

Mandate Now

Review

of

Crewe Alexandra Football Club Child Protection and Safeguarding Policy

&

Crewe Alexandra Football Club Whistle-blowing policy



10 December 2018

## Background

On 21/7/16 the Government admitted publicly for the first time in writing that there is no legal obligation on employees working in [Regulated Activities](#), as defined by the SAFEGUARDING VULNERABLE GROUPS ACT 2006 (AND as amended in 2012), to report known or suspected abuse of a child. Crewe Alexandra Football Club is defined as a Regulated Activity ('RA') and like all RAs, child protection is entirely reliant on staff reporting known or suspected abuse on a discretionary basis and the RA leadership team reporting the concern on a discretionary basis to the statutory agencies.

Released to Parliament 21/7/16


**Reporting and acting on child abuse and neglect** Government consultation

6. There is currently no general legal requirement on those working with children to report either known or suspected child abuse or neglect.

The absence of mandatory reporting law in Regulated Activities presents a significant challenge to staff employed in them. No law means those who decide to report are whistleblowers by default with no legal immunity from [prosecution in the event that they report a suspicion in good faith which is not then validated in law](#). England, Wales and Scotland are out of step with the majority of [jurisdictions on all four continents](#) in not having mandatory reporting. Furthermore there is no sanction on the individual who has what is described as 'statutory responsibility' for safeguarding at any setting (The Chair) if it is discovered, usually years later if at all, that s/he did not refer known or suspected abuse to the statutory agencies. These serious shortcomings undermine the quality and reliability of safeguarding in all Regulated Activities and make it all the more important for a setting to write clear policies that deliver safeguarding which is understood by everyone and which even without mandatory reporting, can have a greater element of reliance placed on it.

## Crewe AFC

Without MR parents are reliant on the administration of the RA to instil an effective culture of safeguarding in the setting. Sometimes this is assisted by the terms of employment which supports staff to report concerns. But there is no sign of any of this in the CAFC safeguarding policy. Instead the policy, such as it is, is disorderly and has a 'cut and paste' quality about it. There are aspirational statements that cannot be relied upon, a position of trust clause that is simply wrong despite the policy having been approved in May 2018, and a whistleblowing policy that is cause for deep concern. The safeguarding policy refers to 'ISA' without explaining the acronym is for the INDEPENDENT SAFEGUARDING AUTHORITY which ceased to exist in 2012. It's a policy of veneer absent of clear protocols on which reliance can be placed. Even the statutory guidance quoted in the policy is out of date. The document provides the club with carte blanche to do as it sees fit assuming anyone is courageous enough to make a report about a safeguarding concern. One might have hoped CAFC would have tried its utmost to convince parents it had learned from its chequered past, and worked hard to get safeguarding in the best shape. Instead the Club has produced a policy that needs to be replaced with one that is (i) current, (ii) supports staff with protocols on which reliance can be placed, and (iii) is embedded into every aspect of the club's operation with effective training of all personnel from the top down.

					
<b>Child Protection and Safeguarding policy</b>					
<b>Approved By</b>	<b>Version</b>	<b>Issue date</b>	<b>Review date</b>	<b>Contact person</b>	<p>It remains unclear how the board approved its child protection policy, without the accompanying Related <b>safeguarding portfolio policies</b> being available – See Email exchanges. The club says of its portfolio policies: “This policy should be read alongside our other Club safeguarding policies and procedures” One of these is the ‘whistleblowing’ policy. Safeguarding in this country is entirely dependent on whistleblowing because there is no law which mandates and supports a member of staff to report a concern.</p>
Board	6	May 2018	May 2019	Paul Antrobus	

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<b>Policy statement and principals</b>	
<p>Crewe Alexandra Football Club (CAFC) is committed to providing a safe and positive environment for everyone involved in its services and activities. The Club takes its extended moral and legal duty of care very seriously in relation to children and young people. We seek to ensure the safety and wellbeing of all children and to protect them from harm or abuse when they engage in any activities conducted under the name of Crewe Alexandra Football Club. This policy is one of a number in the Club's safeguarding portfolio.</p>	<p>Despite the club taking its extended '<i>moral and legal duty of care very seriously</i>' in relation to children, trying to get a copy of the safeguarding policy and the important "Related safeguarding portfolio policies" took a considerable time and many emails to the Club and several to the Head of Media Relations for the English Football League demanding to know who the inquirer was. Such a demand runs counter to safeguarding norms and would likely scare off a potential safeguarding whistleblower who contacted the club for safeguarding information. No prior versions of the policies were available on the club's website so the question one needs to ask – did any previous policies exist? This point was made in the email exchanges.</p>
<p>This policy is promoted to all new staff, volunteers and participants and via the Club website. It is also included in the staff handbook.</p>	<p>Use of the word 'promoted' in these circumstances should be reconsidered as it could be mistakenly infer the policy is optional.</p>
<b>Child protection statement</b>	
<p>We recognise our moral and statutory responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.</p>	<p>This review of the club's procedures will inform us what reliance can be placed safeguarding at the club. Throughout it must be remembered that failing to report known or suspected abuse does not break any law. A parent should therefore ask – 'Can I place reliance on this setting to care for my child/ren?' That's all any parent can do with any setting. The quality of the safeguarding policy is often a useful indicator.</p>
<p>The procedures contained in this policy apply to all staff and volunteers are consistent with those of East Cheshire Local Safeguarding Children Board (LSCB).</p>	<p>All RA's (as defined by the Safeguarding Vulnerable Groups Act 2006, as amended 2102) only need 'have regard to' statutory guidance. It is not a given that any Regulated Activity (such as a football club) will follow their own 'procedures' as ultimately there is no legal obligation on anyone working in any Regulated Activity to report suspected or even witnessed rape of a child by an employee.</p>
<b>Policy principles</b>	
<ul style="list-style-type: none"> <li>• The welfare of the child is paramount</li> </ul>	
<ul style="list-style-type: none"> <li>• All children, regardless of age, ability, culture, race, language, religious beliefs, sexual or gender identity, have equal rights to protection</li> </ul>	<p>Protection that is entirely dependent on value judgments, discretionary reporting grounded on courage rather than legal obligation.</p>
<ul style="list-style-type: none"> <li>• Safeguarding is everybody's responsibility. All staff and volunteers have a responsibility to respond positively in response to any concerns, suspicion or disclosure that may suggest a child is at risk of harm</li> </ul>	<p>This in a 'nominal responsibility' unsupported by legislation. The statement is commonly copied and pasted without much thought. In law no one need respond or report suspected sexual or physical abuse to a statutory authority. 'Guidelines' that the club 'must have regard to' only suggest such concerns 'should' be reported, which is discretionary.</p>



