



**ST. GEORGE'S PARK**

# **OUR CHILD SAFEGUARDING POLICY AND HOW TO PUT IT INTO PRACTICE**



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## THE FA'S SAFEGUARDING STRATEGY

The FA's safeguarding strategy – which encompasses all our activities at St. George's Park – comprises three core elements:

1. **Prevention:** Implementing preventative safeguarding measures to help create fun, safe environments;
2. **Reporting:** Making the reporting of concerns as easy as possible;
3. **Investigation and resolution:** Ensuring safeguarding concerns are investigated swiftly and thoroughly with relevant statutory agencies and with demonstrable outcomes.

Safeguarding is **everyone's** responsibility. We must all play our part. This means being clear about:

- Your role and responsibilities;
- Professional boundaries and The FA Codes of Conduct;
- How to respond and report a Safeguarding concern or ask for advice.

This document is intended to create clarity, so you understand how we should apply Safeguarding good practice to everyone, every day.

## SAFEGUARDING AT ST. GEORGE'S PARK

We're committed to delivering a safe and enjoyable experience for everyone who works at or visits St. George's Park.

In particular, we have a duty of care to safeguard and promote the welfare of children. This means we need all our staff, partners and suppliers to apply safeguarding consistently and effectively.

Safeguarding at St. George's Park reflects statutory responsibilities, government guidance and good practice. We'll also build on existing safeguarding practices and procedures to provide a consistent and relevant process.

This policy applies to all FA Group employees (full- and part-time, including agency workers and casual staff), consultants, contractors – and any other individual employed or engaged by the FA Group at St George's Park.

Although this policy relates to child safeguarding, any concerns about safeguarding risks to vulnerable adults (known as 'adults at risk') at St. George's Park must be reported using the same procedures.





## THE LEGAL FRAMEWORK

Our policy is based on current English legislation, statutory guidance and good practice in the safeguarding and protecting of children. The framework is informed by:

- Safeguarding Vulnerable Groups Act 2006;
- Protection of Freedoms Act 2012;
- Working Together to Safeguarding Children 2015 (currently being revised);
- Keeping Children Safe in Education DFE 2016 (currently being revised);
- The Children Act 2004;
- Children and Social Work Act 2017;
- The NSPCC/Sport England Child Protection in Sport Standards (2005);
- UN Convention on Rights of the Child (UNCRC).

## DEFINITIONS AND TERMINOLOGY

**‘Staff’:** in this document refers to all employees, service providers, contractors, tenants, licensees and volunteers at St. George’s Park. It also includes any event support staff, paid or unpaid.

**‘Child’:** a child is defined in law as under the age of 18. (The term ‘child’ includes children and young people). Safeguarding is the action that is taken to promote the welfare of children and protect them from harm.

**‘Safeguarding’** means protecting children from abuse and maltreatment and preventing harm to their health or development. It is intended to ensure children grow up surrounded by safe and effective care.

## QUALITY ASSURANCE AND MONITORING

This policy will be reviewed in June 2019 – and then every three years, or if there’s:

- A change in legislation and/or government guidance, or
- A requirement from the LCSB, or any other significant change or event.

A Safeguarding Review Group (SRG) will be established to represent all key areas across the St. George’s Park site. The Senior Safeguarding Manager will ensure compliance, and lead on reviews and updates.

We are committed to working in partnership with the Police, Children Social Services Departments and LSCB or their equivalent. This is essential to enable these organisations to carry out their statutory duties to investigate concerns and protect all children and young people.

- A log will be kept securely by the Senior Safeguarding Manager of the number of safeguarding referrals and concerns.
- Safeguarding-related incidents will be collated quarterly and analysed annually. Any recommendations/data/learning from this annual analysis will be fed into the annual safeguarding report to The FA Board.
- Child safeguarding will be included in staff inductions.

**<sup>1</sup> Local Safeguarding Children Board (LCSB):** *Section 13 of the Children Act 2004 requires each local authority to establish a Local Safeguarding Children Board (LSCB) for their area. It also specifies the organisations and individuals (other than the local authority) that should be represented on LSCBs. The LSCB has a range of roles and statutory functions, including developing local safeguarding policy and procedures and scrutinising local arrangements.*





## OUR FIVE-POINT SAFEGUARDING POLICY

1. All participants and visitors to St. George's Park, including children and young people have the right to feel safe and secure. Wherever they come into contact with us, they will be treated with dignity and respect.
2. All the members of our workforce have a duty to keep children and other vulnerable people safe and to help protect them from abuse or harm.
3. The child's welfare is, and must always be, the paramount consideration.
4. All children and young people have a right to be protected from abuse regardless of their age, gender, gender reassignment, sexual orientation, race, nationality, ethnic origin, colour, religion or belief, ability or disability.
5. All staff (paid/unpaid) working at St. George's Park will ensure that all suspicions of abuse and allegations are taken seriously and reported swiftly, so they can be dealt with appropriately.



