

Safeguarding Children Policy



Last Reviewed - July 2022

Tim Allison - Chief Operating Officer

Policy Overview

Our Safeguarding Children Policy applies to all staff, including the Board of Directors and all managers, coaches, paid staff, players, scholars and volunteers or anyone working on behalf of Sutton United Football Club. The Club seeks to ensure the safety and wellbeing of all children, young people and vulnerable adults who engage in activities with the Club.



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1. Who This Policy Applies To

This policy applies to all staff, including the Board of Directors, all managers, coaches, Club staff, volunteers, or anyone working on behalf of Sutton United Football Club. The Club seeks to ensure the safety and wellbeing of all children, young people and vulnerable adults who engage in activities with the Club. Safeguarding at Sutton United is everyone's responsibility and everyone has a role to play in protecting those at risk.



2. Why This Policy Exists

If you work or intend to work with children, young people or vulnerable adults 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 and young people's development can be significant. Football can and does influence children and young people's development and is potentially an inspiration to whole communities.

It is through the application of the Policy and Procedures that the Club seeks to develop a positive and proactive safeguarding/welfare programme to enable all children and young people 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 young people.

The safeguarding and welfare of children and young people under eighteen years are legally regulated through Acts of Parliament (Children Act 1989 and The Children Act 2004); Safeguarding is a term that is broader than 'child protection' and relates to the action taken to promote high ethical standards throughout of persons in these categories and protect them from harm.

Safeguarding is everyone's responsibility at Sutton United. 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, which work with children and young people, 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 but also it enhances the confidence of directors, relevant authorities, staff, volunteers, parents, carers and the general public.

3. Scope

This Policy is for use across the Club and is to be observed by all those working with children, young people and vulnerable adults. The standard application of this Policy and Procedures across the Club, promoting safeguarding good practice is mandatory. All the requirements are obligatory and are to be enforced as indicated by the appropriate persons in all cases where there are any suspected instances of poor practice or abuse. All employed staff, directors, Club officials, consultants, agency staff and volunteers must make themselves aware of the Club's Safeguarding Children Policy and Procedures and where appropriate their work with children and young people will be supported by a safeguarding training programme.

The Senior Safeguarding Manager has overall responsibility for safeguarding and child protection at the Club and is supported by department Safeguarding Officers.

The Club fully acknowledges and accepts its responsibility for the safety and well-being of children and young people, who engage in any activity carried out with the Club. Children's welfare is of paramount importance. It is the duty of all adults working at the Club to safeguard the welfare of children and young people by creating an environment that protects them from harm.

Activities undertaken at the following locations/departments are under the remit of this policy including:

- First Team and Academy Training Ground.
- Academy
- The VBS Community Stadium
- Stadium tours, Stewarding and all other activities on match days and roles that encounter children, young people and vulnerable adults
- Other hired facilities for events, matches, tours, courses and camps

The Club has in place comprehensive safeguarding procedures that meet the requirements of The FA and English Football League Rules (in particular, The Safeguarding of Vulnerable Groups and the strict application of safer recruitment). The FA Safeguarding Children Rules and The Children Act 1989 and 2004 are applied to ensure the national standards for safeguarding are met and implemented throughout the Club.

The Club also has a responsibility to maintain regular dialogue with the Local Safeguarding Children Board and the Local Authority Designated Officer (LADO). This Policy has been communicated with the Sima Hirani (LADO, London Borough of Sutton) for feedback and endorsement.

4. Legal Framework

This policy has been drafted with cognisance to the following:

- 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 Counterterrorism 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

5. Definition of a Child

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 in the secure estate, does not change his/her status or entitlements to services or protection. (Working Together 2018)

6. Aims and Key Principles

The aims of the Club's Safeguarding Children/Young Persons Policy are:

- To safeguard all children and young people who interact in any way with the Club.
- To demonstrate best practice around safeguarding children, young people and vulnerable adults.
- To develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment.

7. Key Principles Underpinning This Policy

- The child or young person's welfare is and must always be the primary consideration.
- All children and young people 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. All concerns will be recorded within a secure case management system (MyConcern) which will also provide an audit trail for any report and subsequent actions.
- To ensure that staff, coaches, parents and other adults who come into contact with children and young people are good role models.
- Working in partnership with other organisations, children and young people and their parents/carers is essential.

To provide staff and volunteers with the overarching principles which guide our approach to safeguarding. Sutton United Football Club believes that a child or young person should never experience abuse of any kind. We have a moral and legal responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to this practice.



8. The Role of The Club Lead Designated Safeguarding Officer

The role of the Officer is to work with the Football Club's safeguarding representatives to provide clarity across the Club to ensure full compliance with English Football League and FA rules, The FA safeguarding agenda and Government legislation, whilst also maintaining key relationships with Club Senior Management, the English Football League/FA Safeguarding Teams, Police, Local Authority Children's Services (LADO), and any appropriate external agencies and other Clubs where appropriate.

Provide regular reports to Senior Club Management on the effectiveness of the Club's Safeguarding strategy. Compliance and updates on current legislation and any changes in English Football League or The FA Rules or statutory agency legislative changes which will impact on the Club.

Represent the Club as Lead Case Manager when cooperating with/reporting directly to external statutory agencies such as the Police, Children's Services, appropriate external agencies and the FA Safeguarding Case Management team.

Support the promotion of the moral and legal responsibilities in implementing procedures to provide a duty of care for children and young people, safeguard their wellbeing and protect them from abuse and poor practice.

To take responsibility for the day-to-day management of safeguarding issues and proactive promotion of safeguarding awareness and implementation within the Football Club and its departments.

To be available, at all reasonable times, as a first contact for staff, parents, children, and if appropriate, external agencies regarding information or referral of all incidents, concerns, allegations, evidence of poor practice and evidence of best practice, in confidence, and in line with Data Protection legislation.

To handle sensitively, in confidence, any safeguarding concerns raised within the club.

