



# Safeguarding Policy (Children and Vulnerable Adults)

**Document Version 1.0**

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| <b>Policy Owner:</b>       | Mark Cornish, Director |
| <b>Approved by:</b>        | Directors              |
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## Version Control

| Version No. | Revision Date | Description of Changes and Reason | Change Author(s) | Approved by | Date Approved |
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| 1.0         | 01/02/25      | Creation, replacing old policy.   | Mark Cornish     | Board       | 26/02/2025    |
|             |               |                                   |                  |             |               |
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## 1. DEFINITIONS

| Word / Term                            | Definition                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|----------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>TAFC, us, our, or we etc.</b>       | Means Tonbridge Angels Football Club Limited, a Community Benefit Society, registered with registered number IPO 32445                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| <b>Adults at risk</b>                  | <p>A person aged 18 or over who has needs for care and support (whether the local authority is meeting any of those needs) <u>and</u>:</p> <ul style="list-style-type: none"><li>• because of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.</li><li>• is at risk of, abuse or neglect/</li></ul> <p>An individual's level of vulnerability to harm may vary over time depending on the circumstances they are in and their needs at that time. Not all adults with care and support needs will be at risk of harm. This will depend on the individual, their current situation, and the circumstances they are in.</p> |
| <b>Child/Children</b>                  | Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody, does not change his/her status or entitlements to services or protection.                                                                                                                                                                                                                                                                                                                                                                                                   |
| <b>Designated Safeguarding Officer</b> | Charlie Cole whose contact details are set out in section 26 of this Policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Our People</b>                      | All directors, officials, employees, volunteers, management, players, or contractors as applicable, and working for or engaged by TAFC.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Safeguarding Champion</b>           | Sophie Purves whose contact details are set out in section 26 of this Policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| <b>You, Your etc</b>                   | The person to whom this policy applies as applicable.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |

## 2. PURPOSE, SCOPE AND LEGAL FRAMEWORK

### Purpose

If you work or intend to work with children or adults at risk, you are automatically placed in a position of trust that carries authority, status, power and responsibility. If the adults involved are positive role models displaying high moral and ethical standards, the benefit to children's development can be significant.

It is through the application of this Safeguarding Policy and related procedures that TAFC seeks to develop a positive and proactive safeguarding/welfare programme to enable all children and adults at risk to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with and responsible for the activities involving children and adults at risk.

The safeguarding and welfare of children under eighteen years are legally regulated through Acts of

Parliament (Children Act 1989 and Children Act 2004). Safeguarding is a term that is broader than 'child protection' and relates to the action taken to promote high ethical standards of people in these categories and protect them from harm.

Safeguarding is everyone's responsibility. Safeguarding is defined in 'Working Together to Safeguard Children 2013' as:

- Protecting children from maltreatment
- Preventing impairment of children's health and development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- Taking action to enable all children to have the best outcomes

Organisations that work with children and adults at risk must always act in their best interests and ensure they take all reasonable steps to prevent them from harm. Having safeguards in place within an organisation not only protects and promotes the welfare of children and adults at risk but also enhances the confidence of Directors, staff, volunteers, parents, carers and the general public.

### **Scope**

This policy applies to all those who provide services on behalf of TAFC, including directors, staff and volunteers. TAFC seeks to ensure the safety and wellbeing of all children and adults at risk who engage in activities with TAFC. This policy is for use across TAFC and must be observed by all those working with children and adults at risk.

Our People must make themselves aware of this policy and where appropriate their work with children and adults at risk will be supported by a safeguarding training programme.

The Designated Safeguarding Officer and Safeguarding Champion have overall responsibility for safeguarding and child protection at Tonbridge Angels Football Club (the Club).

TAFC fully acknowledges and accepts its responsibility for the safety and well-being of children and adults at risk who engage in any way in any activity carried out with TAFC.

Their welfare is of paramount importance. It is the duty of all adults working at TAFC to safeguard the welfare of children and adults at risk by creating an environment that protects them.

Periodic feedback should be sought from children and adults at risk and from their parents/carers as to the suitability and correct application of TAFC's arrangements and procedures for Safeguarding.