## PUTTING OUR POLICY INTO PRACTICE

First and foremost, we all need to understand our collective safeguarding responsibilities, in particular:

- That Safeguarding is everyone's responsibility and 'it could happen here';
- When to apply our policy and procedures;
- How to report a concern and/or disclosure;
- The procedures to be used to protect an individual when those concerns lie outside the organisation;
- The procedures to be used to protect an individual when those concerns lie within the organisation;
- The duties of those with specific Safeguarding responsibilities.

The above are covered in the following set of 11 guidance notes, covering:

1. The role and responsibilities of our Senior Safeguarding Manager (SSM)
2. Our safeguarding Code of Conduct
3. Our individual responsibilities
4. How safeguarding concerns can arise
5. Steps to take if you are told of – or witness – a concern
6. Steps to take if an allegation is made towards a member of staff
7. How the safeguarding reporting process works – flowchart
8. Maintaining confidentiality
9. Good practice for information-sharing
10. Use of photography/filming
11. Ongoing staff training

### 1. THE ROLE AND RESPONSIBILITIES OF OUR SENIOR SAFEGUARDING MANAGER (SSM)

The FA's Senior Safeguarding Manager (SSM) is **Sara Niblock**. Sara has responsibility for supporting and overseeing the safeguarding arrangements at St. George's Park. She manages safeguarding concerns and advises on incidents that occur at St. George's Park. Specifically, her responsibilities include:

- Being the single point of contact (SPOC) for safeguarding at St George's Park;
- Ensuring that any safeguarding incidents that occur are managed effectively and swiftly;
- Maintaining links with local statutory agencies, including the Police, Children's social care, Local Authority Designated Officer (LADO)<sup>2</sup> and Local Safeguarding Children Boards (LSCB), or their equivalent partnership board.
- Liaising with statutory agencies on individual cases in an urgent situation and/or support the FA Case Management Team;

- Providing appropriate support and guidance to senior staff;
- Ensuring regular staff safeguarding briefings;
- Provide good-practice guidance in relation to recruitment and vetting;
- Developing safeguarding training pathways for staff, relevant roles and responsibilities;
- Developing and maintain secure recording and reporting processes;
- Maintaining excellent communication across The FA, particularly The FA Safeguarding Team and case managers;
- Instilling in everyone the five 'Rs' of safeguarding good practice – with training in each of them:

**RECOGNISE > RESPOND > REPORT > RECORD > REFER**

**<sup>2</sup>Local Authority Designated Officer (LADO):** Allegations against professionals or volunteers working with children are managed through the LADO. The role of the LADO is to manage cases when it has been alleged that a professional has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates s/he is unsuitable to work with children. The LADO liaises with organisations such as the Police, Ofsted and Social Care to ensure a thorough and fair process for all those involved.

## 2. OUR SAFEGUARDING CODE OF CONDUCT

This Code sits alongside the FA's wider Code of Conduct [TheFA.com - Codes of Conduct](#)

It specifically refers to expectations about staff's professional contact with children and young people who come to St. George's Park.

### ST. GEORGE'S PARK – OUR SAFEGUARDING CODE OF CONDUCT

**We believe in respect for all and support the FA's zero tolerance approach to bullying harassment, victimisation and all forms of discriminatory behaviour. Breaches of this policy are classed as a disciplinary offence which will be dealt with under The FA Group's Disciplinary Procedure.**

Staff must demonstrate exemplary behaviour when providing service and assistance to all children and young people to ensure their safety and welfare. The following sets out the expectations of all staff at St George's Park.

- Always work in an open environment with children, avoiding private or unobserved situations. Where your role specifically requires one-to-one contact, only carry out duties with the consent of the young person and their responsible adult (e.g. carer, coach, parent).
- Ensure you are polite and courteous at all times and use only appropriate behaviour and language.
- It is an offence for a member of staff to knowingly allow a child or young person to purchase or consume alcohol, or other substances at St. George's Park (Licensing Act 2003). Staff shall immediately report any such offences or incidents to their manager.
- Treat all children and young people equally, and with respect and dignity. Always put the welfare and safety of each child or young person first.
- If a child or young person is involved in an accident, request the assistance of another staff member as soon as possible, and call for medical assistance (following the relevant emergency procedures) and ensure you notify your Supervisor and Line Manager. If the parent or carer is not present when the incident occurs, they should be contacted as soon as possible.
- Staff should always be child-centred and promote a fun, safe environment for children and young people. You should never:
- Allow or engage in any form of inappropriate physical contact.
- Allow children or young people to use inappropriate language unchallenged.
- Make sexually suggestive comments to a child or young person, even in fun, by any mechanism e.g. face-to-face, e-mail, phone, text or via social media.
- Reduce a child or young person to tears as a form of control.