<ul style="list-style-type: none"> <li>Children, volunteers and staff involved in child protection issues will receive appropriate support</li> </ul>	Often stated but rarely defined, this policy is no exception.
<ul style="list-style-type: none"> <li>Staff and volunteers with roles and responsibilities for children and young people will be subject to appropriate safe recruitment checks and safeguarding training</li> </ul>	DBS checks were adversely impacted by amendments in the Protection of Freedoms Act 2012. From being an over burdensome function, the Conservative led Coalition and the current Government harmed the value of DBS. <a href="#">Lords speeches from the Late Baroness Heyhoe Flint and Baroness Tanni Grey –Thompson highlighted the concerns in sport</a> . Interestingly the Club does not state in its policy that it will submit a referral/s to the DBS in accordance the SVGA 2006 as amended in 2012. This is regrettable because it is mandatory a mandatory referral that carries with it a criminal offence for failing to comply. The DBS to assess whether an individual is fit to work with children. The DBS has no investigatory role; it is a quango with an assessment function.
<ul style="list-style-type: none"> <li>CAFC staff and volunteers of the Club will receive appropriate learning and training opportunities to ensure that they can make informed and confident responses to safeguarding issues</li> </ul>	The reader is left uninformed what these are. Inclusion of the word ‘opportunities’ suggest some if not all might be voluntary.
<ul style="list-style-type: none"> <li>CAFC is committed to providing a safe and positive environment for all children and young people to participate in the sport to the best of their abilities for as long as they choose to do so</li> </ul>	Aspirational statement.
<b>Policy aims</b>	
<ul style="list-style-type: none"> <li>To provide all staff and volunteers with the necessary information to enable them to meet their safeguarding and child protection responsibilities</li> </ul>	Aspirational statement
<ul style="list-style-type: none"> <li>To promote consistent good practice</li> </ul>	Aspirational statement
<ul style="list-style-type: none"> <li>To demonstrate the Club’s commitment to safeguarding children</li> </ul>	Aspirational statement
<b>Terminology</b>	
<b>Safeguarding</b> and promoting the welfare of children refers to the process of protecting children from maltreatment, preventing the impairment of health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective care and taking action to enable all children have the best outcomes.	This is cut and paste material from guidance.
<b>Child protection</b> refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering, significant harm.	This is cut and paste material from guidance.

<b>Staff</b> refers to all those working for or on behalf of the Club, full time or part time, temporary or permanent, in either a paid or voluntary capacity.	
<b>DSO</b> refers to the designated safeguarding officer at the Club	
<b>Child</b> includes everyone under the age of 18.	The CAFC definition of a child has not been adopted by Government despite the <a href="#">NSPCC's 'Trust to Lead'</a> campaign. (See Position of Trust paragraph below). There is nothing to stop the club changing the definition of a child from 16yrs when in the care of CAFC, but it does present significant legal complication. This seems to be an error by the club rather than a determined policy position. It needs to be addressed.
<b>Parent</b> refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and legal guardians.	
<b>Safeguarding legislation and guidance</b>	
The following safeguarding legislation and guidance has been considered when drafting this policy:	With all this legislation you'd think there might be a legal obligation on those who work with children to report known or suspected abuse of a child by those who have personal responsibility their care. There isn't.
• Children Act 1989	
• Children Act 2004 Children and Families Act 2014	
• Criminal Justice Act 1988	
• UN Convention on the Rights of the Child	
• The Human Rights Act 1998	
• Sexual Offences Act 2003	
• Safeguarding Vulnerable Groups Act 2006	
• Equality Act 2010	
• Serious Crime Act 2015 Counter terrorism and Security Act 2015	
• Protection of Freedoms Act 2015	This act received Royal Assent in 2012 and damaged the DBS framework in many ways. We recently had a discussion with the DCMS to explain just how bad the situation is.
• Working Together to Safeguard Children 2017	
• Keeping Children Safe in Education 2016	
• What to do if you're worried a child is being abused 2015	

<b>Roles and responsibilities</b>	
<b>Key personnel</b>	
<b>The designated safeguarding officer (DSO) for safeguarding is</b>	
Paul Antrobus	
Contact details: email: <a href="mailto:pantrobus@crewealex.net">pantrobus@crewealex.net</a>	
Tel: 07788432463	
<b>The Senior Safeguarding Manager is</b>	
Andrew Blakemore	
Contact details: email: <a href="mailto:ablakemore@crewealex.net">ablakemore@crewealex.net</a>	
Tel: 01270213014	
<b>The Designated Safeguarding Officer (DSO):</b>	
<ul style="list-style-type: none"> <li>has the status and authority within the Club to carry out the duties of the post, including committing resources and supporting and directing other staff</li> </ul>	
<ul style="list-style-type: none"> <li>is appropriately trained, with regular updates</li> </ul>	
<ul style="list-style-type: none"> <li>acts as a source of support and expertise to the Club community</li> </ul>	
<ul style="list-style-type: none"> <li>has a working knowledge of LSCB procedures and FA Procedures</li> </ul>	
<ul style="list-style-type: none"> <li>makes staff aware of LSCB training courses and the latest policies on FA safeguarding</li> </ul>	Who manages the training of club staff to ensure all are up to date with evolving guidance and practice? Is training provided by the club mandatory for all staff?
<ul style="list-style-type: none"> <li>keeps detailed written records of all concerns, ensuring that information-sharing and record storage is secure and compliant with statutory guidance and General Data Protection Regulation</li> </ul>	Has the Club got a good history of record keeping in this realm? Does anybody from outside the club undertake an independent audit that records are being properly kept?

<ul style="list-style-type: none"> <li>refers cases of suspected abuse to the Local Authority, FA Case Management Team, <b>ISA</b> and/or police as appropriate</li> </ul>	<p>The Local Authority Designated Officer at Cheshire East Council is the authority to which concerns involving a person in a position of trust at the club <b>‘should’</b> be referred.</p> <p>It is odd that the ISA is mentioned because it hasn’t existed for six years. The ISA <b>was</b> the <b>INDEPENDENT SAFEGUARDING AUTHORITY</b> and under the Protection of Freedoms Act 2012 the functions <b>of the CRIMINAL RECORDS BUREAU</b> and the <b>INDEPENDENT SAFEGUARDING AUTHORITY</b> merged to form the <b>DISCLOSURE AND BARRING SERVICE</b>. The DBS and the police are two bodies with entirely different functions, but the wording in this paragraph confusingly links the two. In the case of a suspicion the matter <b>‘should’</b> be referred to the LADO when the concern is about adult on child abuse at the Club. The LADO provides assistance and will indicate if s/he thinks other agencies need to be involved. There <b>‘should’</b> be a dotted line to the FA but its role, like the club, is an advisory one rather than investigatory.</p> <p>“as appropriate” is undefined, allows unlimited discretion about what (if anything) to do.</p> <p>“and/or” allows the club to pick &amp; choose who (if anybody) to inform. In this case it is used incorrectly.</p>
<ul style="list-style-type: none"> <li>attends and/or contributes to child protection strategy meetings and conferences</li> </ul>	
<ul style="list-style-type: none"> <li>takes the lead role in development of CAFC’s safeguarding framework and coordinates the implementation of the club’s approach to safeguarding children and young people</li> </ul>	
<ul style="list-style-type: none"> <li>Coordinates the Club’s contribution to child protection plans</li> </ul>	
<ul style="list-style-type: none"> <li>develops effective links with relevant statutory and voluntary agencies including the LSCB</li> </ul>	Yet the LADO, who is the key person at the Local Authority for all Regulated Activities, has not yet been mentioned.
<ul style="list-style-type: none"> <li>ensures that Safeguarding policy and linked policies, procedures and practice guidance are reviewed and updated annually</li> </ul>	
<ul style="list-style-type: none"> <li>liaises with and reports regularly to the Senior Safeguarding Manager and Board</li> </ul>	
<ul style="list-style-type: none"> <li>Coordinates dissemination of policy, procedures and resources through each area of Club activity or responsibility</li> </ul>	

