



Notts County Football Club

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Notts County Football Club Safeguarding Children Policy Season 2020/2021

General Statement:

Notts County Football Club (hereinafter referred to as NCFC) acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment for all members.

A child or young person is anyone aged 18 or below engaged in any club football activity. We subscribe to the EFL's Safeguarding Children Policy and Procedures and endorse and adopt the Policy Statement contained in that document.

Notts County Football Club's Safeguarding Policy:

The key principles of the EFL Safeguarding Children Policy are that:

- The child's welfare is, and must always be, the paramount consideration
- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- Working in partnership with other organisations, children and young people and their parents or carers is essential

We acknowledge that every child or young person who plays or participates in football should be able to take part in an enjoyable and safe environment and be protected from poor practice and abuse.

Notts County Football Club recognises that this is the responsibility of every adult involved in our club.

Notts County Football Club has a role to play in safeguarding the welfare of all children and young people by protecting them from physical, sexual or emotional harm and from neglect or bullying. It is noted and accepted that the EFL's Safeguarding Children Regulation applies to everyone in football whether in a paid or voluntary capacity. This includes those who are volunteers, match officials, helpers on club tours, football coaches, club officials or medical staff.

A duty has been placed on all sports club to be a key partner in safeguarding that will be confirmed in the new version of working together to safeguard children 2018. Notts County Football Club therefore recognises the following as definitions of abuse and neglect as defined within Keeping Children Safe in Education and will work with all relevant authorities to report and prevent them.

Types of abuse

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. They may be abused by an adult or adults or another child or children.

Keeping Children Safe in Education outlines four areas of abuse as follows:

Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

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Emotional abuse: the persistent emotional ill treatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interactions. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber-bullying) causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect: the persistent failure to meet a child’s basic physical/and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate caregivers); ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

In addition, Keeping Children Safe in Education identifies that there are wider safeguarding issues that we need to consider and act upon. The statutory guidance list 16 specific safeguarding issues and provides links to further information regarding all of these areas. The 16 specific safeguarding issues are listed as:

Child Sexual Exploitation	Bullying including Cyberbullying
Domestic Violence	Drugs
Fabricated or Induced Illness	Faith Abuse
Female Genital Mutilation (FGM)	Forced Marriage
Gangs and Youth Violence	Gender-based Violence/Violence Against Women and Girls (VAWG)
Mental Health	Private Fostering
Radicalisation	Sexting
Teenage Relationship Abuse	Trafficking

Notts County Football Club’s Prevent Duty

The Prevent duty requires all specified authorities to work to prevent people from being drawn into terrorism. This duty is part of the Counter Terrorism and Security Act 2015, this came into effect in July 2015.

This duty will:

- 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 ensure that they are given appropriate advice and support; and
- work with sectors and institutions where there are risks of radicalisation that we need to address

The Prevent duty refers to all schools and childcare provider and Notts County Football Club’s Academy therefore is classed as a specified authority. The Government has defined extremism in the Prevent strategy 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. We also include in our definition of extremism

calls for the death of members of our armed forces". The Academy is committed to all forms of safeguarding and our young players well-being. The Prevent duty will form part of this, we will work together to identify any child or young person who is at vulnerable to radicalisation and take appropriate action to protect them and we will promote fundamental British values in our teaching and coaching activities

Signs of radicalisation include but are not limited to:

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family.

The Designated Safeguarding Officer will make a referral to the Channel programme if there is a concern about radicalisation. The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individuals concerned

The Club will then work in partnership with all those involved in the Channel programme to ensure the well-being of that child or young person - <https://www.gov.uk/government/publications/channel-guidance>. Academy and other key club staff will be trained in the prevent duty via the Home Office WRAP (Workshop to Raise Awareness of Prevent) training. The Club will have an IT user policy in place that all staff and scholars will be asked to sign, which highlights the usage of the Clubs IT equipment with regard to the Prevent duty. Filtering is in place to ensure there is not access to online known radicalisation sites or searches for extremist material.

Harmful Sexual Behaviour

Harmful sexual behaviour (HSB) is defined as "Sexual behaviours expressed by children and young people under the age of 18 that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child, young person or adult." (Derived from Hackett, 2014).

