



CLUB SAFEGUARDING POLICY

Children and Vulnerable Adults

CREATING A SAFE ENVIRONMENT FOR EVERYONE

Club Approval in September 2019:

Updated 01/10/2020

Senior Safeguarding Manager, Bob Symns

Club Welfare Officer, Liz Elsom

Peterborough United Board of Directors

Written By:

Academy Player Care Manager, Kayleigh Stent

Club Welfare Officer, Liz Elsom

Bob Symns

Liz Elsom

Kayleigh Stent

Terminology and Definitions

Peterborough United Football Club (the club, the football club, PUFC) – This is Peterborough United Football Limited, its workforce, and its activities.

Peterborough United Foundation (PUF) – This the community department which branch off from the Football Club to make up PUFC, its workforce, and its activities.

Activity – This is any match, coaching or activity or event where the club is responsible for the welfare of individuals taking part.

Workforce – Refers to any person, employed or deployed, by club managers to work on a paid or voluntary capacity on a club activity. Such individuals may be full or part-time, permanent or fixed term staff employed directly by the football club; they may be deployed by the club on a temporary or casual basis; they may be volunteers deployed by club management, they may be deployed via a third party contractor.

Child – The term 'Child' is defined in the Children Act of 1989 as any person under the age of 18.

Vulnerable Adult – Is a person aged 18 years or over who is, or may be in need of community care services by reason of mental or other disability, age or illness; and who is or maybe unable to take care of themselves, or unable to protect themselves against significant harm or exploitation.

Harm – Means ill-treatment or the impairment of health or development, including for example, impairment suffered from seeing or hearing the ill- treatment of another (Children Act 1989). Harm will often be related to abuse of which there are several recognised forms many relating to both children and vulnerable adults: emotional (including bullying), discriminatory, financial, physical, neglect and sexual. Financial abuse is something more usually related to vulnerable adults but where future professional footballers are concerned this is a significant are of risk.

Parent – This is when a Parent has responsibility of the child/ children and consent is required in respect of a child taking part in Club related activities or reporting a concern. We will take all reasonable steps to identify the person(s) with legal PR (parental responsibility) for the child/ children. Where identifying PR is complex or disputed (not all parents have PR and not all people with PR are parents) we will seek consent from the biological parent or adoptive parent unless we are otherwise instructed.

Weston Homes Stadium – This is the primary venue for the Football Club:

Weston Homes Stadium, London Road, Peterborough, Cambridgeshire, PE2 8AL

Training Ground – This is the main venue for all Academy training, games and education and first team training.

Mick George Training academy, Oundle Road, Peterborough, Cambridgeshire, PE2 7EA

SSM – Senior Safeguarding Manager

CWO - Club Welfare Officer

APCM – Academy Player Care Manager

DSO – Designated Safeguarding Officer

LADO – Local Authority Designated Officer

LFE – League Football Education

EFL – English Football Club

The FA – The Football Association

NSPCC – National Society for the Prevention of Cruelty to Children

Our Club Safeguarding Aims

Peterborough United Football Club Limited, and Peterborough United Foundation, together acknowledges the duty of care to safeguard and promote the welfare of children, young people and vulnerable adults.

Peterborough United Football Club has both a moral and legal obligation to ensure a duty of care for children, young people and vulnerable adults throughout the football club. As a club we are committed to ensuring that all children and vulnerable adults are protected and kept safe from harm whilst engaged in any services organised and provided by the club. The football club is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and local authority requirements.

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

Peterborough United Football Club acknowledges that some children (and adults), including those with a disability or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

We aim to create a safe and welcoming environment for all children, young people and vulnerable adults involved in any of our club activities, free from abuse and fear of abuse in all its forms.

A culture where safeguarding practice is widely understood, openly discussed and the workforce recognise the role they play in keeping children, vulnerable adults, themselves and their colleagues safe from harm.

A clear system which promotes and supports:

- Constant vigilance
- Prevention and early intervention in all safeguarding matters
- Where necessary, prompt and thorough action in response to any concerns or incidents.
- To implement legislation, Government policy and Premier League and FA regulations, policy and guidance where necessary to comply with the law at all times, and
- To work closely together with parents, local statutory agencies and other partners to promote and safeguard the welfare of children and vulnerable adults.

