

#### **TABLE OF CONTENTS**

**DOCUMENT VERIFICATION STRUCTURE & GOVERNANCE** 3 **POLICY STATEMENT** 5 **LEGISLATION & GUIDANCE DEFINITIONS** 5 RECORDING INFORMATION 13 **INFORMATION SHARING & GDPR** 14 **SAFEGUARDING TEAM** 14 **SAFER RECRUITMENT & DBS** 15 SAFEGUARDING CODE OF CONDUCT 15 **RISK MANAGEMENT** 16 **REFERRAL THRESHOLDS** 18 SAFER WORKING PRACTICE 20 PREVENT GUIDANCE 21 **USEFUL LINKS & RESOURCES** 21 **USEFUL CONTACT NUMBERS** 

**APPENDICES** 

22 APPENDIX 1

Action: Disclosure and Allegation Flow Chart

23 APPENDIX 2

Action: Reporting a Concern About a Child
Form

NB Preston North End Football Club (this incorporates the Academy and Preston North End Community and Eduaction Trust) and will be referred to throughout this document as 'the club'.

#### **DATE AND REVIEW**

This safeguarding policy is reviewed annually or following legislative changes.

Date of next review: December 2024





### **DOCUMENT VERIFICATION**

**REPORT REFERENCE:** Safeguarding Children and Young People

ISSUE: 4

DATE: January, 2024

Revision	Date	Description	Prepared	Approved by the Safeguarding Governance Group	Approved by the Board	Review Date
1	October 2021	Safeguarding Children and Young People	ZH	October 2021	October 2021	December 2021
2	January 2022	Safeguarding Children and Young People	СР	December 2021	December 2021	December 2022
3	January 2023	Safeguarding Children and Young People	СР	December 2022	December 2022	December 2023
4	January 2024	Safeguarding Children and Young People	СР	December 2023	December 2023	December 2024

# SAFEGUARDING STRUCTURE & GOVERNANCE

#### **ZOË HALL**

Board Level Lead T: 01772 693313 (Ext 1313) M: 07792 149 716 E: zoe@pne.com

#### **CAROLE PLAYER**

Head of Safeguarding T: (Ext 1316) M: 07557 181 094 E: carole.player@pne.com

#### **HARRIET CREIGHTON-LEVIS**

PNECET Senior Safeguarding Manager T: (Ext 1365) M: 07767 896 308 E: harriet@pne.com

#### **PHILIP BROWN**

Academy Designated Safeguarding Officer (DSO) M: 07766 925 078 E: phil@pne.com

#### **REBECCA ROBERTSON**

PNECET Designated Safeguarding Lead (DSL) T: 01772 693309 (Ext 1309) M: 07769 131 446 E: rebecca@pne.com

#### **GUY NELLANY**

Matchday Designated Safeguarding Officer (DSO) E: guy@pne.com

#### JESSICA RILEY

PNECET Designated Safeguarding Officer (DSO) T: 01772 693309 (Ext 1367)

E: jessica@pne.com

#### **LIAM SEALEY**

PNECET Designated Safeguarding Officer (DSO) T: 01772 693309 (Ext 1368) E: liamsealey@pne.com

#### **JACK MOUNTAIN**

PNECET Designated Safeguarding Officer (DSO) T: 01772 693309 (Ext 1312) E: jack.mountain@pne.com





# SAFEGUARDING POLICY STATEMENT

Preston North End Football Club (PNEFC) recognises and accepts the responsibility to safeguard all children and young people who are under the clubs care and supervision, or using the club's facilities. It is fundamental for all adults working at the club to safeguard and promote the welfare of children and young people. All staff and volunteers contribute to an ethos where children feel secure and safe. All children have opportunities to communicate and know that they will be listened to.

The wellbeing of children and young people is paramount and the recommendations and guidelines outlined within this policy are to be adhered to at all times. All staff and volunteers are expected to make themselves aware of this safeguarding policy and understand that safeguarding is everyone's responsibility.

This policy and associated procedures are widely promoted and are mandatory for everyone involved with Preston North End Football Club. Failure to comply with the safeguarding policy may ultimately result in dismissal from the club, and in all cases will be dealt with in accordance with the disciplinary procedures set out in the Employee Handbook. Academy scholars and parent/carers are informed about the club's approach to safeguarding during the induction process and this includes information about who to contact with concerns. The club's website contains information about the club's approach to safeguarding and, again, who to contact in the event of any worries or concerns.

All staff have attended safeguarding training sessions operated by the English Football League (EFL) and The Football Association (FA).

The policy is endorsed by the Board of Directors. A safeguarding committee meets bi-monthly to discuss and review safeguarding matters, and a Board Director sits on this committee and attends all meetings.

This safeguarding policy should be read in conjunction with the club's Matchday Safeguarding Plan and Staff Code of Conduct. If there are any residual concerns or issues following the application of this policy, staff should consider the content of the club's Managing Staff Allegations Policy, Whistleblowing Policy, Low-Level Concerns Policy and Grievance Procedure if necessary.

#### LEGISLATION AND GUIDANCE

Preston North End Football Club seeks guidance from relevant legislations, organisations and governing bodies for all safeguarding matters. The Children and Young People Safeguarding Policy is informed by the following legislation:

#### **LEGISLATION**

The Children Act 1989 & 2004

Health & Safety at Work Act, 1974 and 2015

Management of Health & safety at Work Regulations 1999

Modern Slavery Act 2015

Counter Terrorism and Security Act 2015

Female Genital Mutilation Act 2003 and 2015

Domestic Abuse Act 2021

Protection of Freedoms Act 2012

#### **GUIDANCE**

Working Together to Safeguard Children 2023
Keeping Children Safe in Education 2023 (KCSiE)
Management of Health and Safety at Work
Regulations 1999
Private Fostering Regulations, 2005
General Data Protection Regulations 2018

General Data Protection Regulations 2018 SEN Code of Practice guidance 2015 and 2020 UKCIS Guidance

In addition, The Football Association, (FA) and English Football League (EFL) rules, regulations and guidance. Preston North End Football Club is dedicated to promote best practice throughout the club, and its counterparties and will do so in accordance with the above.

#### **DEFINITIONS**

**Abuse** – refers to the maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. A child can be abused by an adult or adults, or another child or children.

**Activity** – refers to any matches, coaching programmes, educational events or other related activity where there are children taking part.

Child/Children – a person who has not reached their 18th birthday.

**Child Protection** – this refers to the activity undertaken to protect children who are suffering, or likely to suffer from harm. Child protection forms part of safeguarding and welfare.

**Confidentiality** – an assurance that limits access, or places restrictions on certain information.

**Consent** – voluntary permission with knowledge of the purpose, effects and risks involved, as well as the likelihood of success, and any other consequences. Consent can be given orally or in writing.

**Duty of Care** – a legal obligation on an individual requiring adherence to a standard of reasonable care while performing any acts that could foreseeably harm others.

Harm – as defined by the Children Act 1989, harm can be defined as the ill-treatment or impairment of health and development. This was then developed in the Adoption and Children Act, 2002, impairment suffered from seeing or hearing the ill-treatment of another. As well as physical and sexual ill-treatment, harm can also include an avoidable deterioration in physical or mental health and the impairment of physical, intellectual, emotional, social or behavioural development.

**Private Fostering** - a privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent or close relative. Where the child is to be cared for in that home for 28 days or more, close relative is defined as "a grandparent, brother, sister, uncle or aunt ('whether of the full blood or half blood, or by marriage or civil partnership) or step-parent'.