HSB may include:

- inappropriate touching
- using sexual violence or threats
- sexual activity that involves force, coercion or persuasion
- sexual bullying (both online and offline) for example enticement to perform sexual acts, production of sexual photos, sexting

Children and young people have been found to engage in a wide range of harmful sexual behaviours including both contact (touching, masturbation, penetration) and non-contact (grooming, exhibitionism, voyeurism and sexting or taking film of sexual acts via smart phones and social media applications) behaviours.

Sexual behaviour between children is also considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other isn't. However, children can be sexually abused by same aged peers, and a younger child can abuse an older child, particularly if they have power over them – for example, if the older child has a disability (Rich, 2011; Yates et al, 2012) Around a third of sexual abuse is committed by children and young people.

The key indicators of HSB are:

- Signs of bullying environments/ incidents; dominance
- Changes of behaviour in an individual
- Individuals trying to avoid another club member; absences from training or changing rooms
- Games/banter which involve sexual touching
- Pictures of body parts being taken particularly without consent
- Behaviours in changing rooms which make other people feel uncomfortable

The club acknowledges that for some people reporting sexual behaviours will be uncomfortable, but it is essential that any information about HSB is passed on to the DSO or DSL as soon as possible. If HSB is observed the following process will be followed:

- The behaviour will be stopped
- The behaviour will be defined (Describe the behaviour accurately to avoid any misunderstanding for the child or young person involved)
- The incident will be reported immediately to the Designated Safeguarding Officer
- The incident will be recorded as specifically as possible - what was seen and heard. Both the young person's and the victim's response will be included and passed to the Designated Safeguarding Officer as soon as possible
- The Designated Safeguarding Officer will consider the level of concern and may consult statutory authorities before making a formal referral, involving parents (unless this would pose a risk to the young person), review with FA safeguarding team and take advice for the Senior Safeguarding Manager
- The Designated Safeguarding Officer will then work with staff who work with the young person to ensure that the individual has no opportunity for unsupervised contact with other potentially vulnerable children or young people, including the suspected victim

Remember it is not the role of Notts County Football Club to distinguish between experimental and harmful sexual behaviours in children and young people.

Positions of Trust

The Sexual Offences Act 2003 (the Act) states that any sexual activity involving children under 16 is unlawful. The Act addresses the abuse of positions of trust is the need to protect young people aged 16 and 17 who, despite reaching the age of consent for sexual activity, are vulnerable to sexual abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with adults who hold a position of trust, responsibility or authority in relation to them and, as a result, have a considerable amount of power and influence in their lives. The law defines specific roles and settings where sexual activity between 16 and 17-year olds and those in positions of trust, responsibility or authority constitutes a criminal offence.

This legislation does not include sports roles (e.g. coaches, instructors or helpers) or sports organisations and settings (e.g. clubs, leisure facilities or events) within these definitions.

Notts County Football Club defines all roles within the academy and coaching staff that come into contact with children and young people as positions of trust and therefore ban any sexual relationships/activity between adults in those roles and 16 - 17-year olds for whom they are in a position of authority. All staff should ensure they maintain healthy, positive and professional relationships with all athletes. Coaches and others in positions of authority and trust in relation to players aged 16 and 17 years must not engage in sexual relationships with them while that unequal power relationship exists.

Any allegations regarding position of trust abuse will be dealt with by the Whistleblowing Policy, the Allegations Policy alongside the Disciplinary Policy both of which are available on the website.

If anyone suspects that an abuse of a position of trust has occurred, is occurring or may occur report this to the Designated Safeguarding Officer or Designated Safeguarding Lead. They will ask you to make a written record of your concerns and relevant details.

If you feel your concern has not been dealt with appropriately, you can consult with the Local Authority Designated Officer (LADO) whose details should be available through Nottingham City Council Children's Social Care Department and whose duties include responding to concerns about potential breaches of positions of trust. Alternatively, you can seek advice from the 24-hour NSPCC Helpline – 0808 800 5000.

The role of the Designated Safeguarding Officer

Notts County Football Club has a Designated Safeguarding Officer (DSO) in line with the EFL's role profile and required completion of the Safeguarding Children Workshop. The post holder will be involved with designated person's training provided by the EFL. The DSO is the first point of contact for all club members and parents or guardians regarding concerns for the welfare of any child or young person. They will also play a proactive role in increasing an awareness of poor practice and abuse amongst club members.