- Use any personal form of social media or personal mobile or other devices to contact a child or young person, unless this is agreed as part of your role and is done using FA-approved mechanisms and equipment.
- Fail to act upon and record any allegations made by a child or young person or their parent or carer.
- Do things of a personal nature for children or young people that they can do for themselves.

**NB:** It may sometimes be necessary for staff to assist children or young people, particularly if they are young or are disabled. These tasks should only be carried out with the understanding and consent of the individual, and with the involvement of their parents or carers.

### 3. OUR INDIVIDUAL RESPONSIBILITIES

It's vital we all understand our individual safeguarding responsibilities.

We should all:

- Know what to do if you have a safeguarding concern;
- Be clear what the FA expects in terms of your behaviour and conduct;
- Be familiar with the safeguarding reporting procedure and with whom to raise any concerns;
- Be willing to learn and receive training and support to enhance our understanding of The FA's safeguarding requirements;

The FA's Senior Management Team (SMT) will fully support any member of staff or volunteer who in good faith reports a concern that a colleague or any other person is, or may be, behaving inappropriately towards a child/young person.

### 4. HOW SAFEGUARDING CONCERNS CAN ARISE

Typically, child safeguarding concerns can arise in six ways – sometimes inter-connected:

1. A child tells you something directly;
2. A child goes missing from St. George's Park;
3. A colleague or partner organisation passes on information;
4. A report is made about behaviour that gives cause for concern, poor practice or a breach of the Code of Conduct;
5. Low-level concerns about someone in a position of trust build up or are being passed round;
6. Apart from direct reporting, concerns can be expressed:
  - Via past or present staff, volunteers, contractors, associates, consultants etc.
  - Via social media;
  - Anonymously via text, letters emails or telephone calls.

However a concern arises, it is essential that all St. George's Park staff and associates follow the guidance and processes below.

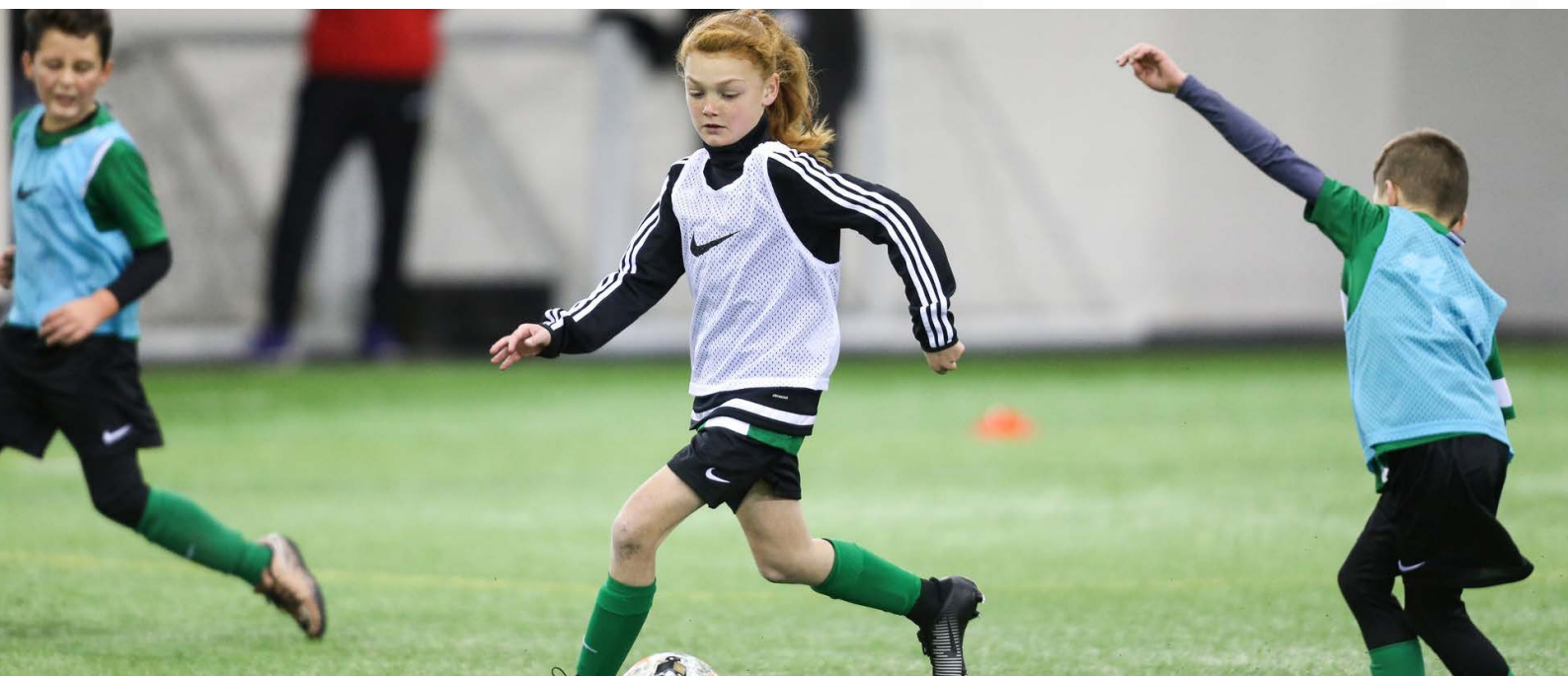
### 5. STEPS TO TAKE IF YOU ARE TOLD OF – OR WITNESS – A CONCERN