### **Legal Framework**

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely;

- Children Act 1989 & 2004
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Sexual Offences Act 2003
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012 (including DBS checks and information)
- Guidance Child Sexual Exploitation (CSE) – CEOP 2012
- Working Together 2015/2017/ 2018
- Keeping Children Safe in Education 2016/ 2018
- The Counter-Terrorism and Security Act 2015
- Public Interest Disclosure Act 1998
- General Data Protection Regulations 2018
- Health and Safety at Work Act 1974
- Management of Health and Safety at Work Regulations 1999
- Modern Slavery Act 2015
- Private Fostering Regulations 2005
- Female Genital Mutilation Act 2003

### **3. AIMS AND KEY PRINCIPLES**

The aims of TAFC's Safeguarding Policy are:

- To safeguard all children and adults at risk who interact with TAFC.
- To demonstrate best practice in the area of safeguarding children and adults at risk.
- To develop a positive and proactive welfare programme to enable all children and adults at risk to participate in an enjoyable and safe environment.

Key Principles

- The child or adult at risk's welfare is and must always be the paramount consideration.
- All children and adults at risk have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion or belief or age.
- All suspicions and allegations of poor practice or abuse will be taken seriously and responded to efficiently and appropriately.
- To ensure that staff, coaches, parents and other adults who come into contact with children and adults at risk are good role models.
- Working in partnership with other organisations, children and adults at risk and their parents/carers is essential.
- To provide staff and volunteers with the overarching principles which guide our approach to safeguarding. TAFC believes that a child or adult at risk should never experience abuse of any kind. We have a moral and legal responsibility to promote the welfare of all children and adults at risk and to keep them safe. We are committed to this practice in a way that protects them.
- To handle sensitively, in confidence, any safeguarding concerns raised within TAFC.

### **4. RECRUITMENT & DISCLOSURE**

As part of TAFC's safer recruitment and selection process, offers of work for positions which involve working with children and adults at risk are subject to a satisfactory Enhanced Disclosure Barring Service (DBS) check and appropriate references. All offers of work are subject to a satisfactory outcome of the screening process and until such time as a satisfactory disclosure has been confirmed, the individual concerned will not be permitted to commence work or any activity for TAFC.

All employees, workers, consultants, agency staff and volunteers in a position of trust will be required to undergo regular DBS disclosure clearances, normally every three years or more often if requested.

Should an individual's DBS check reveal any convictions TAFC will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children and adults at risk. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment will be carried out to assess the information contained within the disclosure certificate. The individual may also be asked to attend an interview prior to a recruitment decision being made.

All new employees, workers, consultants and volunteers working with children or adults at risk at TAFC will be required to complete a self-declaration on commencement of duties.

### **5. RESPONSIBILITY OF SAFEGUARDING CHILDREN AND ADULTS AT RISK – POSITION OF TRUST AND DUTY OF CARE**

TAFC acknowledges its responsibility to safeguard the welfare of every child and adult at risk who has been entrusted to its care and is committed to working to provide a safe environment. Our People are accountable for the way in which they exercise authority, manage risk, use resources and protect children and adults at risk from discrimination and avoidable harm. To ensure best practice at all times, Our People must be fully aware of this policy. All Our People have a duty of care to keep children and adults at risk safe.

Our People must demonstrate integrity, maturity and good judgement whilst working with children and adults at risk.

## **6. PROTECTING CHILDREN AND ADULTS WITH DISABILITIES**

Children and adults with disabilities are at an increased risk of abuse and the greater the disability the greater the risk. There are a number of factors that contribute to this and these include:

- Lack of friends and peer group to support and protect.
- Intimate/physical care/invasive medical care required. This can make it difficult for the child or adult to know what unacceptable touching is.
- Lack of speech or limited communication. This makes it harder to report abuse.
- Multiple carers – making it hard to identify who may be abusing.
- History of being told what to do and not given choices.
- Depending on the abuser for a service or basic need.
- Having medical conditions that are used to explain injuries.

Children and adults with disabilities may also be less valued than their peers and poor care may be observed but tolerated by others. This might include such things as not speaking directly to the child or adult; not offering choices; not moving and handling them safely; not respecting their privacy and dignity; not treating them according to their age; allowing physical restraint to occur; or using derogatory language. There is no one way to ensure that children and adults with disabilities are protected but the safest environments are those that help children and adults at risk to protect themselves by helping them to speak out and do their best to stop abuse from happening and take responsibility for observing, challenging and reporting poor practice and suspected abuse.

## **7. EMPLOYEE/WORKER TRAINING**

Upon induction all employees and volunteers receive a copy of the Safeguarding Policy. All Our People working in direct contact with children will be given safeguarding training and should complete the FA Safeguarding Children workshop and will receive regular training appropriate to their position. Training should be refreshed periodically, and at least every two years. Records of training will be kept (see section 25 below).