To chair quarterly Club Safeguarding Team meetings with appropriate designated representatives from all other sections of the Club.

To ensure all safeguarding training is delivered to all appropriate staff and that this is regularly updated and current.

9. Safeguarding Management Structure

The below diagram shows the safeguarding structure and responsibilities within Sutton United Football Club and Academy. All reports/concerns in relation to a child, young person or adult at risk will be brought to the attention of the Lead Designated Safeguarding Officer (LDSO) who will ensure that the incident/concern is recorded and that all other interested parties and statutory agencies are contacted as appropriate.

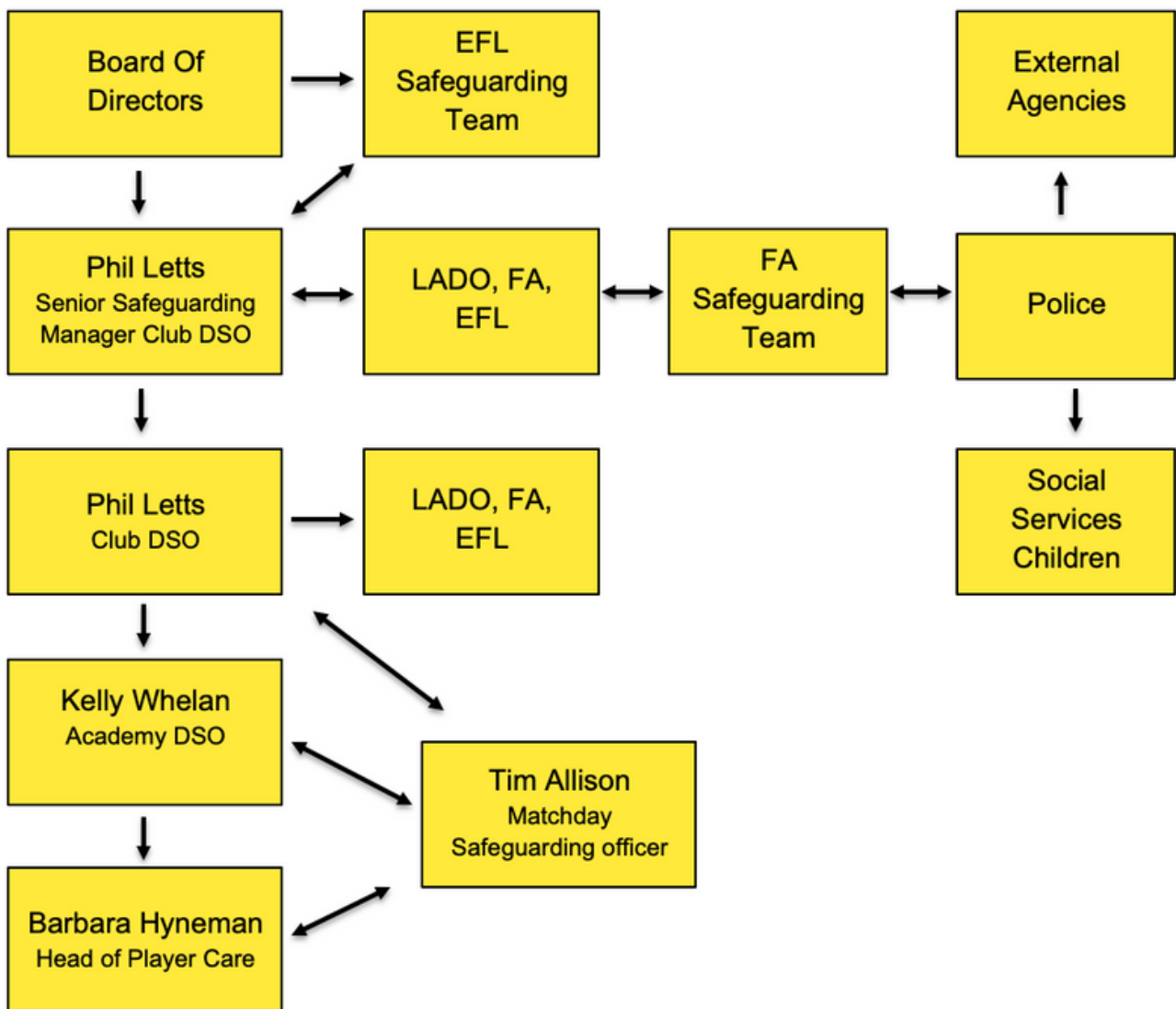
The Club safeguarding structure is:

Board of Directors (including Board safeguarding Champion Phil Letts 07595539220)

Senior Safeguarding Manager (Phil Letts) 07595539220

Designated Safeguarding Officer (Kelly-Jade Whelan) 07510075868

Match day Safeguarding Officer (Tim Allison) 07804270468



10. Recruitment & Disclosure

Sutton United Football Club operate strict safer recruitment policy which includes: validating at least two references, satisfactory Enhanced Disclosure Barring Service check, interview process where safeguarding knowledge/training is checked.

If supplementary safeguarding training is required the Club DSO will be responsible for access to this. All offers of employment (paid or otherwise) are subject to a satisfactory outcome to the screening process and until such time as a satisfactory disclosure has been confirmed, the individual concerned will not be permitted to commence unsupervised work with access to children or vulnerable adults.

All employees, workers, consultants, agency staff and volunteers in a position of trust will be required to undergo regular DBS disclosure clearances, normally every 3 years or earlier if requested.

Should an individual's DBS check reveal any convictions the Club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children and young people. In such circumstances, when the nature of any disclosure must 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. On occasions the County FA Safeguarding Officer and/or the Local Safeguarding Children Board Manager may be asked to attend the risk assessment meeting.

All new employees, workers, consultants and volunteers working with children or young people at the Club will also be required to complete a self-declaration on commencement of duties.



