



SAFEGUARDING CHILDREN POLICY

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1. INTRODUCTION

At Kettering Town FC Community Trust the safety and welfare of our young people is of the utmost importance. Due to the day-to-day contact with young people, our staff are well placed to observe signs of abuse. All adults working for the Trust must protect children from harm and abuse and be aware that any young person may be at risk of harm or abuse. We have a duty to safeguard and promote the welfare of our young people (*students under 18 years in FE institutions*) under the Education Act 2002 and Children Acts 1989 and 2004 by identifying any child welfare concerns and taking action to address them in partnership with families and other agencies where appropriate.

The purpose of this safeguarding children policy is to set a clear protocol of action and framework for our responsibilities and legal duties in relation to each child's welfare. The hope is to ensure a reliable and effective response in the event of any concern for a child's welfare, and to support each child.

We aim to put children's needs first at all times. We hope to encourage children to be confident and assertive. We aim to develop a positive, trusting and respectful relationship with children and young people in our care, so that they know they will be listened to and believed.

Our policy applies to all staff and volunteers working for Kettering Town FC Community Trust.

In addition to our safeguarding children policy, we have policies to cover health and safety, anti-bullying, whistle-blowing, safe working practice (ethics), complaints and appeals and equality and diversity.

2. SAFEGUARDING CHILDREN POLICY STATEMENT

2.1 Scope of Policy

Kettering Town FC Community Trust are governed by the rules and regulations set out in the 1989 and 2004 Children Act, the FA Safeguarding Children and Vulnerable Adults guidance, Education Act 2002 and Working Together to Safeguard Children (2015).

The Community Trust is fully committed to ensuring that the best practice recommended by these bodies is employed throughout and has a responsibility to maintain regular dialogue and work in partnership with Northamptonshire FA Safeguarding Children's team.

Officers of the Trust, relevant staff and volunteers who carry out work for Kettering Town FC Community Trust, and relevant staff and organisations who work in partnership with the Trust, should all be committed to practices which protect children from harm. Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. (Working Together to Safeguard Children, HM Government, 2018)

For detailed information on current legislation please refer to the following NSPCC and Working Together to Safeguarding Children links:

NSPCC – <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>

Working Together to Safeguard Children 2018 –

www.gov.uk/government/publications/working-together-to-safeguard-children

What is 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 their status or entitlements to services or protection (Working Together to Safeguard Children, 2018)

An **'Activity'** means any activity or series of activities arranged for a child or children by or in the name of the Community Trust. These are deemed to be regulated and therefore activate the required levels of Disclosure and Barring Service (DBS) checks that are associated.

2.2 Values and Principles Underpinning this Policy:

The aims of Kettering Town FC Community Trust's Safeguarding Children Policy are:

- To safeguard children and young people who interact with the Community Trust.
- To demonstrate best practice in the area of safeguarding children.
- To develop a positive and pro-active welfare programme to enable all children and young people to participate in an enjoyable and safe environment.
- To promote high ethical standards throughout Kettering Town FC Community Trust's activities.

2.3 The key principles and aims underpinning this policy are:

- **Safeguarding is everyone's responsibility** – for KTFCCCT staff to be effective each member of staff must play their part
- **A child centred approach** – all KTFCCCT staff should have a clear understanding of the needs and views of children.
- The child or young person's welfare is, and must always be, the paramount consideration.
- All children have an equal right to be protected from abuse, exploitation or poor practice, irrespective of their age, disability, gender, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation (see KTFCCCT Equality and Diversity policy).
- The Community Trust is committed to address the additional vulnerability of some participants and the extra barriers they may face e.g. those in care, looked after children, those with mental health issues, physical disability etc.
- All allegations of abuse or poor practice will be taken seriously and responded to efficiently and proportionately (see Allegations Against Staff and Volunteers policy)
- Recruiting employees, casual workers, agency staff, consultants, and volunteer safety, ensuring all necessary checks are made (see KTFCCCT Recruitment and Selection policy).
- To ensure that coaches, parents, and other adults who come into contact with children provide good role models of behaviour and have received effective management and training.
- Staff understand behaviour expectations in line with the staff employee handbook, induction policy and Safer Working Practice (ethics) policy.
- Sharing information about concerns with the appropriate agencies in a confidential manner (see KTFCCCT Data Protection Policy).
- Ensuring there is a platform for staff to share best practice and discuss safeguarding through the Kettering Town FC Community Trust DSO, internal staff meetings and board meetings.
- Report when appropriate to the Disclosure and Barring Service (DBS) anybody delivering a regulated activity for Kettering Town FC Community Trust who is believed by the Trust to present a risk to harm children. Where the Trust 'withdraws permission' for a person to deliver a regulated activity they will also be reported to the DBS (Appendix 1, Reporting Concerns procedure).

- Review this policy on an annual basis to ensure up to date aims and objectives in line with changes to current legislation, terminology and personnel. This policy will also be reviewed following a serious incident.

The Community Trust has the power as part of their disciplinary procedure to issue a suspension, pending a risk assessment where any one or more of the following applies:

- The individual fails to comply with any part of Kettering Town FC Community Trust's DBS and safe recruitment processes.
- The FA Safeguarding team has imposed a suspension.
- The individual has engaged in 'Relevant Conduct' relating to children.
- The individual has been barred by the DBS from engaging in 'Regulated Activity' related to children.
- The individual has been convicted of, or made the suspect of caution for, a serious sexual, violent offence or any other offence that Kettering Town FC Community Trust believe to be relevant to the care of children (Relevant Offence).
- Following a risk assessment, the Trust is satisfied on the balance of probabilities that the individual poses or may pose a risk of harm to children.
- An allegation has been made against a member of staff requiring investigation.

