult at risk or his/her family should not be used for their own or others advantage.

Confidential information about a child, young person or adult at risk should never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the child or young person’s identity does not need to be disclosed, the information should be handled anonymously.

There are some circumstances in which an employee, worker, consultant, agency staff or volunteer may be expected to share information about a child, young person or adult at risk, for example when abuse is alleged or suspected. In such cases, employees, workers, consultants, agency staff and volunteers have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities (CWO / FOM).

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, guidance should be sought from the club’s Safeguarding or Legal Teams. The storing and processing of personal information about children, young people and adults at risk is governed by the Data Protection Act 1998.

Any documentation concerning Safeguarding is to be kept in a locked cabinet located within a locked room.

**Information sharing**

The club abides by the 7 guiding principles as set out by HM Government on sharing information:

1.Remember that the Data Protection Act and Human Rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.

6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely (see principles).

7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

The Data Protection Act 1998 and human rights laws are not barriers to justified information sharing, but provide a framework to ensure that personal information about children, young people and adults at risk is shared appropriately; Openness and honesty with the child or young person (and/or their parents/carers or family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek agreement, unless it is unsafe or inappropriate to do so;

Advice is sought from the club’s Safeguarding and/or Legal Team if there is any doubt about sharing the information concerned, without disclosing the identity of the child or young person where possible; Information is shared with informed consent where appropriate and, where possible, there is respect for the wishes of those who do not consent to share confidential information.

Information will still be shared without consent if, in the club’s judgement, there is good reason to do so, such as where safety may be at risk. Judgement will be based on the facts of the case;

Safety and well-being of the child, young person or adult at risk is always considered; Information is only shared when it is necessary, proportionate, relevant, adequate, accurate, timely and secure to do so;

Records of the club’s decision to share information in relation to any reported concerns, with whom and the reasons are always recorded on the Safeguarding Concern Form.

The club will share information with the relevant statutory agencies, the National League and FA where appropriate in relation to safeguarding cases.

**Consent**

The first priority in safeguarding should always be to ensure the safety and welfare of the child, young person or adult at risk. If concerns arise, it is best practice to always gain the consent of the child or young person before an external referral is made. There are a number of circumstances whereby an external referral can be made without consent and these include:

• The child or young person is at risk of harm;

• Other people are, or may be, at risk, including other children or young people;

• Emergency or life-threatening situations may warrant the sharing of relevant information with the emergency services without consent;

• Sharing the information could prevent a serious crime;

• The child or young person lacks the mental capacity to make that decision;

• A serious crime has been committed;

• There is a risk of significant harm and meets the threshold for a multi-agency strategy meeting;

• Employees, workers, consultants, agency staff or volunteers are implicated;

*What to do if you suspect abuse or poor practice has occurred?*

If you are concerned about the safety or welfare of a child, young person or adult at risk or you are concerned about an adult’s behaviour towards a child or young person you must act.

Do not assume that someone else will help the child, young person or adult at risk.

Safeguarding children, young people and adults at risk is everyone’s responsibility. It is important that you report your concerns to one of the following:

• CWO (inc DSO)

• Football Operations Manager - This initial report should be in writing, however if you feel that more urgent action is needed then a phone call should be made, followed up by a written report.

**Taking no action is not an option.**

**What to do if you receive a safeguarding disclosure from a child, young person or adult at risk**

Children, young people or adults at risk who may be vulnerable are likely to disclose abuse or neglect to those they trust and how one responds to a disclosure is crucial.

**Stage 1** - Deal with the disclosure as it happens and ensure that the child, young person or adult at risks immediate needs are met and that he/she feels supported.

When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy and Procedure, even if the validity of the disclosure is uncertain.

You are not expected to act as a social worker, counsellor, judge, and jury or avenge the abuser; you are however expected to act in the best interest of the child, young person or adult at risk, who may be at risk.