11. Responsibility of Safeguarding Children – Position of Trust and Duty of Care

The Club 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. All employees, workers, consultants, agency staff and volunteers are accountable for the way in which they exercise authority, manage risk, use resources and protect children from discrimination and avoidable harm. To always ensure best practice employees, workers, consultants, agency staff and volunteers must be fully aware of this Safeguarding Children Policy and Procedures and the responsibilities. All employees, workers, consultants, agency staff and volunteers have a duty of care to keep children and young people safe; this can be exercised through the development of respectful, caring and professional relationships between adults and children/young people.

Employees, workers, and volunteers must demonstrate integrity, maturity and good judgement whilst working with children and young people.

Any person responsible for a child or young person, whether solely or jointly, is in a position of trust which requires behaviour to be in accordance with this policy.

12. Examples of Positions of Trust (but are not limited to)

A Manager of a Department, member of community staff or volunteer working with children, a coach, a team manager, a scout, a physiotherapist, a driver, a learning mentor/tutor, as well as staff engaged in match day activity involving children and young people, including supervising mascots, stewards, catering personnel and photographers. All employees, workers, and volunteers working with children and young people have signed an undertaking to in line with the principles set out in this policy.

13. Protecting Children and Young People with Vulnerabilities

All relevant staff are trained to understand that children and young people with disabilities are at an increased risk of abuse and that the greater the disability the greater the risk. There are several factors that contribute to this, including:

- 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 young person to know what acceptable and unacceptable touch 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 young people with disabilities may also be less valued than their peers and poor care may be observed, yet tolerated by others. This might include such things as not speaking directly to the child or young person; not offering choices; not moving and handling them safely; not respecting 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 young people with disabilities are protected but the safest environments are those that help children and young people 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.

14. Employee/Worker Training

Upon induction all employees shall receive a copy of the Club's Safeguarding policy, safeguarding strategy and staff Handbook. All employees or workers working in direct contact with children and young people shall be required to complete The FA Safeguarding Children workshop and will receive regular training as appropriate to their position. Details of those satisfactorily completing this course are retained on the Club's Single Central Register.

15. Whistleblowing

If you disclose information about wrongdoing the law can protect 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 in good faith.

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

- A criminal offence has been suspected or 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.

This is set out in the Public Interest Disclosure Act 1998.

Also refer to the Club's Whistle Blowing Policy with regards to further information and procedures.

16. Staff Code of Conduct

The Football Club/Academy code is that all staff should conduct themselves with the utmost professionalism and that 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 actions or word, that could give rise to any sort of misunderstanding or, indeed, allegation, for example when conducting one to one tuition, or sports coaching, or conveying a student in private cars, giving personal email or telephone numbers to students. Also, in particular, caution should be observed about sending text messages or any other electronic communication to students and young players. Such communication could easily be misunderstood or considered as inappropriate.

Staff should refrain from any unplanned off-site interactions with young players. In all dealings with young players please observe common sense rules: all dealings with students should be conducted according to the highest professional standards (see separate staff Handbook).

17. Concerns Around Radicalisation & Extremism

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

During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to 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, coaching staff should be alert to changes in children's behaviour which could indicate that they may need help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

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 of care relates to reducing or eliminating the risk of individuals becoming involved in terrorism. Radicalisation refers to process by which a person comes to support terrorism and extremist ideologies associated with it.

Safeguarding is the process of protecting children, young people and vulnerable persons from being drawn into terrorist activity.

Sutton United Football Club recognises its responsibilities to the "Prevent duty of care", supporting the strategy in all activities involving children, young people and vulnerable people with any aspect of the football club. The Designated Club Safeguarding/Welfare 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.

Further information relating to this area can be found in the Club's Prevent Policy.

18. Understanding & Identifying Abuse & 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 greatly in terms of their 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 appears to be worrying for a younger child might be normal behaviour for an older child. Parental behaviours may also indicate child abuse or neglect, so you should also be alert to parent-child interactions which are concerning and other parental behaviours. 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 doesn't automatically mean a child is being abused.

There are several warning indicators which might suggest that a child may be being abused or neglected.



19. Indicators of Abuse

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 adult's, particularly those 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

20. Definitions of Abuse

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 the serious impairment of a child's health or development. Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do 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 and young people 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 opportunity 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 - may come from another young person or an adult. Bullying is defined as deliberate hurtful behaviour, usually repeated over a period of time, where it is difficult for those bullied to defend themselves.

21. Signs of Bullying

- Behavioural changes such as reduced concentration and/or becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go training or 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 frequents loss of possessions

It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place. It is NOT the responsibility of those working at the Club to decide that child abuse is occurring. IT IS their responsibility to act on and report any concerns.

Further circumstances where abuse may be prevalent

There are many additional categories linked with abuse. The list is not exhaustive. Further information will be found in Local Safeguarding Partnership Guidelines and Keeping Children Safe in Education 2018, but below is an outline of some of the specific categories.

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 pro-longed period and exert power which increases 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.

Bullying is behaviour that is intended to hurt someone physically or emotionally. It is often persistent or repeated over a long period of time and is hostile and intimidating. It can be name calling, isolation and exclusion, pushing, spreading rumours, threatening behaviour, constant criticism and undermining. Indicators may include, physical injuries such as unexplained bruises, being afraid to go to school, training sessions, matches, mysterious illnesses, a dip in performance, problems eating or sleeping, loss of confidence, withdrawal.

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 in reality by a stranger or someone they know, for example a family member friend or professional. Groomers can 'groom' family members in order to gain access to a child. They can be male or female or any age. Many children, young people do not understand they have been groomed or that it is abuse and so 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 should be aware of changes in behaviours 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

These factors would be considered in conjunction with the circumstances of an individual rather than individually. Many of our staff have completed the Channel Training module which is part of the Government's PREVENT strategy.