The Designated Safeguarding Officer's role includes but is not limited to the following:

- The Designated Safeguarding Officer may take advice from the EFL CPA if required before a decision is made.
- If the Designated Safeguarding Officer decides that they must report the allegation, the Designated Safeguarding Officer should contact Social Services or the LADO by telephone and send relevant written back up within 24 hours of the initial disclosure/allegation, if requested.
- The Designated Safeguarding Officer will ensure details of all referrals or allegations are passed on to EFL DSO and the Football League case management team within 72 hours
- The young person and referring staff member should be informed of the action being taken and the reasons for this decision. This should happen before Social Care Services are informed, unless doing so would place the young person at greater risk. In this case, both staff and player should be contacted as soon as safety considerations of the young person permit
- Refer cases to the Disclosure and Barring Service (DBS), Disclosure Scotland, or Access NI, Independent Safeguarding Authority (ISA), Local Authority Designated Officer and the FA where a member of staff has been dismissed following concerns they posed a risk to a child
- The Designated Safeguarding Officer should ensure that all written records relating to the incident are kept indefinitely, in a secure location. All electronic records are stored in a restricted area and all incidents are recorded on a central record
- Provide ongoing safeguarding training to all staff dependant in their role

The role of the Designated Safeguarding Lead

The Club has a Designated Safeguarding Lead who is the Academy Manager, this role includes but is not limited to:

- Work with the board to ensure safeguarding is at the heart of the Club's ethos and that all staff are supported in knowing how to recognise, respond and report potential concerns
- Liaise with the Senior Safeguarding Manager and the Board to keep them informed of any safeguarding of issues especially ongoing enquiries and police investigations
- As required, liaise with the local authority designated officer at the local authority if a concern has arisen regarding a member of staff
- Act as a source of support, advice and expertise for staff
- Act as a stand in for the Designated Safeguarding Officer and second contact

The role of the Senior Safeguarding Manager

Notts County Football Club has a Senior Safeguarding Manager who is the Chief Executive Officer, this role includes but is not limited to:

- Operational leadership responsibilities for safeguarding across the club
- Support club staff and volunteers who are responsible for making referrals across the club
- Liaise with the local authority designated officer at the local authority if a concern has arisen regarding a member of staff

- Meet with the Clubs Designated Safeguarding Lead and Officer to discuss ongoing cases, issues and best practice
- Update the Board with safeguarding issues and development

Notts County Football Club's DSO is Ady Osborne, who can be contacted on 07976 921475, at ady.osborne@nottscountyfc.co.uk or by writing to Notts County Football Club, Meadow Lane, Nottingham, NG2 3HJ.

The Designated Safeguarding Lead is Dave Plant, who can be contacted on 07495 006936, or dave.plant@nottscountyfc.co.uk

The Club's Senior Safeguarding Manager is Jason Turner who can be contacted on 0115 952 9000 or jason.turner@nottscountyfc.co.uk

Any allegation, disclosure or suspicion of abuse needs will be taken seriously and handled in a sensitive manner. Individual members of staff should wherever possible deal with safeguarding disclosures with the help of a Designated Safeguarding Officer or Lead and should always refer to the Designated Safeguarding Officer if available, who will undertake the interview. Information should be strictly limited to those who need to know.

Process

As outlined in Part One of Keeping Children Safe in Education 'if, at any point, *there is a risk of immediate serious harm* to a child a referral should be made to children or adult Social Care immediately. Anybody can make a referral'. If this ever happens, staff must inform one of the Designated Safeguarding Officer or Lead at the first possible moment.

Staff should **ALWAYS** make it clear to a young person that they cannot make guarantees of confidentiality.

The following forms a checklist for those dealing with a disclosure:

- Listen carefully to what is being said
- Keep questions to a minimum, just to clarify what is being said
- Avoid leading questions, prompting or making comments
- Suspend your own judgement – remember that you are not investigating the matter
- Inform the young person of the actions that will follow your conversation and assure them that they will be kept informed of all developments
- Staff should support the student and give reassurances whilst explaining which other people will need to know about the allegations
- Staff should make notes of the conversations which may be shared by the investigating agency (e.g. Social Services) including the below

During or immediately after the disclosure record the following:

- Names of those present during the disclosure/allegation
- Address and contact of young person
- Date of birth
- Ethnic origin
- Other agencies already involved
- Date and time of the conversation
- Place where the alleged abuse happened
- Brief description of the allegation
- Any visible injuries
- Any alleged injuries
- The young person's preferred action
- Means of contacting the young person
- Next steps and follow up agreed

We acknowledge and endorse the EFL's identification of bullying as a category of abuse. Bullying of any kind is not acceptable at our club. We have a separate Anti-bullying process in place which outlines in detail how Notts County Football Club deals with bullying. Incidents need to be reported to the Designated Safeguarding Officer and in cases of serious bullying, the County FA's Welfare Officer will be contacted.