You must:

• Put your own feelings aside and listen as if the information is not sensational;

• Allow the child, young person or adult at risk to lead the discussion and to talk freely;

• Listen to what the child, young person or adult at risk is saying without investigating. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like being interrogated;

• Allow the child, young person or adult at risk to tell you at his/her own pace;

• Don’t worry if the child, young person or adult at risk stops talking for a while, silences are ok. You don’t have to rush in to fill the gaps;

• Accept what the child, young person or adult at risk says without challenge;

• Allow the child, young person or adult at risk to talk but protect him/her from sharing the information with too many other people;

• Provide reassurance that you are taking them seriously and he/she have done the right thing by disclosing;

• Let the child, young person or adult at risk know it is recognised how hard it is for him/her to tell you;

• It is ok to let him/her know if you are unable to answer all their questions;

• Avoid asking leading questions, for example “Did the coach hit you?”;

• Never ask questions that may make the child, young person or adult at risk feel guilty or inadequate;

• If physical abuse has taken place, you may observe visible bruises and marks but do not ask a child, young person or adult at risk to remove or adjust his/her clothing to observe them and do not take photographs of the injuries, you should make a note of the injuries on the Body Map in the Safeguarding Concern Form Appendix

• Tell the child, young person or adult at risk who you will be contacting e.g. club’s CWO and that you will support him/her through that process;

• If you establish that they he/she has been harmed or is at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure;

• Respect the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting children/young people and adults at risk.

*You must not:*

• Panic or show that you are shocked. It is important to remain calm and in control of your feelings;

• Document the conversation while the child, young person or adult at risk is disclosing. This should be done as soon as possible after the child, young person or adult at risk has disclosed to you;

• After the child, young person or adult at risk has disclosed, the conversation must be documented remembering as accurately as you can, the words and phrases used by the child, young person or adult at risk to describe what happened to him/her; Investigate;

• Give the impression that you might blame the child, young person or adult at risk e.g. don’t ask: “Why did you let him?”, “What were you doing there anyway?” or “Why didn’t you tell me before?

• Press for details by asking questions such as “What did he/she do next? • Ask leading questions;

• Pass judgement on what is said;

• Make false promises and/or promise confidentiality – it should be explained that the child, young person or adult at risk has done the right thing, outline who will need to be told and why;

• Approach the alleged abuser yourself. Do remember, when a child, young person or adult at risk discloses they may feel:

• Guilt: he/she may blame themselves for the abuse and often feel guilt for telling.

• Ashamed: he/she may feel ashamed about the abuse itself.

• Confused: he/she may be confused about his/her feelings for the alleged abuser.

• Scared: he/she may be fearful of the repercussions of telling. He/she may be scared of the alleged abuser. Be careful about touching (e.g. hugging or cuddling) the child, young person or adult at risk if they have not initiated the contact. He/she may be upset by physical contact.

**Stage 2**

As soon as possible, once the immediate comfort and safety of the child, young person or adult at risk is secured, you must inform the CWO or FOM of the disclosure. This should be in writing, but if you feel that more urgent action is needed then make contact with the CWO by phone and follow up in writing.

You may make a referral yourself directly to a statutory agency if you are concerned about the child/young person or adult at risks’ immediate safety and/or are having difficulty contacting the CWO or if the CWO is the alleged abuser.

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

**Stage 3**

You should complete the club’s Safeguarding Concern Form (SCF) as soon as possible after the disclosure has been made and send the SCF Appendix to the CWO within 24 hours of the disclosure.

Wherever possible, you must record information as it was relayed to you using the language of the child or young person rather than your own interpretation of it.

**What happens next?**

It is important that concerns are followed up and it is everyone’s responsibility to ensure that they are. You should be informed by the club’s Safeguarding Team (CWO/FOM) what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the club’s FOM and ultimately contact the relevant statutory agency.

A disclosure is not the only way that you may be made aware of an issue. Sometimes another adult or even a child, young person or adult at risk may say something about a possible abusive situation.

On occasions you may witness an incident that may cause concern or indeed you may pick up on things that cause concern or information may be passed to a coach or manager anonymously by a person or persons who do not want to be directly involved for whatever reason.

**Raising a concern**

You do not need to have firm evidence before raising a concern. But we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Step 1 - If you have a concern of any form of safeguarding poor practice or abuse, raise it first with the CWO, who will raise it with the appropriate Club officials.

Step 2 - If you feel unable to raise the matter with the CWO for whatever reason, raise the matter with the Football Operations Manager (FOM).

Step 3 - If you feel the FOM has not handled the concern appropriately you should contact the National League/Somerset FA contact (listed in policy).

**Managing Allegations Against Employees, Workers, Consultants, Agency Staff and Volunteers**

Should a concern arise about an employee, worker, consultant, agency staff or volunteer’s conduct in relation to a child, young person or adult at risk, this should be reported to the club’s Safeguarding Team who will take such steps as considered necessary to ensure the safety of the child, young person or adult at risk in question and any other person who may be at risk.

The person raising the concern should do so via the club’s Safeguarding Concern Form.

