

Safeguarding Children

Policy and procedures



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Safeguarding Children Policy

Date of Policy: November 2019

This policy super cedes any other safeguarding policy.

Safeguarding Policy Statement

Bristol City Football Club and Bristol City Foundation (together known as “Bristol City Football Club”) Bristol Bears, Bristol Bears Women and Bristol Bears Foundation (together known as “Bristol City Rugby Club”), Bristol Flyers and Bristol Women’s Football Club. All of these organisations together with Ashton Gate and Bristol Sport, Bristol Sport Foundation (referred to as “the Company” within this policy) acknowledge the duty of care to safeguard and promote the welfare of children.

“the Company” has both a moral and legal obligation to ensure a duty of care for children across its services. We are committed to ensuring that all children are protected and kept safe from harm whilst engaged in any services organised and provided by “the Company”. “the Company” is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and local authority requirements.

The policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all children have a positive and enjoyable experience of the activities delivered by “the Company”. We are committed to ensuring that these activities will be in a safe environment, where children are protected from abuse whilst under our care.

“the Company” acknowledges that some children, including those with a disability or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

As part of our safeguarding policy “the Company” will:

- Promote and prioritise the safety and wellbeing of children.
- Ensure staff, volunteers and trustees understand their roles and responsibilities in respect of safeguarding and are provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children.
- Ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern.

- Ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored and retained in accordance with Data Protection Act legislation.
- Ensure that “the Company” have Safer recruitment procedures to secure the employment/deployment of suitable individuals.
- Ensure robust safeguarding arrangements and procedures are in operation
- Ensure that children, young people, parents/carers are informed about safeguarding via education sessions and through Safeguarding guide. (Keeping Children Safe in Education 2019)

This policy and the procedures will be widely promoted amongst staff and are mandatory for anyone whose role involves working with Children in “the Company”. Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from “the Company”.

Principles

This policy and supporting procedures are based on the following principles

- The welfare of children is the primary concern. (Working together to Safeguard Children 2019)
- All children irrespective of their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/ or sexual orientation have the right to protection from abuse and harm. (The Children’s Act 1989 and 2004)
- It is everyone’s responsibility to report any concerns about abuse in order that prompt action be taken if required.
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately.
- All personal data will be processed in accordance with the requirements of the Data Protection Act May 2018. (GDPR) General Data Protection Regulation and any relevant privacy policy issued by “the Company”. All data will be kept in line with “the Club’s” Retention policy.

Monitoring

The policy will be reviewed a year after development and then every year after, or in the following circumstances:

- Changes in legislation and/or government guidance
- As required by the Local Safeguarding Children Boards
- As a result of any other significant change or event.

Recruitment, Induction, training and qualifications

All staff recruitment is conducted in an open and transparent manner to ensure that “the Company” has the best staff. Reference should be made to “the Club’s” Safer Recruitment policy.

Successful candidates are also subject to reference checks, which ask previous employers for their opinion as to whether the candidate is suitable to work with children, if the role requires it.

The employment of all “Club” staff, (where the role requires it) is subject to individuals having a relevant and up to date safeguarding qualification and enhanced DBS check. The standard recognised welfare qualification for “the Company” is the FA Safeguarding Children and Welfare workshop.

The qualification is valid for a period of three years from the date it is attained, and all staff are required to maintain their safeguarding qualification throughout their employment to ensure that it remains up to date and valid.

As part of the induction process for every member of staff (and volunteers), a copy of this Safeguarding Children Policy is provided and discussed. This allows all staff and volunteers to understand their, and “the Club’s” responsibilities in running our activities in a controlled and safe environment for all participants. The induction process also covers the procedures for making disclosures or referrals, should the need arise.

“the Company” will also undertake mandatory in-house training and development on safeguarding and welfare, to ensure that it remains continuously at the top of the agenda for all staff.

Disclosure and Barring Service Checks

All staff and volunteers who are working with young people, are subject to an enhanced DBS check, which will be undertaken through the criminal record bureau service, with the process further outlined in “the Club’s” Self-declaration form and Criminal Records Policy. These checks will be led by the Head of Safeguarding with the support of the Safeguarding administrator.

The Club undertakes not to discriminate unfairly against any person subject to a Criminal Records Check or self- disclosure based on a conviction or other information revealed.

Having a criminal record will not necessarily bar individuals from working or volunteering with “the Company” and any record will be considered as part of a risk assessment process, as outlined in the Safer Recruitment policy and Volunteering policy, that ensures suitability for the post in question.

The decision on suitability will depend on the nature of the position and the circumstances and background of the offences, cautions and other criminal intelligence.

The CRB confirms that all CRC and criminal record data will be processed on behalf of “the Company” in accordance with the provisions of the Data Protection Act 2018 and the DBS Code of Practice.

Trustees

Ultimately, responsibilities for safeguarding and welfare within “the Company” Foundations (for the purpose of this policy known as “the Foundation”), lies with the trustees of “the Foundation”. As

part of the induction process for trustees, they are provided with a copy of the Children England *'Everybody's Business, Safeguarding for Trustees'* guidance on their responsibilities for safeguarding.

The role of the trustees in "the Foundation" is not to oversee the day to day management of safeguarding and welfare controls, but to take leadership responsibility for "the Foundation's" safeguarding arrangements.

The day to day management for safeguarding controls is delegated to the Directors of "the Foundation". The subject of safeguarding and welfare is continuously managed and monitored by trustees at quarterly meetings through a standard 'risk' agenda item. Safeguarding and welfare is included within this risk analysis and is continuously monitored through "the Foundation's" Risk Management Policy and subsequent risk register.

Senior Head of Safeguarding (SOS)

"the Company" has a Senior Safeguarding officer who is supported by a team of Designated Safeguarding Officers (DSO) in all areas of the "Club". The officers of the "Club" will have undergone the relevant and necessary training.

The role of Senior Safeguarding Officer is:

- To be clear about the Clubs responsibilities when running activities for children, young people and vulnerable adults.
- To help the Club staff and volunteers understand what their duty of care towards children, young people and vulnerable adults means and entails on a day to day basis.
- Ensure that proper procedures and policies are in place and are followed with regard to child safeguarding and protection issues.
- Ensure all staff and volunteers receive appropriate training

The Senior Safeguarding Officer will lead "the Company" on safeguarding and the welfare of children on a day to day basis, supported by an informed and trained workforce. This ensures that risks are managed as effectively as possible and all staff, players and volunteers, project participants and parents are aware of the processes and procedures for reporting concerns should the need arise.

Designated Safeguarding Officers (DSO)

Each area of "the Company" has a Designated Safeguarding Officer who will have undergone relevant training and DBS checks. As part of their role they will have access to continual professional development and form part of a Safeguarding forum. (Appendix 3)

The role of the DSO is:

- To be the first port of call for safeguarding issues within their area of "the Company".
- To report directly to Senior Safeguarding Officer any serious safeguarding concerns.
- Ensure that all concerns are reported and recorded appropriately.
- Liaise with and support SSO

Should a member of staff have a concern related to SSO or Board Safeguarding Officer they should report this directly to LADO (page 13)

Definitions

Child

In line with the UN Convention on the Rights of the Child and NSPCC guidance for England, for the purpose of this policy a child is defined as anyone under the age of 18.

All the policies and procedures in this document refer to children.