A child who is Looked After by a local authority, or placed in a children's home, hospital or school is excluded from the definition. In a private fostering arrangement the parent still holds Parental Responsibility, (PR) and agrees the arrangement with the private foster carer. A child, (as per definition above) placed with a host family for 28 days or more is in a private fostering arrangement and therefore, clubs with host families should inform and work with their local authority ensuring that they meet legislative and local procedural requirements.

#### AIMS AND KEY PRINCIPLES

The aims of Preston North End Football Club's safeguarding policy are:

- To safeguard all children and young people who are in contact with the club.
- Protecting children from maltreatment; preventing impairment of children's mental and physical health sor development.
- To promote and demonstrate best practice for the safety and wellbeing of children and young people.
- To ensure all staff, whether full-time, part-time, or voluntary understand their roles and responsibilities with regards to safeguarding at the club.
- To ensure parents, guardians and other third party adults who may come in contact with children and young people act as positive role models.
- To reflect the club values (proud, diverse, unity, ambitious, financially prudent) with regards to safeguarding children and young people.
- To understand the importance of teaching children how to keep themselves safe from all types of abuse.

#### **ADDITIONAL POLICIES**

This policy must be read in conjunction with all other policies within Preston North End Football Club's Employee Handbook, and in particular, Safer Recruitment & Selection Policy, ED & I Policy, Anti-bullying and Harassment, Whistleblowing, Low-Level Concerns Policy, IT & Computer Use Policy, Social Media Policy, Adults at Risk Policy, Managing Staff Allegations Policy, Staff Code of Conduct, Academy Safeguarding Procedures, Matchday Safeguarding Plan, Inappropriate Behaviour Policy, Complaints Policy, EFL Safer Working Practice document and the club's Health and Safety Policy.

## RESPONDING TO SAFEGUARDING INCIDENTS AND CONCERNS

All staff and volunteers will maintain and demonstrate an attitude of "it can happen here". A person can describe child abuse as harm to a child, or failure by those with responsibility for a child to provide reasonable care, or both. Abuse may take the form of physical injury, sexual or emotional abuse, or neglect. Anybody in contact with the child or young person may cause harm, i.e. parents, carers +or relatives for example. The following paragraphs describe the four main types of abuse.

#### **CATEGORIES OF ABUSE**

These can be classed as Physical, Sexual, Emotional and Neglect - there can be an overlap between all the different forms of child abuse and all or several can co-exist.

#### **PHYSICAL ABUSE**

This is the actual or likely physical injury to a child where a person physically injures or hurts a child or young person. This can involve hitting, shaking, squeezing, burning, biting or any other way of intentionally causing harm to another: Bruises and other marks are indicators of physical harm caused by another. If bruises are noticeable in unlikely areas of the body then concern should be raised to a Designated Safeguarding Officer (DSO).

#### **PHYSICAL INJURY**

**Identification** – the first task for the staff member should be to check out the incident or injuries which have aroused their concern. Speaking with the child or young person may do this. **No physical examination should be undertaken**.

Satisfactory explanations – if the staff/volunteer is satisfied with this explanation a note should be made of the incident and the relevant DSO contacted. This must be recorded on My Concern, this is to ensure the DSO is alerted to a pattern of repeated incidents.

**Unsatisfactory explanations** – if the staff member/volunteer is still concerned they should contact the relevant DSO.

Serious incidents – some serious injuries may need immediate medical attention and the staff member, volunteer should ensure this happens. A record on My Concern should be made and reported to the DSO immediately.

When a referral has been made to the DSO every co-operation should be given to this person, and or the key partner in any arrangements they may wish to make for the child or young person.

#### **EMOTIONAL ABUSE**

Emotional abuse is present in all other forms of abuse but it can stand alone. It is defined as the actual or likely severe adverse effect on the emotional and behavioural development of a child or young person caused by persistent, or severe emotional ill-treatment.

The role of the staff member or volunteer is to recognise and record concerns and consult with the Designated Safeguarding Officer (DSO).

#### **Definition**

This refers to actual, or likely severe adverse effects on the emotional and behavioural development of a child or young person caused by persistent, or severe ill-treatment, or by rejection. All abuse involves some emotional ill-treatment and the areas of concern are:

- · Rejection.
- · Lack of praise or encouragement.
- · Lack of attachment.
- · Lack of stimulation i.e. fun and play.
- · Lack of appropriate handling relative to age.
- Segregation.
- Punishment, or given work tasks as a punishment.

#### **NEGLECT**

For neglect to be considered it needs to be persistent or severe resulting in a significant impairment of the child or young person's development. As with emotional abuse, it is the role of the staff member/volunteers to recognise and record, then consult with the DSO who will refer where appropriate.

#### Definition

This refers to the persistent or severe neglect of a child or young person, or failure to protect them from exposure to danger, including cold or starvation, extreme cases of lack of care resulting in the significant impairment of the child's health, safety and welfare. Signs of neglect could also include the following;

- Can occur during pregnancy as a result of maternal substance misuse.
- Failure to protect a child from physical and emotional harm or danger.
- Failure to ensure access to appropriate medical care or treatment and education.
- Neglect of, or unresponsive to, a child's basic emotional needs.



#### **'SHARING NUDES AND SEMI-NUDES': DEFINITION**

This advice uses the term 'sharing nudes and seminudes' to mean the sending or posting of nude or seminude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship.

It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- Children and young people find nudes and semi-nudes online and share them claiming to be from a peer.
- Children and young people digitally manipulate an image of a young person into an existing nude online.
- Images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts. Nude or semi-nude images, videos or live streams may include more than one child or young person. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex.

#### **Alternative Definitions**

Many professionals may refer to 'nudes and semi-nudes' as: youth produced sexual imagery or 'youth involved' sexual imagery.

#### **Indecent imagery**

This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.

#### 'Sexting'

Many adults may use this term, however some young people interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images.

#### Image-based sexual abuse

This term may be used when referring to the non-consensual sharing of nudes and semi-nudes. Terms such as 'revenge porn' and 'upskirting' are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences outlined in s.33-35 of the Criminal Justice and Courts Act 2015, Voyeurism (Offences) Act 2019 and s.67A of the Sexual Offences Act 2003.

What to do if an incident involving sexting comes to your attention - report it to your Designated Safeguarding Officer (DSO) immediately:

- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSO (or equivalent).

#### For further information

Download the full guidance, Sharing nudes and seminudes: advice for education settings working with children and young people (UKCIS, 2020)

#### **DOMESTIC VIOLENCE**

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

- Psychological
- Physical
- Sexual
- Financial
- Emotional

Controlling behaviour is: a range of acts designed to make a person subordinate and/or dependent by isolating them from sources of support, exploiting their resources and capacities for personal gain, depriving them of the means needed for independence, resistance and escape and regulating their everyday behaviour.

Coercive behaviour is: an act or a pattern of acts of assault, threats, humiliation and intimidation or other abuse that is used to harm, punish, or frighten their victim.

This definition, which is not a legal definition, includes so called 'honour' based violence, female genital mutilation (FGM) and forced marriage, and is clear that victims are not confined to one gender or ethnic group

#### **FEMALE GENITAL MUTILATION (FGM)**

The practice involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls or women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK, or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

FGM is mostly carried out on young girls sometime between infancy and adolescence, and occasionally on adult women. The practice is mainly concentrated in the Western, Eastern, and North-Eastern regions of Africa, in some countries the Middle East and Asia, as well as among migrants from these areas. FGM is therefore, a global concern.