In order to realise these aims we will

- Work with relevant governing bodies and statutory agencies to ensure we meet all necessary regulations in respect of our safeguarding practice. We will adopt the standards presented in the government's statutory guidance documents 'Working Together to Safeguard Children', 'No Secrets' and 'Keeping Children Safe in Education'

- Listen to children, young people and vulnerable adults, take them seriously, and react swiftly and appropriately to ideas, feelings and concerns and address them in a fair, effective and timely manner.
- Develop and communicate a series of clear policies, protocols and guidance designed to help deliver good practice across the club.
- Maintain a visible presence across all areas of the club including club internet platforms
- Created an effective support network of designated safeguarding officers across the club.
- Provide an advisory and support mechanism across all areas of the business where children and vulnerable adults are involved in any club-led activity.
- Support the club's 'Safer Recruitment' philosophy, through an appropriate criminal record vetting protocol, in accordance with legislative and regulatory requirements.
- Develop a consistent and appropriate safeguarding training programme for staff, volunteers, partners and participants.
- Maintain confidentiality of all information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with the Data Protection Act. Ensure that child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring that these are acted upon.
- Ensure that the players are unable to access terrorist and extremist materials through the internet within the organisation. Ensuring that suitable internet filtering is in place and that the players are taught about online safety from a general perspective.
- Ensure that all staff are aware that they have an individual responsibility to pass on safeguarding concerns.

This policy and the procedures will be widely promoted amongst staff and are mandatory for anyone whose role involves working with children, young people and vulnerable adults in Peterborough United Football Club. Failure to comply with club policies and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the club.

Principles

This policy and other supporting procedures are based on the following principles:

- The welfare of children, young people and vulnerable adults is the primary concern
- All children, young people and vulnerable adults irrespective of their age, culture, disability, gender, language, racial origin, socio-economic status, religious belief and/ or sexual orientation have the right to protection from abuse and harm
- It is everyone's responsibility to report any concerns or nagging doubts about abuse in order that prompt action is to be taken if required
- All incidents of alleged poor practice, misconduct and abuse will be taken seriously and responded to swiftly and appropriately through the process of 'My Concern'
- All personal data will be processed in accordance with the requirements of the Data Protection Act May 2018. (GDPR) General Data Protection Regulation and any relevant privacy policy issued by the Club. All data will be kept in line with the Clubs Retention policy.

Monitoring

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

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

Who will we work tirelessly to keep safe

To illustrate the scope of this, work the list below provides several examples or situations across the club where we need to consider the welfare of people in our care:

- Players involved in the academy and associated development programmes
- Under 18 players who are part of the senior squad
- Children, young people and vulnerable adults taking part in community activities
- Disabled supporters and other vulnerable adults contacting the club, visiting the stadium on match days, or visiting for other pre-arranged activities (e.g. stadium tours)
- Children and young players on tour or living for significant time away from home in club-arranged accommodation
- Children (including very young children) visiting the stadium for matches, events or tours
- Ball boys, match-day mascots and flag-bearers
- Match day staff
- Work experience staff
- Support to those who may be vulnerable to bullying or cyberbullying through their relationship with the club
- Disabled children and disabled adults taking part in any Peterborough United organised activity

Age Sensitivity

The club recognises that the term 'children' covers individuals from birth up to 18 years old and this policy covers this entire age range. As a general principle we will also be sensitive to the developmental maturity of children in our care and ensure that this is considered when decisions are made that affect them.

Additional Vulnerability

'Children' are usually easy to identify. Additional vulnerability is not as easy.

Adults with additional vulnerability are often even more difficult to identify and plan for. It is a priority of the clubs to safeguard the welfare of both children, young people and adults with additional vulnerability when in our care.

Language & Communication

Football is a multi-cultural, global sport. Some people taking part in our activities may not use English as their first language or may experience difficulty communicating with club staff in the usual ways. As a principle we will always be patient and try to communicate in an individual's chosen way and where necessary we will use an interpreter (i.e. foreign language) or communicator (e.g. British Sign Language).

Children from Overseas

Occasionally the club will encounter children who do not live in this country. This policy applies equally to them. We will also ensure that where this situation does arise that international law and football regulations are applied as well as the needs of the child being put first. Where we have a concern that a child may be being exploited or 'trafficked' the appropriate authorities will be informed.

Recruitment, Induction, training and qualifications

All staff recruitment is conducted in an open and transparent manner to ensure that Peterborough United Football Club has the best staff. Refer to our club safer recruitment policy.

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

The employment of all Peterborough United Football Club staff, (where the role requires it) are subject to individuals having a relevant and up to date safeguarding qualification and enhanced DBS checks. The standard recognised welfare qualification for Peterborough United Football Club is the FA Safeguarding Children and FA Welfare Officer for those who are employed as DSOs.