Safeguarding

Safeguarding is the action that is taken to promote the welfare and human rights of individuals especially children, young people and vulnerable adults to live free from abuse, harm and neglect. Safeguarding is everyone's responsibility.

Position of Trust

A relationship of trust can be described as one in which one party has power and influence over another by virtue of their work or nature of the activity.

Types of Abuse

Abuse can happen on any occasion or in any place where children are present. Abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and represents an abuse of power or a breach of trust. Abuse can happen to an individual regardless of their age, gender, race or ability.

Somebody may abuse or neglect an individual by inflicting harm, or by failing to act to prevent harm. People may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by a stranger. People can be abused by adults either male or female, or children.

Any allegations or suspicions of abuse, poor practice or bullying need to be responded to and reported in line with "the Club's" reporting procedures. (Appendix 4 and5)

There are four main types of abuse: neglect, physical abuse, sexual abuse and emotional abuse. Children can also be harmed through poor practice and bullying within an activity setting.

Here we look in detail at the types of abuse and some signs to look out for if staff are concerned about abuse. (Appendix 1)

Code of conduct for staff and volunteers

“the Company” staff and volunteers involved have a great opportunity to be a positive role model and help build an individual’s confidence.

Staff and volunteers are expected to:

- Ensure the safety of all children by providing effective supervision, proper pre-planning of sessions, using safe methods at all times
- Consider the wellbeing and safety of participants before the development of performance
- Encourage and guide participants to accept responsibility for their own performance and behaviour
- Treat all people fairly and ensure they feel valued. Have no favourites
- Encourage all Children not to discriminate on the grounds of religious beliefs, race, gender, social classes or lack of ability
- Not allow any rough or dangerous play, bullying, or the use of bad language or inappropriate behaviour
- Be positive, approachable and offer praise to promote the objectives of “the Company” at all times
- Not let any allegations of abuse of any kind or poor practice to go unchallenged or unrecorded
- Incidents and accidents to be recorded in the line with “the Club’s” procedures
- Never use sanctions that humiliate or harm participants
- Report accidents or incidents of alleged abuse or poor practice to the designated person
- Administer minor first aid in the presence of others and where required
- Have access to telephone for immediate contact to emergency services if required
- Foster team work to ensure the safety of children in their care
- Ensure the rights and responsibilities of children are enforced
- Establish and address the additional needs of disabled participants or other vulnerable groups
- Not abuse members physically, emotionally or sexually
- Not engage in a sexual relationship with a child for whom they are responsible
- Maintain confidentiality about sensitive information
- Respect and listen to the opinions of children
- Develop an appropriate working relationship with participants, based on mutual trust and respect
- Be a role model, displaying consistently high standard of behaviour and appearance (disciplined/committed/time keeping), remember people learn by example
- Refrain from smoking and consumption of alcohol during activities or sessions

- Never condone rule violations, rough play or the use of prohibited substances
- Not spending excessive amounts of time alone with children unless there are exceptional circumstances
- Never taking a child to their home or travel alone with them
- Not administering First Aid involving the removing of an individual's clothing unless in the presence of others
- Hold appropriate valid qualifications and insurance cover
- Make activity fun
- Adhere to the Club's Player Announcement and Confidentiality Social Media policy at all times.

Staff and volunteers have the right to:

- Access on-going training and information on all aspects of leading/managing activities for young people particularly on safeguarding
- Support in the reporting of suspected abuse or poor practice
- Access to professional support services
- Fair and equitable treatment by "the Company"
- Be protected from abuse by children, young people, other adults and parents
- Not to be left vulnerable when working with children

Any minor misdemeanours and general misbehaviour will be dealt with immediately and reported verbally to the Senior Safeguarding Officer. Serious or persistent breach of the code will result in disciplinary action and could lead to dismissal from "the Club."

Refer to "the Club's" Whistleblowing policy and Grievance and Disciplinary policies.

Emergency action and first aid

All coaches, leaders and members should be prepared with an action plan in the event of an emergency and be aware of our First Aid Procedures. (Management of Health and Safety at Work regulations 1999) (Appendices 6 and 7) This will include:

- Access to First Aid equipment
- Telephone contact if the participant is a minor
- Telephone contact to the Emergency Services

Procedures

Management of safeguarding cases

The NSPCC Child Protection in Sport Unit (CPSU) assists sports Clubs to achieve an agreed set of standards which provide frameworks for safeguarding the welfare of children and young people involved in sport.

A key requirement of the standards is for sports Clubs to have procedures and systems in place to effectively manage complaints and concerns about the welfare of children. These are collectively referred to as the case management process.

General principles of case management

1. Where, in a sport context, any issue arises in relation to child protection and safeguarding, the welfare of children shall be the paramount consideration
2. Any investigation or inquiry is to proceed upon the basis that the primary consideration will be a determination of the risk posed to children.
3. Unless the determination finds no, or an insignificant, risk, effective steps must be taken to manage or reduce the risk
4. Individuals about whom there are concerns should be treated fairly and honestly and should be provided with support throughout the process

Investigation

5. Every investigation or inquiry must be sensitive to the welfare of the child during its processes and, at all times, hold central the need to keep the interests of those directly involved as paramount
6. Where issues other than risk to children are under consideration in any investigation or inquiry, such issues must remain subordinate to the requirement to determine the risk posed to children

Risk assessment

7. The assessment of risk involves consideration of the actual or potential harm that an individual poses to a child
8. The assessment of risk does not involve making a finding based upon either the criminal or civil standards of proof (i.e. certainty or “the balance of probabilities”). The assessment requires a defensible decision that a risk does or does not exist and, where it does, a determination of the extent of such risk
9. Save in exceptional cases, the assessment will not require the production of a formal risk assessment report

Risk management

10. The steps taken to address any perceived risk to children must have regard to the nature and extent of the risk as well as to any particular and relevant aspects of the activity in question and, in the light of this, must seek to ensure that such steps will be effective
11. In cases where the perceived risk is low, and no criminal or disciplinary charge could be made out, it may be nonetheless necessary to impose stringent restrictions on an individual or remove his/her ability to participate in the activity in question

Responding to Disclosure

If a child informs a member of staff directly or a member of staff identifies that they are concerned about someone’s behaviour towards them, this is known as disclosure. This disclosure may be relating

to an incident or incidents either during “the Company” activity, or outside of the activity environment. The person receiving the disclosure should:

- React calmly so as not to frighten the individual
- Tell the individual that he or she is not to blame and that they were right to share their concerns
- Take what the individual says seriously
- If the individual needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concern and ensure they are aware that is a child protection issue (as outlined in the referral procedure diagram)
- Ensure the immediate safety of the individual in question
- Avoid leading the individual in questioning and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said
- Re-assure the individual but do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments
- In the event of suspicion of sexual abuse do not let the child bath or shower until given permission to do so. Washing can destroy evidence
- Inform parents/carers immediately unless there is a specific reason not to e.g. the individual has named the parent/carer as the abuser. If this is the case, then contact the Club’s Senior Safeguarding officer. If they are unavailable, staff should contact local Social Services or the Police for guidance
- The judgment about whether an incident is one of abuse or poor practice may not be able to be made at the point of referral, but only after the collection of relevant information by someone appropriately trained and skilled
- Make a full written record of what was said, seen and heard as soon as you can. (using “the Club’s” child Protection Incident Report Form or “My concern”)

In the event of a disclosure, staff should not:

- Dismiss the concern
- Panic
- Allow your shock or distaste to show
- Probe for more information than is offered
- Speculate or make assumptions
- Make negative comments about the alleged abuser
- Make promises or agree to keep secrets
- Ask the child or any witnesses to sign your written information as this may be significantly detrimental to any subsequent police investigation

Do not take photographs of any alleged injuries. Any such recording must only be done by an approved medical or other practitioner, following referral.