#### **CHILD SEXUAL EXPLOITATION (CSE)**

A form of child sexual abuse occurs where an individual, or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something, the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may be sexually exploited even if the sexual activity appears consensual. Child Sexual Exploitation can also take place through the use of technology. Some of the signs that a child may be subject to sexual exploitation include;

- going missing for periods of time or regularly returning home late
- skipping school or being disruptive in class
- appearing with unexplained gifts or possessions that can't be accounted for
- experiencing health problems that may indicate a sexually transmitted infection
- having mood swings and changes in temperament
- using drugs and/or alcohol
- displaying inappropriate sexualised behaviour, such as over-familiarity with strangers, dressing in a sexualised manner, or sending sexualised images by mobile phone, (sexting)
- may also show signs of unexplained physical harm, such as bruising or cigarette burns.

## CHILD CRIMINAL EXPLOITATION (CCE) - COUNTY LINES NSPCC definition of County Lines

The 2018 Home Office Serious Crime Strategy states the NPCC definition of a County Line is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and vulnerable adults to move [and store] the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

A common feature in county lines drug supply is the exploitation of young and vulnerable people. The dealers will frequently target children and adults - often with mental health or addiction problems - to act as drug runners or move cash so they can stay under the radar of law enforcement.

As we have seen in child sexual exploitation, children often don't see themselves as victims or realise they have been groomed to get involved in criminality. So it's important that we all play our part to understand county lines and speak out if we have concerns.

#### Some signs to look out for include:

There are several signs to look out for that may indicate someone is involved in County Lines;

- repeatedly going missing from school or home and being found in other areas;
- having money, new clothes or electronic devices and they can't explain how they paid for them;
- getting high numbers of texts or phone calls, being secretive about who they're speaking to;
- decline in school or work performance;
- significant changes in emotional or physical well-being.

### Social Media and How It Can Be Used within the County Lines

A briefing on how organised crime groups use social media to groom and exploit young people. There is information that "one in four young people (24%) reported that they see illicit drugs advertised for sale on social media – a significant figure considering how recent a phenomenon this is."

- Most common social media platforms used to advertise drugs are Snapchat 56%, Instagram 55% and Facebook 47%.
- Advertising occurs through sharing photos, videos or statuses showing money, new drugs or when they are open for "business". Use of hashtags on platforms such as Instagram mean that individuals can search for specific terms linked to drug use and can find an account to purchase from in minutes. Outright searches for drugs are banned, however users can still search slang that will go undetected by Instagram.
- Emoji's are also used to mask and hide language that is linked to drugs, violence and sexual activity online.

#### What can you do about it?

- Always report your concerns to a DSO and follow the safeguarding policy.
- If a child is in immediate danger, contact 999 or 101 in a non-emergency.
- Share any information or intelligence you obtain about the ways in which children are being groomed and criminally exploited.
- Use appropriate language to reframe the issue from one of criminality, and choice, to one of exploitation and abuse. This shift in language encourages appropriate safeguarding interventions which lead to improved support and outcomes for children.

#### **CHILD FINANCIAL EXPLOITATION (CFE)**

Children and young people can be financially exploited in a range of ways. While there are many positive aspects of online life, the emergence of internet banking, online gaming, technological advancements, and social media has created new spaces and opportunities for perpetrators to target and exploit children for financial gain. While child financial exploitation can take many forms, for the purposes of this policy, we refer to the practice of using a child's bank accounts (or online wallets) to hold, transfer or hide funds or assets for the purposes of exploitation. These funds are often the direct proceeds of crime. The grooming of these victims follows a familiar pattern to other forms of child exploitation. They are targeted by perpetrators, often online through social media adverts of 'easy cash', and then groomed through promises of payment or gifts, including cryptocurrency, online gaming credits or 'skins'.

As well as being used as bait to establish an emotional or monetary debt, exploiters often use these small gifts as a gateway to further exploitation. Children may be tested through being told to make small transactions which can then lead to requests to hold or 'clean' large quantities of money. The child becomes complicit in fraud and money laundering, often without realising these are criminal funds. The child can then experience further threats and blackmailing from their exploiters. Eventually, children are trapped in debt bondage and potential poverty through funds being confiscated and accounts being shut down, leaving the child more vulnerable. Exploiters will then capitalise on this and may use the situation to coerce the child into other forms of exploitation and abuse.

#### What can you do about it?

- Listen out for slang terms that children or others might use. Terms such as 'squaring' or 'deets' are often used to describe a child's bank account being used to hold or 'clean' money from criminal activity.
- Ensure you respond to signs of child financial exploitation as a safeguarding concern, recognising it as exploitation and abuse. Always report your concerns and follow the safeguarding policy.
- If a child is in immediate danger, contact 999 or 101 in a non-emergency.
- Share any information or intelligence you obtain about the ways in which children are being groomed and financially exploited. For example, children talking about 'adverts' on social media promoting 'easy cash' or gifts they have been bought online.
- Use appropriate language to reframe the issue from one of fraud, criminality, and choice, to one of exploitation and abuse. This shift in language encourages appropriate safeguarding interventions which lead to improved support and outcomes for children.

### CHILD ON CHILD ABUSE (ALSO REFERRED TO AS PEER ON PEER ABUSE)

It should be recognised that physical, sexual and emotional abuse might be carried out on a child by another child. Physical and emotional abuse may be recognised by;

- planned abuse
- · calculated selection of a victim
- persistent physical, emotional or verbal abuse
- difference in age, size, physical strength or status
- racial or other forms of discriminatory abuse.

Preston North End FC staff and volunteers understand that children can abuse other children, staff and volunteers will inform the DSO of suspected Child on Child abuse and record in line with the club's recording policy. Child on Child abuse will be taken as seriously as any other form of abuse. All staff understand that abuse is abuse and should never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'. All staff will also understand that children with SEND are more prone to peer group isolation.

Flare-ups and spontaneous fighting should not be considered as abuse providing they do not become persistent – always use a proportionate response in your thinking.

#### **CUCKOOING**

Cuckooing is a practice where people take over a person's home and use the property to facilitate exploitation. It takes the name from cuckoos who take over the nests of other birds.

There are different types of cuckooing:

- Using the property to deal, store or take drugs.
- Using the property for sex work.
- Taking over the property as a place for them to live.
- Taking over the property to financially abuse the tenant.

The most common form of cuckooing is where drug dealers take over a person's home and use it to store or distribute drugs.

People who choose to exploit will often target the most vulnerable in society. They establish a relationship with the vulnerable person to access their home. Once they gain control over the victim - whether through drug dependency, debt or as part of their relationship - larger groups will sometimes move in. Threats are often used to control the victim. It is common for the drug dealers to have access to several cuckooed addresses at once, and to move quickly between them to evade detection.

The victims of cuckooing are often people who misuse substances such as drugs or alcohol, but there are cases of victims with learning difficulties, mental health issues, physical disabilities or socially isolated.

#### **HAZING**

Hazing, initiation, ragging or deposition refers to any activity expected of someone in joining or participating in a group that humiliates, degrades, abuses, or endangers them regardless of a person's willingness to participate.

#### **GROOMING**

Grooming is when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them.

Children and young people who are groomed can be sexually abused, exploited or trafficked.