In all circumstances involving an allegation or disciplinary issue, the action taken will follow the procedures set out in the KTFCCCT Disciplinary policy and procedures and Allegations against staff and volunteers' policy respectively.

The aims of this policy are to ensure that staff at KTFCCCT:

- Work to stop abuse wherever possible by raising a concern.
- Safeguard children in a way that supports them.
- Promote an approach that focusses on improving life for the children participating in the trust's programmes.
- Work in partnership to play their part in identifying and responding to abuse and neglect.

In order to achieve these aims it is necessary to:

- Ensure that all staff are clear about their roles and responsibilities.
- Work together to provide an effective response to concerns.
- Develop a positive environment for participation that encourages children to be confident to confide in KTFCCCT staff.
- Provide opportunities for staff to access relevant safeguarding training to inform practice.

- Be clear on how to respond to safeguarding concerns using the procedures provided and having awareness of other policies related to safeguarding practice.

2.4 Management Roles and Responsibilities:

Day to day responsibility for implementation is delegated through the management structure from Designated Safeguarding Officer to the management team, delivery staff and volunteers.

Safeguarding concerns are communicated to the Chief Executive and the board representative through bi-weekly meetings between the DSO and Chief Executive.

The DSO will provide a safeguarding update for the board meetings informing of policy updates and/or statistics of safeguarding e.g. number of concerns raised.

Kettering Town FC Community Trust has a Designated Safeguarding Officer (DSO). The Designated Officer has a responsibility to:

- inform the chief executive and the board of any safeguarding issues or changes to policy and procedure (Appendix 2, Safeguarding update proforma);
- ensure staff are informed of relevant safeguarding updates and expectations during meetings;
- liaise with the local authority Education and Children and Family Services, Police and other agencies on individual child protection cases;
- act as the contact person within Kettering Town FC Community Trust, providing advice and support and ensuring that all staff (including temporary, supply staff and volunteers) are aware of their role;
- be responsible for co-ordinating action within Kettering Town FC Community Trust on safeguarding issues and ensuring procedures are followed;
- discuss individual cases with staff on a “need to know basis” to protect children's right to confidentiality;
- oversee the planning of any curricular or other provision in relation to safeguarding matters;
- with any other relevant staff (e.g. key worker, youth worker), represent Kettering Town FC Community Trust at safeguarding meetings and be a member of a “Core Group” if required;
- ensure staff are familiar with this Policy and Procedure, the Child Protection Procedures, and Government guidance;
- raise awareness about safeguarding on an ongoing basis;
- together with the Chief Executive Officer and local authority safeguarding training officer, arrange safeguarding training for *all* (i.e. including ancillary) staff and volunteers at least once every three years (and for new staff commencing work between whole service training sessions or absent for such sessions to arrange attendance at induction sessions arranged by the local authority);
- ensure that they (Designated Safeguarding Officer) receive update training at least every 2 years;

- where required utilise the right to follow KTFCCCT safeguarding procedures when there may be a lack of clarity in procedure by a partner organisation.

Designated Safeguarding Officer (KTFCCCT): Greg Hyams, Mobile: 07834 869143, email: ketteringtowntownwfc@btinternet.com

If the DSO cannot be contacted please contact the CEO Jason Thurland mobile: 07969 864328, email: jason.thurland@ketteringtowntownwfc.com

2.5 Staff and Volunteers Roles and Responsibilities:

Everyone at Kettering Town FC Community Trust must be alert to the possibility that any child or young person could be the victim of abuse or neglect and must be familiar with these procedures.

It is every person's human right to live a life free from abuse and neglect. Every child has an equal right to support and protection within these procedures regardless of their individual circumstances or differences.

Throughout this policy due regard must be given to individual differences, including age, gender reassignment, disability, religion or belief, sex, sexual orientation, race or racial group, caring responsibilities, class, culture, language, pregnancy and marital or civil partnership status. KTFCCCT Equality and Diversity Policy outlines the Trust's commitment to Equality and Diversity.

The abuse or neglect maybe from the carer, but also may be from another child or young person. Concern about a young person must be discussed with the Designated Safeguarding Officer immediately so that if necessary, a referral can be made without delay. In urgent situations, referral must not be delayed. If the Designated Safeguarding Officer is not available, please consult the CEO who will have access to the appropriate course of action. Any concern about a child must be reported following the procedures set out in this policy and procedures flow chart (Appendix 1, Reporting Concerns Procedures flowchart).

Staff and volunteers have a responsibility to report poor practice or any concerns regarding staff and volunteers both internally and from external organisations. This is in line with the Kettering Town FC Community Trust whistleblowing and complaints and appeals policies.

Staff and volunteers are also responsible for ensuring that they undertake relevant training identified for their post. The DSO has a responsibility to inform staff of upcoming training in regards to safeguarding.

Kettering Town FC Community Trust staff, volunteers and others will encounter children in a range of situations and in a range of locations including the office, schools, leisure facilities and out in the local community, as well as in a range of other environments. How a member of staff should behave is outlined in the Staff Induction Policy (code of conduct, appendix 8) and Employee Handbook.

2.6 Working in partnership – Due diligence

Kettering Town FC Community Trust work in partnership with a variety of organisations. KTFCCCT ensure that any service level agreements that are in place with delivery partners highlight the requirement to safeguard children and young people. KTFCCCT will inform delivery partners that the Trust has policies and procedures in place in order to report concerns. KTFCCCT will always ensure that delivery partners, namely when commissioning, have the required insurance(s), DBS checks have been performed on staff and that the organisation has thorough safeguarding procedures (Due Diligence Policy)

Where a delivery partner has their own safeguarding procedures e.g. schools, KTFCCCT will follow these procedures as a supporting partner.

Whether commissioning an organisation to deliver on behalf of KTFCCCT or working in partnership with an organisation, Kettering Town FC Community Trust will always follow its own procedures if at any time there is deemed to be lack of clarity or response to a concern by a partner organisation.