Other Disclosures

There may be instances where a fellow member of staff, friend or carer of a child may disclose a concern about the welfare of a young person.

In this instance the same protocol should be followed regarding reporting procedures, and it should be made clear on the referral form by whom the disclosure was made.

This Safeguarding Children Policy should be made available for all key stakeholders upon request, to ensure individuals and other Clubs are aware of the “the Company” reporting procedure for safeguarding concerns.

Reporting Procedure

All allegations or suspicions and concerns are to be treated seriously. No abuse is acceptable. Some Safeguarding concerns may indicate the commission of a criminal offence and must be reported to the Police as soon as possible.

It is the responsibility of the individual employee or volunteer to take a lead on reporting all concerns to “the Clubs” Designated Safeguarding Officer. The individual employee should assist in any further action required on behalf of the Club. A copy of the referral process for staff and volunteers is available in Appendices 4 and 5.

Information should be shared with the Senior Safeguarding Officer, who must approve any actions to be taken and any documentation or correspondence being sent out.

Employees with concerns should discuss them with the Designated Safeguarding Officer immediately. If the Designated Safeguarding Officer is not available, then any concerns should be discussed with the Senior Safeguarding Officer who will then seek advice if necessary, from other nominated welfare professionals (Bristol City Council, Football League and the Football Association).

Volunteers with concerns should discuss these discreetly with their coordinator or the Designated Senior Safeguarding Officer as soon as possible after the abuse or suspicions of abuse are observed. If unavailable, then any concerns should be discussed directly with the Senior Safeguarding Officer.

Concerns about colleagues should be addressed initially with the Designated Safeguarding Officer, but if this is not possible or the concern is about the Designated Safeguarding Officer then speak directly to the Senior Safeguarding Officer or Bristol City Council, Bristol County FA or the Football League.

“the Company” has a secure email address for reporting concerns safeguarding@bristol-sport.co.uk

Where there is evidence of immediate harm then the employee should phone 999 and report the incident to the Police.

Information Sharing

If there is a reasonable concern that a child may be at risk of significant harm this will always override a professional agency requirement to keep information confidential.

If “the Company” is approached about sharing information, the following will be considered:

- What information do they need?
- Why they need it
- What they will do with the information?
- Who else needs to be informed if concerns about the individual persist?

If we are asked to provide information, we will never refuse solely on the grounds that all information is confidential.

“the Company” will consider:

- What information the individual in question has given permission to use
- Any perceived risk to the individual which would warrant breaching confidentiality
- Any relevant information on risk to the individual, which would allow another agency to offer appropriate help and services or take action to reduce risk to the child
- Whether to ask advice from Bristol City Council or Bristol County FA or the Football League Welfare Officers

“the Company” will record when, what, why, and with who information has been shared; or why sharing was refused. This is recorded as “the Company” may be required to justify reasons at a later date.

Staff should always seek advice if unsure and never refuse to provide information without considering the risks of not sharing. All decisions on information sharing will ultimately fall with “the Club’s” Senior Safeguarding Officer.

Guidance for referrals

Bristol City Referrals

In Bristol, the contact referral numbers are:

- To refer any child in need, including child protection concerns, during normal office hours (9.00am – 5.30pm Monday to Friday) ring 01179490944
- Out of normal hours 01179036444 First response team
www.bristol.gov.uk
- If you have reason to believe that a child is at immediate risk of harm, contact the police on 999.

Warwickshire Referrals

- Office hours 01926 410410
- Out of hours 01926 886922

<http://www.warwickshire.gov.uk/wscbresources>

Worcestershire Referrals

- Office hours 01905 763763.
ylyc.worcestershire.gov.uk

South Gloucestershire Referrals

- Mon-Thurs – (9.00-5.00) 01454866000
- Fri (9.00-4.30) 01454866000
www.southglos.gov.uk

North Somerset Referrals

- Mon-Fri (8.00-6.00) 01275888808
- Out of hours 01454615165
www.northsomersetsafeguarding.co.uk

Bath

- Office hours 01225396312
- 01225396313
www.bathnes.gov.uk

Cardiff and Vale of Glamorgan

- Office hours 02922330880 or 02922330833
- Emergency out of hours 02920788570
cardiffandvalersb@cardiff.gov.uk

When making a referral regarding child protection concerns, it is important to have the following information wherever possible readily available for the duty social worker:

- Name, date of birth, ethnic origin, gender of the child, address and telephone numbers
- The reasons for your concern
- Injuries and/or other indicators observed
- The child's first language
- Details of any specific needs of the child, e.g. disability, etc.
- Details of family members, if known
- Other agencies, professionals involved
- Family doctor

Staff in children's teams will make enquiries with other agencies who may have information regarding the child and family. On the basis of the information gathered, they will then make an initial assessment on what further action is necessary or appropriate.

Whenever children's teams receive information about a possible criminal offence against a child, they will share the information with the Police at the earliest opportunity and a decision will be made jointly on how to proceed with the enquiries.

Following the referral of a child, the referrer and the children's team must be clear about who will be taking what action.

Professionals who contact a children's team to make a referral must confirm the details of this in writing within 24 hours addressed to the children's team for that locality, using the Confirmation of Child Protection Referral form.

The team should acknowledge a written referral within one working day of receiving it, so if we have not heard within three working days, contact the children's team again.

The Senior Safeguarding Officer for “the Company” is:

Maggie Martin

Tel: 07880140411 safeguarding@bristol-sport.co.uk

The Senior Board Member for the “Club” is:

Doug Harman

Tel: 07702911078

Other key contacts are:

Gloucestershire FA Designated Safeguarding Officer - Hugh Feltham 01454615888

Somerset FA Designated Safeguarding Officer- Shirley Needham 01458837034

The English Football League Welfare Officer – Alex Richards 01772325940

Useful Contacts/Support

If you have concern that a child is being harmed as a result of abuse or neglect, you must not keep these concerns to yourself. Keeping children safe is everyone’s responsibility.

Staff must ensure that they speak to the appropriate staff member in “the Company” who can listen to and record the concerns, and then take appropriate action.

Useful contacts

- NSPCC Helpline 0808 800 5000
- ChildLine 0800 1111 / www.childline.org.uk
- Kidscape www.kidscape.org.uk
- Anti-Bullying Alliance www.antibullyingalliance.org

Reviewed on: 12 November 2019

Next review date: 12 November 2000

Reviewed there after: Annually

Appendix 1

Neglect

This is when adults consistently or repeatedly fail to meet an individual's basic physical and/or psychological needs which could result in the serious impairment of the individual's health or development e.g. failure to provide adequate food, shelter and clothing; failing to protect someone from physical harm or danger; or the failure to ensure access to appropriate medical care or treatment. It may also include refusal to give love, affection and attention.

Neglect in sport or physical activity could include a coach or other member of staff repeatedly failing to ensure people are safe, exposing them to undue cold, heat or extreme weather conditions without ensuring adequate clothing or hydration; exposing them to unnecessary risk of injury e.g. by ignoring safe practice guidelines, failing to ensure the use of safety equipment, or by requiring young people to participate when injured or unwell.