## **8. WHISTLEBLOWING**

If you disclose information about wrongdoing the law protects you from being treated unfairly or losing your job. A disclosure qualifies for protection if you are an employee or volunteer and you disclose something about an organisation.

A disclosure must be about something that affects the public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- a legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed

Refer to the Whistleblowing policy with regards to further information and procedures.

## **9. STAFF AND VOLUNTEER CODES OF CONDUCT**

Our People should conduct themselves with the utmost professionalism and sound common sense should be applied at all times. It is important for any member of staff not to put themselves in a position, by action or word, that could give rise to any sort of misunderstanding or allegation, for example when conducting one to one tuition, or sports coaching, or conveying a child in private cars, giving personal email or telephone numbers to children. Also, in particular, caution should be observed about sending text messages or any other electronic communication to children. Such communication could easily be misunderstood or considered as inappropriate.

Our People should refrain from any unplanned off-site interactions with children. In all dealings with children please observe common sense rules: all dealings with children should be conducted according to the highest professional standards.

Our People are asked to agree and abide by appropriate Codes of Conduct as may from time to time be circulated. These will incorporate and build on FA provided codes and include provisions relating to safeguarding including:

- The FA's Grassroots Code for Adult Football
- The FA Respect Code of Conduct
- Know your Rights in Football.

Copies of these documents can be found in Annexe 2 of this Policy.

## **10. CONCERNS AROUND RADICALISATION & EXTREMISM**

Protecting children and adults at risk from the risk of radicalisation should be seen as part of wider safeguarding duties, and is similar in nature to protecting children and adults at risk from other forms of harm and abuse.

During the process of radicalisation it is possible to intervene to prevent children and adults at risk from being radicalised. Radicalisation is the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer

The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with other safeguarding risks, staff and volunteers should be alert to changes in a child's or adult at risk's behaviour which could indicate that they may be in need of help or protection. Staff and volunteers should use their judgement in identifying children and adults at risk who might be at risk of radicalisation and act proportionately.

The Counter-Terrorism and Security Act 2015 places a duty on specified authorities, including local authorities and childcare, education and other children's services providers including sport, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent Duty"). The Prevent Duty relates to reducing or eliminating the risk of individuals becoming involved in terrorism.

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with it. Safeguarding in this context is the process of protecting children and adults at risk from being drawn into terrorist activity. TAFC recognises its responsibilities to the Prevent Duty, supporting the strategy in all activities involving children and adults at risk.

The Designated Safeguarding Officer will be responsible for working with partnership agencies involved in the Channel programme, including the police, in undertaking the initial assessment around concerns raised as to whether a referral is appropriate.

## **11. UNDERSTANDING AND IDENTIFYING ABUSE AND NEGLECT**

Abuse and neglect are forms of maltreatment – a person may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Child welfare concerns may arise in many different contexts and can vary in nature and seriousness. Children may be abused in a family or in an institutional or community setting by those known to them or by a stranger, including via the internet. In the case of female genital mutilation, children may be taken out of the country to be abused. They may be abused by an adult or adults, or another child or children. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Abuse and neglect can happen over a period of time but can also be a one-off event. Child abuse and neglect can have major long-term impacts on all aspects of a child's health, development, and well-being.

The warning signs and symptoms of child abuse and neglect can vary from child to child. Disabled children may be especially vulnerable to abuse, including because they may have an impaired capacity to resist or avoid abuse. They may have speech, language and communication needs which may make it difficult to tell others what is happening. Children also develop and mature at different rates so what is worrying for a younger child might be normal behaviour for an older child.

Parental behaviour may also indicate child abuse or neglect, so you should also be alert to parent-child interactions which are concerning and other parental behaviour. This could include parents who are under

the influence of drugs or alcohol or if there is a sudden change in their mental health. By understanding the warning signs, you can respond to problems as early as possible and provide the right support and services for the child and their family. It is important to recognise that a warning sign does not automatically mean a child is being abused.