3. RECRUITMENT AND DISCLOSURE

In our recruitment and selection of staff and volunteers we will at all times adhere to the Government guidance contained within “*Working Together to Safeguard Children*” (HM Government 2010) and “*Safeguarding Children and Safer Recruitment in Education*” (DfES 2006).

In particular we will ensure that our interview panellists are appropriately trained, that we always follow up gaps in previous employment, that we always require specific references from employers for the last five years and that for all posts, paid and voluntary, the appropriate Disclosure & Barring Service (DBS) disclosure and FA Criminal Records Check (CRC) carried out.

Kettering Town FC Community Trust is committed to providing equal opportunities to staff and therefore a positive CRC will not necessarily result in a bar from work. All KTFCCCT job specifications inform applicants of our commitment to safeguarding.

The Rehabilitation of Offenders Act 1974 and Protection from Freedoms Act 2012 will be considered in all cases before a final decision is made. In all cases where the act applies, KTFCCCT will follow the procedures set out in the KTFCCCT Recruitment of ex-offenders policy.

We keep a central record of all staff with the reference number, date and outcome of their Disclosure & Barring Service (DBS) Enhanced disclosure.

Senior staff will receive training in Safer Recruitment.

All new employees, workers or volunteers working with children or young people at the Community Trust will be required to complete an induction before commencement of duties.

3.1 Training:

All Kettering Town FC Community Trust employees are expected to complete formal safeguarding training. The Northamptonshire Football Association (NFA) provide a safeguarding young people and adults course which is the recommended training suggested by the Trust, however the Trust acknowledges that there are other training courses and providers which staff can access.

As a minimum operating requirement, volunteers are advised to complete the 1st for Sport Safeguarding qualification delivered by the county sports partnership, Northamptonshire Sport. Staff will also be provided with access to other relevant Safeguarding training relevant to their role including NCS Trust, FA and Local Authority training opportunities.

Staff are required to bring a copy of their safeguarding certificates to hold in staff files.

4. RELATED POLICIES

4.1 Health and Safety:

Kettering Town FC Community Trust work in line with the internal health and safety policy alongside guidance from the Football Association with regards working with children and young people. Where a child or young person is involved, a risk assessment must take into account of their particular vulnerabilities which will include the safeguarding of children. The risk assessment should set out what arrangements are in place for their care and supervision. For a child who is subject to a care plan the DSO will work with the relevant agencies to ensure an individual risk assessment is in place to ensure health and safety requirements are adhered to.

4.2 Data Protection:

The Community Trust's Data Protection Policy adopts the principles laid out in the Data Protection Act 1998 and General Data Protection Regulation (GDPR). Kettering Town FC Community Trust will ensure all sensitive information about the children and families we work with is retained and disposed of in line with current Data Protection legislation. See 9.3 for the information sharing procedure in relation to safeguarding.

4.3 Equality and Promoting Diversity:

As set out in the Equality and Diversity policy Kettering Town FC Community Trust is committed to providing a working environment in which staff, volunteers and participants are able to realise their full potential irrespective of their age, disability, gender, marriage or civil partnership status, pregnancy and maternity, race, religion and belief, sex or sexual orientation (Equality Act 2010).

The Trust is also committed to address the additional vulnerability of some participants and the extra barriers they may face.

Declared Disabilities:

The Equality Act requires employers to treat people with a declared disability equally with non-disabled persons in all employment matters. A disability under the Act is described as a physical or mental impairment that has a 'substantial' (more than a minor or trivial) and "long-term" (more than 12 months) negative effect of the individual's ability to undertake normal daily activities.

The Community Trust will make reasonable adjustments / changes to the premises etc. to accommodate the needs of employees with disabilities so long as these changes do not contravene other health and safety laws.

4,4 Managing Allegations against staff and volunteers

Kettering Town FC Community Trust work in line with the Managing allegations against staff and volunteer's policy. The purpose of this policy is to provide a framework for managing cases where allegations are made about the staff that indicate that children, young people and adults at risk are alleged to have been harmed or have the potential to be harmed. Where an allegation has been investigated and an outcome given, the staff member is able to appeal if they feel the outcome is not a fair one (KTFCCCT Complaints and Appeals policy).

5. TRUST PROCEDURES

5.1 Parental/Guardian Consent:

Kettering Town FC Community Trust will make every effort to obtain parental/Guardian consent for all activities using a signed consent form or online consent in the form of our Future Lions Management software. Kettering Town FC Community Trust will do everything it can to safeguard children in its care.

5.2 Use of Images:

The Community Trust takes its guidance on the use of images from guidelines issued by the FA and (Guidance for safer working practice – Safeguarding Vulnerable Groups). All images are taken by Community Trust staff who have been briefed by the media officer regarding their responsibility for the activity being photographed / filmed.

- Before taking images of children, parental consent is sought in writing at the start of each new session the child attends. Parents / Legal Guardians are responsible for informing the Trust of any change in circumstances within the course of that child's attendance that may affect consent.
- Parents / Legal Guardians will be informed of how the image will be used. The Trust will not allow an image to be used for something other than that for which it was initially agreed.
- All children featured in Community Trust publications will be appropriately dressed.

- Where possible, the image will focus on the activity taking place and not the specific child.
- Where appropriate, images represent the broad range of people participating safely in the session or event.
- Children who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any Trust document.
- No images of children featured in Trust publications will be accompanied by personal details such as their home address etc.
- Any instances of inappropriate images should be reported to the DSO immediately.
- The media officer will ensure that the images used adhere to gaining consent and the *Kettering Town FC Community Trust Social Media Policy*.