NEGLECT	
Examples include	Signs include
<ul style="list-style-type: none"> • Withholding help or support necessary to carry out daily living tasks • Ignoring medical and physical care needs • Failing to provide access to health, social or educational support • The withholding of medication, nutrition and heating • Keeping someone in isolation. • Failure to intervene in situations that are dangerous to the vulnerable person Inadequate supervision and guidance – leaving the child to cope alone, abandoning them or leaving them with inappropriate carers and failing to provide appropriate boundaries about behaviours such as underage sex or alcohol. 	<ul style="list-style-type: none"> • Constant hunger, sometimes stealing food from others • Dirty or 'smelly' • Loss of weight, or being constantly underweight • Inappropriate dress for the weather • Complaining of being tired all the time • Having few friends • Worsening of health conditions • Mentioning their being left alone or unsupervised • Sore or extreme nappy rash • Skin infections • Lack of response to stimuli or contact • Poor skin condition(s) • Anxiety • Distressed • Child moves away from parent under stress • Little or no distress when separated from primary carer • Inappropriate emotional responses • Language delay

Physical Abuse

When someone physically hurts or injures another person by hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating, drowning or otherwise causing harm. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes, ill health to someone they are looking after.

Physical abuse in sport or physical activity may be when the nature and intensity of training or competition exceeds the capacity of the child's immature and growing body; where coaches encourage the use of drugs or harmful substances to enhance performance or delay puberty; if athletes are required to participate when injured; or when sanctions used by coaches imposed involve inflicting pain.

PHYSICAL ABUSE	
Examples include	Signs include

<ul style="list-style-type: none"> • Shaking • Pinching • Slapping • Force-feeding • Biting • Burning or Scalding. • Causing needless physical discomfort • Inappropriate restraint • Locking someone in a room 	<ul style="list-style-type: none"> • Unexplained bruising, marks or injuries on any part of the body • Frequent visits to the GP or A&E • An injury inconsistent with the explanation offered • Fear of parents or carers being approached for an explanation • Aggressive behaviour or severe temper outbursts • Flinching when approached • Reluctance to get changed or wearing long sleeves in hot weather • Depression • Withdrawn behaviour or other behaviour change • Running away from home/ residential care • Distrust of adults, particularly those with whom a close relationship would normally be expected
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Sexual Abuse

This is where children are abused by adults (both male and female) or other children who use them to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal intercourse, kissing and sexual fondling. Showing individuals pornographic material (books, videos, pictures) or taking pornographic images of them are also forms of sexual abuse.

In sport or physical activity, coaching techniques which involve physical contact with others can create situations where sexual abuse can be disguised and may therefore go unnoticed. The power and authority of, or dependence on, the coach if misused, may also lead to abusive situations developing. Contacts made within sport and pursued e.g. through texts, Facebook or Twitter have been used to groom children for abuse.

SEXUAL ABUSE	
Examples include	Signs include
<ul style="list-style-type: none"> • Rape and other sexual offences • For vulnerable adults, sexual activity including sexual contact and non-sexual contact that the person does not want, to which they have not consented, could not consent, or were pressured into consenting to. 	<ul style="list-style-type: none"> • Pain or itching in the genital/anal areas • Bruising or bleeding near genital/anal areas • Sexually transmitted disease • Vaginal discharge or infection • Stomach pains • Discomfort when walking or sitting down • Pregnancy

<ul style="list-style-type: none"> • Being encouraged or enticed to touch the abuser • Coercing the victim into watching or participating in pornographic videos, photographs, or internet images • Any sexual relationship that develops where one is in a position of trust, power or authority 	<ul style="list-style-type: none"> • Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn • Fear of being left with a specific person or group of people • Nightmares • Leaving home • Sexual knowledge which is beyond their age or development age • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell anyone about • Self-harm or mutilation, sometimes leading to suicide attempts • Eating problems such as overeating or anorexia
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Emotional Abuse

Emotional abuse is the persistent emotional ill-treatment of an individual so as to cause severe and persistent adverse effects on the person's emotional development. It may involve conveying to people that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.

It may feature age or developmentally inappropriate expectations being imposed on someone or even the over protection of an individual. It may involve causing people to feel frightened or in danger by being constantly shouted at, threatened or taunted which may make the person very nervous and withdrawn. Some level of emotional abuse is involved in all types of ill-treatment of a child.

Emotional abuse in sport or physical activity may occur if people are subjected to constant criticism, name-calling, sarcasm, bullying, racism or pressure to perform to unrealistically high expectations; or when their value or worth is dependent on sporting success or achievement.

EMOTIONAL/PSYCHOLOGICAL ABUSE	
Examples include	Signs include
<ul style="list-style-type: none"> • Intimidation and/or threats • Bullying • Rejection • Shouting • Indifference and the withdrawal of approval • Denial of choice • Deprivation of dignity or privacy • The denial of human and civil rights • Harassment • Being made to fear for one's well being 	<ul style="list-style-type: none"> • A failure to thrive or grow • Sudden speech disorders • Developmental delay, either in terms of physical or emotional progress • Behaviour change • Being unable to play or socialise with others • Fear of making mistakes • Self- harm • Fear of parent or carer being approached regarding their behaviour • Confusion

Additional Welfare Considerations

Poor Practice

Poor practice is behaviour of an individual in a position of responsibility which falls below "the Club's" required standard. Poor practice may not be immediately dangerous or intentionally harmful to an individual, however is likely to set a poor example.

Poor practice is potentially damaging to the individual, "the Company" and to those who experience it. For example, leading a group with alcohol on the breath, smoking, swearing in front of others, or not paying due care and attention to participants all constitute poor practice.

Poor practice can sometimes lead to, or create, an environment conducive to more serious abuse. It may also lead to suspicions about the individual's motivation, even where no harm is intended. For example, if a member of staff is giving one child too much attention, regularly transports children in their car, or encourages physical contact with children without obvious justification.

Bullying

Bullying by peers can occur whenever children and young people come together. Bullying can take many forms and is harmful to the victim. It may be physical e.g. hitting; online or cyber e.g. abusive messages, comments or images on social media; involve damage or theft of property; based on someone's gender, ethnicity, sexuality or disability; or about their physical ability.

More detail on recognising and managing instances of bullying can be found in "the Club's" Anti-Bullying Policy.

Cyberbullying

This is defined as the use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. Refer to “the Club’s” “Acceptable IT use policy”. Bullying because of discrimination occurs when motivated by prejudice against certain people because of an individual’s ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability.

Child sexual exploitation

This is a form of Child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a Child into sexual activity in exchange for something the victim needs wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may be sexually exploited even if the sexual activity appears consensual. Child exploitation can even take place through the use of technology.

Sexting

This is where a person sends or receives sexually explicit or suggestive images. (see appendices 10.a/b) Refer to UKCCIS guidance-sexting in schools.

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)

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 or women. The Female Genital Mutilation Act 2003 makes it illegal to practice FGM in the UK or to take girls who are British nationals or permanent residents in the UK abroad for FGM.

Hazing

Any rituals, initiation activities, action or situation with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of vulnerable groups.

Infatuations

Vulnerable groups may develop an infatuation with a member of staff who works with them. There is a high risk that words or actions may be mis-interpreted, and allegations made against staff.

Domestic violence

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 Yrs. or above, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial, emotional abuse and so called "honour" based violence.

