



Swindon Town FC

Safeguarding Children Policy & Procedures

Version I.D	Reviewed by	Update details	Date of review	Endorsed by	Signature
1.1	Matt Waters	Post EFL Visit edits	2 nd November 2018	Steve Anderson	



Safeguarding Policy

1.1 This policy outlines a strong commitment from the board to the safeguarding agenda and the promotion of wellbeing.

Swindon Town FC recognises its duty of care to safeguard all children, young people and young players involved in club activities. The club acknowledges that all children have the right to protection, and the needs of those children who may have additional vulnerabilities must be considered and addressed, such as:

- physical disabilities.
- mental health issues.
- special educational needs.
- being a displaced or looked after child.

The club will endeavour to ensure the safety and protection of all children and young people involved in its activities through adherence to the club Safeguarding Policies, Procedures and Guidelines.

A child or young person is defined as anyone up to their 18th birthday (Children Act, 1989). Safeguarding children and young people is defined as:

- Protecting children and young people from maltreatment;
 - Preventing impairment of children or young people's health or development;
 - Ensuring that children and young people are growing up in circumstances consistent with the provision of safe and effective care; and
 - Taking action to enable all children and young people to have the best life chances.
- (Working Together to Safeguard Children 2015)

Swindon Town Football Club is committed to encouraging equality and diversity among our workforce and eliminating unlawful discrimination. The club's Equality Policy is strongly linked to this Safeguarding policy to provide equality, fairness and respect for all full-time, part-time, temporary staff in addition to any trialists and signed players within the Academy.

Policy aims

The aim of Swindon Town FC's Safeguarding Policy is to promote good practice and to enable staff, to ensure that we:

Provide children, young people and young players with appropriate safety and protection whilst in the care of Swindon Town FC.

Provide relevant Safeguarding Guidance and Training, with appropriate training providers, for staff, players and volunteers.

Allow staff/volunteers to make informed and confident responses to specific Safeguarding issues.

Provide education and awareness raising, to young players and parents to understand their role in safeguarding.



Scope

This policy covers all activities within the club, Stadium, Academy and any external club managed activities. The policy will be reviewed on annual basis at board level or following a major incident or legislative change.

1.2 Roles and Responsibilities

The club has a comprehensive safeguarding structure which ensures the safety and welfare of all children who interact with the club. The Safeguarding Team consists of; the Chief Executive Officer, the Safeguarding Lead, the Safeguarding Manager and Designated Safeguarding Officers.

Chief Executive Officer - is responsible for all aspects of the club and to ensure safeguarding is a key priority at Board Level.

Senior Safeguarding Manager - is responsible for the strategic and operational direction and embedding safeguarding across the club.

Designated Safeguarding Officer (DSO) – Is responsible for all operational aspects and embedding safeguarding in all of the football and community departments as well as being the lead point of contact in all those areas. Is responsible for ensuring all vetting checks including criminal record checks adhere to the club's Recruitment Policy as well as legislation and governing body rules as well as guiding referrals to outside agencies

Safeguarding Committee officers - are responsible for embedding safeguarding within their own departments as well as being the point of contact should a concern arise within their own departments.

Employees, workers, agency staff, consultants and volunteers - are responsible for familiarising themselves with the club's policy and procedures, ensuring the safety and welfare of all adults at risk as well as promoting best practice and creating a safe and inclusive environment to prevent harm occurring through awareness of what constitutes abuse and neglect.



1.3 SWINDON TOWN FC SAFEGUARDING TEAM

Chief Executive Officer - Steve Anderson – steve@swindontownfc.co.uk Head of

Safeguarding(SSM) - Steve Anderson - steve@swindontownfc.co.uk

Designated Safeguarding Officer (DSO) - Ray Murphy – ray@swindontownfc.co.uk

Safeguarding Officers for Club:

Seamus Brady – Academy Director – seamus@swindontownfc.co.uk

Debbie Edgell – Academy Physio - debbie.edgell@hondatrading.eu.com

Shane Hewlett- Footballing in the Community Designated Safeguarding Officer - shane@stfc-fitc.co.uk

Useful Definitions Child

A child is defined as a person under the age of 18 (The Children Act 1989)

Staff or Employees

Defined as any member of the workforce either paid or unpaid. **DSO**
Designated Safeguarding Officer

LADO

Local Authority Designated Officer

ICRT

Integrated Contact & Referral Team (Social Services)

DBS

Disclosure & Barring Service

CRC

Criminal Records Checks



What is Child Abuse?

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm.

Child abuse is a generic term encompassing all ill-treatment of children, including 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 in an institutional or community setting. The perpetrator may or may not be known to the child.

Abuse can happen to a child regardless of their age, gender, race or ability. Abusers can be adults (male or female) and other young people and may be known to and trusted by the child and family.

All staff should maintain an awareness of safeguarding issues. Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, truancy and sexting put children in danger. Safeguarding issues can manifest themselves via peer on peer abuse which is most likely to include, but may not be limited to, bullying (including cyberbullying), gender-based violence/sexual assaults and sexting.

Recognising Signs of Child Abuse

In U.K. Criminal and Family law there are four specified types of Child Abuse:

Physical abuse

Sexual abuse

Emotional abuse

Neglect.

The F.A however regard **Bullying** within Football as the 5th form of child abuse and incidents of bullying should be given equal importance when reporting concerns regarding a child's welfare and safety.

Should you have any concern that child abuse is occurring you should contact a member of the Safeguarding Team immediately.



1. Physical abuse:

Where adults or other young people physically hurt, or injure children, including by hitting, shaking, throwing, poisoning, burning, biting, scalding, suffocating or drowning. This category of abuse can also include when a parent or carer reports non-existent symptoms of illness or deliberately causes ill health in a child they are looking after, known as fabricated and induced illness.

Examples of physical abuse in sport may be:

When the nature and intensity of training or competition exceeds the capacity of the child's immature and growing body.

Where the child is given drugs to enhance performance or delay puberty.

When sanctions imposed by coaches involve inflicting pain.

When harmful physical initiations or challenges are set by peers. (Hazing)

2. Sexual abuse:

When adults (male or female) or other young people use children to meet their own sexual needs. The following are all examples of sexual abuse:

- Rape, sexual assault.
- Engaging in sexual activity with a child.
- Causing or Inciting a child to engage in sexual activity, such as encouraging them to have sexual activity with another person, or to perform sexual acts on-line.
- Engaging in sexual activity in the presence of a child.
- Causing a child to watch a sex act, which may include pornographic videos or online pornography.
- Making, possessing or distributing indecent images of a child.
- Sexual Communication with a Child. This new offence criminalises a person aged 18 years or over who, for sexual gratification, communicates with a child under 16 if the communication is sexual or if it is intended to elicit from the child a communication which is sexual. (it will apply to oral communications and written notes as well as to e-mails and text messages).
- Grooming - when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation or trafficking. Children and young people can be groomed online or face-to-face, by a stranger or by someone they know - for example a family member, friend or professional.
- Coaching techniques which involve physical contact with children can create situations where sexual abuse can be disguised or go unnoticed. A child or young person may feel unable to refuse sexual advances if they feel their future within the club could be jeopardised.
- Sexting - sharing sexually explicit images, videos or messages via mobile phones. More information can be found in the separate Sexting Policy Document.
- Relationships of trust, if misused, may also lead to abusive situations developing.