#### What are the six tactics used in grooming?

Grooming steps include:

- Identifying and targeting the victim. Any child or teen may be a potential victim.
- · Gaining trust and access.
- Playing a role in the child's life.
- · Isolating the child.
- Creating secrecy around the relationship.
- Initiating sexual contact.
- · Controlling the relationship.

#### **MODERN SLAVERY**

Modern slavery is the illegal exploitation of people for personal or commercial gain. It covers a wide range of abuse and exploitation including sexual exploitation, domestic servitude, forced labour, criminal exploitation and organ harvesting.

#### What are the 4 types of modern slavery?

- · Child sex trafficking.
- Bonded labour or debt bondage.
- Domestic servitude.
- Forced child labour.
- Unlawful recruitment and use of child soldiers.

#### **RADICALISATION**

Radicalisation is when someone starts to believe or support extreme views, and in some cases, then participates in terrorist groups or acts. It can be motivated by a range of factors, including ideologies, religious beliefs, political beliefs and prejudices against particular groups of people.

People may be radicalised in many different ways, and over different time frames from as little as a few days or hours, or it may take several years.

#### Who is at risk?

Anyone can be radicalised, but factors such as being easily influenced and impressionable make children and young people particularly vulnerable. Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. They may feel:

- · Isolated and lonely or wanting to belong.
- Unhappy about themselves and what others might think of them.
- Embarrassed or judged about their culture, gender, religion or race.
- Stressed or depressed.
- Fed up of being bullied or treated badly by other people or by society.
- Angry at other people or the government.
- · Confused about what they are doing.
- Pressured to stand up for other people who are being oppressed.

#### **MENTAL HEALTH**

All staff should also be aware that mental health problems can, in some cases be an indicator that a child or adult has suffered, or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Where children and young people have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, (ACE's) this can have a lasting impact throughout childhood, adolescence and into adulthood. If staff have a mental health concern about a child or young person that is also a safeguarding concern immediate action should be taken following our safeguarding and child protection policy, and speaking to a Designated Safeguarding Officer.

#### **SPECIAL EDUCATION NEEDS (SEN)**

When managing safeguarding in relation to children with SEN, staff and volunteers will be aware of the following:

- Children with SEN or disabilities (SEND) are nearly 4 times more likely to be a victim of abuse.
- Certain indicators of abuse, such as behaviour, mood and injury may relate to the child's disability but without further exploration; however, it should never be assumed that a child's indicators relate only to their disability.
- Children with SEND can be disproportionally impacted by issues such as bullying, without outwardly showing any signs.

Where additional needs are identified, a risk assessment relating to the activity should be prepared. In addition, any specific additional staff training requirements will be considered and implemented prior to the activity taking place.

#### **RAISING CONCERNS**

All safeguarding concerns and allegations **must** be taken seriously. Staff will respond in line with safeguarding policies and training. This includes allegations about non-recent abuse and allegations made about deceased individuals. Staff and volunteers should contact the Designated Safeguarding Team without delay if they witness an incident or have any concerns pertaining to the safety and welfare of a child or young person.

#### Doing nothing is never an option.

#### **HOW MAY A SAFEGUARDING CONCERN BE REVEALED?**

A child or young person may share with others that they have been abused. This can happen in a variety of ways including.

- Directly: Telling someone what has happened to them
- Indirectly: Inadvertently or deliberately communicating through behaviours, emotions, art, writing, appearance, inquiries, or discussions about fears, concerns or relationships.

We recognise that it takes extraordinary courage for someone to go through the journey of revealing abuse and we will ensure that appropriate action is taken to support and protect.

#### **HOW TO RESPOND TO A SAFEGUARDING CONCERN**

#### LISTEN

Staff or volunteers should give their full attention to the person revealing any form of abuse and should keep their body language open and encouraging.

Staff or volunteers should limit any questioning to the minimum necessary to seek clarification only. When seeking clarification, staff or volunteers should use the direct language of that person to demonstrate that it is their lived experience. Staff and volunteers should be aware that words may mean different things to different people and therefore, it is always important to check understanding of what is actually being said.

#### **REASSURE**

Staff and volunteers should provide reassurance that the person involved is being taken seriously and that they are not to blame.

#### **VIEWS AND WISHES**

Staff and volunteers should engage the person involved as far as possible about how best to respond to their safeguarding situation. Staff and volunteers are expected to act in the best interest of the child or young person.

#### **SAFETY**

Staff and volunteers should ensure that the immediate needs of the person are met and should prioritise their safety and protection above all else. The Designated Safeguarding Officer **must** be immediately notified and they may decide to contact emergency services and/or statutory agencies.

#### ACT

Staff and volunteers should explain to the person involved what action they will be taking and how they will support them through the process. Where it is suspected that a crime has been committed, the police should be contacted immediately and physical, forensic, and other evidence **must** be preserved.

#### **RECORD**

Good record keeping is essential safeguarding practice. It is vital that staff or volunteers make a written record as soon as possible after the person revealed abuse, their immediate needs have been met and the appropriate referrals have been made. Staff and volunteers should be guided by the Designated Safeguarding Officer if in doubt about recording requirements.

#### Staff and volunteers must never:

- Make ambitious promises or promise confidentiality.
- Seek details beyond those the person willingly reveals.
- Give the impression that the person revealing abuse is to blame.
- Approach the alleged perpetrator or person whose behaviour and/or actions there are concerns about.
- Ask leading questions.

A 'leading question' is one in which you suggest to the other person what the answer might be, or what answer you expect.

In safeguarding it is very important **not** to ask leading questions, because if an allegation of abuse were to go to court the lawyers defending the alleged abuser could claim that words were put into the victim's mind.

#### The wrong way to do it:

You: "So, did he touch your private parts?"

Victim: "Yes, he did."

#### The right way to do it:

You: "Did anything happen that you didn't like?" Victim: "Yes, he touched my private parts."

The flowchart in Appendix 2 outlines the steps to be taken by staff or volunteers when dealing with a safeguarding incident.

#### **RECORDING INFORMATION**

All safeguarding incidents should be recorded on the club's safeguarding reporting tool My Concern. If staff or volunteers are unable to access this, a written record should, include the following information:

- Provide a factual account of what you have been told or observed, use the words given to you.
- Record any questions you asked in the exact words you used.
- The date and time of what you have witnessed or been told.
- · Details of those involved:
- (i) Person/s whose safety and welfare there are concerns about, (ii) alleged perpetrator of abuse or person/s whose behaviour or actions there are concerns about, (iii) witnesses, (iv) any third party who has raised concerns.
- Action taken and your rationale for taking that actions.
- Date and time of referring the information and to whom the information was referred.
- · Your details as the referrer.

#### Staff and volunteers are expected to:

- Provide clear, concise and relevant information.
- Record information in an objective and professional manner.
- Record information of fact rather than assumption of what you have witnessed or been told.
- Record actual words and language. Do not rephrase what you have been told or leave things like insults or intimate vocabulary out.
- Record observations, for example, a description of visible bruising or injuries.

Never ask someone to remove or adjust their clothing to observe bruises, marks, or injuries.

If more information is recalled later, this should be added as an addendum. The original record **must** not be changed.

Staff and volunteers should be aware that such records may be used as evidence for investigations and inquiries, court proceedings, disciplinary procedures and/or quality assurance purposes.