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

The FA Welfare Officers course is done once by DSOs but extra training either through the FA, EFL, LFE or externally and the continuous FA Safeguarding training will be needed.

As part of the induction process for every member of staff (and volunteers), will be issued with a copy of this safeguarding policy and a member of the safeguarding team will be around should staff (and volunteers) wish to discuss anything. This allows all staff (and volunteers) to understand theirs, and the club's responsibilities in running of our activities in a controlled and safe environment for all participants involved.

Staff (and volunteers) will also undertake mandatory in-house training and development on all aspects of safeguarding and welfare, to ensure that it remains continuously at the top of the agenda for all staff (and volunteers)

Disclosure and Barring Service Checks

All staff and volunteers who are working with young people and vulnerable adults, are subject to an enhanced DBS check, which will be undertaken through the criminal record bureau service, with the process further outlined in the club's self-declaration form and criminal records policy. This will be led by the Club Welfare Officer or Academy Player Care Manager.

The club undertakes not to discriminate unfairly against any subject of a criminal records check or self-disclosure based on a conviction or other information revealed.

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

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

The Criminal Record Bureau confirms that all criminal record data will be processed on behalf of Peterborough United Football Club in accordance with the provisions of the Data Protection Act 2018 and the Disclosure and Barring Service code of practice.

Trustees

Ultimately, responsibilities for safeguarding and welfare within Peterborough United Foundation, lies solely with the trustees of the Foundation.

The role of the trustee in the foundation is not to oversee the day to day management of the safeguarding and welfare controls, but to take leadership responsibility for the foundation's safeguarding policies and procedures.

The day to day management of safeguarding controls is designated to the managers and safeguarding team within the foundation.

Safeguarding and the Club's workforce

Safeguarding is also about ensuring that all Peterborough United staff (and volunteers) understand the wider role that they play in protecting vulnerable people.

This means all members of the workforce involved in training, managing, supervising or caring for children or vulnerable adults, in particular:

- Managers and assistants
- Office staff
- Football scouts
- Medical staff
- Stewards
- Drivers
- Accommodation providers
- Hospitality
- Private tutors
- Players
- Partners, licence holders and their staff

The workforce must help to keep those in their care safe from harm but must also be aware of the need to understand how to keep themselves and their colleagues safe from having unfounded or malicious allegations by maintaining professional boundaries and avoiding behaviour that may be misinterpreted by others.

Safeguarding

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

Positions of Trust

As a result of the roles and authority that many members of the club hold, they are in positions of trust in relation to those in their care. This means that they are in a position of power and influence over children, young people or vulnerable adults who take part in any club activities and as such have the potential to abuse that position of trust. Staff must not abuse their position for personal advantage or gratification or that of others.

Standards of Behaviour

The club will adopt the highest standards of behaviour at all times in order to maintain the confidence and respect of children, young people, vulnerable adults, parents, customers, supporters and colleagues. Within the capacity of their duties their actions should always be reasonable, appropriate, warranted, proportionate, safe and applied equitably.

Training

The clubs safeguarding team will receive training across most areas of the safeguarding landscape, such as:

- Good practice
- E-safety
- Disability
- Neglect
- Domestic violence
- Gang culture
- Substance misuse
- Prevent
- Exploitation
- Radicalisation

Peterborough United staff also receive several training sessions from outside organisations such as NSPCC, Cambridgeshire and Peterborough Police and Peterborough City Council.

Therefore, in turn the safeguarding team will offer support and training to other staff who may be faced with those issues and concerns through their day-to-day work with children, young people or vulnerable adults.

Types of Abuse

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

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

Any allegations or suspicions of abuse, poor practice or bullying need to be responded to and reported in line with the clubs reporting procedures.

There are four main types of abuse:

- Neglect
- Physical abuse
- Sexual abuse
- Sexual abuse and emotional abuse

Children, young people and vulnerable adults can also be harmed through poor practices and bullying within activity settings.

Neglect

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

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

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

Physical Abuse

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

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

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

Sexual Abuse

This is where children, young people or vulnerable adults are abused by adults (both male and female) or other children who use them to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal intercourse, kissing and sexual fondling.

Showing individuals pornographic material (books, videos, pictures) or taking pornographic images of them are also forms of sexual abuse.