3. Emotional Abuse

The persistent emotional ill treatment of a child, likely to cause severe and lasting adverse effects on the child's emotional development. It may involve communicating to a child that they are worthless or unloved, inadequate, or valued only in terms of meeting the needs of another person. It may involve causing children to feel frightened or in danger by being constantly shouted at, threatened or taunted which may make the child very nervous and withdrawn. Ill treatment of children, whatever form it takes, will always feature a degree of emotional abuse.

Examples of emotional abuse in sport include:

- Subjecting children to constant criticism.
- Name calling
- Sarcasm
- Bullying.
- Racism.
- Putting a child under consistent pressure to perform to unrealistically high expectations.
- When a child's value or worth is dependent on sporting success or achievement.

4. Neglect

Neglect occurs when adults fail to meet a child's basic physical and/or psychological needs, to an extent that is likely to result in serious impairment of the child's health or development. For example, failing to provide adequate food, shelter and clothing, failing to protect a child from physical harm or danger, or failing to ensure access to appropriate medical care or treatment.

Examples of neglect in sport could include:

- Not ensuring children 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 by ignoring safe practice guidelines or failing to ensure the use of safety equipment.
- By requiring young people to participate when injured or unwell.

5. Bullying

Although anyone can be the target of bullying, children who are perceived as "different" from the majority may be at greater risk of bullying. This includes children from minority cultures or children with disabilities.



Swindon Town Football Club is committed to providing a caring, friendly and safe environment for all players so that they can participate in football in a relaxed and secure atmosphere.

Bullying of any kind is unacceptable and is regarded in football as a type of abuse. If bullying does occur, players or their parents should be able to recognise this and know that incidents will be dealt with promptly and effectively. All incidents will be approached with equal thoroughness and consistency.

Swindon Town FC expects that anyone who knows that bullying is happening should report it to the Designated Safeguarding Officer who is Ray Murphy and his email address is ray@swindontownfc.co.uk or other appropriate member of staff, who will then in turn report it to the Designated Safeguarding Officer.

Bullying is:

- Bullying is the use of aggression with the intention of hurting another person.
- Bullying results in pain and distress to the victim.
- Bullying is unprovoked and repetitive.
- Bullying may be carried out by one person or by a group and gives the bully or bullies a perceived position of power.

More information can be read in the independent Ant-Bullying Policy.



Promoting Good Practice with Children and Young People

Introduction

Child abuse, physical, emotional, neglect and in particular sexual abuse, can result in strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about any action to take.

Abuse can occur within many situations including the home, school and the footballing environment. Some individuals will actively seek employment or voluntary work with young people/young players in order to harm them. Conversely, a coach, instructor, teacher, official or volunteer may have regular contact with young people/young players and be an important link in identifying cases where a young person needs protection.

All cases of inappropriate behaviour should be reported following the guidelines in this policy. When a child enters the club, having been subject to child abuse outside the footballing environment, football can play a crucial role in improving a child's self-esteem. In such instances, the club must work with the appropriate agencies to ensure the child receives the appropriate support.

Good Practice guidelines

All personnel are encouraged to demonstrate exemplary behaviour to best safeguard children but also to protect themselves from allegations.

The following are common sense examples of how to create a positive culture and climate within Swindon Town Football Club.

Good practice means:

- All staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Treating all children and young people equally, and with respect and dignity.
- Putting the welfare of each young person first and act in their best interest.
- Building balanced relationships based on mutual trust and maintain professional boundaries at all times; for example, never have an intimate relationship with a child U18 (even if they are over 16 years old) when you are responsible for their supervision, care, support or coaching.
- Give enthusiastic and constructive feedback rather than negative criticism.



- Making football fun, enjoyable and promoting fair play.
- Being an excellent role model - this includes not smoking, drinking excessive amounts of alcohol, using drugs or using bad language in the company of children and young people.
- Have access to and be familiar with the club's Code of Code of Conduct and Safeguarding policies and procedures.
- Know who is their Safeguarding Manager and how to contact them.
- Ensure any concerns or allegations pertaining to a child's safety and welfare are recorded and acted upon, in line with the club's safeguarding policies and procedures.
- Promote an environment where poor practice is challenged and reported.
- Help maintain an ethos whereby colleagues, children, young people and their parents/carers feel able to articulate any concerns, safe in the knowledge that effective action will be taken as appropriate.

Ensure there is always an appropriate staff to participant ratio, determined by:

- Age and needs of the participants.
- Nature of the activity and environment.
- Risk assessments identifying potential behavioural or other issues.
- Expertise and experience of the staff involved.
- Male and female supervising staff wherever possible for mixed gender participant activities.

Staffing ratios as per NSPCC guidance:

4 - 8 years. 1 adult to 6 children.

9 - 12 years. 1 adult to 8 children.

13 - 18 years. 1 adult to 10 children

However, regardless of the number of children participating in STFC activities, staff are expected to work in pairs, particularly if there is a requirement to be in dressing rooms or undertake any personal care.

Where **lone working** is an integral part of a role e.g. an Academy teaching position, or club Driver, then additional risk assessment strategies will be put in place e.g.

If conducting a one-to-one tutorial staff should aim to have the tutorial take place in a communal area, e.g:

- canteen or an office with other people present
- Staff should ensure a colleague is made aware of when and where the tutorial is being held



- If Staff are on their own in a room with a child, the staff member should prop open the door of the room (so long as that does not constitute a fire safety hazard).
- When transporting a lone child, they should be seated in the rear of the vehicle. If several children are being transported, and it is necessary to sit a child in the front passenger seat, then that child must be the first to leave the vehicle so that at no time will the driver be alone with a child in the front of the vehicle.
- Staff should never work alone if they are concerned about risks to themselves or others in the situation.

Potential risks that individuals could be exposed to during lone working include:

- Being the recipient of physical, emotional or sexual abuse.
- Being accused of perpetrating physical, emotional, sexual abuse or neglect.
- Neglecting one's own duties to safeguard children.

Coaching Contact

- Ensure that if any form of manual/physical contact is required, it should be provided openly and according to the guidelines provided
- within the FA Safeguarding Children Workshop. Care is needed as contact may be difficult to maintain when a child is constantly moving. Young people/young players should always be consulted, and their agreement gained. Some parents are becoming increasingly sensitive about manual support and their views should be carefully considered.
- Keeping up to date with the technical skills and qualifications in football to the appropriate level.
- All care givers must be subject to DBS checks at the highest level.
- Ensuring that if mixed teams are taken away they should always be accompanied by a male and female member of staff. NB - however, same sex abuse can also occur.
- All staff should be vigilant and ensure adults around children and young people act in accordance with the standards set by Swindon Town FC. Staff are also responsible for those who enter changing rooms etc.
- Ensuring that at tournaments or residential events, adults should not enter children's rooms or invite children or young people into their rooms.
- When coaching giving enthusiastic and constructive feedback recognising the development needs and capacity of young people/young players - avoiding excessive training or competition and not pushing them against their will.
- Being an excellent role model – this includes not smoking, not using bad language, not using drugs or being under the influence of alcohol in the company of young players.



- Secure parental consent in writing to act in loco parentis if the need arises to give permission for the administration of emergency first aid and/or other medical treatment.
- Keeping a written record of any injury or accident that occurs, along with the details of any treatment given and/or action taken. Advise parents of the incident.