#### CONFIDENTIALITY

All safeguarding incidents and allegations **must** be taken seriously, and every effort should be made to ensure that confidentiality is maintained for all concerned. Those who need to know are those with specific responsibilities to support and protect children and young people and others who may be at risk. Examples would include, EFL and The FA safeguarding teams, parents and carers, health and education. Care should be taken in cases where parents or carers are suspected to be the perpetrators. If in any doubt what to share, further advice should be sought from safeguarding staff.

#### **INFORMATION SHARING AND GDPR**

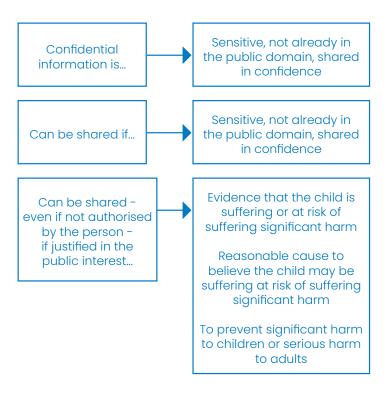
#### The seven golden rules to sharing information.

- 1. Remember that the General Data Protection Regulation (UKGDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
- 2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- 3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
- 4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the UKGDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on The facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.
- 5. Consider safety and wellbeing: base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions.
- 6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.
- 7. Keep a record of your decision and the reasons for it whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

# The UKGDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe. To effectively share information:

- All practitioners should be confident of the processing conditions, which allow them to store, and share, the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered 'special category personal data' meaning it is sensitive and personal.
- Where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes 'safeguarding of children and individuals at risk' as a condition that allows practitioners to share information without consent

- Information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- Relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional wellbeing.



#### **COMMUNICATION AND MEDIA PROTOCOLS**

All media enquiries and communications following any safeguarding incident or about our general safeguarding provision **must** be approved by our communications and safeguarding teams to ensure investigations and identities of those involved are not compromised.

### SUPPORT FOR STAFF AND VOLUNTEERS DEALING WITH SAFEGUARDING INFORMATION

Dealing with a safeguarding incident may have an impact on the wellbeing of all those involved. It is important that anyone affected seeks help if they feel that they need support. Staff and volunteers can contact a club Mental Health First Aider who will offer assistance in signposting to access appropriate support.

#### **MANAGING SAFEGUARDING CONCERNS**

Our safeguarding processes are underpinned by statutory guidance to effectively safeguard children and young people. We are committed to working in partnership with key statutory agencies, health, social care, education, and police, The FA and the EFL to achieve positive outcomes.

If a child, young person, or any person is in immediate danger of being harmed call the police on 999.

#### SAFEGUARDING TEAM

Preston North End Football Club is committed to providing trained personnel with clear and explicit roles and responsibilities to ensure accountability when safeguarding children and young people. The club has a Board level safeguarding lead, a full time head of safeguarding and a senior safeguarding manager (SSM) who hold overall responsibility for the safeguarding of children and young people. Additionally, there are six designated safeguarding officers who represent specific areas of the club and ultimately, report back to the head of safeguarding when required.

Board Level Safeguarding Lead – Zoe Hall Head of Safeguarding – Carole Player Senior Safeguarding Manager (PNECET) – Harriet Creighton-Levis

Academy Designated Safeguarding Officer – Philip Brown Preston North End FC Community and Education Trust (PNECET) Designated Safeguarding Lead – Rebecca Robertson

Preston North End FC Community and Education Trust (PNECET) Designated Safeguarding Officers - Jessica Riley, Liam Sealey and Jack Mountain

Matchday Designated Safeguarding Officer - Guy Nellany

Should a concern arise about a child or young person's welfare, any of the above named safeguarding team members should be contacted for advice and guidance (contact details on Page 4).

# CONTINUING PROFESSIONAL DEVELOPMENT

Preston North End FC recognises the importance of ongoing staff training and development to ensure staff and volunteers are aware of emerging issues and trends and this supports the ethos of keeping safeguarding a high priority. Everybody has a role to play in safeguarding children and young people and we strive to ensure all staff and volunteers are well informed and know how to recognise abuse and what to do if they have a concern, who to report a concern to, and how to record a concern.

Detailed records will be held of staff safeguarding training and ensure that no training becomes out of date. Any staff member can discuss any specific training requirements or gaps in knowledge or understanding with the HoS/SSM/DSO's. DSO's will undertake training every two years and update their knowledge, skills and understanding of relevant safeguarding issues including Prevent on a regular basis.

#### SAFER RECRUITMENT

Preston North End Football Club is committed to getting the right people to join our organisation, and preventing unsuitable people from working with children and young people. We recognise that most people who wish to work with us in a paid or volunteer capacity are well motivated. However, it is important that we ensure that all individuals have the right skills, knowledge and attitude for the role. Some individuals may not be suitable to work with these groups due to previous concerns about their conduct, or an inability to meet documentary requirements. It is therefore essential that we have effective recruitment and selection procedures for both paid staff and volunteers. These help us to discourage those who may not be suitable to join the organisation.

Our safer recruitment procedure follows these steps:

- Writing a clear role or job description what tasks will be involved.
- Writing a person specification what experience or attributes the successful candidate needs to carry out the role
- Creating an advertisement for the post which clearly set out our expectations including those for safeguarding.
- Using an application form to gather relevant information about each applicant.
- · Requiring specific written references.
- Conducting a values based interview for relevant posts.
- Undertaking a criminal record check via Disclosure and Barring Service (DBS) – England and Wales.
- Review risk assessment and management of any concerning information.
- · Verifying qualifications and experience.
- Induction to the role including safeguarding policies and procedures; at least Level 1 safeguarding training and understanding of our Safeguarding Code of Conduct.
- · A probationary period.

#### **DBS**

All staff, volunteers, and partners whose role involves working with children, young people and vulnerable adults may be required to undertake enhanced DBS vetting. Such roles will be designated by the club according to the level of contact with these groups.

All offers of employment in these identified roles are subject to a satisfactory outcome of the DBS screening process and when applicable, this will be set out in the 'Offer of Employment'. Until such time as the disclosure certificate has been received the colleague will not be left unsupervised with a child, young person or vulnerable adult.

The club is committed to the equal opportunities of its employees and therefore, if a disclosure with content is received it will not necessarily result in an instant dismissal from employment. Further investigation around the circumstances will be reviewed and a risk assessment will be carried out. The employee or volunteer may also be asked to attend an interview prior to the final employment decision being made.

All employees or volunteers in relevant roles will be subject to a DBS renewal check at least every three years in line with industry standards. In the intervening years staff and volunteers will be required to complete a self-declaration form. Where the club employ temporary staff or volunteers in non-relevant roles they may be required to sign a self-declaration form and will not be permitted unsupervised access to children, young people and vulnerable adults.

If staff subscribe to the DBS Update Service consent will be sought for each status check.

#### **SAFEGUARDING CODE OF CONDUCT**

All our staff and volunteers have a responsibility to maintain confidence in their suitability to work with children and young people. Any behaviour or action that maylead to question motivation, intention, and suitability to work with children and young people must be avoided. Staff and volunteers should always act in the best interests of the child or young person to ensure their safety and welfare.

Preston North End Football Club's Safeguarding Code of Conduct sets out our expected behaviours of staff and volunteers and all will confirm understanding during any induction process.