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

Example	Signs include
<ul style="list-style-type: none"> • Rape and other sexual offences • For vulnerable adults, sexual activity including sexual contact and non-sexual contact that the person does not want, to which they have not consented, could not consent, or were pressured into consenting to. • Being encouraged or enticed to touch the abuser • Coercing the victim into watching or participating in pornographic videos, photographs, or internet images • Any sexual relationship that develops where one is in a position of trust, power or authority 	<ul style="list-style-type: none"> • Pain or itching in the genital/anal areas • Bruising or bleeding near genital/anal areas • Sexually transmitted disease • Vaginal discharge or infection • Stomach pains • Discomfort when walking or sitting down • Pregnancy • Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn • Fear of being left with a specific person or group of people • Nightmares • Leaving home • Sexual knowledge which is beyond their age or development age • Sexual drawings or language • Bedwetting • Saying they have secrets they cannot tell anyone about • Self-harm or mutilation, sometimes leading to suicide attempts • Eating problems such as overeating or anorexia

Emotional Abuse

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

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

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

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

Additional Welfare Considerations

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

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

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

Anti -Bullying

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

More detail on recognising and managing instances of bullying can be found in the Peterborough United Anti-Bullying policy.

Increased Risk to Vulnerable Children

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

Parental factors:

- Parent has a mental illness
- Parent is abusing drugs or alcohol
- Parent has already abused a child
- Pregnancy was not wanted
- Parent has a background of abuse when growing up
- Young, unsupported mother often with low education

- Parents have unrealistic expectations of the child and lack parenting knowledge
- Parent is isolated and has little support
- Parent has a learning difficulty

Environmental factors:

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

Additional Risks to children.

- Child Sexual Exploitation
- Child criminal exploitation
- Peer on peer
- Grooming
- Radicalisation
- Female genital mutilation (FGM)
- Cyberbullying
- Hazing
- Infatuations
- Domestic violence

Additional Risks to Vulnerable Adults

With vulnerable adults being classed as 18+, there are additional risks relating to financial, legal and discriminatory matter

FINANCIAL ABUSE (Vulnerable Adults)	
Examples include	Signs include
<ul style="list-style-type: none"> • Being over charged for services • Being tricked into receiving goods or services that they do not want or need • Inappropriate use, exploitation, or misappropriation of property and/or utilities • Theft • Deception • Fraud • Exploitation or pressure in connection with wills 	<ul style="list-style-type: none"> • Lack of basic requirements e.g. food, clothes, shelter • Inability to pay bills. • Unexplained withdrawals from accounts. • Inconsistency between standard of living and income • Reluctance to take up assistance which is needed • Unusual interest by family and other people in the person's assets • Recent changes in deeds • Power of Attorney obtained when person lacks capacity to make the decision

DISCRIMINATORY	
Examples	Signs
<ul style="list-style-type: none"> • Use of inappropriate “nick names” • Use derogatory language or terminology • Enforcing rules or procedures which undermine the individual’s well being • Denial to follow one’s religion • Lack of appropriate food • Denial of opportunity to develop relationships • Denial of health care • Coercive control • Modern slavery • Organisational • Neglects/acts of omission 	<ul style="list-style-type: none"> • Being treated unequally from other users in terms of the provision of care, treatment or services • Being isolated • Derogatory language and attitude by carers • Dismissive language by staff • Hate campaigns by neighbours or others • Deteriorating health • Indicators of other forms of abuse

Consent

The club recognises the need to approach the individual needs of children and vulnerable adults in the appropriate way and according to the law and statutory guidance.

Where a child is at risk of harm, consent to act on concerns is not required, although consent from, and consultation with, those with Parental Responsibility is considered good practice by the club unless this would put the child at greater risk of harm.

‘Consent’ – Vulnerable Adults

If a vulnerable adult has the capacity to consent, then they should have the opportunity to consent before a decision is made that affects them – e.g. passing on a concern to statutory agencies. Club staff will assume that an adult has the capacity to consent unless it is established that they lack this capacity. A seemingly unwise decision should not be mistaken as lacking capacity. We will act where the individual is put in immediate and significant risk of harm.

‘Best Interests’ – Vulnerable Adults

Any decisions, taken on behalf of someone who is deemed, at the point where a decision must be made, to lack capacity, will be taken in his or her best interests. Where possible we will take into account (known) past or future wishes and religious or moral beliefs.

Reporting concerns.

Alerters

If any member of the club has a concern about a child or vulnerable adult, they have a duty to tell a member of the clubs safeguarding team. At this point they become an ‘Alerter’. The safeguarding team member will in turn report any ‘alerts’ to the CWO or APCM. If there is immediate risk of harm, a serious injury, or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity.

Whistleblowing

Peterborough United Football Club views the reporting of concerns by members of the workforce as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents to

the DSO/CWO where malpractice of the law, club policy or protocol has been breached by another member, or members, of the workforce. Failure to do so may result in disciplinary or criminal action. Please see whistleblowing policy for more information.