Remember – **IT IS NOT** the responsibility of staff or volunteers to decide if abuse has taken place, but **IT IS** your responsibility to act on any concerns. Here's some helpful guidance.

**Scenario:** A child discloses concerning information to you OR you have witnessed or had reported to you an incident or complaint involving behaviour of an adult in relation to a child. This could be considered either abuse or poor practice.

**Your response:**

- Stay calm and offer reassurance, do not promise to keep disclosures confidential. Then follow the reporting protocol below.



- If the victim is in need of urgent medical treatment, contact the medical team or emergency services immediately – and tell them it's a potential safeguarding issue.

**Reporting protocol:** All safeguarding concerns, including those that come from the Hilton Hotel or any other third-party provider, must be reported within 24hrs in person or via telephone to at least one of:

**Sara Niblock, Senior Safeguarding Manager:**

T: 0800 169 1863 Ext: 5050

M: 07974 225525

E: [sara.niblock@TheFA.com](mailto:sara.niblock@TheFA.com)

**Caitlin Hawkins, Player Education Manager:**

M: 07773 074229

E: [caitlin.hawkins@TheFA.com](mailto:caitlin.hawkins@TheFA.com)

**Holly Murdoch, St. George's Park General Manager:**

T: 01283 577280

M: 07984 639793

E: [holly.murdoch@TheFA.com](mailto:holly.murdoch@TheFA.com)

**Mike Smith, Operations Manager:**

T: 01283 57 7320

M: 07725 163637

E: [mike.smith@TheFA.com](mailto:mike.smith@TheFA.com)

Even if the initial report doesn't go to Sara Niblock, it will be forwarded to her by the relevant person above within 48 hours. Serious issues will be reported to her immediately.

- Serious incidents requiring immediate action will be reported verbally and then recorded on a safeguarding referral form (appendix 1)
- Less serious incidents will be reported via the safeguarding referral form to one of the above designated staff, who will forward it to the Senior Safeguarding Manager.

The Senior Safeguarding Manager will advise on key actions to be taken. He/she will also keep a central safeguarding log. This will be held in a secure place and the information it contains will only be shared on a 'need to know' basis.

Where applicable, all concerns raised at St. George's Park, but referring to matters away from the site, will be referred and applied using local procedures and protocols. E.g. referral to Multi-Agency Safeguarding Hubs (MASH)<sup>3</sup> teams and Local Safeguarding Children Boards.

Where applicable, the Senior Safeguarding Manager may refer an incident to the FA Safeguarding Team.

**<sup>3</sup>Multi-Agency Safeguarding Hubs (MASH):** The Multi-Agency Safeguarding Hub (MASH) is the single point of contact for all professionals to report safeguarding concerns.



## 6. STEPS TO TAKE IF AN ALLEGATION IS MADE TOWARDS A MEMBER OF STAFF

Where a safeguarding complaint is made against another member of staff, the staff member to whom the complaint is made should immediately:

Contact either:

**Holly Murdoch, St. George's Park General Manager:**

T: 01283 577280

M: 07984 639793

E: [holly.murdoch@TheFA.com](mailto:holly.murdoch@TheFA.com)

**Mike Smith, Operations Manager:**

T: 01283 57 7320

M: 07725 163637

E: [mike.smith@TheFA.com](mailto:mike.smith@TheFA.com)

If either of the above are unavailable, you should contact your supervisor or line manager.