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 or not 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 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 take 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 and 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 – generally referred to a 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 or young person. 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 at home 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 or young person (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 a crime. 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. It is important to be aware of this and the additional risk factors when deciding

22. Good Practice

All employees, workers, consultants, agency staff and volunteers working with children or young people 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 sporting activity fun and enjoyable: promote fairness, confront and deal with bullying.
3. Treat all children and young people equally and with respect and dignity.
4. Always put the welfare of the child or young person first.
5. Maintain a safe and appropriate distance with children and young people 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 young person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child or young person'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 consent if Club officials are required to transport children and young people.
9. Gain written parental consent for any significant travel arrangements e.g. overnight stays. Coaches are qualified and a qualified first aider, is in attendance.
10. Ensure that at away events adults should not enter a child or young person's room or invite children and young people to their rooms.
11. Be a good role model, this includes not smoking or drinking alcohol in the company of children and young people.
12. Always give enthusiastic and constructive feedback rather than negative criticism.
13. Secure written parental consent for the Club to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises.
14. Keep a written record of any injury that occurs, along with details of any treatment given.
15. All other good practice/common sense principles given the varying situations.

23. Poor Practice

The following are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers (list is not exhaustive):

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

24 Related Policies and Documents

Sutton United Football Club and Academy also have in place the following policies, related to this policy, they are:

- Safeguarding Adults Policy
- Equality and Diversity Policy
- Disciplinary Policy
- Driving & Travel Policy
- Academy Transport Policy
- ICT, social media, Email & Internet Policy
- Recruitment, Training, Development & Promotion Policy (Recruitment of Ex-Offenders)
- Induction Policy
- Grievance Policy
- Data Protection Policy
- Privacy Policy
- Your Right in Relation to Your Data Policy
- Anti-Bullying Policy
- Digital Photography & Image Policy
- Late Collection of Children Policy
- Prevent Policy
- Code of Conduct for Manager(s) Coaches & Employers
- Code of Conduct for Players.
- Complaints Policy

Safeguarding is everyone's responsibility if you have concerns or are worried about the welfare of a child or young person or receive a disclosure from a child or young person it is important that you report those concerns – no action is not an option.



25. Safeguarding Concerns Raised Within Sutton United Football Club

- Any safeguarding concern received which states a complaint is running alongside a safeguarding investigation - The Lead Designated Safeguarding Officer will notify the Senior Safeguarding Manager. If appropriate, the Lead Designated Safeguarding Officer will agree next steps and actions.
- Safeguarding Disclosures which identify they have been closed as a referral and should be treated as a complaint not a safeguarding issue – The Lead Designated Safeguarding Officer will notify the Senior Safeguarding Manager of the information received and decide who will manage the complaint.
- The Lead Designated Safeguarding Officer will work with the Senior Safeguarding Manager in the formulation of any letters that are required to be sent.
- Complaints will be acknowledged in line with the Football Club's procedures.
- If any complaints or safeguarding issues relate to the senior safeguarding manager or the club DSO these will be investigated separately via the club's COO and CEO.

26. Complaints Raised with The Designated Safeguarding Officer

- Any complaints received which potentially have safeguarding issues.
- The Football Club and Academy will discuss with the Lead Designated Safeguarding Officer to check if there is a need to alert services regarding safeguarding issues.

Any complaints received, direct to or from the Football Club and Academy relating to coaching practice may also need to be referred to the Lead Designated Safeguarding Officer and/or The Football Association Case Management Team as required.

27. Allegations or Concerns Against Staff or Volunteers

Where there are concerns or suspicions about abuse being committed by a member of staff or volunteer employed by the Sutton United Football Club or Academy the Lead Designated Safeguarding Officer must be notified immediately. On receipt of the information and details the LDSO will inform the Senior Safeguarding Manager and if appropriate other outside agencies that may have an interest in example; the Local Authority Designated Officer (LADO), Children's Social Services, Police and other external agencies as appropriate.

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 (LSCB) 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.

Referrals to the LADO apply 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 the Football Club.

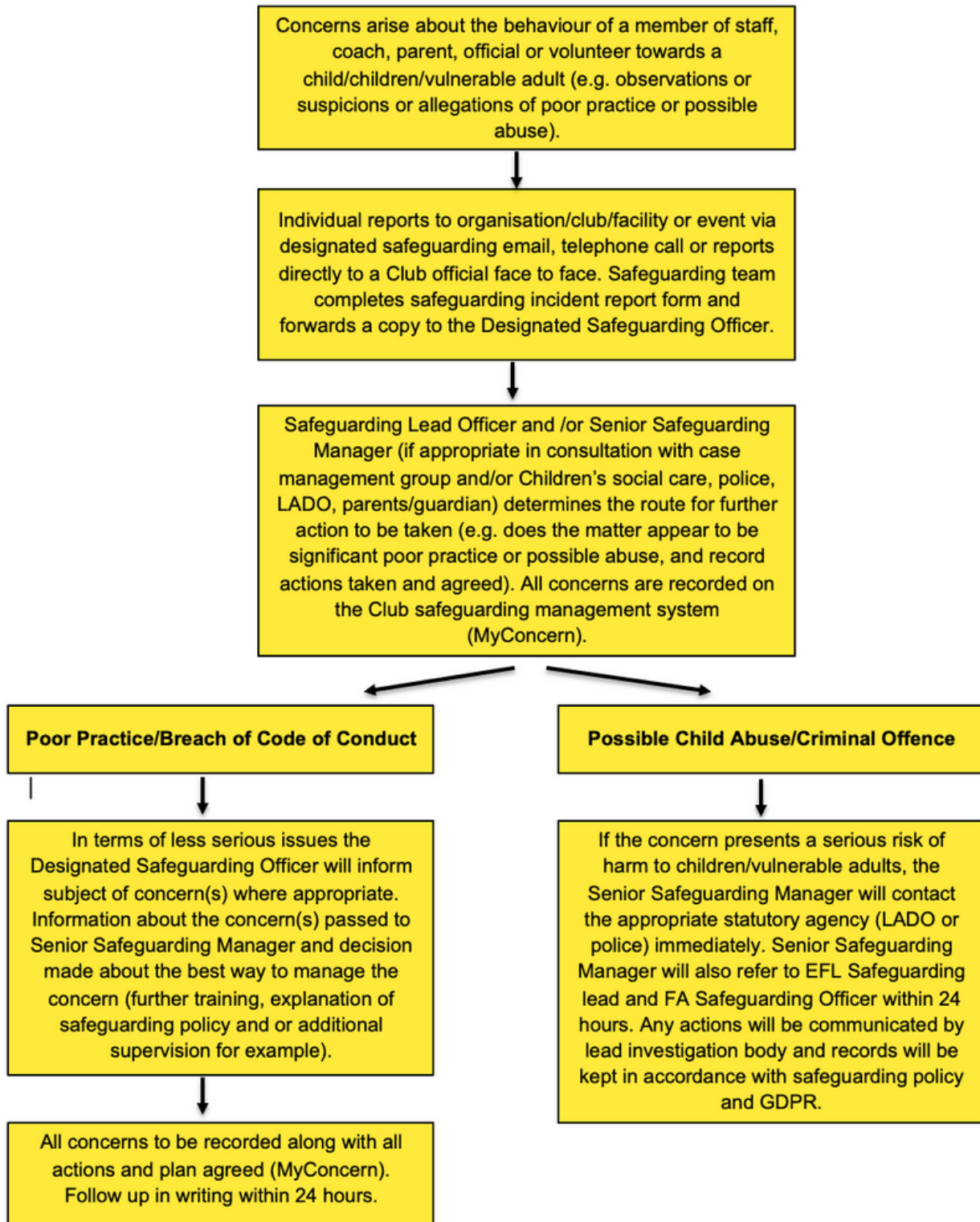
The LADO may be involved from the initial phase of the allegation through to the conclusion of the investigation and any subsequent actions. The LADO may also provide advice and guidance to help determine whether the allegation sits within the scope of Club or otherwise. Within the role the LADO helps co-ordinate information sharing. The LADO will also monitor and track any investigation with the expectation that it is both prompt and effective.