Fabricate or induce illness

Fabricated or induced illness is easiest understood as illness in a child which is fabricated by a parent or person in loco parentis. Acute symptoms and signs of illness cease when the child is separated from the parent.

Forced Marriage

A marriage in which one or both spouses do not consent to the marriage and duress is involved. This is different from an arranged marriage where both parties agree. A forced marriage is a criminal offence (The Anti-social Behaviour, Crime and Policing Act 2014) and can result in up to 7yrs in prison.

County Lines

This is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs. They are likely to exploit children. Child Criminal exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 Yrs. Child Criminal exploitation does not always involve physical contact but can occur through the use of technology.

Increased Risk to Vulnerable Children

There are many issues that may contribute to child abuse, but some factors increase the risk to children and make them more vulnerable to abuse. They can be found in the background of parents, in the environmental situation and in attributes of the child themselves. (SEN Code of Practice guidelines 2015)

Parental factors:

- Parent has a mental illness
- Parent is abusing drugs or alcohol
- Parent has already abused a child

- Pregnancy was not wanted
- Parent has a background of abuse when growing up
- Young, unsupported mother often with low education
- Parents have unrealistic expectations of the child and lack parenting knowledge
- Parent is isolated and has little support
- Parent has a learning difficulty

Environmental factors:

- Overcrowding in the house
- Poverty or lack of opportunity to improve the family's resources
- Domestic violence is present
- A non-biological adult (i.e. unrelated) living in the house
- Family is experiencing multiple stress

Private fostering

A privately fostered child is a child under 16 yrs. (18 Yrs. If disabled) who is cared for by an adult who is not a parent or close relative where the child is to be cared for in that home for 28 days or more. Should any child be placed in a Host Family who meets the above criteria the "Club" will be required to work with the local authority to ensure that all legislative and local procedures are met. (Private Fostering Regulations 2005)

Prevent

This is part of the government's counter terrorism strategy and addresses all forms of dangerous extremism including Islamist extremism and far right extremism.

Prevent aims to:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it.
- prevent people from being drawn into terrorism and to ensure they are given appropriate advice and support
- work with sectors and institutions where there are risks of radicalisation that we need to address.

There are specific statutory obligations under Prevent for organisations such as the "Club" to provide training for all staff and players.

What to do if you're worried that a child is being abused

Discuss with Senior Safeguarding Officer

Maggie Martin

For advice prior to referral call
Maggie Martin
Senior Safeguarding Officer
07880140411

Gloucestershire FA
Designated Safeguarding Officer
Hugh Feltham
01454615888

Safeguarding Officer EFL
Alex Richards
01772325940

FA Case Management Team
Investigation Team
0800 169 1863

F/A NSPCC Helpline
0808 800 5000

DSO: Refer Concern to
County Welfare Officer
and/or Police and/or
Children Services if required
and FA Case Management

Follow up in writing within 24
hours on a Referral Form.
Keep a copy (and secure) of
all documentation

Agency should acknowledge
receipt of referral and decide
on next course of action

Further
enquiry/investigation by
appropriate agency

No Longer has a concern

No Further Action
A record should be kept of your
concern and the action taken

NO FURTHER ACTION

Concerns about child's
immediate safety

Police
Call 999

Emergency Children's Services
Duty Team
01170490944

FA Case Investigation Unit
0800 169 1863
Police (See above)
Children's Services (above)
**NSPCC Helpline: 0808 800
5000**

SUSPENSION/PROSECUTION

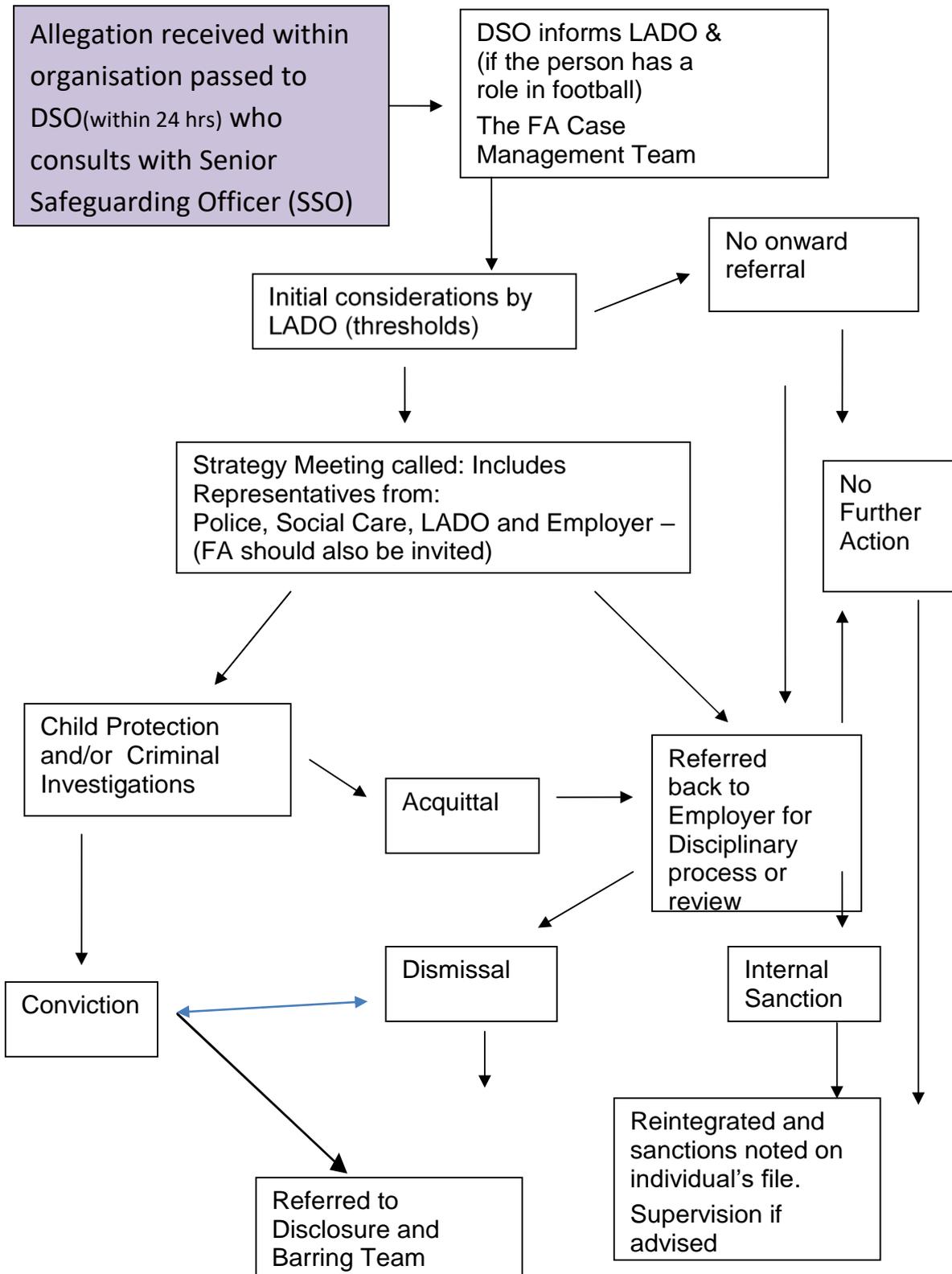
Your Safeguarding teams

Appendix 3

Maggie Martin-Senior Safeguarding Officer			
BCFC Doug Harman-Executive Director	BB Mark Tainton- Chief Executive	FLYERS	BS/Ashton Gate
Academy Jen Owsley-DSO Mark Humphrey-Player Care Manager	Academy Gary Townsend-DSO	Academy	Karen Riddiford-Match Day Experience Co-ordinator Dave Storr-Head of Safety and Security
First Team Ruth Summerbell-First Team Staff Co-ordinator	First Team Mark Tainton-DSO	First Team Steve Devereux-DSO Mike Edkins - Assistant DSO	Gareth Torpey – Disability Liaison Officer Dale Fitzsimmons-Chef de Partie
Foundation Chris Stenner-DSO James Howiantz-Assistant DSO	Foundation Craig Capel-DSO	Foundation Benjamin Breeze-DSO	Foundation Rob Webber-DSO
Women's Rebecca Smith-Administrator Club Welfare Officer	Women's Clare Brophy-DSO		Pat Dowle -Disabled Assistance Steward Supervisor Match Day Simon Anstey-Disability Steward Match Day