<ul style="list-style-type: none"> <li>Promotes the safeguarding policy to all stakeholders and publicly, on the Club's website and by other means</li> </ul>	
<ul style="list-style-type: none"> <li>Advises about safeguarding recruitment/deployment checks, training needs, resources and requirements and ensures all staff have access to and undertake appropriate learning and training opportunities with compliance being reviewed regularly</li> </ul>	
<b>The Senior Safeguarding Manager:</b>	
Is responsible for the strategic and operational direction and embedding safeguarding across the club. The Senior Safeguarding Manager is also responsible for ensuring that accountability and governance arrangements for the Club are understood and addressed at Board level.	<p>It's a collection of words that could have important meaning but clear explanation is needed.</p> <p>Buzz words include responsibility, accountability, and governance. To repeat – there is no law to report suspected or known abuse. There is no law to hold anyone to account for failing to report abuse. Reporting abuse to the DSO / Senior Safeguarding Manager is discretionary. Should known or suspected abuse be reported to the person at the Club who has statutory responsibility for safeguarding (the Chair) it 'should' (which is discretionary) be reported to the appropriate agencies at his/her discretion. But if the alleged abuse is unreported this might only come to light some years later. This is the weakness of these arrangements and the result is that failure might only be discovered years after the abuse occurred. Stable door safeguarding. This applies to all Regulated Activities because of the dysfunctional framework. It makes safeguarding policies in all Regulated Activities very important. Poorly constructed policies reflect the importance of safeguarding to the setting.</p>
<b>Good practice guidelines and staff code of conduct</b>	Cut and paste clauses
Good practice includes:	Cut and paste clauses which hopefully transfer into training.
<ul style="list-style-type: none"> <li>treating all with respect</li> </ul>	
<ul style="list-style-type: none"> <li>setting a good example by conducting ourselves appropriately</li> </ul>	
<ul style="list-style-type: none"> <li>maintaining a child focus and involving children and young people in decisions that affect them</li> </ul>	
<ul style="list-style-type: none"> <li>encouraging positive, respectful and safe behaviour by all</li> </ul>	
<ul style="list-style-type: none"> <li>being a good listener</li> </ul>	

<ul style="list-style-type: none"> <li>• being alert to changes in children's behaviour and to signs of negative impact, abuse, neglect and exploitation</li> </ul>	
<ul style="list-style-type: none"> <li>• recognising that challenging behaviour may be an indicator of abuse</li> </ul>	
<ul style="list-style-type: none"> <li>• reading and understanding the Club's child protection policy, staff behaviour policy and guidance documents on wider safeguarding issues</li> </ul>	
<ul style="list-style-type: none"> <li>• being aware that the personal and family circumstances of some children and other issues of diversity (including disability and communication/learning differences) lead to an increased risk of abuse</li> </ul>	
<ul style="list-style-type: none"> <li>• sharing all concerns about a child's safety and welfare to the DSO without delay, or, if necessary directly to police or children's social care</li> </ul>	
<b>Abuse of position of trust</b>	
All staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards them must be beyond reproach.	
Staff understand that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual or intimate relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is deemed consensual. This means that any sexual activity between those in a position of trust and a young person under 18 may be a criminal offence and <b>would</b> be reported to the Local Authority Designated Officer (LADO).	<p>A sports coach is not committing a crime by having a sexual relationship with a person between the ages of 16-18 who is in their care. In simple terms, someone has misread the SEXUAL OFFENCES ACT 2003. This clause is simply wrong.</p> <p>The NSPCC's <a href="#">'Trust to Lead'</a> campaign which started in November 2017 failed to persuade Government to put sport on a par with education, healthcare and other specified activities, in making it illegal for a person in a position of trust to have sex with someone between age of 16-18 in their charge.</p> <p><a href="#">This was recently discussed by Mandate Now at a meeting with the DCMS.</a> Frankly there is nothing complicated about it, there was resistance to the proposals, exclusively on grounds of dogma than effective safeguarding.</p>
<b>Children who may be particularly vulnerable</b>	
Some children may be at increased risk of harm or abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to recognise concerning behaviour or to accept that abuse can occur. To ensure that all children involved in Club activities receive equal protection, we will give special consideration to those who are:	

• disabled or have communication and language differences	
• young carers	
• affected by parental substance misuse, domestic violence or parental mental health needs	
• asylum seekers	
• living away from home	
• vulnerable to being bullied, or engaging in bullying	
• living in temporary accommodation	
• live transient lifestyles	
• living in chaotic and unsupportive home situations	
• vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability, gender identity or sexuality • at risk of sexual exploitation	
• do not have English as a first language	
• at risk of female genital mutilation (FGM)	
• at risk of forced marriage	
• at risk of being drawn into extremism.	
This list provides examples of issues and circumstances which increase risks for individuals but is not intended to be exhaustive. Special consideration includes the provision of safeguarding information and resources in community languages when appropriate and accessible formats for children with communication support needs.	

<p><b>Responding to allegations, disclosures or concerns</b></p> <p>All staff, volunteers and players have a responsibility to ensure the safety and welfare of children and to take appropriate steps to ensure that suspicions and allegations of abuse are taken seriously and responded to quickly and appropriately. It is not the responsibility of anyone within the club to decide whether or not child abuse has taken place. It is never an option to do nothing if you become aware of concerns. These should be shared with the appropriate designated individuals or agencies without delay so that advice can be sought and appropriate action taken. It is however recognised that an individual may need to respond to a situation immediately and prior to such contact if the nature of the suspicion or report is putting the child concerned in immediate danger.</p>	<p>Club provides no protocols which should then be reinforced through training. The flow diagrams are not protocols.</p> <p>“Responded to quickly and appropriately” – doesn’t define what is appropriate.  “Should” be shared – optional, not required by the policy.  “Appropriate action” – left undefined</p> <p>The wording of the clause permits non-reporting of suspected of known abuse.</p>
<p><b>✦ Raising concerns about a member of staff or a colleague</b></p>	
<p>Staff who are concerned about the behaviour of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation and they will wonder whether a report could jeopardise their colleague’s career. All staff must remember that the welfare of the child is paramount. The Club’s whistleblowing code enables staff to raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place.</p>	<p>See our review of the Crewe Alexandra whistleblowing code.</p> <p>By default all staff are whistleblowers whether the individual about whom they have concerns is a member of staff or not. The only protection they have is the Public Interest Disclosure Act which provides very little. It is possible that if a member of staff reports and the referral is made which is unsubstantiated, the accused might seek legal redress against the person who reported him/her. Mandatory Reporting will provide legal immunity for reports that are made in good faith which helps support good staff.</p> <p>A setting should make it entirely clear what staff must do if confronted by known or suspected abuse. This paragraph describes the difficulty but doesn’t make things easier by providing a clear direction as to what to do.</p>
<p>All concerns of poor practice or possible child abuse by colleagues <b>should</b> be reported to the DSO. Complaints about the DSO <b>should</b> be reported to the Senior Safeguarding Manager. The LADO will be notified of any concerns relating to staff and the Club’s Designated staff will consult with the police and local authority children’s social care as appropriate. Useful contact details are listed at the end of this policy.</p>	<p>The policy says ‘should report’ which is discretionary.</p> <p>“Club’s Designated staff will consult ... as appropriate” leaves undefined what is considered “appropriate”. In effect this leaves the club with unlimited discretion as to whether designated staff report at all, because non-reporting wouldn’t breach the club’s safeguarding policy if it was decided that it wasn’t “appropriate” to do so.</p>