#### Staff and volunteers are expected to:

- Familiarise themselves with the relevant safeguarding policy and procedures.
- Ensure that they have complied with safer recruitment procedures and the appropriate level of training commensurate with their role as identified in the Safeguarding Workforce Development Plan.
- Be able to identify the Designated Safeguarding Team and how to contact them.
- Always ensure the safety of children and young people in their care and to act in their best interests.
- Build balanced relationships with children and young people based on mutual trust. Always maintain professional boundaries.
- Treat children and young people equally, with respect, dignity, and fairness.
- Ensure that the same professional standards are applied regardless of ethnic origin, colour, nationality, race, religion or belief, gender, sexual orientation, age, or disability.
- Respect the views, wishes and feelings of children and young people.
- Recognise the developmental needs and capacity of children and young people.
- Help maintain an ethos whereby everyone feels able to express any concerns comfortably and safe in the knowledge that effective action will be taken.
- Promote an environment where poor practice is always challenged and reported in line with the club's Low-Level Concerns Policy.
- Report without delay any allegation, incident or concern relating to the safety and/or welfare of children and young people and take action to ensure that no person

is left at immediate risk.

- Encourage and demonstrate consistently high standards of behaviour, and understand the types of behaviour that may call into question suitability to work with children and young people.
- Consider risk prior to, and whilst undertaking activities.
- Be aware that behaviour outside of work may impact upon suitability to work with children and young people.

#### Staff and volunteers should never:

- Use their position of power and influence to intimidate, threaten, coerce, exploit, or undermine a child or young person.
- Use their status and role to form or promote inappropriate relationships with children and young people.
- Professional boundaries **must** always be maintained.
- Use their position to gain access to information relating to children or young people (or their parent's and carer's) for their own or others advantage. Such information should only be used or shared to protect and to meet the child and young person's individual needs.
- Share personal information or contact details, or use any sexualised language with children and young people.
- Carry out their duties whilst under the influence of alcohol, solvents, or drugs.

#### **RISK MANAGEMENT**

Our risk management approach involves a decision-making process that helps us to prevent or reduce the impact of unexpected or undesired outcomes in all our activities. To reduce the possibility of harm we aim to have an early awareness of what could go wrong and to be there to implement strategies to prevent or manage risk.

#### Our steps to managing risk are:

- Identifying potential hazards.
- Assessing the risk, deciding whether existing precautions are adequate or whether further steps are required.
- Regularly reviewing our risk assessments and making changes to practice where identified.

We will ensure that our risk assessments are consistent, accountable, and transparent across all areas of the club. Our risk assessment templates and guidance are available for all staff to ensure the process is completed before activities are conducted dynamically where required. Through our partnership working we have created a culture where safeguarding responsibilities and procedures for creating safe environments and raising concerns are widely understood and embedded in our values and practices.

All safeguarding will be managed on a secure IT system by trained users. All entries will be timely, accurate and written comprehensively to maintain high levels of accountability and transparency. An ethos of defensible decision making will be demonstrated through users explaining any relevant actions and why they were taken.

#### **LOW-LEVEL CONCERNS**

The club has developed a Low-Level Concern Policy. A low-level concern is any concern, even if no more than causing a sense of unease or a 'nagging doubt' that an adult may have acted in a way that: is inconsistent with Preston North End FC Staff Code of Conduct, including inappropriate conduct outside of work, and does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO (Local Authority Designated Lead).

#### **REFERRAL THRESHOLDS**

#### **Police**

We will contact the police via 101 or online if a crime has been committed against a child or young person within our environments. We will contact them immediately via 999 if they are in immediate danger.

#### **Local Authority**

If we have a concern about a child or young person we will telephone the Local Authority Children's Advice and Duty Service.

We will ensure we have full details of the child or young person and their family or carers, along with the details of the concern, any support we have provided and what we would like to happen.

We will ensure that consent has been sought from the parent or carers, unless to do so would place the child or young person at risk of further harm, or undermine a criminal investigation. If we have not sought consent we will inform the local Authority worker of this and the reason why.

The local authority worker will agree a way forward and keep us informed of outcomes.

The club will not investigate such matters and will take direction from the local authority and/or the police. We will make careful and robust records of all conversations, including dates and times of who we spoke to, the information shared, and the agreed actions.

The Local Authority Designated Officer (LADO) is responsible for the management and oversight of all child protection allegations made against staff or volunteers who work with the child or young person. Any person can raise a concern directly with them.

#### LADO - Local Authority Designated Officer T: 01772 536 694 - (between 8am and 5pm)

We will refer and consult with our LADO to ensure correct safeguarding processes are followed and that our practice remains transparent and accountable.

In those cases which meet the local authority thresholds the LADO will investigate the circumstances and subsequently adjudicate whether the person involved is suitable to continue to work with children and young people. This matter will be separate to any internal investigation carried out in line with the club's Disciplinary Policy. Throughout the process the person involved will be kept fully informed and supported.

#### **Football Authorities**

We will make referrals to The FA and EFL safeguarding units within 24 hours (or as soon as reasonably practicable) where any referral to, or from any external authority (including, without limitation; the police, local authority or DBS) about abuse to any child or young person by any of our current, prospective, or former employees or volunteers. This also includes allegations of non-recent abuse.

The FA will assess people who pose, or may pose a risk of harm, and put in place safeguards. The FA's regulatory framework enables them to act against any affiliated person or organisation that breaches their safeguarding regulations and policies. On an individual level, The FA can put in place risk management measures ranging from education, mentoring and supervision agreements, to interim and permanent suspensions.

These football authorities may participate in safeguarding planning processes, such as LADO or strategy meetings, commission independent inquiries and provide support to all those involved.



#### **Disclosure and Barring Service**

Our duty to refer to the Disclosure and Barring Service (DBS) is met when we have dismissed or removed a person from regulated activity (defined in the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012) or would or may have if the person had not left, resigned, retired, been made redundant or moved to another position because the person has:

- Been cautioned or convicted for a 'relevant offence'.

  A 'relevant offence' for the purposes of DBS is an offence that would result in the individual's automatic inclusion in the Children's or Adult's Barred List.
- Engaged in 'relevant conduct'. 'Relevant Conduct' is that which endangers or is likely to endanger children, young people and adults at risk.
- Satisfied the 'harm test'. The 'harm test' is met when an employer believes that an individual may harm, may cause to be harmed, may put at risk of harm, may attempt to harm, or may incite another person to harm a child, young person or adult at risk.

Referrals to the DBS should be made once investigations and disciplinary processes are complete, (even if the person has left employment). Referrals must be made even if a significant period has passed between the allegation and the gathering of evidence to support a decision to make a referral.

#### **Discriminatory Abuse**

Abusive or bullying behaviour because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation, or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'. Discriminatory behaviour is unacceptable and will be reported to The FA. This includes incidents on and off the pitch (including social media).

#### **Kick it Out**

We will refer all race discriminatory abusive incidents within our environment to Kick it Out in line with existing EFL protocols. This organisation will provide the necessary support to anyone affected by the incident.

#### **Charity Commission**

The Charity Commission is the statutory regulator of charities in England and Wales.

Our Community Sports Foundation and the EFL Trust Charitable Foundation are required to report serious incidents, which include safeguarding issues, to the Charity Commission. Government guidance states that if a serious incident takes place, a charity needs to report what happened and explain how they are dealing with it, even if they have reported it to the police.

The Charity Commission's priority is to ensure that Trustees meet their legal requirements and obligations.



#### SAFER WORKING PRACTICE

We firmly believe the best safeguarding practices protect everyone.

We will inform our staff and volunteers about practices that contribute to a safer culture and environment however, we recognise that it cannot cover all eventualities. Staff and volunteers are expected to make judgements about their actions and behaviour to secure the best outcomes and safety of the children and young people in their care.