## 12. INDICATORS OF ABUSE

There are several warning indicators which might suggest that a child may be being abused or neglected. Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. Most people are not experts in such recognition, but indications that a child is being abused may include one or more of the following:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- An injury for which an explanation seems inconsistent
- The young person describes what appears to be an abusive act involving them
- Another young person or adult expresses concern about the welfare of a young person
- Unexplained changes in a young person's behaviour e.g. becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper
- Inappropriate sexual awareness
- Engaging in sexually explicit behaviour
- Distrust of adults, particularly those with whom a close relationship would normally be expected
- Difficulty in making friends
- Being prevented from socialising with others
- Displaying variations in eating patterns including overeating or loss of appetite
- Losing weight for no apparent reason
- Becoming increasingly dirty or unkempt

## 13. DEFINITIONS OF ABUSE

Concerns about abuse should be framed in respect of the information below. It must be recognised that the list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place.

**Critically It is NOT the responsibility of those working at TAFC to decide that child abuse is occurring. IT IS their responsibility to act on and report any concerns.**

**Physical Abuse** - is deliberately physically hurting a child. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning or scalding, drowning or suffocating a child. Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol and mental health or if they live in a home where domestic abuse happens. Babies and disabled children also have a higher risk of suffering physical abuse. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse can also occur outside of the family environment.

**Neglect** - is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision or shelter. It is likely to result in serious impairment of a child's health or development. Children who are neglected often suffer from other types of abuse. Practitioners must remain alert and must not miss opportunities to take timely action.

However, while you may be concerned about a child, neglect is not always straightforward to identify.

Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing or warmth for the child. Neglect may occur during pregnancy as a result of maternal drug or alcohol abuse.

**Sexual Abuse** - is any sexual activity with a child. You should be aware that many children who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health.

Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch 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 commit acts of sexual abuse, as can other children.

**Emotional Abuse** - is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse and it can have severe and persistent adverse effects on a child's emotional development.

Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be in a position to observe it, for example, in the way that a parent interacts with their child.

Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.

Emotional abuse may involve serious bullying – including online bullying through social networks, online games or mobile phones – by a child's peers.

**Bullying** - is behaviour that is intended to hurt someone physically or emotionally. It is often persistent or repeated over a prolonged period of time and is hostile and intimidating. It can be name-calling, isolation, exclusion, pushing, spreading rumours, threatening behaviour, constant criticism, and undermining. may come from another young person or an adult. Bullying is defined as deliberate hurtful behaviour, usually repeated over time, where it is difficult for those bullied to defend themselves. Signs of Bullying

- Behavioural changes such as reduced concentration and/or becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go training or to competitions
- An unexplained drop in performance
- Physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching and bruising, damaged clothes, bingeing e.g. on food, alcohol or cigarettes
- A shortage of money or frequent loss of possessions

**Further circumstances where abuse may be prevalent** - Below is an outline of some of the specific categories. Further information will be found in Local Safeguarding Partnership Guidelines and Keeping Children Safe in Education 2018.

**Child Sexual Exploitation** - involves exploitative situations, contexts and relationships where young people may receive something such as gifts, food, accommodation, drugs, alcohol, even affection in return for engaging in sexual activities.

The perpetrator will groom the victim over a prolonged period and exert increasing power as the relationship develops. Sexual exploitation involves a degree of coercion, intimidation, enticement, cyberbullying and grooming. Young people may be tricked into believing they are in a loving consensual relationship and do not necessarily see themselves as a victim and so don't always exhibit external signs of abuse.

**Grooming** - is when someone builds an emotional or transactional connection with a child to gain their trust for the purpose of sexual abuse or criminal exploitation. Children can be groomed on-line or by a stranger or someone they know, for example a family member, friend or professional. Groomers can 'groom' family members to gain access to a child. They can be male or female or any age. Many children do not understand they have been groomed or that it is abuse and don't recognise themselves as being a victim.

**Radicalisation** is a form of grooming or exploitation whereby people come to support forms of extremism and extremist ideology which in some cases leads to participation in terrorist groups and activities. There is no clear profile of who is likely to become radicalised. However, staff and volunteers should be aware of changes in behaviour which may indicate help or protection is needed and have a general understanding of some key indicators which may make an individual more susceptible to exploitation and which for example may include:

- Identity or personal crisis
- Unemployment/ underemployment
- Underachievement
- Isolation / exclusion

**Modern Slavery and Trafficking** encompasses human trafficking, slavery, forced labour and domestic servitude. Victims can be coerced, deceived, forced into a life of abuse and inhumane treatment. Section 52 of the Modern Slavery Act 2015 places a duty on public authorities to notify the National Crime Agency if there are signs or intelligence has been received or there are reasonable grounds to believe there is an indication that a person may be a victim of slavery or human trafficking.