Staff <b>may also</b> report their concerns directly to the LADO, children's social care, the police or the NSPCC if they believe direct reporting is necessary to secure action. Where there is a complaint against a member of CAFC staff then one of the following may occur:	Staff 'may' report – or they 'may not.' May provides options at the discretion of the individual who ' <b>could</b> ' have something to report.
<ul style="list-style-type: none"> <li>A criminal investigation led by the Police</li> </ul>	Statement of fact outside the club's control. There isn't a commitment by the club to do anything, in contrast to the bullet point 3 which is within the club's control. However because of the "may" in the paragraph above (' <b>staff may</b> ' also) there is no commitment to do anything
<ul style="list-style-type: none"> <li>A child protection investigation led in a multi-agency approach by the Local Authority</li> </ul>	Statement of fact outside the club's control
<ul style="list-style-type: none"> <li>A disciplinary or misconduct investigation led by the club, which may also involve The Football Association</li> </ul>	Within the club's control, but note from paragraph above the bullets that "staff may" occur. It provides no commitment that it "will" or "must" occur.
The club will delay an internal disciplinary or misconduct investigation while a criminal or local authority investigation takes place.	
✦ <b>Historical Allegations against staff</b>	It would be better to use 'Non-recent child abuse allegations.' <a href="#">[See page 4/8 in this guideline by NAPAC]</a> . There is a further point – 'historic' is often used by defence barristers in criminal cases to potentially prejudice a complainant in the eyes of a jury by time distancing the perpetrator from the crime and therefore its importance today. NAPAC and other survivor organisations deprecate the use of the word. Police increasingly use the term "non-recent" – <a href="#">even parliament recognised the term has had its day.</a>
All concerns will be taken seriously by CAFC and responded to positively irrespective of when they arose. Evidence demonstrates that historic concerns may indicate current risks and therefore the Club encourages anybody with concerns to report them directly to the Police or Designated Safeguarding Officer.	"Responded to positively" offers no commitment as to the form the response will take. Specifically it does not commit the club to pass on the concern to LA children's services, the police, or to even have a discussion with the LADO.
Please see the club's Whistleblowing policy.	Please see Mandate Now review of CAFC whistleblowing policy.
Allegations concerning staff who no longer work at the Club, or historical allegations will be reported to the police and/or LADO, FA and EFL.	

<b>Staff training</b>	
<p>It is important that all staff receive training to enable them to recognise the possible signs and indicators of abuse, neglect and exploitation and to know what to do if they have a concern.</p>	<p>Might it be better to say – ‘All CAFC staff will receive safeguarding training to (Level 1 + Level 2 or Level 3).....and specify who receives which level of training ?</p> <p>Expressed in the way we have suggested, there is a clear undertaking that all staff will be provided with training by the Club. Staff are then in a position to raise a concern if they have not been trained in the due period.</p>
<p>New staff and Board members will receive a briefing during their induction, which includes the Club’s safeguarding policies and procedures, staff behaviour policy, reporting and recording arrangements, and details for the DSO. All staff, including the DSO, SSM and Board will receive training that is regularly updated. All staff working directly with children will be required to attend an FA safeguarding course (managers, club, officials, stewards, club mascots medics and other support staff) and coaches will be required to undertake the FA coaches’ safeguarding children course (‘How we support’ level 1 workshop) or the UK Coaching Safeguarding and Protecting Children workshop. Training <b>should</b> be refreshed at least every three years. All staff will also receive safeguarding updates via email, e-bulletins, website access and staff meetings throughout the year.</p>	<p>Is ‘a briefing’ the same as training or something else pending training? Within what period of time do new staff receive full safeguarding training?</p> <p>How soon after joining the club will staff receive training?</p> <p>Training ‘<b>should</b>’ be updated every three years is an aspiration without commitment.</p>
<b>Safer recruitment</b>	
<p>Our Club complies with the requirements of Keeping Children Safe in Education (DfE 2016 and DfE 2018 which is currently subject to consultation) and the LSCB by carrying out the required checks including the take up of references and verifying the applicant’s identity, qualifications and work history. The Club’s Staff Recruitment policy and procedures set out the process in full and can be found on our website. All staff engaged in any way in activities involving substantial and unsupervised responsibilities in relation to children, young people and adults at risk are required to have a Disclosure and Barring Service check (DBS) and will not be allowed to work in any unaccompanied capacity until clearance has been received by the Club’s DSO.</p>	<p>The latest version of <a href="#">Keeping Children Safe in Education is September 2018</a> .A sign that a setting is on the safeguarding ‘ball’ would have been quoting the correct version of ‘guidance’ together with the inclusion of any relevant changes that may now apply with the introduction of the new ‘guidance’. To have an appendix of legislation and guidance that has been used to formulate the policy listed in an appendix would be helpful.</p>

<b>Volunteers</b>	
Volunteers will undergo DBS checks commensurate with their role and responsibilities in the Club, their contact with children and adults at risk and the supervision provided to them. Under no circumstances will a volunteer who has not been appropriately checked be left unsupervised.	This is a self-policing arrangement. Hearings at IICSA have revealed just how often such arrangements fail.
<b>Contractors</b>	
The Club checks the identity of all contractors working on site and requests DBS with barred list checks where required by statutory guidance. Contractors who have not undergone checks will not be allowed to work unsupervised during times where children/adults at risk are on site.	Who at the club performs these checks? Unless the responsibility lies with a specific individual, it is unlikely to get done. What records are kept that the checks have been carried out? Football clubs are not inspected for safeguarding; there is no one to check if clubs are operating to best practice.
<b>Site security</b>	
Visitors to the Club, including contractors, are asked to sign in and are given a badge, which confirms they have permission to be on site. All visitors are expected to observe the Club's safeguarding and health and safety regulations.	Are there any requirements for visitors to be accompanied whilst on site? If not, why not?
<b>Off-site arrangements, trips and visits'</b>	
All extended and off-site activities are subject to a risk assessment to satisfy health and safety and safeguarding requirements. Where Club activities are provided by and managed by the Club, our own child protection policy and procedures apply. If other organisations provide services or activities in partnership with or on behalf of the Club we will check that they have appropriate procedures in place, including safer recruitment procedures.	
When our children are involved in off-site activities facilitated or organised by the Club, including day and residential visits and work-related activities, we will check that effective safeguarding and child protection arrangements are in place.	Who is responsible for making these checks? What records are kept that the checks have been carried out?

<b>Staff/children/adults at risk online and electronic communication</b>	
The Club provides advice to staff and volunteers regarding their personal online activity and electronic communication. CAFC has strict rules regarding online contact and electronic communication with participants and service users (children/adults at risk). Staff found to be in breach of these rules may be subject to disciplinary action and/or internal/external investigation.	Where are these rules and what are the rules? Parents of children need to know the club's expectations so they can help police the arrangement
<b>Child protection procedures</b>	
<b>Recognising abuse</b>	
To ensure that our children are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.	
Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm, for example by hitting them, or by failing to act to prevent harm, for example by leaving a small child home alone.	
Abuse may be committed by adult men or women and by other children and young people.	
Working Together to Safeguarding Children 2017 (HM Gov) and Keeping Children Safe in Education (DfE 2016) refer to four categories of abuse. These are set out at Appendix One along with indicators of abuse.	Working Together to Safeguard Children was updated in July 2018 and as previously mentioned KCSIE 2016 has also been updated – have the changes been accounted for in this policy – we are left uninformed. Appendix of legislation would assist.
<b>Bullying</b>	
While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause anxiety and distress. All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our anti-bullying procedures	
<b>Taking action</b>	
<b>Any child in any family and in any organisation could become a victim of abuse. Staff should always maintain an attitude of “it could happen here”.</b>	
Key points for staff to remember for taking action are:	Are these things just for staff to remember, or actually to do?