When an injury occurs because of an accident, where the club or an individual's actions could amount to negligence, then an accident report form must be submitted to the club Safety Officer.

- Request written parental consent if club officials are required to transport children/young people/young players in their cars and ensure that coaches/staff are accompanied by another member of staff. Such transport arrangements should be avoided, unless absolutely necessary.
- Achieve the best level of supervision of children, always
- Record and report any situation which may place a child at risk or which may compromise the club's or the member of staff's own professional standing.
- Adhere to the club policy, guidance and agreed risk management strategies.

Unless a child/young person is a direct relation, the coaches, managers, referees, medics and club officials should not:

- Accept as a "friend", players or referees who are under 18 years, on social networking sites they are members of or share their own personal social networking sites with children or young people involved in youth football
- Contact children or young people known through football outside of the football context on social networking sites.
- Use internet or web-based communications to send personal messages of a non-football nature to a child or young person.
- Engage in any personal communications, 'banter' or comments.

(For further guidance refer to the club's Safeguarding Social Media Policy)

Practices to be avoided

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable they should only occur with the full knowledge and consent of someone in charge in the club or the child's parents. For example, a child sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a child up at the end of a session:

- Avoid spending time alone with children and young people away from others.
- Avoid taking children or young people to your home where they will be alone with you.



Practices never to be Sanctioned

The following should never be sanctioned. You should never:

- Engage in rough, physical or sexually provocative games, including horseplay.
- Share a room with a child.
- Engage in any form of Sexual contact with a child or allow or engage in any form of inappropriate touching.
- Allow children or young people to use inappropriate language unchallenged.
- Make sexually suggestive comments towards, or in the presence of, a child or young person, even in fun.
- Reduce a child or young person to tears as a form of control.
- Allow allegations made by a child or young person to go unacknowledged, unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for children or young people, that they can do for themselves.
- Invite or allow children or young people to stay with you at your home.
- Lend or borrow money or property from a child.

NB, it may sometimes be necessary for staff or volunteers to do things of a personal nature for children or young people, particularly if they are disabled. These tasks should only be carried out with the full understanding and consent of parents and the players involved. There is a need to be responsive to a person's reaction. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where physical contact, lifting or assisting a child or young person to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained. If you are unsure this must be checked with parents or carers and the Head of Safeguarding/Safeguarding Officers within Swindon Town Football Club.

Home visits

There are circumstances and occasions in which a member of staff's responsibilities may include home visits. Wherever possible such visits should not be undertaken alone. Contact by whatever means and meetings with vulnerable groups outside work arrangements should not take place without the agreement of the club, and in the case of a child, they should not take place without a parent/carer being present.



When to report suspicions or incidents.

Staff are not expected to be experts in recognising abuse; however, staff should be vigilant and respond swiftly and appropriately.

If any of the following circumstances occur, you should report this immediately to the club Safeguarding Manager or Designated Safeguarding Officers.

Make a written record of the incident or grounds for concern using the STFC Incident Reporting Form

The STFC Incident Reporting form is an internal document, designed to record the information necessary to formulate a referral, when necessary, to an outside agency but also to enable the club to maintain accurate records of any concerns or allegations of child abuse which may come to light.

You will be guided by the DSO as to how, when and by whom the parents of the child are to be informed:

- If you suspect a child may be the victim of abuse by any person, including neglect, physical, sexual or emotional abuse.
- If a child appears to have been the victim or perpetrator of bullying, including on-line cyberbullying.
- If you observe any injuries/marks on a child which they cannot account for, their explanation for the injury seems unlikely or you have suspicions as to how the injury may have been caused.
- If there is a sudden change in behaviour, i.e. the child/young person's behaviour alters significantly, they become withdrawn or tearful. If a child voices intentions to self-harm or if you suspect, he/she may be exhibiting signs/symptoms of self-harm or an eating disorder.
- If you suspect a child has been exposed to any inappropriate or indecent images or discloses any inappropriate on-line behaviour.
- If you accidentally hurt a child or young person, or you observe another adult hurting a child.
- If he/she seems distressed in any manner and you have concerns for their emotional state or welfare.
- If a child or young person appears to be sexually aroused by your actions or may have developed an infatuation with you or another member of staff.
- If a child or young person misunderstands or misinterprets something you have done, which may compromise your position or working relationship with that child.

The circumstances of the concern will be fully reviewed by the Designated Safeguarding Officer who may decide to refer the concern to Children's Services or another agency.



Do not worry that you may be mistaken. Being worried about doing the wrong thing is not a reason not to act. It is better to have discussed it with somebody with the experience and responsibility to make an assessment.

Responding to Concerns or Allegations

It is not the responsibility of anyone employed by Swindon Town Football Club, in a paid or unpaid capacity to decide whether the alleged harm or abuse has taken place. However, it is the responsibility of all STFC staff to act, by reporting any concerns or allegations of abuse of a child to the STFC Safeguarding Team or by contacting the appropriate authorities.

Action to be taken when Abuse is Suspected.

The following actions must be carried out when abuse of a child is suspected.

- Any suspicion that a child has been harmed or abused by an adult, peer, member of staff, player or volunteer should be immediately reported to the club's Safeguarding Manager or Designated Safeguarding Officers.
- The member of staff reporting the suspicion of abuse will also record the incident, using the STFC Incident Reporting form
- The Safeguarding Manager, Designated Safeguarding Officer or the member of STFC staff dealing with the child at that time, must take steps to ensure the immediate safety of the child in question and any other child who may be at immediate risk of harm.
- The parents/carers of the child will be contacted as soon as possible unless they are suspected to have abused the child in question. In such circumstances, advice will be obtained, by the Safeguarding Manager/ DSO or staff member dealing, from Police or Social Services with regards to when and who should inform the parents of the concern or allegation.
- The Safeguarding Manager will refer the allegation to Together for Children Integrated Contact and Referral Team, who may involve the police.
- If a child is at immediate risk of harm, then the Safeguarding Manager/DSO or any staff member dealing may also report the incident directly to the Police and/or Children's Services.
- The Safeguarding Manager should also notify the Chief Executive who will inform the Media and Communications Manager who will deal with any media enquiries.



- If the Safeguarding Manager is the subject of the suspicion/allegations, the report must be made to the Chief Executive who will refer the allegations to Social Services.
- In cases, such as sexual assault, where forensic evidence from a scene or the victim's body or clothing may be available then staff must attempt to preserve any such evidence e.g. locking a room to prevent other people disturbing the scene, advising the child not to wash, go to the toilet or change clothes if the assault was relatively recent. Staff should also be mindful of documentary or other evidence, which may be present on mobile phones, computers or other devices which may need to be retained.

Advice should be sought from the Safeguarding Manager or DSO as to the preservation of evidence in such cases, pending police involvement.

Action to be taken when a child discloses abuse.

- Stay calm.
- Listen carefully to what is said.
- Reassure the child that they have done the right thing in telling you.
- Do not promise to keep secrets –find an appropriate early opportunity to explain that to keep them safe it is likely that the information they tell you may need to be shared with others.
- Allow the child to continue at her/his own pace.
- Keep questions to a minimum; use the following as a guide to establish the brief, basic facts of the allegation:

WHO? – Names of who is involved.