5.3 Children Who are Not Picked Up on Time:

Kettering Town FC Community Trust has procedures in place for children whose parents do not collect them from an activity at a specific time. All parents / carers are made aware that their children should be met no later than 15 minutes after an activity has finished.

Should the child not be collected within 15 minutes, staff will endeavour to contact the parent / guardian on the emergency contact number which can be found on the parental consent form. In the event that a child is not collected a minimum of two staff or a staff member and volunteer will wait at the venue until a parent / carer arrives.

5.4 Ratio of Adults to Children:

Kettering Town FC Community Trust adopts best practice regulations laid down by the FA in relation to the supervision of adults to children. Procedures are in place to fully risk assess the types of activity and participant ability to ensure appropriate ratio of staff / coaches to participants.

The level of supervision required will vary dependant on the nature of the activity and the participants involved. Ratios for each activity will be determined by taking the following into consideration:

- Age and needs of participants.
- Nature of the activity and environment.
- Risk assessments identifying potential behavioural issues.
- Expertise and experience of the staff involved.
- Male and female supervising staff wherever possible for mixed gender participant activities.
- Where programmes are regulated by an external partner such as NCS, the ratios set by them will be adhered to.

5.5 First Aid and Administration of Medicine – Children Engaged in Trust Activity:

In circumstances where a child needs medication regularly, a health care plan (Appendix 6) should be established to ensure the safety and protection of the child and the staff who are working with them. All medical information concerning children shall remain confidential. When administering first aid, staff should understand the extent and limitations of their role in carrying out basic care and hygiene tasks for minor abrasions and should recognise when an injury requires more experienced intervention.

Kettering Town FC Community Trust accepts that there will be occasions when medical treatment is necessary during activities and events especially at weekends and in the evenings and due to staffing numbers, the Trust may not be able to guarantee that two members of staff are present during treatment. First aid will only be administered by a qualified, nominated First Aider.

Parents should always be informed when first aid has been administered to a child.

5.6 Promoting safeguarding at every session

In order to ensure that safeguarding is embedded in every KTFCCCT session, all parents are made aware of this policy and the children who attend have the opportunity to set the ground rules for the sessions they attend alongside the coaches. This ensures that the children take ownership of rules and are confident to speak to the coaches when they feel something is wrong.

Ground rules expected by coaches include but not limited to:

- No bullying, including teasing, name calling, singling out and aggressive behaviour (anti-bullying policy)
- No swearing.
- Respect the coach and each other
- Listen to the health and safety rules.

Copies of ground rules will be displayed during activities e.g. sports camps.

Participants will also be provided with the KTFCCCT Code of Conduct (Appendix 9).

National Citizen Service (NCS) participants will be required to complete an NCS behaviour agreement.

6. MATCH DAYS

6.1 Unaccompanied Children:

In accordance with Kettering Town FC's ticketing terms and conditions, the minimum age that a child is permitted to attend a match at Latimer Park unaccompanied is 11 years old.

6.2 Ball Persons and Flag Bearers:

The Trust will only allow children to be ball persons and / or flag bearers once parental consent has been obtained.

No photographs of ball persons or flag bearers which feature in Trust or Club publications will be accompanied by personal information about the child, such as their school, home address or local sports team.

Whilst at Latimer Park ball persons and flag bearers will be accompanied at all times by members of staff who have a valid CRC.

Staff who are responsible for ball persons and flag bearers on a match day are also required to have good level of understanding and awareness of safeguarding children.

6.3 Lost Children:

Procedures for dealing with children who become or are reported lost at the stadium on match day are contained within the club's *Matchday Operations Manual* in the control room. The match day procedure can be found in appendix 7.

6.4 Transport:

Kettering Town FC Community Trust has overall responsibility for all Trust activities involving participants which includes transport arrangements. The Trust has a 'Transporting Children, Young People and Vulnerable Adults Policy', which gives full details how the Trust manages the safe transport to and from activities and events.

7. NATIONAL CITIZEN SERVICE

Kettering Town FC Community Trust does not deliver the National Citizen Service programme as a local delivery partner and does not have procedures in place in line with the NCS contractual agreement.

8. GUIDANCE IN THE EVENT OF CONCERN

8.1 Highlighting Concern:

Although Kettering Town FC Community Trust is committed to doing the upmost to safeguard children from harm, there may be an occasion when concern is raised over the treatment of a child.

'Child abuse and neglect' are generic terms encompassing all ill treatment of children as well as cases where the standard of care does not adequately support the child's health or development. Children may be abused or suffer neglect through the infliction of harm, or

through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child.

8.2 Designated Safeguarding Officer (DSO):

For the purpose of the management of a safeguarding situation involving a child, the Designated Safeguarding Officer (DSO) should be consulted. In the absence of the DSO, or if he / she is implicated in the abuse, an alternative member of staff must be identified to deal with the matter, in the case of the Trust this will be the Chief Executive.

The role of the DSO is as follows:

- Directly managing and supporting the staff involved in the situation.
- Ensuring that action taken is effective in providing immediate and ongoing protection to the child.
- Ensuring that practical and emotional support is available according to need.
- Reporting the incident to the Chief Executive and or the NFA Safeguarding Officer (see 10. useful contacts).
- Where an allegation is made against a member of staff or volunteer the DSO will liaise with the Chief Executive to consider invoking suspension procedures.
- The DSO and Chief Executive will take collective responsibility for ensuring the appropriate support is offered to the person who is suspended.

8.3 Recognition – Signs of Abuse:

There are a number of forms of abuse that a child can suffer (Appendix 4, Signs and Indicators Summary).

For a full description of types of abuse please refer to the information below (this is not an exhaustive list) or to the Football Association's Safeguarding Children Policy and Procedures, which can be found at:

<http://www.thefa.com/football-rules-governance/safeguarding/dealing-with-concerns>

Physical Abuse: may involve hitting, shaking, throwing, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. A person might do this because they enjoy or need the attention, they get through having a sick child (fabricated or induced illness). Physical abuse can be used through omission or the failure to act to protect.