A serious Safeguarding allegation management flow-chart

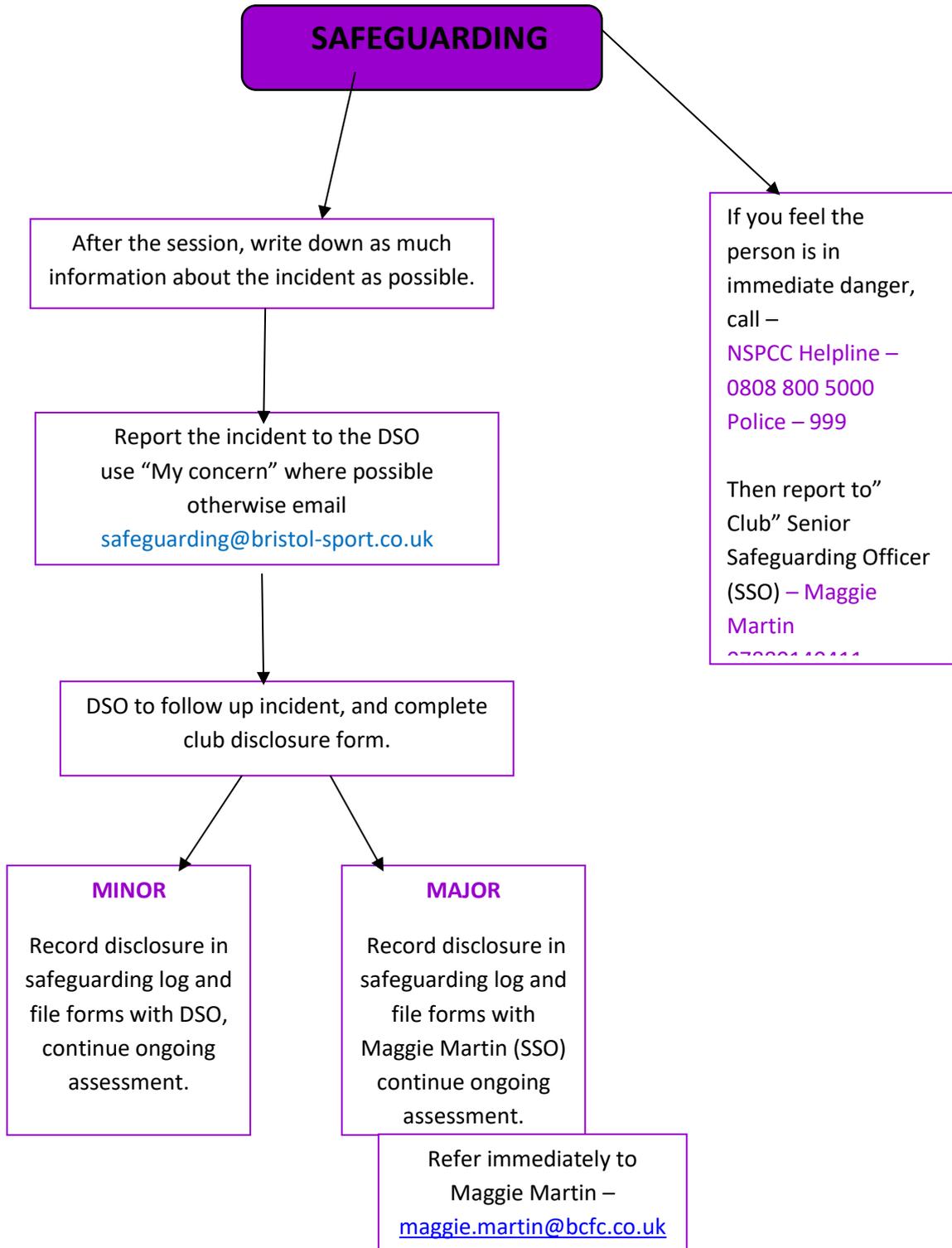
Appendix 4



The FA and EFL Safeguarding team
 to be informed of the final outcome within 48 hours.
 12 Nov 2019