If the member of staff or volunteer also has a role in football outside of their work with the Club or Academy, then the EFL Guidance to Member Clubs Policy and Procedures will be complied with and the Club LDSO will make a referral to the FA Safeguarding Case Management Team for consideration.

If any person employed or volunteering in a Regulated Activity within Sutton United Football Club or Academy is suspended as a result of a concern, or internal investigation, for reasons connected to their role with children, young people or vulnerable adults then the Club must notify all other interested parties as soon as practicable.

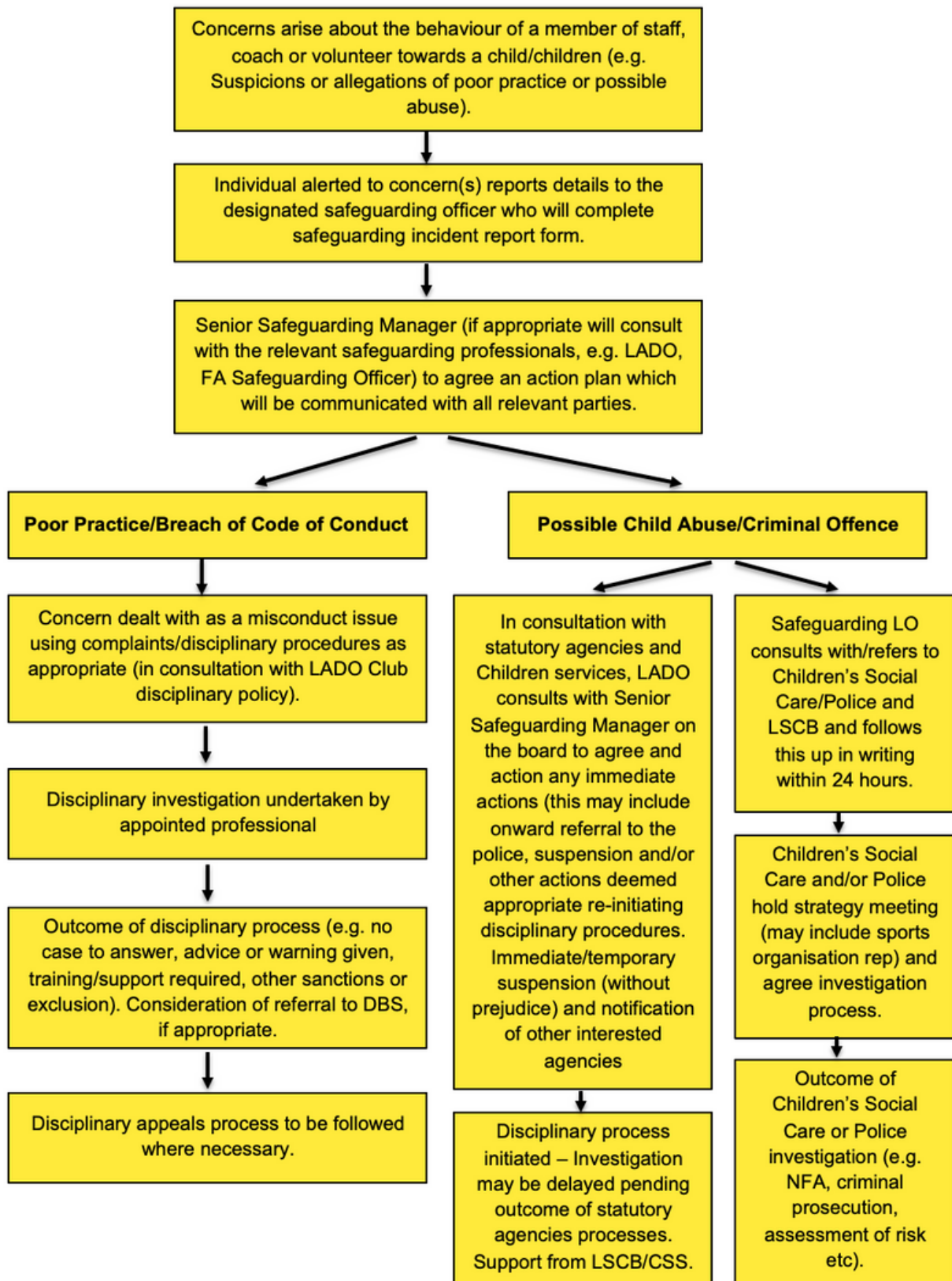
28. Procedures

- 28.1 - Concerns raised about the behaviour/conduct of a member of staff, coach, or volunteer.