<ul style="list-style-type: none"> <li>• in an emergency take the action necessary to help the child, if necessary call 999</li> </ul>	
<ul style="list-style-type: none"> <li>• report your concern as soon as possible to the DSO, definitely by the end of the day</li> </ul>	
<ul style="list-style-type: none"> <li>• do not start your own investigation</li> </ul>	
<ul style="list-style-type: none"> <li>• share information on a need-to-know basis only - do not discuss the issue with colleagues, friends or family</li> </ul>	
<ul style="list-style-type: none"> <li>• complete a record of concern</li> </ul>	
<ul style="list-style-type: none"> <li>• seek support for yourself as these issues almost always have an emotional impact.</li> </ul>	
<b>If you are concerned about a child's welfare</b>	
There will be occasions when staff may suspect that a child may be subject to harm or abuse. These concerns may arise as a result of issues within Club activities or outside of the Club environment. Their behaviour may have changed, they may show signs of confusion or distress, or physical indicators may have been noticed. In these circumstances, staff should give them the opportunity to talk and ask if they are OK or if they can help in any way.	
Staff should record these early concerns and report them to the DSO. If the child does reveal that they are being harmed, staff should follow the advice below and discuss their concerns with the DSO.	"Should" again.
<b>If somebody discloses to you</b>	
It takes a lot of courage for anybody to disclose that they are being abused and there are even greater blocks for children and young people. They may feel ashamed, particularly if the abuse is sexual; their abuser may have threatened what will happen if they tell; they may have lost all trust in adults; or they may believe, or have been told, that the abuse is their own fault. Sometimes they may not be aware that what is happening is abusive.	
If a child talks to a member of staff about anything that indicates a potential risk to their safety or wellbeing, <b>the staff member will, at the appropriate time, let the child know that in order to help them they must pass the information on to someone who can help or advise (the DSO).</b> The point at which they state that this is a matter for personal and professional judgement. During their conversations with the child staff should:	Everything in the list below is "should" – i.e. voluntary.

• allow them to speak freely	
• remain calm and not overreact	
• give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’	
• not be afraid of silences	
• <b>under no circumstances</b> ask investigative questions – such as how many times this has happened, whether it happens to siblings, or what does their mother think about it. It is fine to say ‘do you want to tell me what has happened?’ or ‘Can you describe what you mean by <i>[quote something they have said]</i> ?’ in order to clarify what has caused them distress or harm	
• at an appropriate time tell the child/adult at risk that in order to help them, the member of staff must pass the information on to the Club’s safeguarding lead to get advice and support	
• not automatically offer any physical touch as comfort. If the child is upset and initiates the contact themselves, this should be recorded and reported	
• tell the child what will happen next	
• report verbally to the DSO themselves (never assume the child or someone else will or has done so)	
• provide reassurance, but false promises of confidentiality should never be made.	
• complete a written record and hand it to the DSO as soon as possible	
• seek support for themselves as managing concerns always has an emotional impact	
<b>Notifying parents</b>	
The Club will normally seek to discuss any concerns about a child with their parents/legal guardian. This must be handled sensitively and the DSO will make contact with the parent in the event of a concern, suspicion or disclosure.	“will normally” – discretionary again, no description of what might count as abnormal.
Our focus is the safety and wellbeing of the child. Therefore, if the Club believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are contacted.	But there’s no commitment by the club that it will seek advice from children’s services (or the police).

<b>Confidentiality and sharing information</b>	
All staff will understand that safeguarding issues warrant a high level of confidentiality, not only out of respect for the person and staff involved but also to ensure that information being released into the public domain does not compromise evidence or any subsequent investigation.	
Staff should only discuss concerns with the DSO and/or Senior Safeguarding Manager. That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.	"Should" - discretionary
However, any member of staff can contact children's social care if they are concerned about a child.	"Can" - discretionary
Safeguarding information will be stored and handled in line with the Data Protection Act 1998. Information sharing is guided by the following rules and principles*:	
1. neither data protection legislation and guidance or human rights law are barriers to sharing information in the interests of safeguarding	
2. be open and honest	
3. seek advice (from designated people e.g. DSO or statutory agencies)	
4. share information with consent where possible	
5. always consider safety and wellbeing	
6. the information shared is necessary, proportionate, relevant, adequate, accurate, timely and secure	
7. a record must be kept of your actions, decision & reasons for it	
<i>*Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers. HM Gov. March 2015</i>	
Information sharing decisions will be recorded, whether or not the decision is taken to share.	
Records of concern and other written information will be stored in a locked facility with restricted access and any electronic information will be stored in a protected file, transferred securely and only made available to appropriate individuals.	
Child protection records are normally exempt from the disclosure provisions of the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request to see child protection records, they will refer the request to the DSO/SSM.	

The Club's confidentiality and information-sharing policy is available to parents and young people/adults at risk on request.	
<b>Referral to children's social care</b>	
The DSO will make a referral to children's social care if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. Any member of staff may make a direct referral to children's social care if they believe independent advice and action is necessary to protect a child.	<p>There are two common types of reports from Regulated Settings. Abuse perpetrated within the organisation or a 'sentinel' report when the abuse is perpetrated outside the organisation and reporting is by a member of the institution who suspects abuse may have occurred.</p> <p>The threshold for informing the LADO and children's services necessarily needs to be lower than that which children's services would use to intervene, otherwise there is a risk (through lack of training) of failing to inform LA children's services of concerns which they would consider justified an intervention. The Club is using the same threshold as LA's.</p>
<b>Reporting directly to child protection agencies</b>	
Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children's social care, police or the NSPCC if:	"Should" and "may" - discretionary
<ul style="list-style-type: none"> <li>the situation is an emergency and the DSO and SSM are unavailable</li> </ul>	
<ul style="list-style-type: none"> <li>they are convinced that a direct report is the only way to ensure the child's safety</li> </ul>	
<ul style="list-style-type: none"> <li>for any other reason they make a judgement that direct referral is in the best interests of the child.</li> </ul>	There is nothing in the policy that protects staff ( who are whistleblowers) in the event that they do contact the authorities directly.
<b>Peer on peer abuse</b>	
Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying and will use the Club's anti-bullying procedures where necessary. However, there will be occasions when a child's behaviour warrants a response under child protection rather than antibullying procedures.	
Peer on peer abuse can take many forms, including:	
<ul style="list-style-type: none"> <li><b>physical abuse</b> such as biting, hitting, kicking or hair pulling</li> </ul>	
<ul style="list-style-type: none"> <li><b>sexually harmful behaviour/sexual abuse</b> such as inappropriate sexual language, touching, sexual assault</li> </ul>	



<ul style="list-style-type: none"> <li>• <b>sexting</b>, including pressuring another person to send a sexual imagery or video content</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>teenage relationship abuse</b> - defined as a pattern of actual or threatened acts of physical, sexual or emotional abuse, perpetrated against a current or former partner</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>initiation/hazing</b> - used to induct newcomers into an organisation such as sports team or school groups by subjecting them to a series of potentially humiliating, embarrassing or abusing trials which promote a bond between them</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>prejudiced behaviour</b> - a range of behaviours which causes someone to feel powerless, worthless or excluded and which relates to prejudices around belonging, identity and equality, in particular prejudices linked to disabilities, special educational needs, ethnic, cultural and religious backgrounds, gender and sexual identity.</li> </ul>	
Abuse is abuse and should never be tolerated or passed off as 'banter' or 'part of growing up'. Different gender issues may be prevalent when dealing with peer on peer abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.	
At our Club, we take the following steps to minimise or prevent the risk of peer on peer abuse.	
<ul style="list-style-type: none"> <li>• We will seek to promote an open and honest environment where young people feel safe to share information about anything that is upsetting or worrying them.</li> </ul>	
<ul style="list-style-type: none"> <li>• Induction processes are used to provide a moral framework outlining codes of conduct, acceptable behaviour and stressing the effects of bullying.</li> </ul>	
<ul style="list-style-type: none"> <li>• Staff will endeavour always to create surroundings where everyone feels confident and at ease in the Club.</li> </ul>	
<ul style="list-style-type: none"> <li>• We will ensure that Club activities are well supervised by appropriate and qualified staff and volunteers.</li> </ul>	
All allegations of peer on peer abuse should be passed to the DSO immediately. They will then be investigated and dealt with as follows.	"Should" - discretionary