Domestic Abuse: Legislation encompasses 16 and 17 years olds within the definition of domestic abuse if they are in an abusive or violent relationship. By definition young persons

of this age can be victims of or perpetrators of domestic abuse and violence. Young persons can also be affected by witnessing domestic abuse within a family setting.

The cross-government definition of domestic abuse as of March 2013 is:

Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass but is not limited to the following types of abuse:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

This definition, which is not a legal definition, included so called 'honour' based violence. Female genital mutilation (FGM) and forced marriage. Victims are not confined to one gender or ethnic group.

Sexual Abuse: Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether the child is aware of, or consents to, what is happening. The activities may involve physical contact, including penetrative acts such as rape, buggery or oral sex or non-penetrative acts such as masturbation, kissing, touching over clothing. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images and pornographic material or watching sexual activities, or encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Boys and girls can be sexually abused by males and / or females, by adults and by other young people. This includes people from all different walks of life.

'Sexting' is the act of generating and / or sharing sexually explicit photographs or images, primarily through SMS on mobile phones but also using the internet. This often occurs after the breakdown of relationships involving young people (U18's) and can cause enormous distress to the young person affected.

Crimes involving child abuse images fall under the Protection of Children Act 1978 and Sexual Offences Act 2003.

Child Sexual Exploitation (CSE) is a type of sexual abuse in which children are sexually exploited for money, power or status. Children or young people may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

Child sexual exploitation is a hidden crime. Young people often trust their abuser and don't understand that they're being abused. They may depend on their abuser or be too scared to tell anyone what is happening. It can involve violent, humiliating and degrading sexual assaults, including oral and anal rape. In some cases, young people are persuaded or forced into exchanging sexual activity for money, drugs, gifts, affection, or status. Child sexual exploitation doesn't always involve physical contact and can happen online.

Neglect: Neglect is the persistent failure to meet a child's physical and / or psychological needs. It is likely to result in the serious impairment of the child's health or development. It may involve a parent or carer failing to provide adequate food, shelter, and clothing (including exclusion from home or abandonment).

Failing to protect a child from physical or emotional harm or danger, or the failure to ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve making a child feel or believe that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person.

It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capacity, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.

It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Bullying: Bullying is not always easy to define and can take many forms. The three main types are:

- Physical
- Verbal
- Emotional

The Community Trust has zero tolerance approach to bullying and any reported incidents of bullying by a staff member to child, child to staff member or child to child will be taken seriously and investigated by the DSO. Procedures for dealing with incidents of bullying are contained within the Trusts Anti-Bullying Policy.

8.4. Preventing Extremism and Radicalisation in Children and Young People

Extremism is the holding of extreme political or religious views, for an ideology that is considered to be far outside the mainstream attitudes of society.

Radicalisation is a process by which an individual or group comes to adopt increasingly extreme political, social, or religious ideals and aspirations that reject or undermine the status quo or reject and / or undermine contemporary ideas and expressions of freedom of choice. For example, radicalisation can originate from a broad social consensus against progressive changes in society. Radicalisation can be both violent and nonviolent. There are multiple pathways that constitute the process of radicalisation which can be independent but are usually mutually reinforcing.

From July 2015, all schools and child care providers are subject to a duty under the 'Counter Terrorism and Security Act 2015' in the exercise of their functions, to have 'Due Regard' to the need to prevent people being drawn into terrorism. This duty is known as the 'Prevent Duty'.

The guidance and advice provided is intended to help child care providers think about what they can do to protect children from risk of radicalisation. This is seen as a childcare provider's wider safeguarding duties and similar in nature to protecting children from other forms of harm (e.g. drugs, gangs, neglect, sexual exploitation).

8.5 County Lines

When an organised crime group or urban gang from an area such as London, Birmingham, Manchester, Liverpool, or West Yorkshire extends their drug dealing operation into other counties it's often referred to as 'county lines'. 'Line' refers to the mobile phone drug lines that organised crime groups market to sell their drugs.

Gangs need people to transport drugs and cash and often exploit children and vulnerable adults to do so. These drugs runners are incentivised with things that they want or need such as money, gifts like designer clothes and trainers, status, perceived friendship, or protection in return for completing tasks. Soon these gifts and intangible benefits turn into threats of what will happen if they don't complete a task. These intimidation tactics make it very difficult for new recruits to say no, particularly as debts are incurred.

Children as young as 10 and vulnerable adults are made to travel many miles away from home to coastal towns and rural locations to deliver Class A drugs such as heroin and crack cocaine, collect cash, and even carry out enforcement for the gang. Travelling to areas where they are not known by the authorities allows them to fly under the radar for longer, carrying the risk on behalf of senior gang members. This causes obvious problems in our communities as vulnerable adults and children go missing for days at a time, missing school and being away from any support.

8.6 Peer on peer abuse

Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the child perpetrator as well as the victim.

There is no clear definition of what peer on peer abuse entails. However, it can be captured in a range of different definitions:

- Domestic Abuse: relates to young people aged 16 and 17 who experience physical, emotional, sexual and / or financial abuse, and coercive control in their intimate relationships.
- Child Sexual Exploitation: captures young people aged under-18 who are sexually abused in the context of exploitative relationships, contexts and situations by a person of any age - including another young person.
- Harmful Sexual Behaviour: refers to any young person, under the age of 18, who demonstrates behaviour outside of their normative parameters of development (this includes, but is not exclusive to abusive behaviours)
- Serious Youth Crime / Violence: reference to offences (as opposed to relationships / contexts) and captures all those of the most serious in nature including murder, rape and GBH between young people under-18
- 'Cyberbullying': involves sending inappropriate or hurtful text messages, emails or instant messages, posting malicious material online (e.g. on social networking websites) or sending or posting offensive or degrading images and videos
- Racist and Religious Bullying: A range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin or national status.
- Sexual, Sexist and Transphobic Bullying: includes any behaviour, whether physical or nonphysical, where sexuality is used as a weapon by boys or girls.
- Homophobic Bullying: targets someone because of their sexual orientation (or perceived sexual orientation) x Disablist Bullying: targets a young person solely based on their disability, this can include manipulative bullying where a perpetrator forces the victim to act in a certain way, or exploiting a certain aspect of the victims disability.