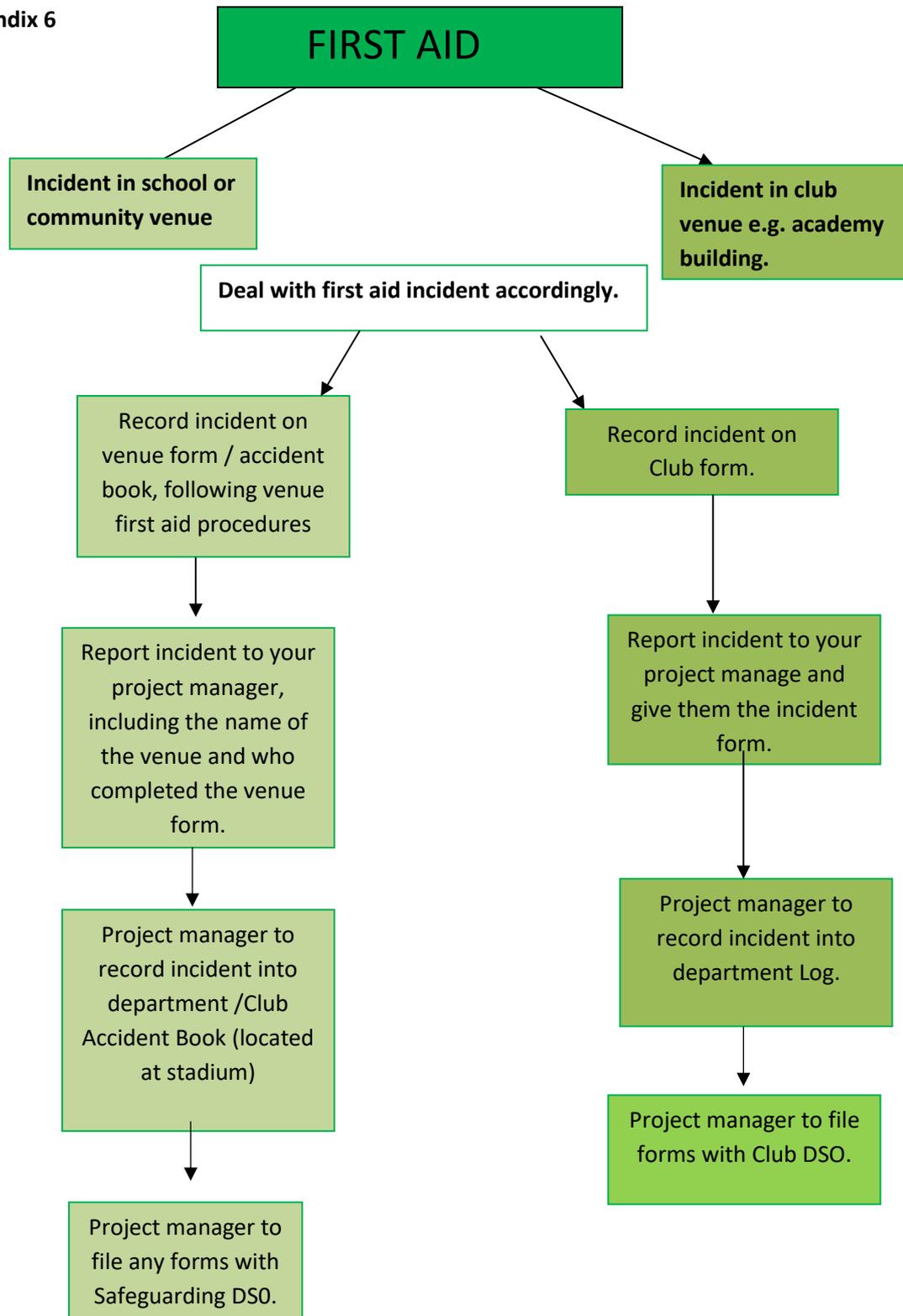
October 2017

Incident reporting flow-chart. (Appendix 5)

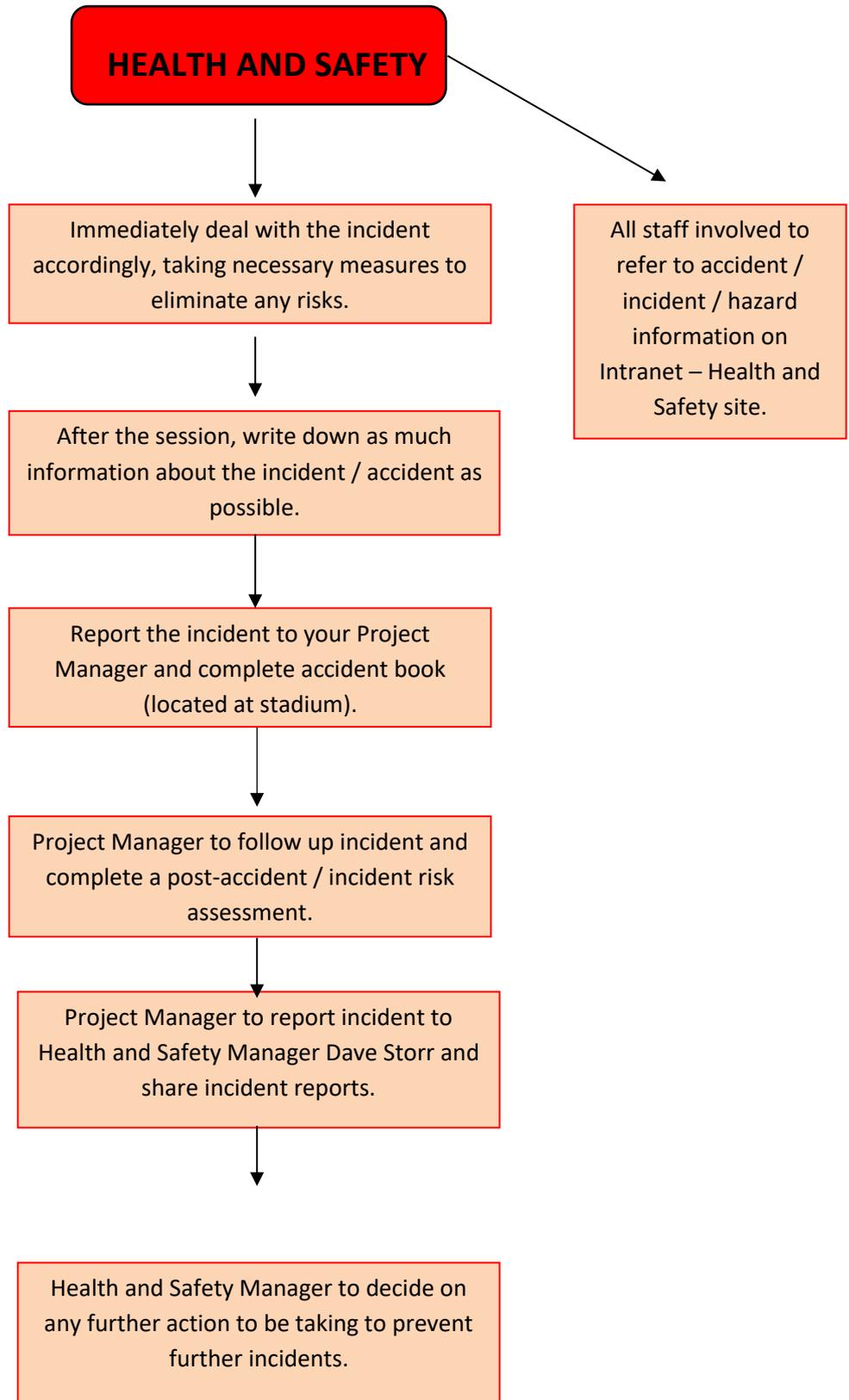


Incident reporting flow-chart.

Appendix 6



Incident / Accident reporting flow-chart.



Foundation-Events/Competition check list.

Appendix 8

External Event Booking

- Receive external event enquiry
- Speak to Manager to confirm event
- Check venue availability
- Complete intranet request form and wait for confirmation
- Confirm availability & request full details
- Send generic club risk assessment to hirer and emergency evacuation information
- Request external hirer's Health & Safety risk assessment, Safeguarding Risk assessment (**Risk Assessments to name a lead first aider and safeguarding officer for the event**) and Employers & Public Liability Insurance certificates
- Share all documents with Dave Storr and Maggie Martin
**Where possible complete risk assessments in advance to be discussed and agreed by DSO Safeguarding “*
- Once all documents are in place, receive manager approval for event
- Make hirer aware it may be necessary to request permission slips for any U18 groups
- Give hirer a name and contact number for the lead Foundation member of staff for the event day
- Lead staff to make sure hirer is aware of emergency evacuation procedures and have access to first aid kit and red evacuation bag

Internal Event Booking

- Speak to Manager to confirm event
- Check venue availability
- Complete intranet request form and wait for confirmation
- Complete a Health & Safety risk assessment and Safeguarding Risk assessment (**Risk Assessments to name a lead first aider and safeguarding officer for the event**)
- Share all documents with Dave Storr and Maggie Martin
**Where possible complete risk assessments in advance to be discussed and agreed at monthly Safeguarding meetings”*
- Once all documents are in place, receive manager approval and confirm event
- Collect all event and photo consent forms
- Name a Foundation member of staff as a lead for the event day
- Lead staff to have access to first aid kit and red evacuation bag

Staff Personal Media Guidance and Procedures

Appendix 9.a.