<ul style="list-style-type: none"> <li>• <b>Information gathering</b> - children, staff and witnesses will be spoken with as soon as possible to gather relevant information quickly to understand the situation and assess both the impact and whether there was intent to cause harm.</li> </ul>	
<ul style="list-style-type: none"> <li>• <b>Decide on action</b> - if it is believed that any young person is at risk of significant harm, a referral will be made to children's social care. The DSO will then work with children's social care to decide on next steps, which may include contacting the police.</li> </ul>	Too high a threshold as previously stated.
<ul style="list-style-type: none"> <li>• <b>Inform parents</b> - as with other concerns of abuse, <b>the school will normally</b> seek to discuss concerns about a child with parents. Our focus is the safety and wellbeing of the child and so if the Club believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.</li> </ul>	<p>What's this about a school? Is this an indicator that aspects, if not most of the policy, has copied from another setting?</p> <p>If the club had a policy of reporting suspicions to LA children's services in the first instance, they would also be able to obtain guidance as to how and when to inform parents. More probably, parents would be informed by children's services.</p>
<b>Supporting those involved</b>	
The support required for the child who has been harmed will depend on their circumstance and the nature of the abuse. Support could include counselling, mentoring, the support of family and friends and/or support with improving peer relationships or some restorative justice work.	
Support may also be required for the child that exhibited harmful behaviour. We will seek to understand why the child acted in this way and consider what support may be required to help the child change behaviours. Once those needs have been met, the consequences for the harm caused or intended will be addressed with them in partnership with parents and external agencies as required.	
<b>Sexting</b>	
There is no accepted definition of 'sexting' but most professionals agree that it refers to the sending or posting of sexually suggestive images, including nude or semi-nude photographs of a person under 18 years of age, via mobiles or over the internet. The UK Council for Child Internet Safety defines sexting as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.	

<p>'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.</p>	
<p>Guidance for staff and volunteers dealing with sexting incident/disclosure:</p>	
<ul style="list-style-type: none"> <li>The incident should be referred to the DSO immediately and the DSO will clarify the concerns with any staff involved in reporting and ensure concerns are accurately recorded</li> </ul>	<p>"Should" - discretionary</p>
<ul style="list-style-type: none"> <li>Never view, download or share the imagery yourself, or ask a child to share or download – this is illegal.</li> </ul>	
<ul style="list-style-type: none"> <li>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 DSO</li> </ul>	
<ul style="list-style-type: none"> <li>Do not delete the imagery or ask the young person to delete it</li> </ul>	
<ul style="list-style-type: none"> <li>Do not ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSO</li> </ul>	
<ul style="list-style-type: none"> <li>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</li> </ul>	
<ul style="list-style-type: none"> <li>Do not say or do anything to blame or shame any young people involved</li> </ul>	
<ul style="list-style-type: none"> <li>Do explain to them that you need to report it and reassure them that they will receive support and help from the DSO.</li> </ul>	
<ul style="list-style-type: none"> <li>If there is a concern a young person has been caused distress, harmed or is at risk of harm a referral will be made to the police immediately. The police do not seek to criminalise young people but take sexting very seriously and will take appropriate action which may include seizure of devices and speaking to the young people involved. On-line abuse through sexting can have very serious consequences and undertaking an investigation at Club level can lead to images and evidence being deleted which prevents appropriate action being taken to support and/or educate those involved or impacted by these issues. Parents will be informed at an early stage and involved in the process unless the police advise against this or there is good reason to believe that involving parents would put the young person at risk of harm.</li> </ul>	

<b>Sexual exploitation of children</b>	
Sexual exploitation involves an individual or group of adults taking advantage of the vulnerability of an individual or groups of children or young people, and victims can be boys or girls. Children and young people are often unwittingly drawn into sexual exploitation through the offer of opportunities, future career gains, friendship and care, gifts, drugs and alcohol, and sometimes accommodation. Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.	
A common feature of sexual exploitation is that the children often don't recognise the coercive nature of the relationship and therefore do not see themselves as a victim. In some cases parents/guardians also fail to recognise that a relationship is potentially abusive and both the child and their carers may initially resent what they perceive as interference by staff, but staff must act on their concerns, as they would for any other type of abuse.	
All staff are made aware of the indicators of sexual exploitation and all concerns are reported immediately to the DSO.	Phrased as if this is a statement of fact. Needs to be a directive using the word "must".
<b>Honour-Based Violence</b>	
'Honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of HBV are abuse.	
FGM is the collective name given to a range of procedures involving the partial or total removal of external female genitalia for non-medical reasons. In England, Wales and Northern Ireland, the practice is a criminal offence under the Female Genital Mutilation Act 2003. The practice can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.	
FGM is carried out on girls of any age, from young babies to older teenagers and adult women. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by a girl of any age about going on a long holiday during the summer vacation period.	

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse. In England and Wales the practice is a criminal offence under the Anti-Social Behaviour, Crime and Policing Act 2014. The reporting of any concerns about either suspected forced marriage or FGM is mandatory.	
A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.	
Children may be married at a very young age, and well below the age of consent in the UK which would make it unlawful in relation to a UK citizen. Relevant Club staff receive training and should be particularly alert to suspicions or concerns raised in relation to a young person who is being taken abroad and may be anxious or prevented from returning to the UK.	“Should” - discretionary
<b>Radicalisation and Extremism</b>	
Radicalisation is defined as the process by which people come to support terrorism and extremism and, in some cases, to then participate in terrorist groups or activities.	
The government defines extremism as ‘vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs’ (HM Government Prevent Strategy).	
Some children are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form however staff should also remain alert to the risk of radicalisation into white supremacy extremism.	

<p>'Prevent' is a cross-Government policy that forms one of the four strands of the UK's strategy for counter terrorism which includes the prevention of radicalisation of vulnerable adults and children. Those who are targeted with a view to radicalise them are often the most vulnerable in society including those with poor networks of support or who are experiencing socially isolated, mental health issues and/or learning and communication issues.</p>	
<p>Keeping children safe from these risks is a safeguarding matter and should be approached in the same way as safeguarding children from other risks.</p>	
<p>If the behaviour of anybody involved in our activities indicates that they or those around them are at risk of harm, staff should report these concerns immediately to the DSO. In the event that there appears to be an immediate risk or danger call 999.</p>	<p>"Should" - discretionary</p>
<p><b>Private fostering arrangements</b></p>	
<p>A private fostering arrangement occurs when someone <u>other than</u> a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify children's services as soon as possible.</p>	
<p>Where a member of staff becomes aware that a child may be in a private fostering arrangement they will raise this with the DSO and the Club will notify the local authority who will check whether the arrangement is suitable and safe for the child. The Club, on very rare occasions, makes arrangements for Academy scholars to stay with a host family. In such circumstances the Club will adhere to its Host Family policy to ensure that all safeguarding considerations are addressed and agreed with the player and his parents. Where any accommodated scholar is aged under 16 arrangements will be agreed in partnership with the local authority and in line with the Children (Private Arrangements for Fostering) Regulations 2005.</p>	<p>"Will" makes it sound as if it is a statement of fact. Should be worded as a directive to staff, using "must"</p>
<p><b>Looked after children</b></p>	
<p>The most common reason for children becoming looked after (taken into care) is as a result of abuse or neglect. Children's early experiences have a significant impact on their development and future life chances. As a result of their experiences, both before and during care, looked after children are at greater risk than their peers.</p>	

Appropriate staff will be informed about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the local authority looking after the child. Any indicators or signs that a looked after child may require additional support or protection must be reported without delay to the DSO who will share concerns with the Local Authority without delay.	
<b>Related safeguarding portfolio policies</b>	
This policy should be read alongside our other Club safeguarding policies and procedures:	Mandate Now has only reviewed the whistleblowing policy as safeguarding in all Regulated Activities is grounded on it.
• Adults at risk policy	
• Photography and digital images policy	
• Whistle blowing policy	
• Complaints policy	
• Anti-bullying procedures	
• Staff and Volunteers Code of Conduct	
• Data Protection Policy	
• Transport Policy	
• Equality and Diversity Policy	
• Trips, visit and tournaments policy	
• Health and Safety Policy	
• Recruitment and Selection Policy	
• Club Mascot Policy	
• Host families policy	
• Use of changing facilities policy	
•	