WHAT? – What happened?

WHERE? – Where did it happen?

WHEN? -When did it happen?

- When they have finished make a detailed record of what they have said, using the child's own words, as soon as possible using an STFC Incident Reporting form recording what actions you have taken so far.
- **There is no requirement to get a lengthy account from the child at this stage. Remember that if the child discloses abuse you are only making a record of that child's initial disclosure and it is likely he/she will subsequently be fully interviewed by Police.**
- Tell them what you will do next and with whom the information will be shared

Contact the club Safeguarding Manager or a Safeguarding Officer immediately.



If the Safeguarding Manager or Safeguarding Team are unavailable, and you feel the child is in immediate danger or at immediate risk of harm, then report your concerns direct to Together for Children Integrated Contact & Referral Team (ICRT) or the Police on the following contact numbers:

Together for Children ICRT Integrated Contact & Referral Team

Tel: 0191 520 5560 (switchboard)

For urgent ICRT referrals Tel: 0191 5617007

Out of hours Emergency Duty Team: 0191 5205552

Police Tel: 101 or 999 in an Emergency

Record the name of the person you spoke to and the time at which you made the referral.

- Do not contact or confront the alleged abuser.
- If the alleged abuser is a parent, then do not immediately inform the parent of the child's disclosure. Seek advice from your Safeguarding Manager, Children's Services or the Police in respect of when and who will contact the parent or alleged abuser.

Information to be recorded

Information passed to social services or the police must be as helpful as possible, hence the necessity for making a detailed record at the time of the disclosure/concern. The STFC Child Incident Reporting form will guide you as to what information is needed but, where possible, include the following:

- Name of child.
- Age of child and date of birth.
- Home address and telephone number.
- Details of child's parents/carers, name(s), address(es), date(s) of birth, contact telephone number(s). Indicate who has parental responsibility if known.
- Indicate if the person making the report is expressing their own concerns or those of someone else?
- If it is not the child making the disclosure has the child concerned been spoken to? If so what was said?
- What is the nature of the allegation? Include dates, times, location(s), person(s) involved and any other relevant information.
- Include a description of any visible bruising or other injuries, but do not ask a child to remove or adjust an item of clothing. Record the child's explanation as to how any bruising or other injuries occurred.



- You may include your own observations about the child's behaviour e.g. tearful, shaking, reluctant to make eye contact etc.
- Do not record your own opinion of the incident on the Incident Reporting form e.g. "She appeared genuine", "I doubt they could have been alone together", "why would he have gone into that room?" etc.
- Details of any witnesses to the incident?
- The child's account, if it can be given, of what has happened. Use the child's own words where possible, put significant comments in speech marks.
- Have the parents been contacted? If so what has been said?
- Details of other people consulted.
- Details of the suspect, name, nickname or description and their relationship to the child (e.g. parent/coach/stranger).

When to Inform the LADO

If the allegation relates to a person who works with children (including STFC members of staff) then the Safeguarding Manager will refer the incident to the LADO (Local Authority Designated Officer) if that person has:

- i) Behaved in a way that has harmed or may have harmed a child.
- ii) Possibly committed a criminal offence against or related to a child.
- iii) Behaved towards a child in a way that indicates they may pose a risk of harm to children.

Allegations against members of staff

Where there is a complaint against a member of staff there may be three types of investigation (internal and external):

- A Criminal Investigation – by Police.
- A Safeguarding Investigation – by Social Services and the club.
- A Disciplinary or Misconduct Investigation – by the club and/or FA.

The results of the police and Safeguarding investigation may well influence the disciplinary investigation, and/or any future action, but not necessarily.



Internal enquiries and Suspension

- The Safeguarding Manager (or Safeguarding Officer dealing) will make an immediate decision in conjunction with the Chief Executive and Head of Human Resources about whether any individual accused of harm, inappropriate behaviour or abuse should be temporarily suspended pending further police and social services enquiries.
- Irrespective of the findings of the social services or police enquiries the Head of HR and Safeguarding Manager, in conjunction with legal advisors, will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, the Head of HR, Safeguarding Manager and the legal advisors must reach a decision based upon the available information which could suggest that on a balance of probability, it is more likely than not that the allegation is true.
- The welfare of children should always remain paramount.
- Should the investigation reveal any breaches of the club's Discipline Code of Conduct then those matters will also be subject of an internal investigation and may result in Disciplinary Action/ Dismissal of the individual.
- The FA/ League should be informed by the club Safeguarding Manager of any serious safeguarding concern or complaint in order that they may consider the risk posed across football.
- If Swindon Town FC decides to withdraw permission for a member of staff to engage in regulated activity with children and/or vulnerable adults STFC is legally obliged to refer that person to the Disclosure and Barring Service when it is also believed that member staff has caused harm or poses a future risk of harm to vulnerable groups, including children. This includes situations when Swindon Town FC would have taken the above action, but the person was re-deployed, resigned, retired, or left. For example, a teacher resigns when an allegation of harm to a student is first made.

Poor Practice

Poor practice is behaviour that falls short of abuse but is nevertheless unacceptable. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed or unreported.

- If, following consideration, the allegation is clearly behaviour which amounts to poor practice; the Safeguarding Manager and Head of HR will deal with it as a misconduct issue.
- If the allegation relates to poor practice by the Safeguarding Manager, or if the matter has been handled inadequately and concerns remain, it should be reported to the Chief Executive who will decide how to deal with the allegation and whether to initiate disciplinary proceedings.



Swindon Town FC will ensure that all staff/volunteers are fully supported and protect anyone, who in good faith reports his or her concerns that a colleague is, or may be, harming or abusing a child. The club's Whistleblowing (Public Interest Disclosure) Policy will apply to ensure this.

Support to deal with aftermath

Consideration should be given about what support may be appropriate to children, parents and members of staff. Use of help lines, support groups and open meetings will maintain an open culture and help the healing process.

The British Association for Counselling and Psychotherapy Directory is available from:
British association for Counselling and Psychotherapy

BACP House
15 St John's Business Park
Lutterworth
Leicestershire
LE17 4HB Tel: 01455 883300
e-mail: bacp@bacp.co.uk
Internet: www.bacp.co.uk

Social Services can signpost children and their families to support services within the community so can be consulted for advice.

Consideration should also be given about what support may be appropriate to the alleged perpetrator of the abuse.

Allegations of Non-recent abuse (Historic abuse)

Non-recent abuse (also known as historic abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years of age.

Many people who were abused in childhood believe that they are to blame and that the abuse was their fault. But this is never the case - a child cannot consent to abuse.

In countless circumstances children are too young to fully understand or articulate what is happening to them. Some spoke out at the time but weren't believed. Others were too embarrassed to tell anyone or did not know who to turn to.

In some cases, the non-recent allegation may be made against a member of staff who is still currently working with children, either within or outside the club.

Where such an allegation is made to a member of STFC staff, follow the "Action to be taken when abuse is suspected" (see page 26), and report the allegation to the Safeguarding Manager or Designated Safeguarding Team. The Safeguarding Manager will then report the allegation to the LADO, social services and/or the police. This is because other children, either within or outside the club, may be at risk of harm from this person.