Even if outside office hours or at a weekend you should contact one of the above. The General or Operations Manager will report the matter to the Senior Safeguarding Manager (SSM) and HR department and seek advice on next steps. If the concern involves either of the Operation or General Manager, or you have any legitimate reason not to involve them, then make direct contact with:

**Sara Niblock, Senior Safeguarding Manager:**

T: 0800 169 1863 Ext: 5050

M: 07974 225525 E: [sara.niblock@TheFA.com](mailto:sara.niblock@TheFA.com)



The SSM will advise on next steps, and will work closely with The FA Safeguarding Team and HR to manage the situation appropriately. This will include recording factual details of the allegation(s) and completing the Safeguarding Referral Form as appropriate. If required, the Police and Local Authority Designated Officer (LADO) will be informed.

The St. George's Park Senior Management will be kept apprised of the process.

Any relevant follow-up investigations, disciplinary incidents or actions will be carried out in accordance with FA Group policies and procedures.

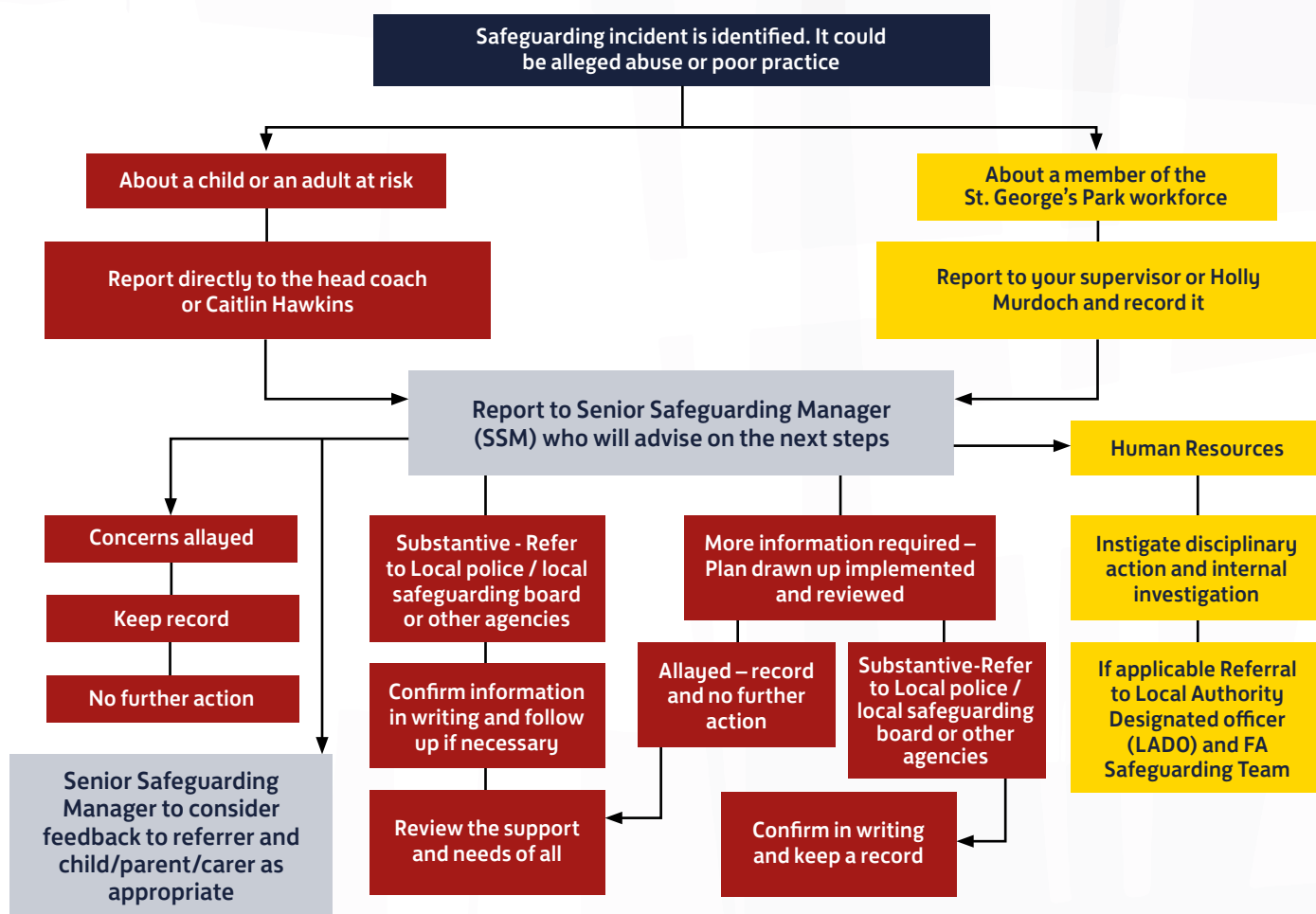
Understandably, staff will be expected to assist and fully co-operate with any investigation.