<b>Sharing Concerns and Reporting Contact Details</b>	
All concerns should be recorded as soon as possible. Records should include the date, time relating to the welfare of any child, whether these concerns arise outside of or within Club activities, should be shared and advice sought without delay. Wherever possible, please have as many relevant details to hand e.g. full name, date of birth and address of child, siblings and parents; full details of the concern etc. but do not let a lack of detail block you from reporting.	"Should" again.
<b>The following contact numbers are provided for the reporting of concerns:</b>	
<b>CAFC Designated Safeguarding Officer</b>	
Paul Antrobus	
T: 07788 432463	
Email: <a href="mailto:pantrobus@crewealex.net">pantrobus@crewealex.net</a>	
<b>Cheshire East Safeguarding Consultation Service:</b>	
Tel: 0300 123 5012 (Select option 3)	
<b>Cheshire East Children's Social Care:</b>	
Tel: 0300 123 5010	
Tel: 0300 123 5022 (Emergency Duty Team for out of hours)	
<b>Local Authority Designated Officer:</b>	
The Cheshire East LADO sits within the Safeguarding Unit and is accountable to the Safeguarding Manager Children, and Families. The LADO is supported by a LADO Business Support Officer who undertakes the administrative duties of the LADO role.	
LADO contact details: Tel: 01606288931	
LADO Business Support Office 01270685904	
LADO secure email: LADO@cheshireeast.gcsx.gov.uk	
<b>Police:</b>	
Emergency: 999	
Local: Call 101 and ask for Cheshire Constabulary's Child Protection Team	
<b>Reaseheath College:</b>	
Call the College Switchboard on 01270 625131 and ask to speak to:	
<ul style="list-style-type: none"> <li>Dave Kynaston, Vice Principal – Safeguarding Lead</li> </ul>	
<ul style="list-style-type: none"> <li>Mark Birtkitt, Head of Student Services – Safeguarding Principal Officer</li> </ul>	
<b>Crewe Alexandra Ladies FC:</b>	



Welfare Officer: Nick Pearce Tel: 01270 216 682 for the Soccer Centre and ask to speak to Nick about a safeguarding concern or fill in the online contact/email form at <a href="http://www.crewealexandaladies.com/contact/">http://www.crewealexandaladies.com/contact/</a>	
<b>EFL Safeguarding Manager:</b>	
Alexandra Richards	
Tel: 07792 284740	
Email: <a href="mailto:arichards@efl.com">arichards@efl.com</a>	
<b>Appendix One</b>	
<b>Four categories of abuse</b>	
<b>Physical abuse</b>	
Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness).	
<b>Emotional abuse</b>	
Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.	

<b>Sexual abuse</b>	
Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.	
<b>Neglect</b>	
Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:	
<ul style="list-style-type: none"> <li>• provide adequate food, clothing and shelter (including exclusion from home or abandonment);</li> </ul>	
<ul style="list-style-type: none"> <li>• protect a child from physical and emotional harm or danger;</li> </ul>	
<ul style="list-style-type: none"> <li>• ensure adequate supervision (including the use of inadequate care-givers); or</li> </ul>	
<ul style="list-style-type: none"> <li>• ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.</li> </ul>	

<b>Indicators of abuse</b>	
Physical signs define some types of abuse, for example, bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For these reasons, it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead.	
<b>It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.</b>	It is also not the responsibility of the club's administration to investigate or decide whether a child has been abused. It is the club's responsibility to assess.
A child who is being abused, neglected or exploited may:	
• have bruises, bleeding, burns, fractures or other injuries	
• show signs of pain or discomfort	
• keep arms and legs covered, even in warm weather	
• be concerned about changing in front of others	
• look unkempt and uncared for	
• change their eating habits	
• have difficulty in making or sustaining friendships	
• appear fearful or withdrawn	
• avoid eye contact	
• be reckless with regard to their own or other's safety	
• self-harm	
• frequently miss sessions, arrive late or try to leave activities before they are scheduled to end	
• show signs of not wanting to go home	
• display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn	
• challenge authority	
• become disinterested in their studies or training	
• be constantly tired or preoccupied	
• be wary of physical contact	

• be involved in, or particularly knowledgeable about drugs or alcohol	
• display sexual knowledge or behaviour beyond that normally expected for their age	
• acquire gifts such as money or a mobile phone from new 'friends'.	
Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw, and each small piece of information will help the DSO to decide how to proceed.	
Appendix 2: Club process and procedures for dealing with disclosures	

## Allegation of Child abuse Practice by a Member of CAFC

Stay calm, reassure, make no promises, ask leading questions, and a

Is the behaviour alleged f  
Club safeguarding policy or  
Conduc

Yes

Report to

SSM/DSO will clarify  
(seeking advice from the  
and Statutory  
appropriate  
interim  
made imposed during  
investig - HR will then  
with safeguarding/misconduct  
issue. Will be referred to  
where appropriate

Is the matter serious  
potentially be a criminal

N

Yes/unsu

Report to the DSO/SSM  
will assess the circumstances and  
the matter to Social Services, LADO  
Police, FA, EFL Safeguarding  
Suspension of the member of staff  
consider