When managing an allegation against an employee, worker, consultant, agency staff or volunteer the Safeguarding Team will follow this process:

• The allegation will be referred to the Local Authority Designated Officer (LADO)/Designated Person at the Local Authority and/or the Police;

• The parent/carer of the child or young person will be contacted as soon as possible, following advice from statutory agencies;

• Senior Management will be notified and if applicable the National League and the FA.

• If the CWO is the subject of an allegation, the report must be made to the FOM who will refer the allegation to the appropriate statutory agencies.

If required, a full investigation and possible sanction in accordance with the club’s Disciplinary Policy for employees will follow. Workers, consultants or agency workers may have their Agreements terminated. Referrals as appropriate will be made to the Disclosure and Barring Service (DBS).

**Managing concerns for a child, young person or adult at risk**

Any concern relating to the abuse of a child or young person by another child, young person or adult at risk must be dealt with through this Policy and Procedure. Any such concern should be reported immediately to the CWO.

**Making a referral**

All employees, workers, consultants, agency staff and volunteers should submit their concerns the CWO (or complete the club’s Safeguarding Concern Form). The Safeguarding Team will contact the relevant Local Authority Children’s Services Team completing their Referral Form.

**Appendix A – Safeguarding Concern Form**

|  |  |
| --- | --- |
| **Safeguarding Concern Form**Private and Confidential when Complete | Provided by thebestof.co.uk |
| Staff should use this form to report any safeguarding concerns. Please complete sections A-H of this forms as fully as you can and as soon as possible after witnessing a safeguarding incident or if one has been reported to you. Where possible, you should always seek consent of the child, young person or vulnerable adult at risk before sharing the information. If you are not sure whether you have consent please contact the Club Welfare Officer using the details below. If there are concerns raised about a club employee, worker, consultant, agency staff or volunteer you should not inform them that a safeguarding allegation has been made until you have sought the advice of the Safeguarding Team. If a person has literacy issues or additional needs and is unable to complete this form, you can complete the form on their behalf but must disclose this is Section F. Please complete this form within 24 hours of disclosure and in black ink and return to welfareofficer@tauntontown.com or hand to Club Welfare Officer |
| Further Information and support can be gained from: | James Blackmore (CWO)welfareofficer@tauntontown.com  |
| Section A – Your Details |
| Full Name |  |
| Role at Club |  |
| Contact Number |  |
| Date and time of concern |  |
| Section B: Child, Young Person or Adult at risk details (The child, young person or adult at risk who is potentially at harm) |
| Child, young person or adult at risk’s name |  |
| Age of child, young person or adult at risk |  |
| Address |  |
| Telephone number of appropriate family member |  |
| DOB |  |
| Section C: Alleged person to have caused the concern |
| Name of person alleged to have caused concern |  |
| Address |  |
| Age |  |
| Section D: Confidentiality |
| Has the child, young person or adult at risk given consent to share the information? |  |
| Section E: Your Concerns |
| **Facts** (Please state facts. For example the child said to me “I was too scared to go home today” and/or the child/young person/adult at risk had a bruise on their right hand – please link any injuries to the body map attached – see Section G) |  |
| **Professional Opinions** (Please state what is your opinion of the concern. For example, I believe in my position as the Strength & Conditioning Coach/Steward that the child(ren) young person or adult at risk is being groomed online through social media) |  |
| **Hearsay/witness** (Please state what has been said by others or overheard regarding this incident. For example, you overheard the child(ren), young people or adult at risk talking to their friend saying they are scared about going home/school/football because of being bullied etc.) |  |
| Section F: Actions |
| What actions did you take? (What did you do i.e. who have you told, did you move the child, young person or adult at risk to a safe place etc?) |  |
| **Have the parents/carers of the child or young person been informed of the concern?** (If you feel that informing the parents or carers about the concern will put the child, young person or adult at risk or yourself at risk, you should not inform the parent/carer but need to document here why you feel it will put them at risk) **Has the adult at risk been informed of your concern?** (Adults at risk need to be informed of your concerns) |  |
| Date and time parents/carers were informed of the concern |  |
| Parent/carers response (Please state facts) |  |
| Have parents/carers given consent to share the information |  |
| Parent/carers address/phone number |  |
| Section G: Acknowledgement All the information recorded on the Safeguarding Concern Form is accurate to my knowledge |
| Signed & Date |  |
| If completing on behalf of another person, please ensure they sign above, and you provide your name and contact details |  |
| Section H: Body Map (If applicable) |
| Record and physical injuries or marks you notice on the body map. Place a mark where the injury is and then a line out to a written number. Write a corresponding description of the nature of any injury in section I. |

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