Record Keeping & Confidentiality

The Club will keep a record of all incidents and concerns reported to the Safeguarding team. Any such reports will be taken seriously, treated with respectful uncertainty and carefully recorded, acted upon where appropriate, and confidentially stored. Records will be regularly reviewed in order to identify patterns of behaviour that may give rise to concern. All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with the Data Protection Act. Please see data protect policy for more information

Criminal Investigations & Social Care Services

Where serious concerns are raised and/or a criminal offence may have been committed then it is not the responsibility of club staff to determine if abuse has taken place. This is the responsibility of the police and/or local authority who may involve club staff in any investigation procedures. Where the police decide that they will not take any further action then the local authority may still proceed with an investigation in conjunction with the club.

Where both the police and social care services have decided to take no further action then the club management may undertake an internal investigation in accordance with club disciplinary procedures.

Local Authority Designated Officer (LADO)

The Academy Player Care Manager will maintain a working relationship with the relevant LADOs (Local Authority personnel who preside over issues relating to adults who work with children) and where necessary, work in partnership in response to concerns, incidents or allegations.

ISA Referrals

If a member of staff is removed (or resigns) from their role as a result of an allegation or investigation conducted under this policy and the necessary criteria are met, a referral to the Independent Safeguarding Authority will be made in conjunction with the appropriate statutory agencies.

Safeguarding Code of Conduct for Staff and Volunteers

Peterborough United Football Club staff and volunteers involved have a great opportunity to be a positive role model and help build an individual's confidence, whether a child, young person or vulnerable adult.

Staff and volunteers are expected to:

- Ensure the safety of all children, young people and vulnerable adults by providing effective supervision, proper pre-planning of sessions, using safe methods at all times
- Consider the wellbeing and safety of participants before the development of performance
- Encourage and guide participants to accept responsibility for their own performance and behaviour
- Treat all people fairly and ensure they feel valued. Have no favourites
- Encourage all children, young people and vulnerable adults not to discriminate on the grounds of religious beliefs, race, gender, social classes or lack of ability
- Not allow any rough or dangerous play, bullying, or the use of bad language or inappropriate behaviour
- Be positive, approachable and always offer praise to promote the objectives of the club
- Not let any allegations of abuse of any kind or poor practice to go unchallenged or unrecorded
- Incidents and accidents to be recorded in the line with the club's procedures

- Never use sanctions that humiliate or harm participants
- Report accidents or incidents of alleged abuse or poor practice to the designated person
- Administer minor first aid in the presence of others and where required
- Have access to telephone for immediate contact to emergency services if required
- Foster team work to ensure the safety of children, young people and vulnerable adults in their care
- Ensure the rights and responsibilities of children, young people and vulnerable adults are enforced
- Establish and address the additional needs of disabled participants or other vulnerable groups
- Not abuse members physically, emotionally or sexually
- Not engage in a sexual relationship with a child, young person or vulnerable adult for whom they are responsible
- Maintain confidentiality about sensitive information
- Respect and listen to the opinions of children, young people and vulnerable adults
- Develop an appropriate working relationship with participants, based on mutual trust and respect
- Be a role model, displaying consistently high standard of behaviour and appearance (disciplined/committed/time keeping), remember people learn by example
- Refrain from smoking and consumption of alcohol during activities or sessions
- Never condone rule violations, rough play or the use of prohibited substances
- Not spending excessive amounts of time alone with children, young people or vulnerable adults unless there are exceptional circumstances
- Never taking a child, young person or vulnerable adult to their home or travel alone with them
- Not administering First Aid involving the removing of an individual's clothing unless in the presence of others
- Hold appropriate valid qualifications and insurance cover
- Make activity fun
- Always adhere to the Clubs Player Announcement and Confidentiality Social Media policy .

Staff and volunteers have the right to:

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

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

Refer to the Clubs Whistleblowing policy and Grievance and Disciplinary policies

Management of safeguarding cases

The NSPCC Child Protection in Sport Unit (CPSU) assist sports to the clubs to achieve an agreed set of standards which provide frameworks for safeguarding the welfare of children and young people involved in sport. The same principles and standards will also be adopted by Peterborough United Football Club for safeguarding vulnerable adults.