9. RESPONDING TO A REPORT OR SUSPICION

9.1. Do's and Don'ts

Where possible the DSO should be contacted as early as possible, however it is recognised that an individual may need to respond to a situation immediately. With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse:

DO:

- If the child is hurt or ill – seek medical attention if necessary – call the Police 999 and ask their advice if you are unsure. Further advice can be obtained from the

Children's Social Care Duty Team / Social Services out of hour's service (see contacts in section 9.) if the child is immediately at risk of significant harm. It may be appropriate to contact the Local Authority Designated Officer (LADO) depending on the nature of the concern.

- Treat all allegations extremely seriously and act at all times towards the child as if you believe what they are saying – **LISTEN**.
- Tell the child they are right to tell you and reassure the child they are not to blame.
- Be honest about your own position, who you have to tell and why.
- Tell the child what you are doing and when, keep them up to date with what is happening.
- Take further action – you may be the only person in a position to prevent further abuse.
- **4R's – Recognise, Respond, Record and Refer** (Report on to the appropriate person).
- Record everything said and actions taken as soon as you can (Safeguarding Young People Incident Form – Appendix 5) – Use the child's words – not opinion or interpretation.
- Inform parents / carers unless there is suspicion of their involvement. Consultation should take place with a DSO / Chief Executive before parent / carers are informed.

DON'T:

- Make promises you cannot keep.
- Ask leading questions
- Interrogate the child – it is not your job to carry out an investigation / interview – ask the most basic questions and then let the child talk, you LISTEN and ensure that you do not jeopardise any potential criminal investigations.
- Cast doubt on what the child has told you, don't interrupt or change the subject.
- Say anything that makes the child feel responsible for the abuse. x Promise to keep secrets or keep the information confidential.

A child or young person should never be pressured to give information or show physical marks unless they do so willingly. **If they choose to show markings, two members of staff should be present.**

In cases where there are suspicions of serious harm or sexual abuse, the DSO will seek immediate advice from the Children and Family Social care BEFORE discussing this with the family.

DOING NOTHING IS NOT AN OPTION: Safeguarding is EVERYONE'S Responsibility (Working together to safeguard children, 2018).

9.2 Recording and reporting Allegations or Suspicions:

The DSO will ask for a written factual statement from the person making the report, where possible the *Safeguarding – Young person incident form* (Appendix 5) will be completed and passed onto the DSO. Any statement made by the child or young person should be reported **in their own words**. These reports should be confined to facts and should not include any opinion, interpretation, or judgement.

If the report involves allegations about another member of staff, that person may also be asked to write a brief report. In this case, the procedure set out in the Allegations against staff and volunteer's policy will be followed.

If the behaviour of a person close to a child is inappropriate (this may also include another member of staff, peer or family member), KTFCCCT staff, participants and partners are encouraged to 'whistle blow' to highlight concerns. In this instance, the KTFCCCT Whistleblowing Policy and Procedure would be followed.

Investigations into possible abuse will require careful management. The DSO should seek advice of, Local Authority Safeguarding Board, the Police, or in cases of low level poor practice The Football Association Safeguarding Children & Adult's at Risk Case Management Team before setting up an internal inquiry and take their advice on informing the child or young person's parents / carers.

In any case of suspected abuse, as soon as the Local Authority Designated Officer (LADO) has been informed, Kettering Town FC Community Trust will provide a report to Northamptonshire Football Association County Welfare Officer and FA Case Management Team.

Kettering Town FC Community Trust will ensure any child that is in immediate danger is immediately removed from any risk of harm.

9.3 Confidentiality and Information Sharing:

Sharing of information between organisations is essential to safeguard children and young people from harm, neglect and exploitation. The advice for all staff at Kettering Town FC Community Trust is that no personal assurances of confidentiality can be given to a child or young person if a concern is raised or an allegation made.

Even in situations where there is no legal requirement to obtain written consent before sharing information, it is good practice to do so. Staff should routinely explain what information is going to be shared with other people or organisations whenever possible however it is recognised that this may not always be possible.

Difficulties in working with the principles of maintaining confidentiality should not lead to a failure to take action to protect a child or young person from harm. Confidentiality must not be confused with secrecy, that is, the need to protect the management interest of the

Trust should not override the need to protect the child or young person. **The safety and welfare of the child or young person at all times is paramount.**

Decisions about what information is shared and with who will be taken on a case-by-case basis. The sharing of information should be:

- Necessary for the purpose it is being shared.
- Shared only with those who have a need for it.
- Be accurate and up to date.
- Be shared in a timely fashion.
- Be shared accurately.
- Be shared securely.

The Community Trust's *Data Protection Policy* fully details how the Trust manages the safe handling, retention and sharing of confidential information.

There are actions that staff have to and are obliged to take once we are aware of a problem. Staff having any concerns about confidentiality, information sharing or any other safeguarding issue in relation to a child or young person should seek advice from the DSO.

All safeguarding information is stored securely by the DSO and will only be shared with the relevant individuals and agencies.