The safety and well-being of the child and young person or adult at risk should always be at the centre of any investigation.



## 7. HOW THE SAFEGUARDING REPORTING PROCESS WORKS – FLOWCHART

**RECOGNISE > RESPOND > REPORT > RECORD > REFER**



## 8. MAINTAINING CONFIDENTIALITY

Every effort should be made to ensure that confidentiality of Safeguarding cases is maintained for all concerned.

Information should be handled and disseminated on a 'need to know' basis only. Decisions on information sharing must be approved by the SSM. Those to whom information may be shared include (but is not limited to):

- The Stadium General Manager;
- The SSM;
- The Event Designated Safeguarding Officer/FA Safeguarding Team;
- The parent(s)/carer(s) of the Child who is alleged to have been abused;
- The Child or the person raising the concern, if contacting the parent(s)/carer(s) would not be appropriate, or if the Child is 16/17 years old;
- The person making the allegation;
- Children's or adults social care /police; AND
- When relevant, the national governing body, or head of an educational establishment.

Information should be stored in a secure place with limited access to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

Good practice for information-sharing:

In line with our policy dictum that 'the Child's best interest are always paramount', The FA will support any Staff member who shares information in circumstances where the individual believes that by not sharing the information a Child would be put at risk of harm.

It is recognised that whilst certain information can be kept confidential, there may be occasions where information may need to be shared with the relevant authority, with or without the consent of the individual.

Confidential information about a Child should never be used casually in conversation, or shared with any person other than on a need-to-know basis. In circumstances where the Child's identity does not need to be disclosed, the information should be handled anonymously.

There are some circumstances in which a member of Staff may be expected to share information about a Child. For example, when abuse is alleged or suspected. In such cases Staff members have a duty to pass information on without delay, but only to those with designated Safeguarding responsibilities.

If a Staff member is in any doubt about whether to share information or keep it confidential, guidance should be sought from the SSM.

The FA's policy with regard to data protection can be requested by contacting the senior Safeguarding Manager. Please refer to this policy for further information regarding The FA's data protection policies and procedures and how an individual's personal data should be handled by members of Staff.

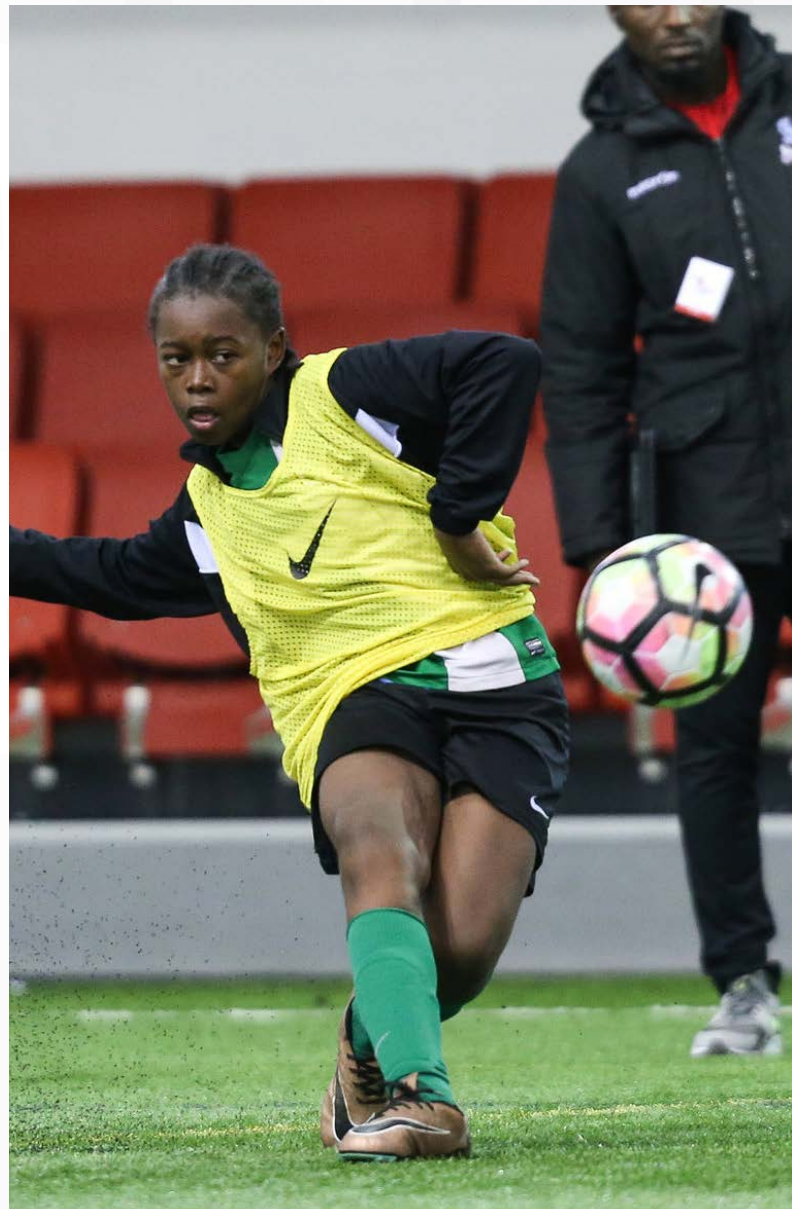
If for any reason you feel unable to openly report a Child Safeguarding concern, you must still report the concern but please do so via The FA's confidential whistle-blowing procedure: Any adult or young person with concerns about a colleague can also use whistle-blowing by calling **0800 169 1863** and asking for The FA's safeguarding team, or via email on [safeguarding@TheFA.com](mailto:safeguarding@TheFA.com)