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

General principles of case management

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

Investigation

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

Risk assessment

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

Risk management

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

Responding to a Disclosure

If a child, young person or vulnerable adult informs a member of staff directly or a member of staff identifies that they are concerned about someone's behaviour towards them, this is known as disclosure. This disclosure may be relating to an incident or incidents either during the Peterborough United Football Club activity, or outside of the activity environment. The person receiving the disclosure should:

- React calmly so that you do not alarm or frighten the individual
- Tell the individual that he or she is not to blame and that they were right to share their concerns
- Take what the individual says seriously – make key notes
- If the individual needs immediate medical treatment, take them to hospital (if two members of staff are present) or telephone for an ambulance, inform doctors of concern and ensure they are aware that is a child protection issue (as outlined in the referral procedure diagram)
- Ensure the immediate safety of the individual in question
- Avoid leading the individual in questioning and keep any questions to the absolute minimum. Ask only what is necessary to ensure a clear understanding of what has been said
- Re-assure the individual
- Do not make any promises to the individual (never inform them you will not tell anyone)
- In the event of suspicion of sexual abuse do not let the child bath or shower until given permission to do so. Washing can destroy evidence
- Inform parents/carers immediately unless there is a specific reason not to e.g. the individual has named the parent/carer as the abuser. If this is the case, then contact a member of the Club's safeguarding team. If they are unavailable, staff should contact local Social Services or the Police for guidance
- The judgment about whether an incident is one of abuse or poor practice may not be able to be made at the point of referral, but only after the collection of relevant information by someone appropriately trained and skilled
- Make a full written record of what was said, seen and heard as soon as you can. (using the My Concern website, this links through to the SSM, CWO and APCM to take over and deal with)

In the event of a disclosure, staff should not:

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

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

Other Disclosures

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

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

This safeguarding policy should be made available for all key stakeholders upon request, to ensure individuals and the Clubs are aware of the Peterborough United Football Club reporting procedure for safeguarding concerns.

Reporting Procedures

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

It is the responsibility of the individual employee or volunteer to take a lead on reporting all concerns to the CWO or APCM assist in any further action required on behalf of the club.

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

Employees with concerns should discuss them with the CWO or APCM immediately. If CWO or APCM is not available, then any concerns should be discussed with the SSM or Academy Manager, who will then seek advice if necessary, from other nominated welfare professionals (English Football League and the Football Association).

Volunteers with concerns should discuss these discreetly with their line manager or the CWO or APCM as soon as possible after the abuse or suspicions of abuse are observed. If unavailable, then any concerns should be discussed with the SSM or Academy Manager.

Concerns about colleagues should be addressed initially with CWO or APCM, but if this is not possible or the concern is about the either the CWO or APCM or other Senior member of staff, then any concerns should be discussed directly with Peterborough City Council, English Football League or The Football Association.

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

Information Sharing

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

If the club are approached about sharing information, the following will be considered:

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

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

is confidential.

Peterborough United Football Club will consider:

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

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

Staff should always seek advice if unsure and never refuse to provide information without considering the risks of not sharing. All decisions on information sharing will ultimately fall with the SSM, CWO and APCM.

Cambridge and Peterborough Referrals

Local Authority Safeguarding

Cambridge and Peterborough Safeguarding Board

T: 01733 863744

E: pscb@peterborough.gov.uk

W: <https://www.peterboroughlscb.org.uk>

NSPCC

Help for children & young people – ChildLine: 0800 1111

Help for adults concerned about a child: 0808 800 5000

NSPCC Peterborough: 01733 207620

W: <https://www.nspcc.org.uk/>

Other Key Contacts

EFL CWO or APCM

Alex Richards

E: arichards@efl.com

T:01772 325940

Northants FA

Candice Hart

E: safeguarding@northantsfa.com

T: 07535640452

W: <http://www.northamptonshirefa.com/about/rules-and-regulations/safeguarding-and-welfare>

Local Police

In an emergency, where there is a threat to life, serious injury, or a crime in progress call: 999

For non-emergency calls or to report a crime call: 101

Useful Football Club Contacts

Bob Symns, Senior Safeguarding Manager (SSM)
Chief Executive
E: Bob.symns@theposh.com
T: 07711924165

Liz Elsom, Club Welfare Officer (CWO)
Club Secretary
E: Liz.elsom@theposh.com
T: 07932772616

Kayleigh Stent, Academy Player Care Manager (APCM)
Training Ground Manager
E: Kayleigh.stent@theposh.com
T: 07772570113