9.4 Critical incident management

Where required, a meeting will be organised to determine issues and responsibilities relating to:

- Assessing risks and response actions.
- Liaison with emergency and other services.
- Contact with the affected person's relatives and other supports (if appropriate).
- Liaison with other organisations.
- Counselling and supporting staff, board members, volunteers, students and consumers not directly involved in, but affected by, the incident.
- Media management (if required).

Kettering Town FC Community Trust Senior Management Team and Board of Trustees will conduct a review of actions arising from the above meeting to ensure:

- Follow up such as de-briefing, counselling and prevention strategies have been completed.
- Relevant people have been informed of all outcomes from the incident.
- A recommendation as to the response to the critical incident is documented and a review of all relevant policies is undertaken to implement those recommendations.

For further information, refer to the Critical incident management policy.

9.5 Policy Review

This policy will be reviewed on an annual basis by the DSO and following any serious incidents where:

- A child is known or suspected to have been abused and
- Either the child has died or the child has been seriously harmed and there is a concern in how KTFCCCT responded to deal with the incident.

9.6 Complaints and Appeals post response

If an individual or organisation has any complaints in regards to how a safeguarding concern has been dealt with or the outcome of a raised concern they are entitled to make a complaint to KTFCCCT.

Similarly, if an individual or organisation who has been part of an investigation views the outcome as a negative one for themselves, they are entitled to appeal the decision.

The full procedure for this is provided in the KTFCCCT Complaints and Appeals Policy.

10. USEFUL CONTACTS

Kettering Town FC Community Trust

Telephone Number: 01536 217006

National Football League Trust

Email: admin@nationalleaguetrust.org.uk

0121 634 3155

The Football Association Safeguarding Team

Telephone Number: 0800 1691863

The FA CRC

Email: FAChecks@TheFA.com

Northamptonshire FA

Telephone Number: 01604 670741

Email: info@northamptonshirefa.com

Northamptonshire Police

Telephone Number: 0300 011 1222

Northamptonshire County Council – Adult Social Care

Telephone Number: 01604 626938

St Marys Hospital, Kettering – Adult Mental Health Services

Telephone Number: 01536 410141

Kettering General Hospital

Rothwell Road, Kettering, NN16 8UZ. 01536 492000

NSPCC Helpline

Telephone Number: 0808 800 5000

Text Number: 88858

Childline

Telephone Number: 0800 1111

Website: www.Childline.org.uk

CEOP – Child Exploitation and Online Protection Centre

Website: www.ceop.gov.uk

Child Protection in Sport Unit

Website: www.nspcc.org.uk/inform/cpsu

National Citizen Services, PHAROS

24hr helpline - 020 3637 0520

Anti-Bullying Alliance

Website: www.anti-bullyingalliance.org.uk

Charity Commission

Telephone Number: 0845 3000 218

Website: www.charity-commission.gov.uk

Working Together to Safeguard Children

Website: www.gov.uk/government/publications/working-together-to-safeguard-children

Keeping Children Safe in Education

Website:

www.gov.uk/government/uploads/system/uploads/attachment_data/file/550551/keeping_children_safe_in_education.pdf

GLOSSARY

Children / Child / Young People – is any person under 18 years and for the purpose of this policy means anyone under the age of 18 engaged in Community Trust activities.

CRC – Criminal Records Check

DBS – Disclosure and Barring Service

DSO – Designated Safeguarding Officer

EFL – English Football League

EFLT – English Football League Trust

FA CRC – The Football Association Criminal Records Check

LADO – Local Authority Designated Officer

NFA – Northamptonshire Football Association

Staff – Staff and Volunteers

The FA – The Football Association

NCS – National Citizen Service

KTFCCT – Kettering Town FC Community Trust

APPENDICES

*****CONFIDENTIAL*****

Safeguarding – Young Person Incident

Form

SECTION A:

Name of young person		Age and DOB	
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Home Address/ Phone Number	
Parent/Carer's Name	

Additional relevant factors, i.e. Disability/Religion/ Ethnicity/Language Please give details	
-----------------------------------------------------------------------------------------------------------	--

*****PLEASE ENSURE A HARD COPY OF A CONSENT FORM FOR THE YOUNG PERSON IS ATTACHED TO THIS DOCUMENT*****

Description of what prompted concerns. Dates/Times of specific incident (Continue on additional page if necessary)	
-----------------------------------------------------------------------------------------------------------------------------------	--

Has the young person displayed any physical/behavioural/ indirect signs in relation to concerns? Please give details (Continue on additional page if necessary)	
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--

*****CONFIDENTIAL*****

Have you spoken to young person and informed them of confidentiality and the need to report disclosures?	
----------------------------------------------------------------------------------------------------------	--

Was anybody else alleged to be involved in incident, i.e another young person or abuser? Please give details (Continue on additional page if necessary)	
---------------------------------------------------------------------------------------------------------------------------------------------------------------	--

In what capacity have you been involved with young person?	
------------------------------------------------------------	--

Please list any other members of staff involved in incident or disclosure	
---------------------------------------------------------------------------	--

Are there any siblings, relatives or any other young people at risk? Please give details	
---------------------------------------------------------------------------------------------	--

Any other relevant information?	
---------------------------------	--

Name of staff member reporting incident		Signed	Date
Name of staff member reported to		Signed	Date

*****CONFIDENTIAL*****

Additional Info page

<p>Description of what prompted concerns Continue</p>	
<p>Has the young person displayed any physical/behavioural/indirect signs in relation to concerns? Please give details Continued...</p>	
<p>Was anybody else alleged to be involved in incident, i.e another young person or abuser? Continued...</p>	

*****CONFIDENTIAL*****

SECTION B

To be completed by Designated Safeguarding Officer Only

Name	Signature	Date Received
------	-----------	---------------

Is there a partner organisation involved? Please circle.	YES	NO
----------------------------------------------------------	-----	----

Actions to be taken as a result of form completion.