Advice and Support for victims can be obtained from:

NAPAC – National Association for People Abused in Childhood

Free help-line - 0800 8010331

Office - 0207 614 1801 (9am-5pm)

NAPAC

Herald House,

Off Bunhill Row,

15 Lamb's Passage,

London EC1Y 8TQ

Victims of non-recent Sexual Abuse in Football can contact:

The FA/NSPCC Helpline 0800 0232642

The Professional Footballers' Association – wellbeing@thepfa.co.uk

The FA Directly via safeguarding@thefa.com

The Police, by going to a police station or dialling 101.

This policy should be read in conjunction with other STFC related policies.

The full policies can be found in the Staff Handbook.

Other Policies:

- **Safer Recruitment and Selection Policy**
- **Equal Opportunities, Diversity and Inclusion**
- **Whistleblowing (Public Interest Disclosure) Policy**
- **Health and Safety Policy**
- **Photography & Digital Images Policy**
- **Ball Assistants Policy**
- **Mascots Policy**

Policies and guidance for the above are included in the:

- **Excursions and Events Policy (including guidance on Under 18's travelling as part of the 1st Team**
- **Safeguarding Adults at Risk Policy**
- **Preventing Radicalisation and Extremism**
- **Safeguarding Within Partnerships Policy**
- **Anti-Bullying Policy**
- **Social Media Policy**
- **Sexting Policy**
- **Confidentiality, sharing data protection policy**
- **Late collection of children policy**
- **Transport Policy**
- **Complaints Policy**



Ball Assistants Policy

Swindon Town FC will endeavour to ensure the safety and protection of Child Ball Assistants, whilst carrying out their duties at the Energy Check County Ground, through adherence to the club's Safeguarding Children Policy and Procedures and Health and Safety Policy.

In addition, the following rules apply:

- Ball assistants will be a minimum of 12 years of age and will be subject of a Code of Conduct and a statement of conditions issued by the club, which must be signed by the child and their parent/guardian.
- Ball assistants will be supervised by at least two members of STFC staff. All supervising staff will be subject of Enhanced DBS checks and will have completed the STFC Safeguarding Children Induction on-line training.
- Male and Female staff, wherever possible, will be used to supervise mixed gender groups.
- Separate gender appropriate changing areas will be made available if required.
- No photographs will be taken in the changing areas.
- Staff should avoid any situation where they may be left alone with a ball assistant.
- All ball assistants will receive a Health and Safety Induction prior to carrying out their duties, this shall be notified to that child's parent/guardian.
- All ball assistants and their parent/guardian will be provided with the name and contact details of the Safeguarding Manager of the club.

Mascots Policy

Swindon Town FC is committed to ensuring that all children who carry out the role of Mascot, whilst in the care of the club, can do so in a safe and enjoyable environment through adherence to the club's Safeguarding Children Policy and Procedures and Safer Recruitment Policy and process.

The following guidance will be applied to all children visiting Swindon Town FC as a Match Day mascot

- Child mascots must be aged minimum 6 years old to maximum 12 years old. (Documentary proof of age will be required).
- All staff escorting match day child mascots must be subject of an enhanced DBS check and must have completed the STFC Safeguarding Children Induction on-line training.
- There should be a maximum of 5 mascots for any game (this will include the away mascot). In cases of a special match where the number of mascots may exceed the recommended number then authorisation from a club Director to include additional mascots will be required.



- Child mascots must be accompanied by a parent/carer at all times, other than when in secure areas e.g. the tunnel, when the mascot will be supervised by suitably qualified STFC chaperones.
- Parents will be advised to bring their child to the Stadium already wearing their Mascot Football strip (worn under warm clothing if appropriate) thereby avoiding the need for the child to change into their strip whilst on club premises as the club is unable to offer designated changing areas for Mascots.
- If a mascot requires help with dressing this will be done by the parent/carer.
- If an injured or disabled child is used as a mascot a risk assessment will be carried out to establish if that child can safely participate in the Match Day Mascot itinerary and to identify what additional safety measures may need to be put in place to allow the child to safely participate. The club Safety Officer will be notified of the risk assessment, who will then advise the paramedics of any issues.
- Every effort should be made to achieve correct staffing ratios and the best level of supervision of Match Day Mascots at all times. An individual member of suitably DBS checked STFC staff will be allocated as chaperone to each child with a disability or injury if they are assessed as requiring additional support.
- Male and Female chaperones, wherever possible, will be used to supervise mixed gender groups of Mascots.
- Staff should avoid any situation where they may be left alone with a mascot e.g. do not use a lift alone with a child mascot.
- Parents/carers will be informed of the club's Images Policy in information sent to them prior to the game; together with the appropriate Mascot Itinerary and details of the club's Safeguarding Manager.
- Should a mascot be subject to a Court Order special reference must be made to the Image Permission form.

Safe Working Practice & Good Conduct Guidance – Working With Vulnerable People

Unless guidance from other agencies is more suitable, the STFC applies the best practice guidance from The FA's best practice guidelines. This guidance is applicable to any football club setting and as such the guidance contained therein is applicable to all members of the organisation. Any breach of this policy or those guidelines will be treated very seriously and may result in disciplinary action or referral to statutory agencies.



Preventing Radicalisation and Extremism Policy

Protecting children from the risk of radicalisation is part of Swindon Town FC's wider safeguarding duties and is similar in nature to protecting children from other forms of harm or abuse.

All Safeguarding Staff, Academy Coaching, Education and Medical staff will receive PREVENT and Channel general awareness training and additionally all Academy scholars will be informed about the dangers of radicalisation via the STFC Life Skills plan.

As with managing other safeguarding risks, staff should be alerting to changes in children's behaviour which could indicate that they may be in need of help and protection. Swindon Town FC staff should use their professional judgement in identifying children who may be at risk of radicalisation and report their concerns (using an STFC Incident Reporting form) to the club Safeguarding Manager, who, if satisfied the concern is valid, will make a safeguarding referral to Children's Services and also share the concerns with the Police.

Referrals should clearly state that a "PREVENT REFERRAL" is being made and should be sent to:

<https://www.togetherforchildren.org.uk/what-we-do/concerned>

A multi-agency assessment meeting (MASH) will determine the appropriate response and level of support to the family. Consideration of referrals to the Channel programme may be appropriate in some cases. Response should be proportionate, with the emphasis on supporting vulnerable children and young people, unless there is evidence of more active involvement in extremist activities.

If there is an IMMEDIATE risk of a terror incident taking place you must call 999 or the Anti-Terrorist Hotline on 0800 789321

Safeguarding within Partnerships Policy

Swindon Town FC recognises its responsibility to safeguard the welfare of all Children and Adults at Risk participating in club activities and when participating in activities arranged in partnership with an external service provider. The club is committed to working within partnerships to provide a safe environment for all Children and Adults at Risk by utilising Safeguarding Policies and Procedures to protect vulnerable groups from physical, sexual or emotional harm, neglect, bullying or exploitation.

The club commitment to safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to Children or Adults at Risk of Harm.