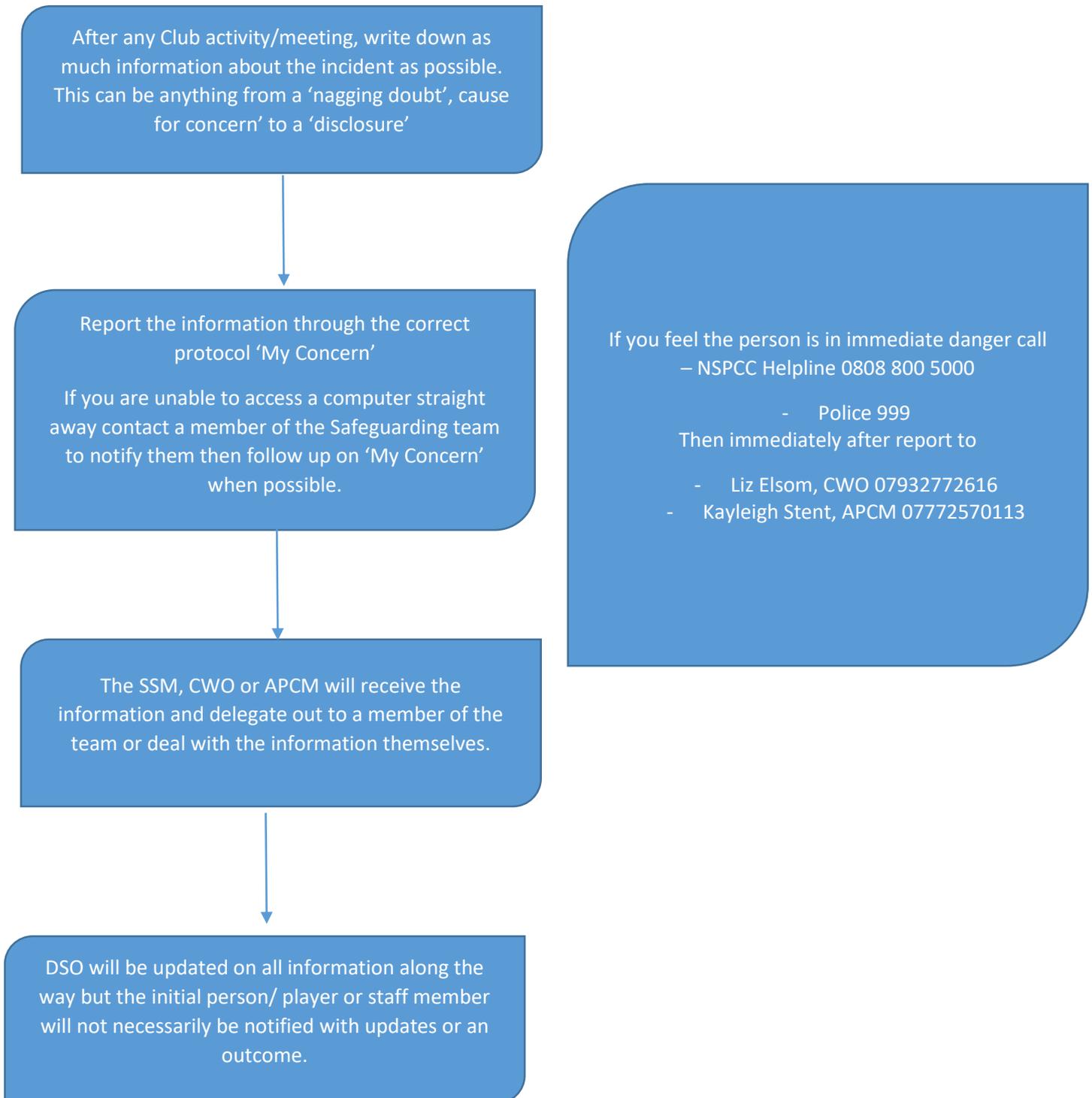
Matthew Dye, Designated Safeguarding Officer (DSO)
Head of Coaching
E: Matt.dyw@theposh.com
T: 07551007928

James Baum, Designated Safeguarding Officer (DSO)
Academy Head Sport Scientist
E: James.baum@theposh.com
T: 07877603826

Bruno Porfirio, Designated Safeguarding Officer (DSO)
Youth Development Lead Phase Coach
E: Bruno.porfirio@theposh.com
T: 07752029743

Paolo Di Fabrizio, Designated Safeguarding Officer (DSO)
Foundation Phase Lead Coach
E: Paolo.difabrizio@theposh.com
T: 07463332226

Peterborough United Football Club Limited Safeguarding Flow Chart



Staff Personal Media Guidance and Procedures

Guidance for staff

DO:

- Gain written parent / carer permission before giving access to U18
- Explain to the parent/carer/player the method of communication to be used and the reasons
- Always use group texts or emails and always copy parents/carers and the designated member of safeguarding team into all communications with young people
- Make sure texts, emails are only in relation to specific club related activities
- Report to the SSM, CWO or APCM any inappropriate communication from a young person.