Guidance for Staff

DO:

- gain written parent / carer permission before giving access to U18.
- explain to the parent/carer/player the method of communication to be used and the reasons.
- always use group texts or emails and always copy parents/carers and the designated member of Safeguarding team into all communications with young people.
- make sure texts, emails are only in relation to specific "Club" related activities.
- Report to DSO/SSO any inappropriate communication from a young person.

DO NOT:

- use your personal phone to text a young person connected with the "Club".
- become friends with, follow, or add to your personal social media network any potential, current or former young person (under 19) This includes use of "like".
- use internet or web-based communications to send personal messages of a non-football nature to a child or young person. This includes, "banter" or comments.
- use language that is directly or could be misinterpreted as being racist, sexist, derogatory, threatening, abusive or sexualised in tone.
- use the "Club" user- name for personal use.

Any of the above could lead to abuse of a position of trust and breach the standards of professional behaviour and conduct expected by the "Club" and could be the subject of disciplinary procedures.

The "Club" will;

- ensure all privacy settings are locked so that the pages are used explicitly for "Club" matters and not as a place to meet or have private conversations.
- monitor social networking pages regularly and where appropriate, raise any concerns or disciplinary matters.

Please refer to the "Club" policy on Acceptable use of IT and IT and Internet use policy

Remember your Induction training and the "Club" Safeguarding code of conduct.

9.b. Player personal media Guidance and Procedures U18

Within the “Club” we want you to use social networks and the internet safely to get or receive information. The guidance below is to keep everyone safe and to ensure we respect each other.

The Club will;

-monitor social networking pages regularly and where appropriate, raise any concerns or disciplinary matters.

-gain written parent / carer permission before giving access to U18.

- explain to the parent/carers/player the method of communication is to be used between parents, players and staff and the reasons.

-always use group texts or emails and always copy parents/carers and the designated member of Safeguarding team into all communications with young people.

-make sure texts, emails are only in relation to specific “Club” related activities.

Guidance for players

- Know who from the “Club” should be contacting you and which site they will use to do so.

- Do not post, text or email things that are hurtful, insulting, offensive, abusive, threatening or discriminatory (e.g. racist, sexist or homophobic). This could be against the rules of football or even criminal and may lead to disciplinary action.

-Do not give out personal details including mobile phone numbers, email addresses or social media account access (such as accepting friend or follow requests) to people you do not know well online.

Use all guidance from social networking sites to keep yourself safe.

-No matter how well you get on with coaches, manager, staff do not invite them to become your friends online They have been asked not to accept such invitations.

-Tell an adult you trust or DSO/SSO if you are asked to become the friend of an adult involved in the “Club” or within football.

Tell an adult you trust about any communications that make you feel uncomfortable or that asks you not to tell your parent/carers or speak to DSO or Senior Safeguarding Officer. (Maggie Martin 07880140411).

Procedures for Youth Produced Sexual Imagery -Guidance for staff

Appendix 10.a.

Definitions:

“Youth produced “means Young people sharing images that they, or another young person have created of themselves.

“Imagery “means both still and moving videos.

Description:

-A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.

-A person under the age of 18 shares sexual imagery created by another person with a peer under the age of 18 or an adult.

A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

Legislation:

The Protection of Children Act 1978 as amended in the Sexual Offences Act 2003 states that it is illegal to make, possess, distribute any imagery of someone under 18 which is “indecent”. This includes imagery of yourself if you are under 18. **Note that the sharing of sexual imagery of people under 18 by adults constitutes sexual abuse and will lead to an immediate police referral.**

What should you do?

-You should NOT view the imagery.

-Refer the incident to the Club DSO or SSO (Maggie Martin 07880140411) as soon as possible and within 24 hrs.

What will happen next?

-The DSO will hold an initial review meeting with appropriate staff.

-Subsequently there will be interviews with young people involved (if appropriate)

-Parents will be involved as soon as possible (unless there is a definite reason not to).

- If at any stage it becomes apparent that a young person has been harmed or at risk of harm or that a criminal offence may have been committed the SSO will make a referral to the Police or Social care. This would include where an adult is involved, violent acts, or the young person is being black mailed or groomed.

At all times the victim’s well- being will be of paramount importance.

10.b. Procedures for Youth produced sexual imagery

Guidance for players

Legislation:

The Protection of Children Act 1978 as amended in the Sexual Offences Act 2003 states that it is illegal to make, possess, distribute any imagery of someone under 18 which is "indecent". This includes imagery of yourself if you are under 18.

You must not:

- - create and share with anyone any sexual images-photos or videos- of yourself.
- share sexual images-photos or videos-with any other whether they are under the age of 18 or not.
- be in possession of sexual images-photos or videos- created by another person under the age of 18.
- be in possession of any sexual image-photos or videos- sent to you by an adult.

If any of the above should happen please speak immediately to a person you trust or Head of Safeguarding and Welfare. You should not show the imagery to anyone else.

What will happen next

- The person you have spoken to will tell the Head of Safeguarding and Welfare.
- If appropriate The Head of Safeguarding and Welfare will speak with you.
- Parents will be involved as soon as possible (unless there is a definite reason not to).

If at any stage it becomes apparent that a you or another young person has been harmed or is at risk of harm the Head of Safeguarding and Welfare will make a referral to the Police or Social care. This would include where an adult is involved, violent acts, or the young person is being black mailed or groomed.

Remember we are there to help and support you.

If you feel unable to talk to anyone at the Club you can get help by contacting;

www.clickCEOP.net

NSPCC Helpline 0808 800 5000

Match Days

On match days the stadium is in the control of the Head of Safety and Security Dave Storr or his nominated deputy. Anyone who has a concern for the safety and well-being of a child or young person should immediately contact the control room. The Head of Safety and Security will then alert the Senior Safeguarding Officer (SOS) Maggie Martin who will attend the incident and advise on any appropriate action including police liaison.

Stewards with appropriate training will be allocated to members of the public who are considered "vulnerable" many of whom are situated in the disabled bays. Specific stewards with DBS checks will be responsible for supporting the SSO and will be advised to do so by the Head of Safety and Security.

Ejections

In the case of a supporter being U18 the control room must be informed immediately. No person U18 should be ejected from the ground until the SSO has attended and a responsible adult has been contacted.

Searching

The "Club" has a clear searching policy which sets out the correct protocols for searching children and young people. All stewards are aware of the policy and receive additional training.

Lost Child

This should be reported immediately to Head of Safety and Security who will alert the SSO. Under no circumstances should an adult be alone with a child. They need to situate themselves in sight of the control room and other people (further detail see contingency plan 31)

Other policies associated with Safeguarding and not mentioned in this policy:

- Staff induction
- Health and Safety
- Trips, tours and tournaments
- Transport
- Accommodation
- Late collection of children policy
- Use of photography and film
- Mascot
- Ball persons
- Youth loans, trials, work experience and Senior Appearance.
- Whistleblowing

Legislation and statutory guidance referred to:

- Working together to Safeguard Children 2018
- The Children Act 1980 and 2004
- Keeping Children Safe in Education 2019
- Health and Safety at work Act 1974
- Management of Health and Safety at work Regulations 1999
- Modern Slavery Act 2015
- Counter terrorism and Security Act 2015
- Private Fostering regulations 2005
- Female Genital Mutilation Act 2003
- General Data Protection Regulations 2018
- SEN Code of Practice guidance 2015

Additional reference materials:

- Allegations against people who work with children
- Single Assessment Framework
- Threshold Guidance



Document review

Date reviewed	Position
Nov 19	