All actions and behaviours should be guided by the principle that the safety and welfare of children and young people is paramount.

#### MAINTAINING PROFESSIONAL BOUNDARIES

Working with children and young people may involve physical contact, such as medical intervention, responding to success or distress, preventing an injury or accident, sporting skills instruction, or demonstrating the safe use of equipment or apparatus.

There may be some roles where physical contact is commonplace and/or a requirement of the role, particularly in sports science or medicine. These tasks should only be undertaken by properly trained and qualified practitioners.

This policy does not seek to replace the specific guidance and codes of practice developed for those professionals.

Children and young people are always entitled to respect and privacy, particularly when in a state of undress, changing clothes, showering, or undertaking any form of personal care.

All supervision measures should be transparent, consistently applied and appropriate to the needs, age, and capacity of those concerned. Staff and volunteers should never assist with personal care tasks that can be undertaken independently and any such assistance must form part of an agreed plan of care.

In all circumstances where a child or young person initiates inappropriate contact, it is the responsibility of the member of staff or volunteer to sensitively deter them and help them understand the importance of personal boundaries.

Should inappropriate contact be initiated by a child or young person, then it **must** be recorded and reported to the DSO.

If a member of staff or volunteer believes their own actions could be misinterpreted, or they observe an action or behaviour by another member of staff or volunteer that could be inappropriate or possibly abusive, the incident and circumstances MUST be recorded and reported to the DSO.

#### Staff and volunteers must never:

- Intimidate, threaten, coerce, exploit, or undermine children and young people.
- Use offensive, abusive, sexualised, or inappropriate language.
- Share any personal information or contact details with children and young people.
- Request any personal information from the child or young person without the knowledge and agreement of the club. The club must always be aware of all data processed.

#### **CREATING A SAFE ENVIRONMENT**

We believe that the safety, welfare and enjoyment of children and young people should be a primary consideration during planning, delivery, and review of all our activities.

The following key considerations give staff and volunteers a good framework to build from when planning and delivering activities:

- Experience and suitability of staff and volunteers involved.
- Assessing the suitability of partners and service providers and the adequacy of their safeguarding and safer recruitment policies and practices.
- Ensuring that contractual agreements outline respective safeguarding responsibilities.
- Health, safety and safeguarding risks should be identified and mitigated. Pre-activity and dynamic risk assessments should be undertaken by competent staff.
- Safe travel and transport arrangements.
- Ensuring that accommodation is in a safe location, is safely managed and is of a good standard of security, hygiene and first aid.
- Emergency response procedures covering injury, illness, emergency evacuation, safeguarding concerns, missing persons, local services, and emergency contacts including emergency consular assistance details when abroad.
- Ensuring that there is adequate insurance in place.
- Consent for participation, emergency medical treatment and use of images and footages.
- Appropriate supervision arrangement ratios.
- Ensuring that additional vulnerability and needs are carefully considered.
- Codes of conduct for children and young people, staff, volunteers and spectators.
- Procedures for dealing with challenging behaviours and bullying.
- Security and measures to manage the behaviour of spectators.
- Safe dispersal procedures.

This list is not exhaustive, and staff and volunteers should consult with the DSO to ensure that they are supported to fully consider, and appropriately manage safeguarding risks prior to delivery.

If there are any concerns regarding the head of safeguarding, senior safeguarding manager (SSM) or designated safeguarding officers, these should be referred to Zoe Hall (Director, People & Culture) who is also the club Board Level Safeguarding Lead with the responsibility for safeguarding.

#### SUPERVISION AND RATIOS

Staff and volunteers are always expected to provide appropriate supervision of children and young people. The level of supervision required will vary between activities.

Ratios for each activity should be determined by taking the following into consideration:

- The age, needs, abilities and behaviour of the children and young people participating.
- The competence and experience of staff.

Ensure that appropriate ratios and supervision arrangements are always carefully considered.

#### **STAFF AND VOLUNTEER RESPONSIBILITIES**

Work in an open and transparent way and avoid conduct which could raise concern, or place a child or young person at risk.

Under no circumstances should staff or volunteers visit children or young people in their homes outside agreed work arrangements. Nor should they invite a child or young person to their own home or to that of a family member, colleague or friend.

Ensure that contact by whatever means and meetings with children and young people outside of agreed working arrangements never take place without the knowledge and agreement of the DSO.

#### **GIFTS, REWARDS AND SELECTION**

Staff and volunteers should exercise care when selecting children and young people for activities, privileges, or rewards to avoid perceptions of favouritism or unfairness. Methods and criteria for selection should always be transparent and fair.

#### PHOTOGRAPHY AND VIDEO FOOTAGE

Photography and video footage include the taking of still photographs, filmed and moving images and video recordings by whatever means. We will ensure that photography and video footage is only taken and used where it is necessary and legitimate to do so and with the appropriate consent.

Please refer to the PNEFC Matchday Event Safeguarding Plan for detailed regulations outlining photography and video footage taken within the stadium footprint.

#### Staff and volunteers must never:

 Take, display, or distribute photographs or video footage of children and young people without the knowledge and agreement of parents or carers. • Share photographs or video footage of the child or young person on private or social or professional media accounts, for example, Instagram, Facebook, or Linkedin.

#### **TRANSPORT**

It is not appropriate for staff or volunteers to transport children and young people outside of their normal working duties.

Any occasion where a child or young person requires lone transport in an emergency, or where not to provide such transport may place them at risk, must be reported to the DSO by the person providing the transport.

Parent/carer consent should also be sought.

#### FIRST AID AND ADMINISTRATION OF MEDICATION

In circumstances where a child or young person needs medication regularly, an agreed care plan with parents/carers should be established.

When administering first aid, staff and volunteers should ensure that another adult is aware of the action being taken wherever possible. Staff and volunteers should understand the extent and limitations of their role and training and should recognise when an injury requires more experienced intervention.

Parents/carers should always be informed when first aid has been administered to a child or young person.



# PREVENT GUIDANCE (COUNTER TERRORISM)

The Prevent Strategy identifies a statutory duty for some agencies including schools, colleges and education providers to support the government's anti-terrorist agenda. Preston North End FC recognises our responsibility to support our partner schools and colleges in working with them to assist them in meeting this duty under the Prevent Strategy.

The Prevent Duty is not about preventing participants from having political and religious views and concerns, but about supporting young people to use those concerns or act on them in non-extremist ways. As a football club we will be addressing our responsibilities under the strategy in commitment to keeping children and young people safe.

Preston North End Football Club (PNEFC) will work with external agencies to address the risk factors for participants in producing a procedure for referral to the local Channel Panel if any young person is identified as being a risk of radicalisation.

PNEFC will, if required, work with external agencies and the Channel Panel to support any young person being identified.