Partnership agreements will include the following:

- All partners will be fully aware of their areas of safeguarding responsibilities.
- It will be determined which organisation's Safeguarding Policy and Procedures will be followed in the event of a concern arising.
- An agreement confirming safe recruitment procedures have been followed.
- If appropriate level DBS checks and self-declarations have been undertaken.
- Agreement on the level of supervision to be provided by the partner during the activity.
- If the provider has valid public liability insurance.
- What safeguarding training has been undertaken by the deliverers?
- Who is responsible for the induction of staff and volunteers? Health & Safety, Codes of Conduct etc.
- Who has responsibility for completion of consent forms (e.g. medical and image consent), registration, record keeping and risk assessments.
- Details of First Aid arrangements
- Clear guidance on the reporting of Safeguarding concerns or concerns regarding Poor Practice during and outside of normal office hours.
- Name and contact details of staff to whom Safeguarding concerns, or concerns regarding poor practice, should be reported.
- Whether participants and their parents/carers have been provided with details of how to report a Safeguarding concern.
- Guidance about informing partner organisations.
- Arrangements to support whistle-blowers.
- What evaluation procedures are in place to gain the vulnerable groups' views about the activity.
- The period by which the safeguarding arrangements in the agreement will be reviewed

Useful Contact Details

Together for Children ICRT Integrated Contact & Referral Team

Tel: 0191 520 5560 (switchboard)

For urgent ICRT referrals Tel: 0191 5617007

Out of hours Emergency Duty Team: 0191 5205552

Wiltshire Police Tel: 101 or 999 in an Emergency

Child Line: 0800 1111 Confidential telephone advice for children.

Child Protection in Sport Unit: 0116 2347278/7280 A central point for sport organisations in relation to child protection in sport.

NSPCC Helpline: 0808 800 5000



NSPCC British Sign Language Helpline: ISDN videophone:0208 4631148

Stonewall: 08000 502020 for support and information about lesbian, gay, bisexual and transgender issues and homophobia.

CEOP (Child Exploitation and Online Protection):Go to their website to report concerns about online abuse or grooming <http://www.ceop.uk/>

(The PFA (Professional Footballer's Association) Independent Youth Advisory Service- available to all Academy Players, Trialists and their parents.

youthadvisory@thepfa.co.uk

The Football League - Head of Safeguarding - Alex Richards arichards@efl.com

Government Guidance

Broad government guidance on additional safeguarding issues (as per the Keeping Children Safe in Education Guidance 2015) listed below, can be accessed via the GOV.UK website:

- bullying including cyberbullying
- children missing education
- child missing from home or care
- child sexual exploitation (CSE)
- domestic violence
- drugs
- fabricated or induced illness
- faith abuse
- female genital mutilation (FGM)
- forced marriage
- gangs and youth violence • gender-based violence/violence against women and girls (VAWG)
- hate
- mental health
- missing children and adults
- private fostering
- preventing radicalisation
- relationship abuse
- sexting
- trafficking



Allegation or Incident of Child Abuse

Stay Calm – Reassure – Take Seriously – No Promises – Few Questions – Follow Guide

Is the Child in need of Urgent Medical Treatment? Or in Immediate Risk of Harm ?

NO

YES

Is a Safeguarding Officer available?

YES

NO

Contact Emergency Services;
Ambulance Service or Police and
inform them of the Safeguarding issue.

Report to Safeguarding Manager or
DSO at earliest opportunity.

Is the matter serious enough to potentially be a
Criminal Offence?

NO

YES/UNSURE

Does the allegation or incident
involve the Child's Parent or Carer?

NO

YES

Does the allegation or incident
involve the Child's Parent or Carer?

NO

YES

Inform Parent/Carer at
earliest opportunity.

Inform Parent/Carer at
earliest opportunity.

Inform Safeguarding Manager/DSO who will
undertake an Assessment of Circumstances.
Referral to Children's Services to be
considered.

Internal Strategy Meeting convened and
Investigation initiated.

Action plan to be determined, including
when to inform parents.

Inform Safeguarding Manager/DSO immediately.

Parent/Carer to be informed after consultation
with Children's Services/Police.

Allegation/incident to be reported to Children's
Services at earliest opportunity.

Referral by Safeguarding Manager/DSO to Police,
LADO, League/FA, if appropriate.

The person receiving/reporting the allegation or incident must submit a STFC Child Incident Reporting
form to the Safeguarding Manager at the earliest opportunity.



Making a Referral to the League / F.A.

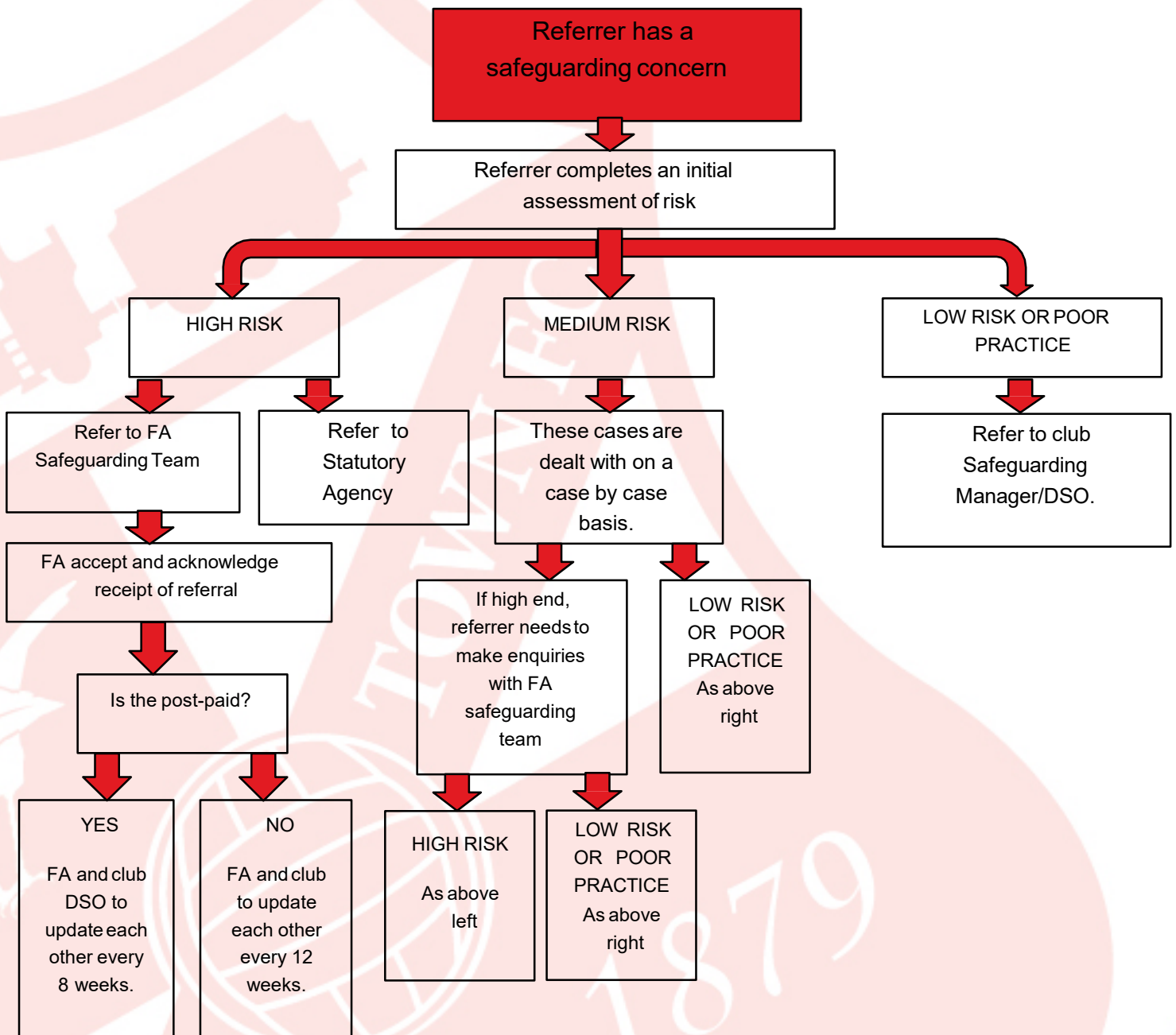
On making any referral of an allegation of or incident of suspected abuse of or unsuitable behaviour towards a Child or Adult at Risk to any external agency (including the police, the local authority or the DBS), the Head of Safeguarding shall notify the club Safeguarding Lead in writing and ensure that the Safeguarding Lead is kept fully apprised of the progress of the referral and any subsequent investigation or action. The club will notify the League and the F.A. of the referral or incident (through the submission of the Affiliated Football Safeguarding Referral Form) and provide them with appropriate updates in respect of:

- Any evidence obtained by the club demonstrating the abuse of, or unsuitable behaviour towards, a Child or Adult at Risk (whether the evidence relates to conduct by a member of Staff in the performance of their duties as a member of Staff, or otherwise);
- A third (or subsequent) incident or allegation of 'poor practice' (as defined in Affiliated Football's Safeguarding Procedures) in relation to a Child or Adult at Risk involving the same member of Staff;
- Any referral of an allegation or incident of suspected abuse or of unsuitable behaviour towards a Child or Adult at Risk the club has made to any external agency.
- Any investigation by an external agency into suspected abuse of or 'unsuitable behaviour' towards a Child or Adult at Risk involved in an Activity of which the club becomes aware.

A referral is made by completing an 'Affiliated Football Referral Form' and sent to The FA Safeguarding Team or County FA (depending on level of risk assessed) within 24 hours. Referrals can be made over the phone, but a written referral needs to be sent within 24 hours. The FA's Safeguarding Team can be contacted on 0844 9808200 (ext. 6401 or 6876) or email safeguarding@thefa.com



FA Referral process



The FA/NSPCC 24-hour Helpline can be contacted for advice on 0808 800 5000 Deaf users text phone 0800 056 0566

Suspensions by the FA

When the FA suspends an individual the FA Safeguarding Team will notify the Safeguarding Manager of the suspension. This notification will be via a copy of the suspension letter sent to the individual.

For further details of The FA process of investigation and decision making (including the appeals process) please refer to The FA's Safeguarding Rules and Regulations available on www.theFA.com.



Legislation

- Children Act 1989
- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Human Rights Act 1998
- Sexual Offences Act 2003
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- Protection of Freedoms Act 2012
- Children and Families Act 2014
- Special Educational Needs and Disabilities (SEND) Code of Practice: 0 to 25 years – Statutory Guidance for organisations which work with and support children and young people who have special educational needs or disabilities; HM Government 2014
- Information Sharing: Advice for practitioners providing safeguarding services for children, young people, parents and carers; HM Government 2015
- Working Together to Safeguarding Children: a guide to inter-agency working to safeguard and promote the welfare of children; HM Government 2015

Version I.D	Reviewed by	Update details	Date of review	Endorsed by	Signature
1.1	Matt Waters	Post EFL Visit edits	2 nd November 2018	Steve Anderson	

Signed.....

Date of Renewal.....

Date of Review 1st July 2019

Steve Anderson
Chief Executive



Swindon Town Football Club

Code of Conduct

This code of conduct will be reviewed on an annual basis, or sooner should any major incident, organisational or legislative change arise.

Date of next review: July 2019

Signed.....Chief Executive
 Signed.....Designated Safeguarding
Officer

Version I.D	Reviewed by	Update details	Date of review	Endorsed by	Signature
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- Physical contact with children, young people and vulnerable adults
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- Communication with children, young people and vulnerable adults (including the use of technology)
- Poor practice
- Concerns About An Adult Working/Volunteering with children, young people or vulnerable adults
- Whistle-blowing
- Appendix 1 – Staff confirmation of code of conduct being read and understood



1. Introduction

Swindon Town FC acknowledges its responsibility to safeguard the welfare of every child, young person and vulnerable adult who has been entrusted to its care and is committed to working to provide a safe environment for all members.

STFC Commitment to Safeguarding

Swindon Town Football Club is committed to ensuring that:

The safety and welfare of the child/vulnerable adult is paramount.

The child/vulnerable adult, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity has the right to protection from abuse.

All suspicions and allegations of abuse and poor practice will be taken seriously and responded to swiftly and appropriately.

All staff are recruited and checked in accordance with safer recruitment processes.

All staff (paid/unpaid) working for STFC have a responsibility to report concerns.

All staff are given the appropriate level of training to deal with situations that may occur and have the support required to report their concerns/suspicions.

All staff, working with children/vulnerable adults are suitably accredited and all coaches/volunteers adequately qualified and checked through the Disclosure and Barring services. (DBS)

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

STFC recognises that safeguarding is the responsibility of every adult in our organisation.

This code of conduct applies to :-

- staff (paid/unpaid) working for, in partnership with or on behalf of STFC. This includes contracted members of staff, casual staff, temporary staff and volunteers. For the purposes of this document, the term 'staff' refers to any of the above.
- senior managers and trustees

This code of conduct is provided to all adults working within and for the STFC, who are subsequently asked to read and sign to confirm that they understand the content and agree to working/volunteering in line with the expectations laid out here.



This code of conduct should be read in conjunction with:-

- the STFC Safeguarding and Child Protection Policy and Procedures.
- STFC policy on trips and overnight stays
- Guidance on transporting pupils (within the STFC Safeguarding and Child Protection policy)
- Parent/Carer code of conduct
- Player code of conduct

2. Positions of trust

As a result of their role, all those working /volunteering with children, young people and vulnerable adults within STFC are in a position of trust. Adults should always maintain appropriate professional boundaries and avoid behaviour which could be misinterpreted by others.

All adults working/volunteering within the STFC have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children, young people and vulnerable adults. Adults should remember that they are a role model for the children and young people they are engaging with. Adults working/volunteering for the STFC are not permitted to drink or smoke whilst participating in activities with children, young people and vulnerable adults or in their company.

3. Lone-working

- Avoid private or unobserved situations and encourage open communication. Adults working/volunteering in one to one situations with children can be more vulnerable to allegations or complaints. Endeavour to ensure there are additional adults present, particularly when with a lone child, young person or vulnerable adult.
- Maintain safe and appropriate boundaries with children, young people and vulnerable adults in your care. Any sexual behaviour by an adult with or towards a child, young person or vulnerable adult is unacceptable. It is an offence for an adult in a position of trust to engage in sexual activity with a child under the age of 18. (Sexual Offences Act 2003: abuse of a position of trust)
- Involve parents/carers wherever possible. For example, encouraging them to take responsibility for the child/vulnerable adult in the changing rooms. If groups have to be supervised in the changing rooms, always ensure parents/carers, teachers, coaches or officials work in pairs.