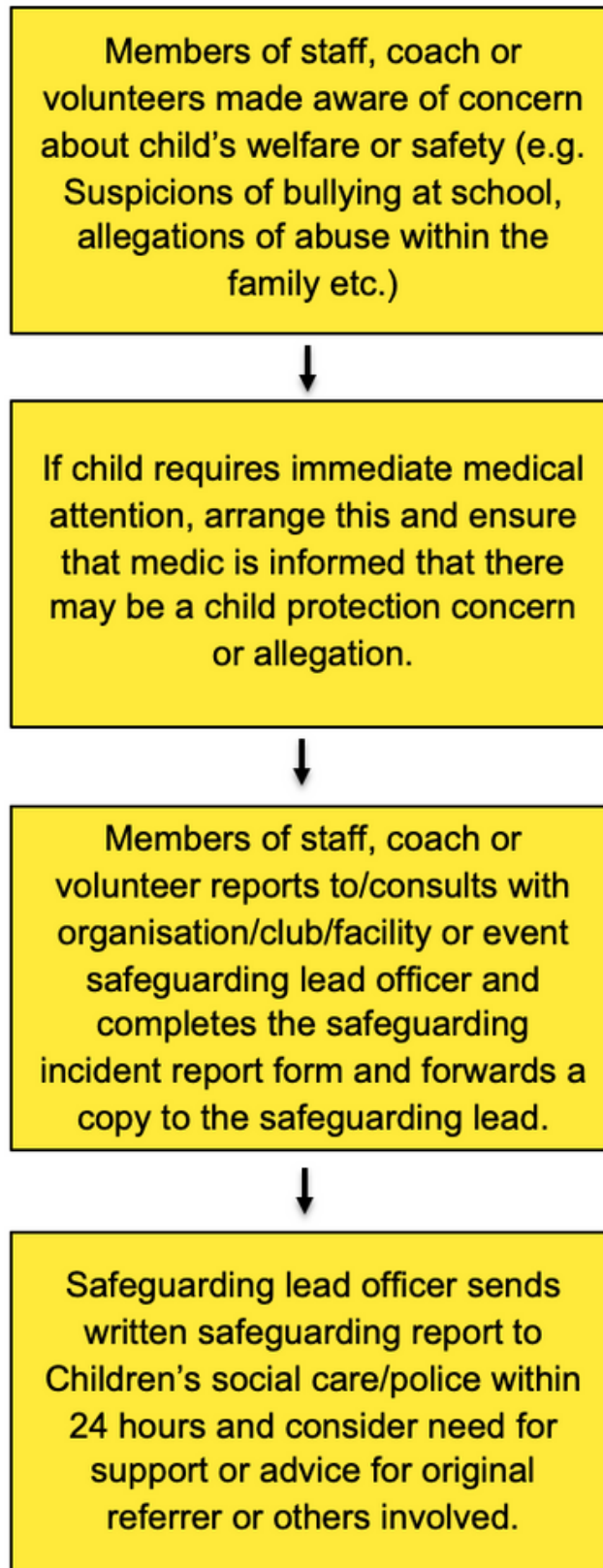
28. Procedures

- 28.2 Concerns raised about the behaviour/conduct of a member of staff, coach or volunteer from another organisation.



28. Procedures

- 28.3 Concerns/allegations made against a person outside of the Football Club or Academy activities.



29. Missing Child or Young Person on Match Days

The following are actions that should be taken should a young person go missing during the course of a training session or match:

1. Always remain calm. If not, yourself ascertain, who was, the last person to see the child/young person.
2. Search the area where the young person was last seen. Get assistance via the Match Day Safety Officer if practicable.
3. Contact the match day Safeguarding Officer and Match Day Safety Officer, who will advise and liaise with Parents and the Police and other Club officials where appropriate. Do not delay. Details of the Club's Match day Safeguarding Officer is included in the safety briefing and can also be contacted immediately via any of the stewards. Communication about where any lost children should go will be placed in key areas around the Club, within the match day programme and announced via the public address system.
4. Be in a position to be able to provide name, address, age, description and clothing of the missing young person.
5. Do not leave the area until the Lead Designated Club Safeguarding Officer or the Police have arrived in the event of the young person returning.



30. Key Contact Details

Club Contacts

Senior Safeguarding Manager - Phil Letts
phil.letts@suttonunited.net
07595539220

Club Safeguarding Officer - Tim Allison
tim.allison@suttonunited.net
07804270468

Matchday Safety Officer – Mike Chenery
mike.chenery@suttonunited.net

Academy Safeguarding Officer – Kelly Whelan
kelly.whelan@suttonunited.net
07510075868

Head of Player Care - Deanne Goring
deanne.goring@suttonunited.net

External Contacts

Police Child Abuse Investigation Unit
01707 354000 (24 hours)

NSPCC
08908 800 5000

Childline
0800 1111

EFL Safeguarding Manager – Alexander Richards
01772 325940 – arichards@efl.com

31. Monitoring and Reviewing the Policy and Procedures

The Board of Directors of Sutton United Football Club acknowledge and adopt this policy and implementation of its procedures and the document will be regularly monitored and reviewed in line with changes to legislation, guidance or major national incidents as and when required. The Senior Safeguarding Manager will regularly report progress against the safeguarding strategy, any policy or operational challenges, resourcing needs and areas where changes are required to the Board of Directors.