## 9. USE OF PHOTOGRAPHY / FILMING

St. George's Park staff should be vigilant in this area. Any concerns about unauthorised photographing/filming of children should be reported to the security team, who may in turn report the incident to the Police. An Incident Form must be completed. Staff should be familiar with The FA's best-practice guidance on photography <http://www.thefa.com/football-rules-governance/safeguarding/raising-awareness>

## 10. ONGOING STAFF TRAINING

Safeguarding training and development will be built into induction procedures and training. It will also be referenced in other forms of role-specific training. All training will be mandatory and a record of attendance will be held centrally.





## KEY CONTACTS

Sara Niblock

Senior Safeguarding Manager

T: 0800 169 1863 Ext: 5050

M: 07974 225525

E: [sara.niblock@TheFA.com](mailto:sara.niblock@TheFA.com)

The NSPCC also run a 24-hour helpline:

0800 800 5000



## REMEMBER THIS

Please memorise this acronym and apply it to your everyday work.

**S**tay alert: Look out for things that worry or concern you. Listen and watch and do not leave others to take action.

**A**ct responsibly: Never engage in, or encourage behaviour that could be misinterpreted.

**F**ind out first: If you see something that concerns you, speak with / contact the Senior Safeguarding Manager.

**E**xemplify good practice: Be an everyday living example of our safeguarding policy in action.

Version 1; Published June 2018



# APPENDIX 1

## SAFEGUARDING REFERRAL FORM

Please complete within 24 hours and submit to the Senior Safeguarding Manager via email:

[Sara.niblock@TheFA.com](mailto:Sara.niblock@TheFA.com)

Should you need to speak to the Senior Safeguarding Manager please call:

T: +44 (0) 0800 169 1863 Ext: 5050

M: +44 (0) 7974 225525

**Date of concern:**

### DETAILS OF THE PERSON WHO IS RAISING THE CONCERN

**Name:**

**Role/job title:**

**Venue:**

**Contact number:**

**Email:**

### DETAILS OF THE PERSON YOU ARE RAISING A CONCERN ABOUT

**Name:**

**Role:** *(please circle)*

**Child**

☐

**Adult at risk**

☐

**Member of staff**

☐

**Volunteer**

☐

**Other**

☐

**Date of birth:**

*Month/Day/Year (if known)*

**Address:**

*(if known)*

**Contact number:**

*(if known)*

**Email:**

*(if known)*

### DETAILS OF THE PARENTS/CARERS (IF APPLICABLE – SEE CONFIDENTIALITY SECTION BELOW)

**Name(s):**

*(if known)*

**Address:**

*(if known)*

**Contact number:**

*(if known)*

**Email:**

*(if known)*



## NATURE OF THE CONCERN

### Circumstances

*(please include ALL the information known to you)*

### Details of any disclosures

*(please include ALL the information known to you, including any verbatim comments)*

### Injuries seen

### Witnesses

*(please include full details, including name, role and contact details)*

## CONFIDENTIALITY

If the allegation is against a member of staff or volunteer, that person should not be informed of the concern until advice has been sought from the Senior Safeguarding Manager.