Action	Date	Outcome
Conversation with staff member who filled out SECTION A		
Conversations with DSO in any partner organisations		
If applicable, form to be sent to DSO in partner organisations/school etc		
Discussion with Parent/Carer if appropriate		
Advice sought from Social Care		
Any additional actions		

Match day lost child procedure

If a **child is reported lost by a parent or guardian**, the following procedure applies:

- Lost child reported to the nearest steward, who reports lost child to the control room
- A description of the child will be radioed around the stewards and a search commenced
- A description of the child will be announced in the stadium
- If found the child will be taken to the first aid room to be reunited with parent/guardian
- If the child is not found following the announcements and coordinated search control room will contact the police.

If a **child reports themselves as lost**, the procedure is as follows:

- Staff who the child reports to will inform the control room
- Control room will make an announcement for the parent/guardian to come to the first aid room to collect child.

Match day Designated Safeguarding Officer: Greg Hyams

Kettering Town FC Community Trust

Safeguarding Code of Conduct

‘Safeguarding’ can be defined as ‘keeping children, young people and adults’ at risk safe from harm’.

The Code of Conduct:

- Makes clear what is required to all staff (inclusive of volunteers);
- Supports staff in meeting their obligations;
- Enables staff to raise concerns without fear of blame;
- Reduces the risk of misplaced or malicious allegations by clarifying responsibilities.

Staff must abide by the following:

- Report any incidents or concerns that cause you to believe that a child, young person or adult at risk is, or is likely to be, at risk of harm including if you suspect that a child or adult at risk may be under the influence of radicalisation or extremism (Prevent).
- KTFCCCT will support any staff member raising legitimate concern about the actions of others.
- Refer to the KTFCCCT whistleblowing procedure if you feel an incident of concern cannot be reported to your manager or your managers manager.
- Disclose any criminal record, caution, reprimand or warning (subject to filtering) whether received prior to or during the course of your employment or volunteering.
- Inform your manager of anyone living in your household or at your address who becomes disqualified from working with children or adults at risk.
- Comply with KTFCCCT policies and procedures that support the development and well-being of children and adults at risk accessing our services.
- Promote positive behaviour through their actions during their duties.
- Ensure behaviour is managed effectively to provide a safe environment for participation.

It is not acceptable (and in some instances, may be unlawful) for you to:

- Use your position to intimidate, bully, threaten, discriminate against, coerce or undermine children, adults at risk or staff.
- Behave or communicate with children and adults at risk in ways which seek to build inappropriate relationships in order to abuse or put them at risk.
- Use a relationship with a service user or family member for personal gain. Any gift giving must be agreed with your manager.
- Give special rewards or privileges in an attempt to build appropriate relationships with children or adults at risk.
- Engage in, or attempt to engage in non-professional relationships with children and adults at risk for whatever reason e.g. suggestive comments, texts, emails and sexual relationships
- Carry out your role whilst affected by alcohol or drugs.
- Contact children and adults at risk for reasons that are not of a professional nature

Print name: _____

Signature: _____

Designated Safeguarding Officer Role Specification

KTFCC will ensure that the safeguarding services they provide to children are discharged in a way that promotes the welfare of children and young people.

Safeguarding Commitment

Kettering Town FC Community Trust is committed to safeguarding and promoting the welfare of children, young people and expects all staff and volunteers, parents, young players and any partner agency or commissioned service to share this commitment.

Post Title: Designated Safeguarding Officer
Department: Kettering Town FC Community Trust
Responsible to: The Board / CEO
Responsible For: Safeguarding throughout KTFCC, ensuring staff adhere to safeguarding policy

The DSO's main duties include:

1. The first point of contact for all staff and volunteers to go to for advice if they are concerned about a child
2. Responsible for ensuring that their organisation's safeguarding policy is kept up to date and complete;
3. Ensure that they comply with safe recruitment procedures for new staff members and their induction.
4. Support staff to assist in information regarding concerns and support decision making about whether staff concerns are sufficient enough to notify Children's Social Work Services and other organisations.
5. Make formal referrals to the Duty and Advice Team; LADO; FA Case Management.
6. Ensure that concerns are logged and stored securely
7. Have joint responsibility with the SSM and Board of Trustees to ensure that the organisation's safeguarding policy and related policies and procedures are followed and regularly updated;
8. Responsible for promoting a safe environment for children and young people;
9. Know the contact details of relevant statutory agencies e.g. Children's Social Work Services (CSWS), Police, Local Safeguarding Children Board, and the Local Authority Designated Officer (LADO) for allegations against staff.
10. To identify training opportunities for staff and maintain a database of training including renewal dates for DBS.
11. To work with the NFA Safeguarding Officer and FA Case Management Team in regards to safeguarding issues and concerns.

It is not the responsibility of the designated safeguarding officer to decide whether a child has been abused or not- that is the responsibility of investigative statutory agencies such as Children's Social Work Services or the police. However, keeping children safe is everybody's business and all staff should know who to go to and how to report any concerns they may have about a child being harmed or at risk of being harmed.

Safeguarding Children Policy – Staff Log

Please sign and date below when you have read the Kettering Town FC Community Trusts Safeguarding Children Policy.

NAME	SIGNATURE	DATE

Participant Code of Conduct

General behaviour

- Arrive on time for activities
- Display and promote high standards of behaviour at all times
- Respect other people
- Respect the staff/coach's decisions and instructions
- Remember that everyone makes mistakes

Personal actions

- Think about improving your skills and look towards developing yourself
- Inform the team leader or other appropriate adult of any issues or concerns you have, including any inappropriate behaviour you see or anything else that could make another person unhappy
- Do not swear
- Do not name call or act aggressively towards others
- No bullying

I understand that if the staff/coach at a session I attend deems my behaviour to be unacceptable I will be asked to leave the session.

Print name _____

Sign name _____