Employees are expected to comply with all elements of this policy, failure to do so may result in the implementation of the Club's Disciplinary Policy. This policy will be reviewed as a minimum on an annual basis and or at any other time as appropriate.

Safeguarding Amendment - Covid-19

The way in which our football Club is currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, a number of our important safeguarding principles remain the same:

- With regard to safeguarding, the best interests of children will always continue to come first
- If anyone has a safeguarding concern about any child connected to the Club they should continue to act and act immediately
- A Designated Safeguarding Officer or Deputy will always be available
- Unsuitable people are not allowed to enter the Club workforce and/or gain access to children
- Children continue to be protected when they are online

Club Safeguarding Contacts:

During any Covid-19 lockdown period the Safeguarding contacts for the Club are as follows: Phil Letts – Designated Safeguarding Lead

Remember that in an emergency or where there is risk to life you should contact the police immediately.

Other Safeguarding Contacts in Football

Whilst any safeguarding concern should be raised with the Club Safeguarding contacts in the first instance, we recognise that this may not always be possible or appropriate. Below are the contact details for footballing partners with whom safeguarding concerns in relation to the Club can be discussed:

The English Football League Safeguarding Team

Tel: 01772 325940

Email: safeguarding@efl.com

If they concern regards a person in employed in footballs conduct towards a child:

The FA Safeguarding Team

Tel: 0800 169 1863

Email: Safeguarding@TheFA.com

Mental Health

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of us all. Players who are struggling under the current circumstances should contact the Club safeguarding staff as outlined above. Support can also be accessed through a number of national organisations including:

The Samaritans Tel: 116 123 <https://www.samaritans.org>

ChildLine: Tel: 0800 1111 <https://www.childline.org.uk>

NSPCC: Tel: 0808 800 5000 <https://www.nspcc.org.uk>

Mind: Tel: 0300 123 3393 <https://www.mind.org.uk>

PFA: Tel: 07500 000 777 <https://www.thepfa.com/wellbeing>

Online safety

It is important that internet safety and security messages are re-enforced during this time when we are expecting young people to be online more often. They may also be increasing their usage on devices during their own free time during this lockdown period. It is important that both players and parents are aware of the help and support available should they be concerned about something they have seen or experienced online. These include:

UK Safer Internet Centre <https://reportharmfulcontent.com/>

CEOP <https://www.ceop.police.uk/safety-centre/>

Internet Matters <https://www.internetmatters.org/>

NetAware <https://www.net-aware.org.uk/>

ParentInfo <https://parentinfo.org/>

ThinkuKnow <https://www.thinkuknow.co.uk/>

Procedures and Safety Measures for Online Learning:

The Club expects all staff and players to adhere to the relevant policy boundaries must be maintained at all times. We have put extra measures in place to reduce the risks in relation to online learning which include:

- All contact online being observable and interruptible
- Staff and children must wear suitable clothing as should anyone else in the household
- Any computers being used should be in appropriate areas, for example not in bedrooms and the background should not be blurred
- Online teaching will not be carried out on a one-to-one basis and will be done in a group setting with several players present,
- Another adult will be invited to be present in the room
- All communication provided will have an educational purpose
- Language must be professional and appropriate, including any family members in the background
- The Club will record online teaching/instruction sessions. Players and parents will be informed that sessions are being recorded in advance of doing so.
- All sessions provided will be via the Clubs I.T platform (for example remote desktop) or Wi-Fi (Where possible)

Safeguarding Management Structure

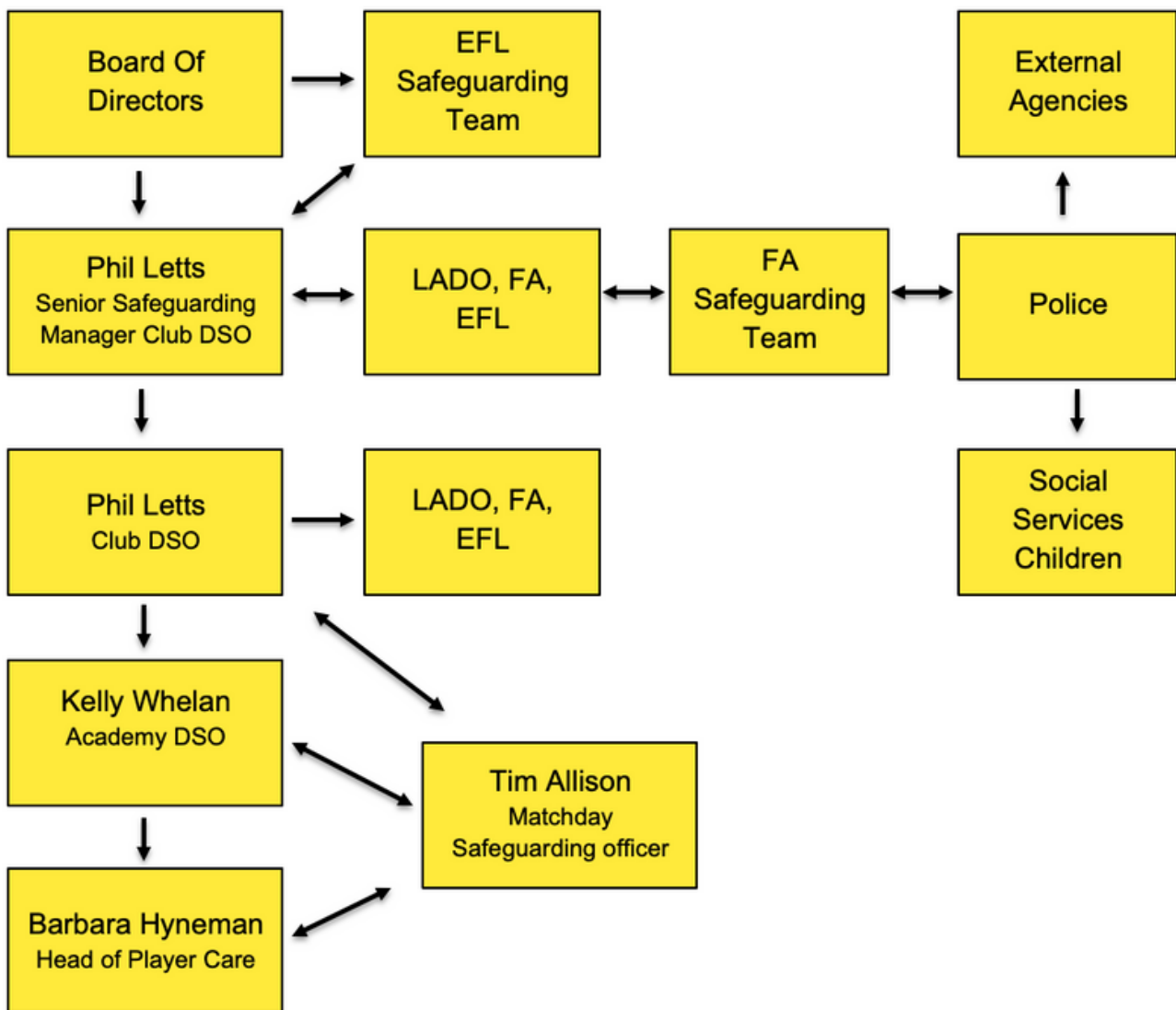
The Club safeguarding structure is:

Board of Directors (including Board safeguarding Champion Phil Letts 07595539220)

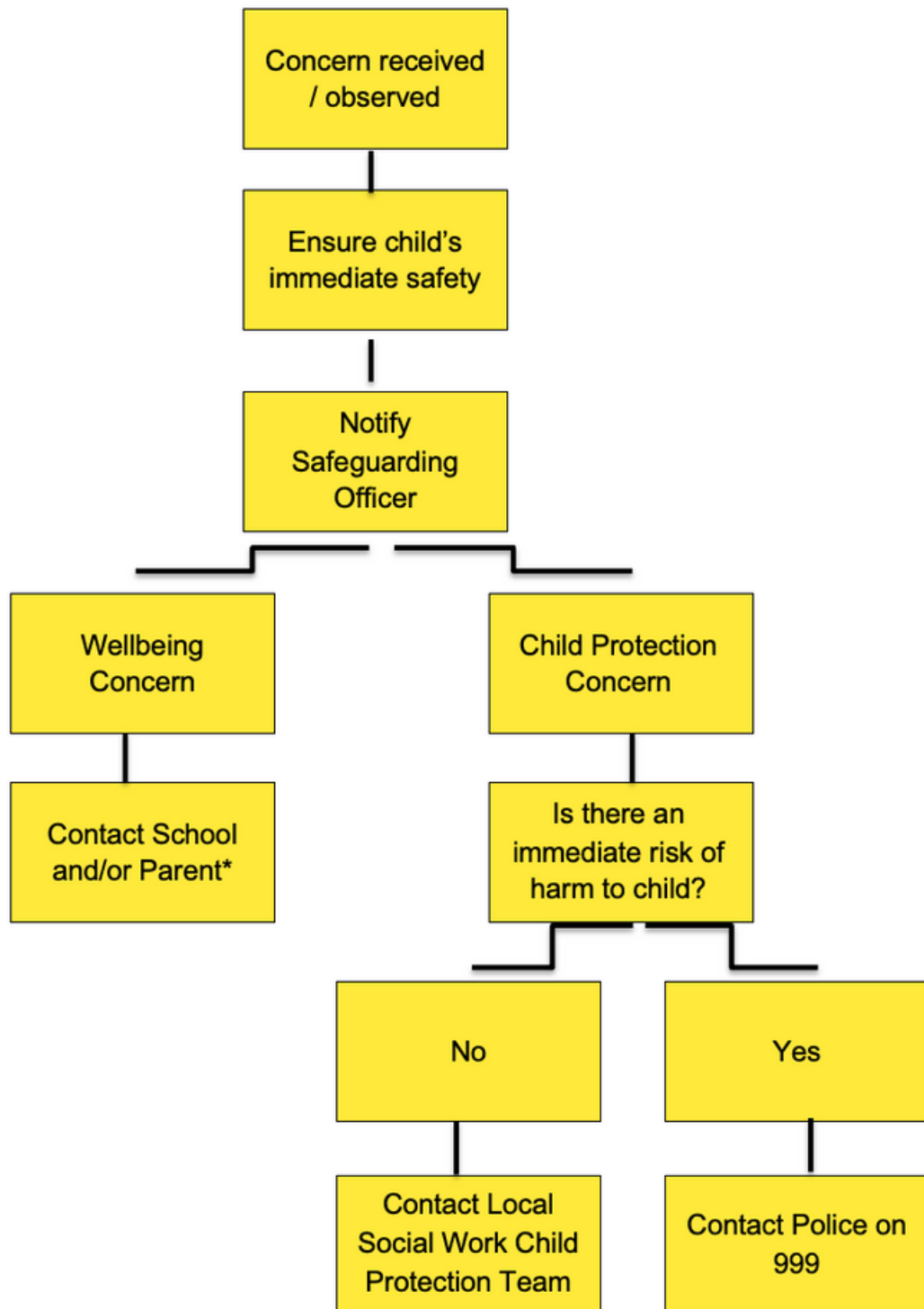
Senior Safeguarding Manager (Phil Letts) 07595539220

Designated Safeguarding Officer (Kelly-Jade Whelan) 07510075868

Matchday Safeguarding Officer (Tim Allison) 07804270468



Concerns/Allegations Procedure



Contact us.

Sutton United FC
VBS Community Stadium
Gander Green Lane
Sutton, Surrey
SM1 2EY

020 8644 4440
safeguarding@suttonunited.net
www.suttonunited.net