If the allegation relates to the DSO  
to the SSM who will follow the

Possible

No case to

Further training and support

Advice/sanctions/warning as per  
codof

Dismiss

Referral to DBS/inclusion on

Working ban imposed by

Possible

Police

Criminal

Civil

Dismiss

Inclusion on DBS

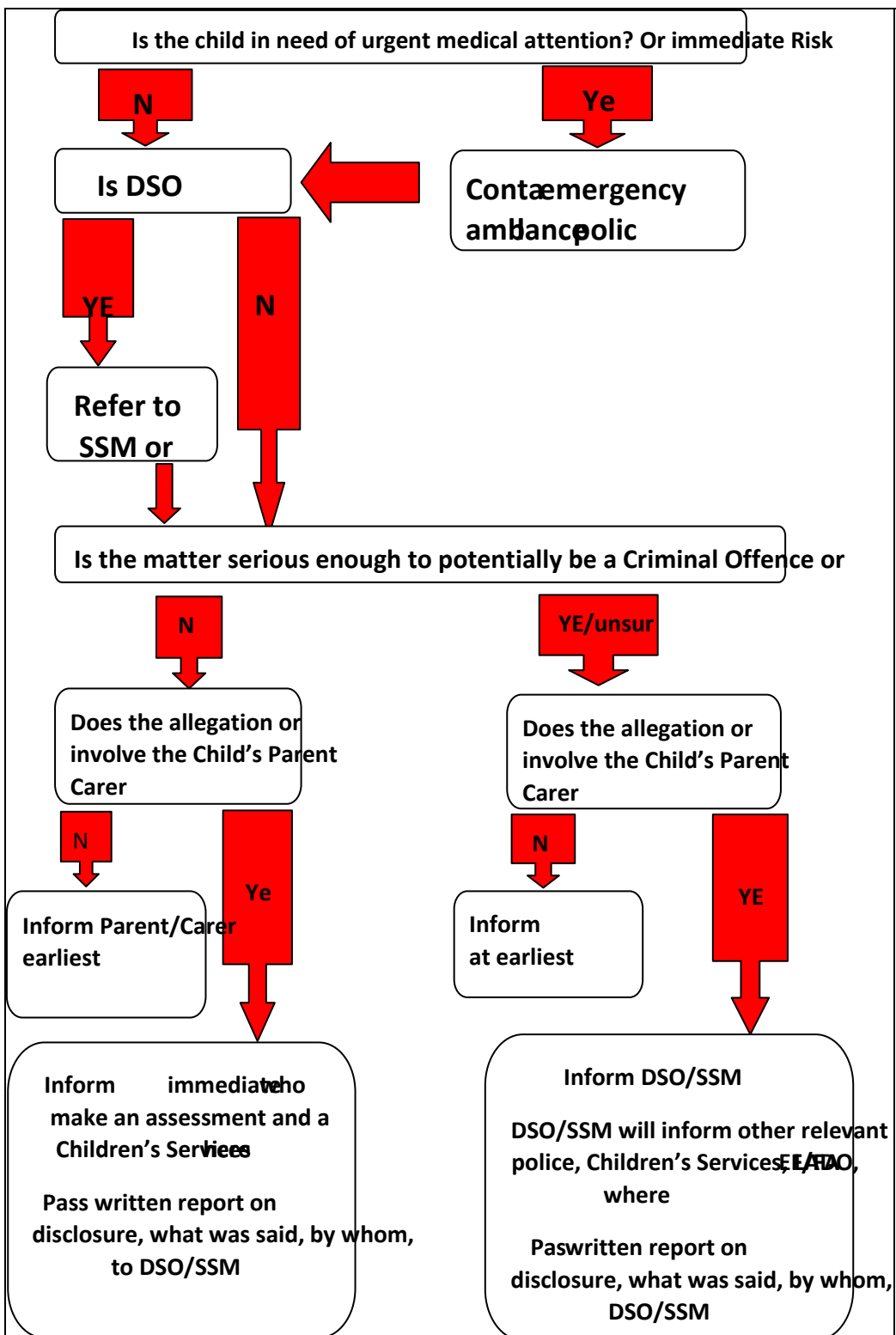
Working ban imposed

All referrals seem to go to one of two people – the DSO or the SSM. Ideally they should go to one named person or the second in the absence of the first with a commitment one is always on duty.

The box on the left below 'Report to' states: 'SSM/DSO will clarify concerns (seeking advice from the EFL/FA and Statutory Agencies as appropriate). Interim suspension may be imposed during the investigation - HR will then deal with as safeguarding/misconduct issue. Will be referred to EFL/FA where appropriate.'

We contend that all allegations must at minimum be discussed with the LADO at the Local Authority (i.e. when a child is known or suspected to have been abused by an adult who is employed or a volunteer at the club). The date / time and outcome of the call should be recorded, and confirmed to the LADO in writing. If the LADO prescribes a course of action that the club can undertake to address a situation, it should be confirmed to the LADO in writing once it is completed.

Allegation or Incident of Child Abuse	
Stay calm, reassure, take seriously, make no promises, don't ask leading questions, and make a record	



### Taking the left side of the flow chart first:

Again – one line of communication is preferred so we recommend a referral is always made to the DSO or in his/her absence (or if the concern involves the behaviour of the DSO) then the SSM. It is assumed the Club will always ensure that either the DSO / SSM is on duty.

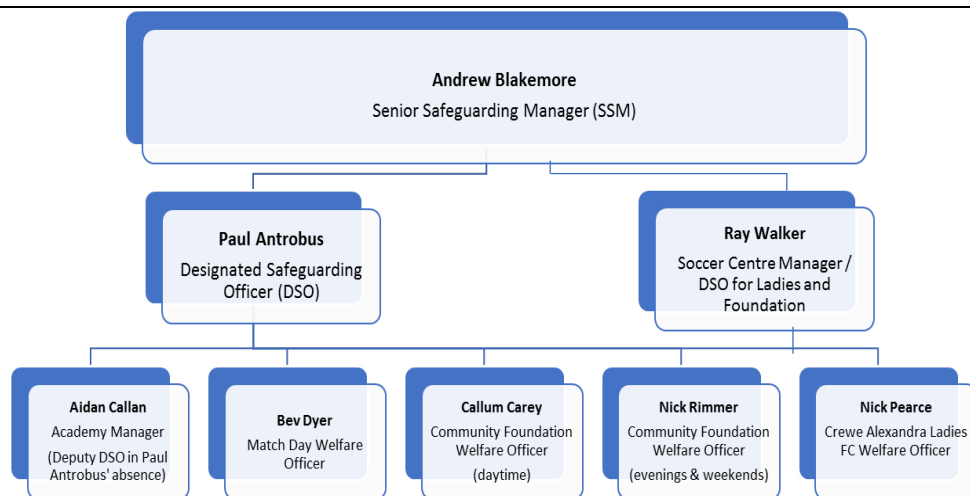
There is a common question to both Left and Right sides of the diagram at: *Does the allegation or incident involve the Child's Parent or Carer?* In fact the potential perpetrator might be a member of the child's extended family, another child at the club or outside and unconnected to the club, or an adult unrelated and unconnected to the family and not involved with the club. In all such cases such referrals are to be made to Children's Services at the Local Authority and not the LADO who has a very specific role.

### Regarding the right hand side of the flow chart:

The next concern arises at: 'Inform DSO/SSM immediately who will **make an assessment and a referral to Children's Services where necessary.** Pass written report on circumstances of disclosure, what was said, by whom, when to DSO/SSM a.s.a.p.'

As with our comment above, we contend that all reports received in these circumstances by the DSO (SSM) must at minimum be discussed with the LADO at the Local Authority (i.e. when a child is known or suspected to have been abused by an adult who is employed or volunteers at the club). The date / time and outcome of the call should be recorded and then confirmed to the LADO in writing within 5 working days. Recommended LADO action must then be undertaken by the Club and confirmed to the LADO in writing. 'ASAP' is not a specified timeframe. A time needs to be stated preferably: - immediately but within (hours).

## Appendix 3: Crewe Alexandra Designated Safeguarding Staff



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### Contact Details:

#### Paul Antrobus, Lead Safeguarding Officer

E: [pantrobus@crewealex.net](mailto:pantrobus@crewealex.net)

M: 07788 432463

**Andrew Blakemore**, Senior Safeguarding Manager (Company Secretary / Finance Operations Manager)

E: [ablakemore@crewealex.net](mailto:ablakemore@crewealex.net)

T: 01270 213014 / M: 07775 896669

**Aidan Callan**, Academy Manager

E: [acallan@crewealex.net](mailto:acallan@crewealex.net)



T: 07887 562210  
**Callum Carey**, Community Education Officer  
E: [ccarey@crewealex.net](mailto:ccarey@crewealex.net)  
T: 07708 723932  
**NB:** Callum is employed by Reaseheath College and would report to the College's Designated Safeguarding Lead Dave Kynaston (Email: [davek@reaseheath.ac.uk](mailto:davek@reaseheath.ac.uk)) if concerns arose in relation to a pupil e.g. CAFC Apprentices and Scholars  
**Beverley Dyer**, (Stadium Operations Manager)  
E: [bdyer@crewealex.net](mailto:bdyer@crewealex.net)  
T: 01270 213014 opt 4 / M: 07733 077611  
**Nick Pearce**, Crewe Alexandra Ladies FC Secretary  
E: [crewealexandralfc@gmail.com](mailto:crewealexandralfc@gmail.com)  
T: 01270 216682  
**Nick Rimmer**, Community Foundation Welfare Officer (Evenings and Weekends)  
E: [nrimmer@crewealex.net](mailto:nrimmer@crewealex.net)  
T: 01270 216682 M: 07970 835347  
**Ray Walker**, Crewe Alexandra Soccer Centre / Community Foundation Trust Manager  
E: [rwalker@crewealex.net](mailto:rwalker@crewealex.net)  
T: 01270 216682 M: 07557 391426

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