DO NOT:

- Use your personal phone to text a young person connected with the club
- Become friends with, follow (unless of work social media pages), or add to your personal social media network any potential
- Current or former young person (under 19) This includes use of “like”
- Use internet or web-based communications to send personal messages of a non-football nature to a child or young person. This includes, “banter” or comments
- Use language that is directly or could be misinterpreted as being racist, sexist, derogatory, threatening, abusive or sexualised in tone
- Use the PUFC username for personal use

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

The Club will:

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

Please refer to the club policy on Acceptable use of IT and IT and Internet use policy.

Remember your Induction training and the club safeguarding code of conduct.

Player Personal Media Guidance and Procedures Under 18

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

The club will:

- Monitor social networking pages regularly and where appropriate (this can also be shared information with the club), raise any concerns or disciplinary matters
- Gain written parent / carer permission before giving access to Under 18

- Explain to the parent/carer/player the method of communication is to be used between parents, players and staff and the reasons
- Always use group texts or emails and always copy parents/carers and the designated member of safeguarding team into all communications with young people
- Make sure texts, emails are only in relation to specific club related activities

Guidance for players

- Know who from the club should be contacting you and which site they will use to do so
- Do not post, text or email things that are hurtful, insulting, offensive, abusive, threatening or discriminatory (e.g. racist, sexist or homophobic). This could be against the rules of football or even criminal and may lead to disciplinary action
- Do not give out personal details including mobile phone numbers, email addresses or social media account access (such as accepting friend or follow requests) to people you do not know well online.

Use all guidance from social networking sites to keep yourself safe

- No matter how well you get on with coaches, manager, staff do not invite them to become your friends online. *They have been told not to accept such invitations*
- Tell an adult you trust or a member of the safeguarding team if you are asked to become the friend of an adult involved in the club or within football

Procedures for Youth Produced Sexual Imagery

Guidance for staff

Definitions:

“Youth produced” means young people sharing images that they, or another young person have created of themselves. “Imagery” means both still and moving videos.

Description:

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

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

Legislation:

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

Note that the sharing of sexual imagery of people under 18 by adults constitutes sexual abuse and will lead to an immediate police referral.

What should you do?

- You should NOT view the imagery
- Refer the incident to a member of the safeguarding team as soon as possible via the 'My Concern' procedure this must be within 24 hrs.

What will happen next

- A member of the safeguarding team will hold an initial review meeting with appropriate staff
- Subsequently there will be interviews with young people involved (if appropriate)
- Parents will be involved as soon as possible (unless there is a definite reason not to)
- If at any stage, it becomes apparent that a young person has been harmed or at risk of harm or that a criminal offence may have been committed a member of the safeguarding team will make a referral to the police or social care. This would include where an adult is involved, violent acts, or the young person is being black mailed or groomed

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

Procedures for Youth Produced Sexual Imagery

Guidance for players Legislation:

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

You must not:

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

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

What will happen next

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

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

Remember we are here to help and support you.

Useful websites and Acts

Keeping Children Safe in Education

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912592/Keeping_children_safe_in_education_Sep_2020.pdf

Children's Act 1989

<http://www.legislation.gov.uk/ukpga/1989/41/contents>

Counter Terrorism and security Act 2015

<http://www.legislation.gov.uk/ukpga/2015/6/contents/enacted>

Child Sexual Exploitation

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591512/HO_DfE_consultation_response_on_CSE_definition_FINAL_13_Feb_2017_2_.pdf

Special Educational Needs and Disability

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf

UK Council for Child Internet Safety

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

Working Together to Safeguard Children

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/779401/Working_Together_to_Safeguard-Children.pdf

Modern Slavery Act 2015

<http://www.legislation.gov.uk/ukpga/2015/30/contents/enacted>

Female Genital Mutilation 2003

<http://www.legislation.gov.uk/ukpga/2003/31/contents>

General Data Protection Regulations 2018

<https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

The below policies can be found on The Peterborough United Officials Website as individual documents <https://www.theposh.com>

- Club safeguarding policies and procedures
- Staff induction policy/process
- Anti-bullying policy
- Whistle-blowing policy
- Health and safety policy
- Trips, tours and tournaments policy
- Transport policy
- Late collection of children policy
- Acceptable I.T use policy
- Social media policy
- Information sharing/data protection policy
- Equal opportunities policy
- Photography/Image consent policy
- Safer recruitment policy