**Female Genital Mutilation (FGM)** is a form of child abuse which involves intentionally altering or injuring female genital organs for non-medical reasons and is illegal in this country (Female Genital Mutilation Act 2003). It is also illegal to take girls who are British Nationals or permanent residents of the UK abroad for FGM whether it is lawful in another country. Staff need to be alert to the possibility of when a female may be at risk of FGM or if it has happened. There is a statutory duty to report these cases to the police. It is for the police to investigate the circumstances and to conduct enquiries into any alleged offence.

**Forced Marriage** There is a clear difference between a forced marriage and an arranged marriage. In arranged marriages the families of both spouses play a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the two people. In a forced marriage, one or both spouses do not consent to the arrangement of the marriage and some elements of duress are involved. This can involve physical, psychological, financial, sexual or emotional pressure. Forced marriage is an abuse of human rights and, where a child is involved, an abuse of the rights of the child. Further information can be found at <https://www.gov.uk/stop-forced-marriage>.

**Hate Crime** is an incident of crime that is motivated by hostility or prejudice based on a victim's disability, race, religion or belief, sexual orientation or transgender identity.

**Peer on Peer Abuse** - Children can abuse other children – referred to as peer-on-peer abuse. All staff should be aware that safeguarding issues can manifest themselves via peer-on-peer abuse. This can include but is not limited to bullying (including cyberbullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, sexual violence and sexual harassment, sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.

**Hazing** is any action or situation, with or without the consent of participants, which recklessly intentionally or unintentionally endangers the mental, physical or emotional wellbeing of a child. It will not be tolerated. An example would be a group initiation ceremony where a child is forcibly encouraged to consume alcohol.

**Domestic Violence** is an important indication of risk of harm to children who may be affected directly or indirectly if they are connected to a household where there is domestic violence. It can have a damaging effect on health and development. Many of the signs will be those related to physical and emotional abuse.

**Child Criminal Exploitation: County Lines** - criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

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

**Honour-based violence** - is an internationally recognised term used to describe cultural justifications for violence and abuse. It justifies the use of certain types of violence against children, women and men and crosses all communities, cultures, faith groups, nationalities transcending national and international boundaries. It is domestic abuse, child abuse and criminal. It encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community including female genital mutilation (FGM) forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators.

## 14. GOOD PRACTICE

All Our People working with children or adults at risk should adhere to the following principles and action

(list is not exhaustive):

1. Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
2. Make the experience of the activity fun and enjoyable: promote fairness, confront and deal with bullying.
3. Treat all children and adults at risk equally and with respect and dignity.
4. Always put the welfare of the child or adult at risk first.
5. Maintain a safe and appropriate distance with children and adults at risk and avoid unnecessary physical contact.
6. Where any form of manual/physical support is required it should be provided openly and with the consent of the child or adult at risk. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child or adult at risk's consent has been given.
7. If groups have to be supervised in changing rooms always ensure coaches etc work in pairs.
8. Request written parental/carers consent if Foundation staff or volunteers are required to transport children or adults at risk.
9. Gain written parental consent for any significant travel arrangements, e.g. overnight stays. Ensure that coaches are qualified and that a qualified first aider is in attendance.
10. Ensure that at away events adults should not enter a child's room or invite children to their rooms.
11. Be a good role model. This includes not smoking or drinking alcohol in the company of children and adults at risk. Always give enthusiastic and constructive feedback rather than negative criticism.
12. Secure written parental consent for TAFC to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises.
13. Keep a written record of any injury that occurs, along with details of any treatment given.

## **15. POOR PRACTICE**

The following are regarded as poor practice and should be avoided by Our People (list is not exhaustive):

1. Unnecessarily spending excessive amounts of time alone with children and adults at risk away from others.
2. Being alone in changing rooms, toilet facilities or showers used by children and adults at risk.
3. Taking children or adults at risk alone in a car on journeys, however short.
4. Taking children or adults at risk to your home where they will be alone with you.
5. Sharing a room with a child or adult at risk.
6. Engaging in rough, physical or sexually provocative games, including horseplay.
7. Allowing or engaging in inappropriate touching of any form.
8. Allowing children or adults at risk to use inappropriate language unchallenged.
9. Making sexually suggestive comments to a child or adult at risk, even in fun.
10. Reducing a child or adult at risk to tears as a form of control.
11. Allowing allegations made by a child or adult at risk to go unchallenged, unrecorded or not acted upon.