Safer recruitment

We endorse and adopt the EFL's Safeguarding Children Guidelines for Safe Recruitment and will:

- Develop a role profile
- Request and validate identification documents
- As a minimum, meet and chat with the applicant(s) and where possible conduct interviews before appointing with specific questions around safeguarding included in this process relevant to the role
- Request and follow up with two written references before appointing
- Require an FA DBS Enhanced Disclosure where appropriate in line with EFL guidelines

All current Notts County Football Club members, employees and volunteers with direct access to children and young people will be required to complete a DBS Enhanced Disclosure. The Club reserves the right to undertake risk assessments of any individuals whose DBS Enhanced Disclosure confirms content that is considered to be relevant. If there are concerns regarding the appropriateness of an individual who is already involved or who has approached us to become part of Notts County Football Club, guidance will be sought from the EFL.

It is noted and accepted that the EFL will consider the relevance and significance of the information obtained via The FA DBS Enhanced Disclosure and that all decisions will be made in the best interests of children and young people.

It is accepted that the EFL aims to prevent people with a history of relevant and significant offending from having contact with children or young people and the opportunity to influence policies or practice with children or young people. This is to prevent direct sexual or physical harm to children and to minimise the risk of 'grooming' within football. The Club commits to ensure that it will do all it can to ensure that children and young people are fully protected. A separate Safer Recruitment Policy is to be used in conjunction with this policy.

Notts County Football Club supports the EFL's Whistleblowing Policy. A copy of Notts County Football Club's Whistleblowing Policy can be found on the Club's website. Any adult or young person with concerns about a colleague can 'whistle blow' by contacting the Designated Safeguarding Officer and/or the Child Protection Advisor at the EFL on 01772 325811, or by writing to them at the EFL, EFL House, 10-12 West Cliff, Preston, Lancashire, PR1 8HU or by going directly to the Police, Social Services or the NSPCC.

Notts County Football Club encourages everyone to know about Whistleblowing and utilise it if necessary.

Codes of Conduct for players, parents or spectators, adults working with children have been implemented by Notts County Football Club. In order to validate these Codes of Conduct, the club has clear sanctions to deal with any misconduct at club level and acknowledges the possibility of potential sanctions which may be implemented by leagues or the County FA in more serious circumstances.

This policy is the main guidance for safeguarding at Notts County Football Club. The following policies are available for specific areas and are available on the Club website:

- Accommodation
- Adults at Risk
- Anti-Bullying
- Allegations
- Equality
- Flow Chart for reporting Abuse
- Information sharing
- Late collection of children

- Health and Safety
- Missing children
- Release of players
- Photography and Images
- Poor Practice
- Safer Recruitment
- Social Media
- Transport
- Trips, Tournaments & Travel
- Whistleblowing

Update Responsibility: DSO	Revision version: 11
Signed off by the Board: 22 September 2020	Date for Revision: April 2022

Review History

Number	Date	Review details and Who	Authorised by:
1	April 2016	Development and creation of document	Kate Lovett DSO
2	December 2017	Updated to reflect legislation and KCSIE	Elaine Bond DSO
3	August 2018	Prevent and HSB added to policy Staff updates Process updates Additional legislation added	The Board
4	September 2018	DSO changed	Elaine Bond DSO
5	January 2019	Reviewed for 2019	Claire Burrows Acting DSO
6	April 2019	Reviewed for end of season and prepared for season 2019/20	Claire Burrows DSO
7	October 2019	Annual review and approval	Board of Directors
8	January 2020	DSO changed	Beverley Markland DSL
9	April 2020	Reviewed for end of season and prepared for season 2020/21	Beverley Markland DSL
10	September 2020	Annual review and approval	Board of Directors
11	April 2021	DSO and DSL changed	Jason Turner SSM