#### PREVENT CONTACT DETAILS

#### Prevent team at Preston Police Station

Telephone: 01772 209830 or 01772 209733 Email: <u>prevent@lancashire.pnn.police.uk</u>

#### **Anti-Terrorism Hotline**

0800 789 321 or 01772 209733/830

#### For non-urgent concerns about a vulnerable person

Email: <a href="mailto:channelreferrals@lancashire.pnn.police.uk">channelreferrals@lancashire.pnn.police.uk</a>

#### **USEFUL LINKS AND RESOURCES**

#### **Prevent Duty Guidance**

www.gov.uk/government/publications/prevent-duty-guidance

#### **Channel General Awareness**

www.course.ncalt.com/Channel\_General\_Awareness/01/index.html

#### **UK Safer internet Centre**

www.saferinternet.org.uk

#### **Department for Education guidance**

www.foundationyears.org.uk/files/2015/06/prevent-duty-departmental-advice.pdf

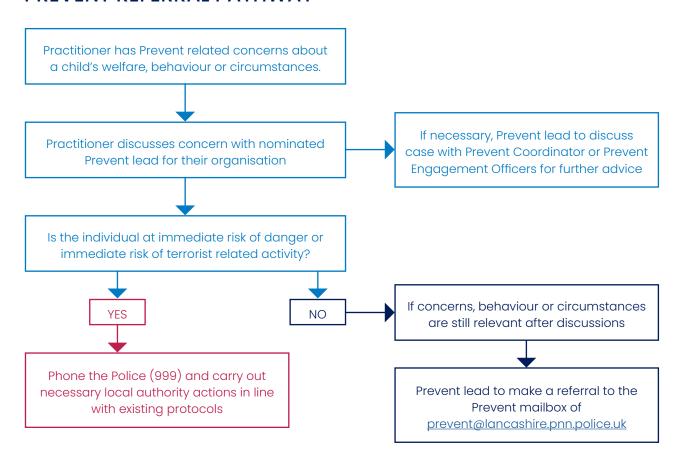
#### **Working Together to Safeguard Children**

www.gov.uk/government/publications/working-togetherto-safequard-children

#### **Keeping Children Safe in Education**

www.gov.uk/government/publications/keeping-childrensafe-in-education

#### PREVENT REFERRAL PATHWAY



#### **USEFUL NUMBERS AND RESOURCES**

Lancashire FA Regional Designated Safeguarding Officers Tel: 01772 325 940

#### The FA Designated Safeguarding Contact

Tel: 0800 169 1863 (option 7)

### Lancashire County Council Children's Services – CYP Referrals

0300 123 6720 (between 8am and 5pm) 0300 123 6722 (out of hours service 5pm to 8am) Email: cypreferrals@lancashire.gov.uk

#### LADO - Local Authority Designated Officer

0300 123 6720 (between 8am and 5pm) 0300 123 6722 (out of hours service between 5pm and 8am)

### NSPCC (National Society for the prevention of cruelty to children)

www.nspcc.org.uk Tel: 0808 800 5000

#### ChildLine

www.childline.org.uk
Tel: 0800 1111

#### **Relevant Legislation**

The Children Act 2004

www.legislation.gov.uk/ukpga/2004/31/

#### The Education Act 2002

www.legislation.gov.uk/ukpga/2002/32/contents

#### **Child Protection in Sport Unit**

thecpsu.org.uk

#### Keeping Children Safe in Education 2022

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1101454/ Keeping\_children\_safe\_in\_education\_2023.pdf

#### **Protection of Freedoms Act**

www.legislation.gov.uk/ukpga/2012/9/contents/enacted

#### Counter Terrorism and Security Act 2015

www.legislation.gov.uk/ukpga/2015/6/contents/enacted

### What to do if you are worried about a child being abused 2015

www.gov.uk/government/publications/what-to-do-ifyoure-worried-a-child-is-being-abused--2

#### Working Together to Safeguard Children 2022

www.gov.uk/government/publications/working-togetherto-safeguard-children--2

#### The Football Association (The FA)

www.thefa.com/football-rules-governance/safeguarding https://www.gov.uk/topic/schools-colleges-childrensservices/safeguarding-children

#### Mental health

Negative experiences and distressing life events can affect the mental health of us all. Support can also be accessed through a number of national organisations including:



#### The Samaritans

Tel: 116 123 www.samaritans.org



#### ChildLine

Tel: 0800 1111 www.childline.org.uk



#### **NSPCC**

Tel: 0808 800 5000 www.nspcc.org.uk



#### Mind

Tel: 0300 123 3393 www.mind.org.uk



#### PFA

Tel: 07500 000 777 www.thepfa.com/wellbeing



#### **KOOTH**

www.kooth.com

#### **On-line Safety**

#### **UK Safer Internet Centre**

reportharmfulcontent.com

#### CEOP

www.ceop.police.uk/safety-centre

#### **Internet Matters**

www.internetmatters.org

#### NetAware

www.net-aware.org.uk

#### ParentInfo

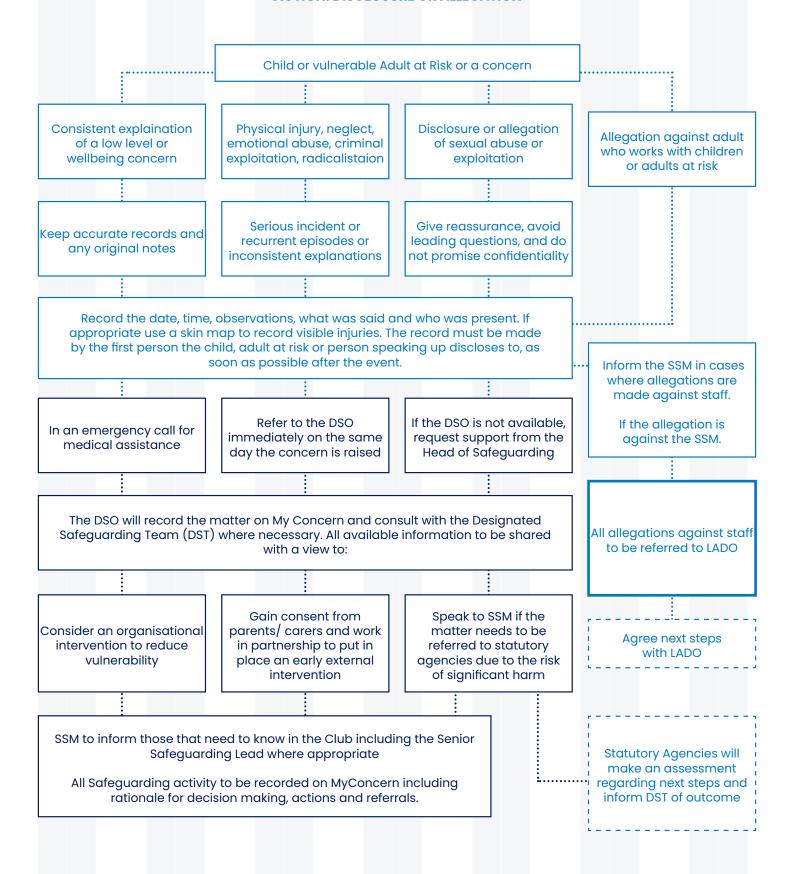
parentinfo.org

#### **ThinkuKnow**

www.thinkuknow.co.uk

### APPENDIX 1

#### **ACTION: DISCLOSURE OR ALLEGATION**



### APPENDIX 2

#### **REPORTING A CONCERN ABOUT A CHILD**

(NB: Use MyConcern if you are able)

Child's Name:	Date of Birth:					
Date and Time of Incident:	Date and Time (of writing):					
Person Reporting Name:						
Signature:	Job Title:					
Factual recording of what you are worried about. Who? What? When? Any Witnesses?						
What is the child's account/perspective?						
Professional opinion where relevant						
Any other relevant information (distinguish between fact and opinion – previous concerns etc						
What needs to happen? Note actions, including names of anyone to whom your information was passed and when						

<sup>\*</sup>Check to make sure your report is clear to someone else reading it.