12. Doing things of a personal nature that the child or adult at risk can do for themselves.

## **16. PUBLICATION AND AWARENESS OF SAFEGUARDING MATTERS**

T AFC will ensure that awareness of safeguarding matters and information relating to safeguarding is promoted and made available to all Our People through various means including:

- the circulation of this Policy
- publication and promotion of promotional material on safeguarding provided by the FA in prominent places throughout the Longmead Stadium.
- Making Our People aware of the identity of the DSO, and any delegated officers for each team.
- Ensuring that the DSO, Safeguarding Champion and welfare officers are visible and approachable to all Our People, and children during matchdays and training.
- The incorporation of safeguarding considerations into codes of conduct.
- The incorporation of safeguarding considerations into health and Safety, and stadium safety matters, and matchday plans.

## **17. SECTION ON PHOTOGRAPHY AND SAFEGUARDING**

Where any of Our People are considering taking and using footages or video footage that may include Children, they will ensure that they adhere to the guidelines set out in the FA's Guidance Note 8.3, headed 'Photographing and Filming Children', a copy of which is included in Annexe 2 of this Policy.

Parental Consent must always be obtained via appropriate parental consent forms prior to filming and the use of any images.

## **18. MISSING CHILD OR ADULT AT RISK ON MATCH DAYS**

The following are actions that should be taken should a child or adult at risk go missing during the course of a Foundation activity:

1. Always remain calm. If not yourself, ascertain who was the last person to see the child or adult at risk.
2. Search the area where the child or adult at risk was last seen. Get assistance if practicable.
3. Contact the Club's Safeguarding Officer, who will advise and liaise with parents and the police. Should the Safeguarding Officer not be immediately available then the stadium safeguarding officer must contact the police direct. Do not delay.
4. Be able to provide name, address, age, description and clothing of the missing child or adult at risk.
5. In the event of the child or adult at risk returning, do not leave the area until the Safeguarding Officer or equivalent and or the police have arrived.

## **19. RAISING SAFEGUARDING CONCERNS**

Any of Our People can raise safeguarding concerns directly with management, the DSO, or Safeguarding Champion.

Where a complaint or concern is received through other matters, that expressly or impliedly suggests there may be a safeguarding concern this must be referred to the Designated Safeguarding Officer. Complaints and Concerns should be dealt with using the Procedures outlined below, and a sample form for taking information is included as an Annexe to this policy.

On receipt of information and details with Safeguarding concerns, the DSO will inform the Safeguarding Champion and if appropriate other outside agencies that may have an interest, for example the FA, National League, Local Authority Designated Officer (LADO), Children's Social Services, police and other external agencies as appropriate in accordance with the processes set out in Section 21 below.

Where concerns relate to the conduct of an employee, Investigations will follow T AFC's conduct and disciplinary processes. Where they relate to the conduct of volunteers, or other non-employees, investigations should follow processes similar to those set out in the club's Anti Bullying and Anti Harassment Policy.

**The Role of the Local Authority Designated Officer (LADO)** - Children have a right to safe services. If you are concerned about the way in which a member of staff has behaved towards a child, you or your manager must inform the LADO.

As outlined in the Children Act 2004, the LADO will be informed of all allegations against adults who work with children. The LADO provides advice and guidance to senior managers on the progress of cases to ensure they are dealt with robustly and resolved as quickly as possible. Information relating to allegations is collated and presented to the relevant Local Safeguarding Children Board to inform training, research, safer recruitment and awareness raising.

The LADO is located within children's services and should be alerted to all cases in which it is alleged that a person who works with children has:

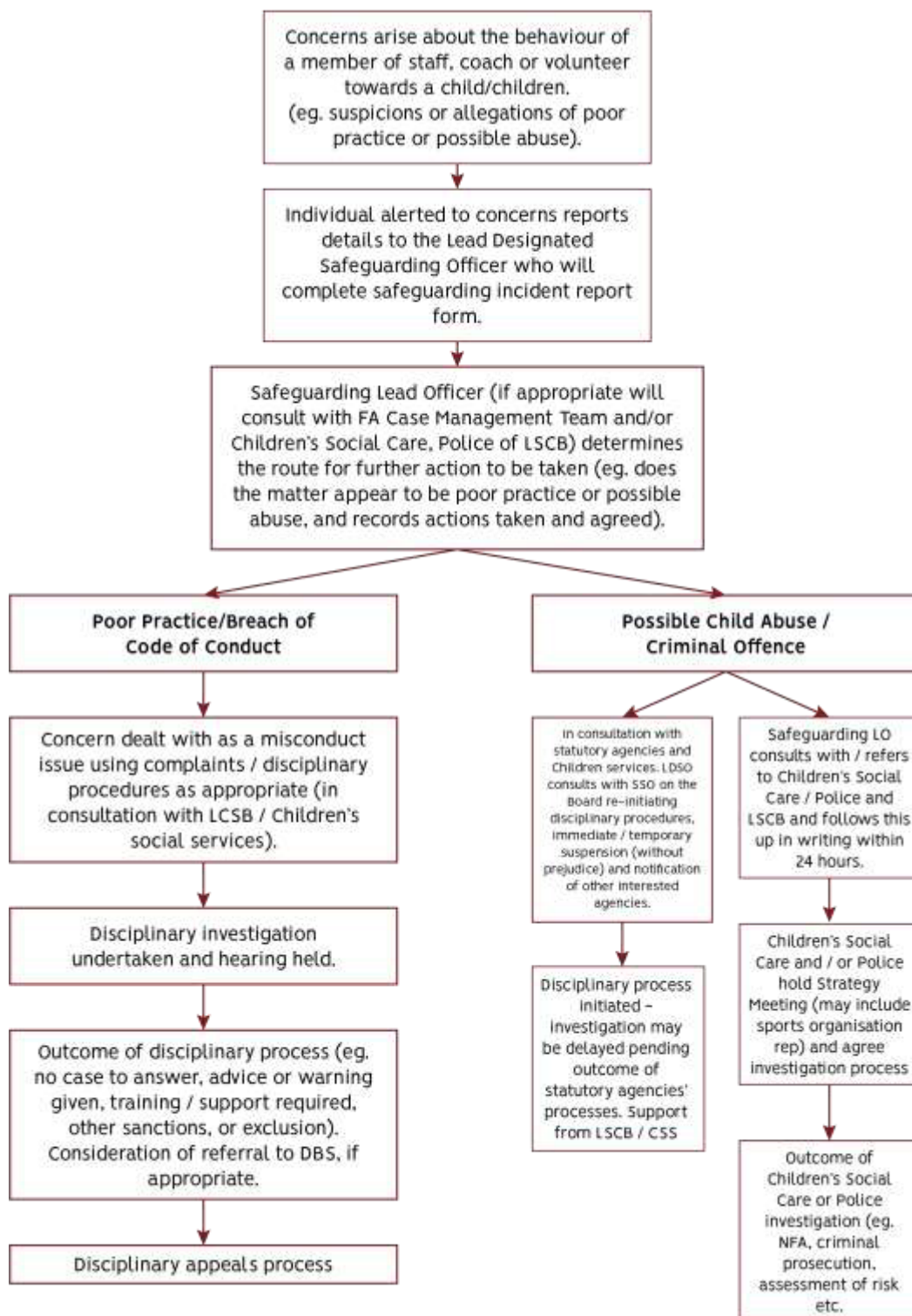
- behaved in a way that has harmed, or may have harmed, a child
- possibly committed a criminal offence against children, or related to a child
- behaved towards a child or children in a way that indicates s/he is unsuitable to work with children.

The LADO role applies to members of staff who are paid, unpaid, permanent, volunteers, casual, agency, or anyone self-employed. It covers concerns, allegations or offences emanating from within or outside of work. The LADO is involved from the initial phase of the allegation through to the conclusion of the case. The LADO will provide advice and guidance and help determine whether the allegation sits within the scope of the procedures. Within the role the LADO helps co-ordinate information sharing. The LADO will also monitor and track any investigation with the expectation that it is resolved as quickly as possible.

## 20. REPORTED SAFEGUARDING CONCERNS - PROCEDURES

Below are guidelines for procedures to follow when safeguarding concerns are raised.

### A. Concerns raised about the behaviour/conduct of a member of staff, coach or volunteer of TAFC:



## B. Concerns/allegations made against a third-party person/organisation outside of TAFC's activities:



## 21. BREACHES OF THIS POLICY

We take a strict approach to breaches of this policy, which will be dealt with in accordance with our disciplinary procedures. For employees, breaches may amount to gross misconduct, and potentially dismissal.

## 22. ROLES AND RESPONSIBILITIES

All Our People are expected to know and understand the content of this Policy and abide by and promote the rules and principles it contains. Our People should be pro-active in encouraging safeguarding.