4. Treating children, young people and vulnerable adults equally and fairly

- Treat all children/vulnerable adults equally and with respect and dignity.
- Adults should exercise care when selecting children for specific activities, jobs or privileges in order to avoid perceptions of favouritism or injustice.
- Always put the welfare of each child/vulnerable adult first.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Recognising the developmental needs and capacity of the child/vulnerable adult.

5. Physical contact with children, young people and vulnerable adults

- Ensure that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the FA Governing Body. The child/vulnerable adult and their parent/carer should always be consulted, and their agreement gained.

6. Administering first aid

- Secure consent in writing to act *in loco parentis*, (in place of the parent) if the need arises to administer emergency first aid and/or other medical treatment.
- Ensure that a record is made of any injuries, together with the first aid administered
- Inform parents and carers if first aid has been administered (in writing if possible)

7. Communication with children, young people and vulnerable adults (including the use of technology)

- Communication with children, young people and vulnerable adults both in the 'real' world and online should take place within explicit professional boundaries.
- Adults should not request or respond to any personal information from children, young people or vulnerable adults.
- Adults should not give their personal contact details to children, nor should they accept requests to join online social networks from the children, young people and vulnerable adults they are working/volunteering with.
- Adults should ensure that they establish safe and responsible online behaviours.



8. Poor Practice

Practices to be avoided:

- Avoid spending time alone with children/vulnerable adults away from others.
- Avoid taking or dropping off a child/vulnerable adult to an event or activity.

If cases arise where these situations are unavoidable it should be with the full knowledge and consent of someone in a senior position within STFC or the parent/carer of the child/vulnerable adult. For example, a child/vulnerable adult sustains an injury and needs to go to hospital, or a parent/carer fails to arrive to pick the child/vulnerable adult up at the end of a session.

Practices Never to be Sanctioned:

- Never engage in rough, physical or sexually provocative games, including horseplay.
- Never remove or assist children with the removal of sportswear even if requested.
- Never allow or engage in any form of inappropriate touching.
- Never allow the child/vulnerable adult to use inappropriate language unchallenged.
- Never make sexually suggestive comments, even in fun.
- Never reduce a child/vulnerable adult to tears as a form of control.
- Never fail to act upon and record any allegations made by the child/vulnerable adult.
- Never do things of a personal nature for the child/vulnerable adult, that they can do for themselves

It may sometimes be necessary for staff to do things of a personal nature for the child/vulnerable adult, particularly if they are young or are disabled. These tasks should only be carried out with the full understanding and consent of parents/carers and the child/vulnerable adult involved. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible. This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting the child/vulnerable adult to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.



9. Concerns About An Adult Working/Volunteering with children, young people or vulnerable adults

If a concern/disclosure involves reference to alleged abuse or inappropriate behaviour by an adult working within the organisation, the Safeguarding Officer should be contacted immediately.

A record should be made by the member of staff in receipt of the concern / disclosure. This should be passed to the Safeguarding Lead. Copies should not be retained by you. If the concern / disclosure involves the Safeguarding Lead, this must be reported directly to the LADO. (via the contact details for MASH)

The member of staff who is in receipt of a concern or disclosure must not discuss this with the adult involved.

The Safeguarding Lead will contact the Local Authority Designated Officer in the first instance (via the contact details for MASH – see page 6)

If a member of staff / Volunteer or is suspended or dismissed from their role then the EFL (Ann Hussey) and The FA safeguarding team should be informed within 72 Hours. A referral will need to be made to the DBS if the outcome of an investigation is that the adult is dismissed from working with the organisation.

The Safeguarding Lead will report any allegations about staff working in the organisation to the FA Safeguarding Team.(see appendix 7 of Working Together To Safeguard Football – referral form)

Records of allegations involving staff are stored confidentially and securely.

Whistle-blowing

STFC supports the FA's Whistle Blowing Policy and has a separate whistle-blowing policy which outlines a graduated response to report concerns about the practice or behaviour of an adult working within STFC. Ultimately, any adult or young person with concerns about an adult in a position of trust in the organisation can whistle-blow by emailing Safeguarding@TheFA.com or contacting the NSPCC whistle-blowing helpline 0800 028 0285.



Appendix 1 – Staff/ Volunteer/ Trustee Declaration

I understand that it is my responsibility to read the STFC Code of Conduct. If there is something which I do not understand fully, it is also my responsibility to follow this up with a member of the safeguarding team.

I am aware and agree that it is mandatory for all staff and volunteers to adhere to Swindon Town Football Club safeguarding policies and procedures.

Name	Date signed	I confirm I have read the STFC code of conduct	I confirm I agree to the above statement	Follow up required

Signature.....



The following legislation and national and local guidance has been used to inform this policy:

Working Together to Safeguard Children.

Swindon Safeguarding Children Board Procedures.

Data Protection Act 1998.

Sexual Offences Act 2003.

S.67 Serious Crime Act 2015

Protection of Children Act 1978

S.160 Criminal Justice Act 1988

Safeguarding Vulnerable Groups Act 2006

The Human Rights Act 1998.

[UN Convention on the Rights of the Child \(UNCRC\)](#) Achieving Best Evidence 2011.

Premier League Guidance for Safer Working Practice.

Premier League Youth Development Rules

FA Grassroots Football Safeguarding Children 2016.

FA Safeguarding Rules and Regulations.

The F.A. RESPECT Campaign.

NSPCC Child Protection in Sport Unit guidance.

Keeping Children Safe in Education (Statutory guidance for schools and colleges) July 2015

POLICY UPDATE

This policy will be reviewed annually, or in light of any changes in legislation or guidance, or following any learning outcomes from safeguarding incidents, concerns or allegations.

Policy dated June 2018.



Child Protection Incident Reporting Form

1. Please indicate what you are reporting:

I have concerns that abuse may be occurring (complete sections 2 and 3)

I was involved in an incident with a child (complete sections 2 and 4)

I was a witness to an incident with a child (complete sections 2 and 4)

I have received an allegation of abuse (complete sections 2 and 5)

A child has told me that they are being abused (complete sections 2 and 5)

2. Important information:

Your name _____

Your contact details _____

Name of child concerned _____

Capacity in which child is known to you _____

Any other useful information relating to the child (eg: home address, school, date of birth) _____

Is the child aware of this referral. Yes/No (if no explain why)

Is the Parent/Carer aware of this referral. Yes/No (if no explain why)

3. Concerns that abuse may be occurring

Please record the concerns that you have regarding a child or adult:



4. Incident with a child

Please indicate which of the following has occurred:

- I accidentally hurt a child.
- A child misinterpreted or misunderstood something I have done.
- I have had to use reasonable physical restraint.
- I was witness to one of the above (please indicate which one)

Please provide further information, including any action taken so far and the reasons for doing so.

Continue on separate sheet if necessary

5. Allegation/Disclosure of abuse:

Allegation received from: _____

Allegation received on: _____

Name of person about whom allegation has been made:

Please use space below to record the details of the allegation or disclosure you received. This should be a factual account of the information you have received only. Do not include assumptions or opinions of others. Make sure you record details of dates and times and any other potentially useful information. If the disclosure has come from a child who is claiming they are being abused, the conversation should be recorded in their words. If there are any injuries to the child, describe the injuries but do not remove clothing to inspect a child. Do not attempt to investigate the matter yourself. Also record any action you have taken.



Name

Signature _____ Date _____

After completion all documents should be returned to the Club Safeguarding Officer