This Safeguarding Policy is fully supported by senior management. The Directors, senior management, the Designated Safeguarding Officer and Safeguarding Champion are primarily responsible for designing, implementing, overseeing, and controlling the systems, controls, and arrangements in place in relation to this Policy. The Policy is controlled by the Directors, and subject to review and amendment by them from time to time.

## 23. RELATED POLICIES AND DOCUMENTS

Related Policies and Documents. TAFC also has in place the following related policies:

- Equality, Diversity and Inclusion
- Recruitment and Selection of Staff
- Data Protection
- Privacy
- Anti-Bullying
- Late Collection of Children
- Code of Conduct for Directors

- Code of Conduct for Staff and Volunteers
- Code of Conduct for Participants
- Complaints

## 24. RECORD KEEPING

Information about a complaint alleging safeguarding concerns by or about any of Our People may be placed on personnel files, along with a record of the outcome and of any notes or other documents compiled during the process. These will be processed in accordance with our Data Protection Policy.

Records of all DBS checks and safeguarding training will be maintained by TAFC. The DSO will keep and maintain an up-to-date Safeguarding Register confirming details of all DBS checks and safeguarding training undertaken by all of Our People.

## 25. KEY CONTACTS

### TAFC Contacts

#### **Designated Safeguarding Officer**

Charlie Cole

Tel: 07825 702412. Email: [tonbridgeangelsclubsecretary@gmail.com](mailto:tonbridgeangelsclubsecretary@gmail.com)

### External Contacts

**Police Child Abuse Investigation Unit** - 01707 354000 (24 hours)

**NSPCC** - 0808 800 5000

**Childline** - 0800 1111

#### **Kent FA Safeguarding**

Lucy Kidd- Head of Safeguarding

Laura Hawkins and Sara Quinlan - Designated Safeguarding Assistants

Email: [Safeguarding@KentFA.com](mailto:Safeguarding@KentFA.com)

Tel: **01622 792140 (9am - 5pm Monday - Friday)**

If a child is in immediate danger, please contact the police. For guidance related to a safeguarding concern outside of office hours, please email [Safeguarding@KentFA.com](mailto:Safeguarding@KentFA.com) or call NSPCC 24/7 on 0808 800 5000

#### **National League DSO: Martyn Cannon**

Tel: 0121 7140014 Mobile: 07842 429798

Email: [Safeguarding@thenationalleague.org.uk](mailto:Safeguarding@thenationalleague.org.uk)

#### **Local Authority Designated Officer (LADO)**

**[To be Confirmed].**

## ANNEXE 1 – SAFEGUARDING INCIDENT REPORT FORM (EXAMPLE)

For internal use. On completion, this form should be given to the Designated Safeguarding Officer, in a sealed envelope marked 'confidential 'or sent by email to [tonbridgeangelsclubsecretary@gmail.com](mailto:tonbridgeangelsclubsecretary@gmail.com) All information will be treated in accordance with the Data Protection Act and Information Sharing Protocol.

|                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Name and position of person reporting incident/concern:</b>                                                                                                                |
| <b>Date and time of completion of form:</b>                                                                                                                                   |
| <b>Date and time of the incident/disclosure:</b>                                                                                                                              |
| <b>Child/adult's name:</b>                                                                                                                                                    |
| <b>Child's date of birth and age group:</b><br>U6/U7/U8/U9 / U10 / U11 / U12 / U13 / U14 / U15 / U16 / U17 / U18 (please circle)                                              |
| <b>Child/adult's address:</b>                                                                                                                                                 |
| <b>Name(s) and address of carer/parent (if appropriate):</b>                                                                                                                  |
| <i><b>When completing the information below, please continue onto a separate sheet if necessary.</b></i>                                                                      |
| <b>Please describe your concerns here</b> (give details of location, times of specific incidents, any physical, behavioural or indirect signs and the people/staff involved). |

**Have you spoken to the child/adult/s involved? If so, what exactly was said?** (please record details in the person's own words):

**Actions/Outcomes**

**Action taken so far:**

**Outcome:**

**4 Weekly Review:**

**Signature of reporting person:**

**Date:**

**Name:**

**Signature DSO:**

**Date:**

**Name:**

## ANNEXE 2 – FA SUPPLEMENTARY DOCUMENTATION



CC  
Grassroots\_Code\_For,



CC  
respect-codes-of-conc



know-your-rights-for  
-16-17-year-olds (2),r



CC  
8-3-photographing-a