<b>Have the parents/ carers been informed of the concern?</b> <i>(please circle)</i>	<b>YES</b> <input type="radio"/>	<b>NO</b> <input type="radio"/>
<b>If yes, when?</b>	<b>Date:</b>	<b>Time:</b>
<b>If not, please state why</b> <i>(If you feel sharing the information with the parent/ carer will place the child at risk, you should not share this information. Advice should be sought from the Senior Safeguarding Manager and reasons fully documented. Adults at risk need to be informed of the concern)</i>		
<b>Have the parents/ carers or adult at risk been given consent to share information?</b>	<b>YES</b> <input type="radio"/>	<b>NO</b> <input type="radio"/>
<b>If not, why not?</b>		

## DETAILS OF THE PERSON ALLEGED TO HAVE CAUSED HARM (IF APPLICABLE)

<b>Name:</b>						
<b>Role:</b> <i>(please circle)</i>	<b>Child</b> <input type="radio"/>	<b>Adult at risk</b> <input type="radio"/>	<b>Member of staff -</b> further detail required <input type="radio"/>	<b>Volunteer</b> <input type="radio"/>	<b>Parent</b> <input type="radio"/>	<b>Other -</b> please detail <input type="radio"/>
<b>Date of birth:</b> <i>Month/Day/Year (if known)</i>						
<b>Address:</b> <i>(if known)</i>						
<b>Contact number:</b> <i>(if known)</i>						
<b>Email:</b> <i>(if known)</i>						
<b>Do they work/ volunteer anywhere else?</b> <i>(please circle)</i>	<b>YES</b> <input type="radio"/>					<b>NO</b> <input type="radio"/>



If yes, please detail:	
What is the nature of the relationship between the person alleged to have caused harm, and the child?	

## ACTIONS

What has been done about the concern?				
Who has been informed about the concern? (please circle)	<b>Senior Safeguarding Manager</b>  <input type="radio"/>	<b>Safeguarding officer</b> (please name)  <input type="radio"/>	<b>Relevant National Governing Body (NGB)</b>  <input type="radio"/>	<b>Police</b>  <input type="radio"/>
	<b>Children's social services</b>  <input type="radio"/>	<b>Local authority designated officer (LADO)</b>  <input type="radio"/>	<b>Other, please state:</b>  <input type="radio"/>	
When were they notified?				
What was the name of the person you spoke to?				
What did they say?				
What other actions have been taken?				

## OTHER KEY INFORMATION

- If your concern relates to a sexual assault that has taken place within the last 7 days, in addition to completing this form, you must notify the Senior Safeguarding Manager and the Police at the time you are advised.
- If your concern relates to the immediate welfare of a child please contact the Police or local children's services for the area.
- If your concern relates to the immediate welfare of an adult at risk contact the Police or Local adult social care team for the area.
- For all allegations relating to adults who work with children please contact the local authority designated officer (LADO) for the area.
- The Police non-emergency number is: 101
- The Police emergency number is: 999

# APPENDIX 2

## RESPONDING TO A REPORT OR SUSPICION

Where possible the Senior Safeguarding Manager should be contacted as early as possible. However it is recognised that an individual may need to respond to a situation immediately. The following guidelines offer help and support in responding to abuse, or a suspicion of abuse:

### Do's

- If the child is hurt or ill – seek medical attention if necessary – call the Police on 999 and ask their advice if you are unsure.
- Stay calm and offer reassurance, do not promise to keep disclosures confidential.
- Be honest about your own position, who you have to tell and why.
- Tell the child what you are doing and when, and keep them up to date with what is happening.
- Take further action – you may be the only person in a position to prevent future abuse.

Please memorise the five 'Rs' of safeguarding good practice:

**RECOGNISE > RESPOND > REPORT > RECORD > REFER**

**RECOGNISE** something that could be concerning.

**RESPOND** in an appropriate way. Listen to what the person is telling you.

**REPORT** any safeguarding disclosure to your supervisor/line manager. They will forward the concerns and any other information to the Senior Safeguarding Manager, who will advise on next steps.

**RECORD** the concern on the safeguarding referral form. As soon as possible, write down everything that was said and every action taken. Use the child's own words verbatim. Do not record your own opinion or what you think they said. Just stick to the facts.

**REFER** to another agency if required. Inform parents/carers unless there is suspicion of their involvement.

### Don'ts

- Make promises you cannot keep.
- Interrogate the child. It is not your job to carry out an investigation/interview. This will be up to the police and local authority professional staff, who have experience and are trained specifically to sensitively manage the disclosure.
- Cast doubt on what the child has told you. Don't interrupt or change the subject.
- Say anything that makes the child feel responsible for the abuse.
- Promise to keep secrets or keep the information confidential. Report any safeguarding disclosure to your supervisor/line manager. They will forward the concerns and any other information to the Senior Safeguarding Manager, who will advise on next steps.



# APPENDIX 3

## POSSIBLE SIGNS AND INDICATORS OF ABUSE

Child abuse and neglect are generic terms. They encompass all ill-treatment of children, as well as cases where the standard of care does not adequately support the child's health or development.

Children may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child.

There are **five** main forms of abuse:

1. **Physical abuse;**
2. **Sexual abuse;**
3. **Neglect;**
4. **Emotional abuse;**
5. **Bullying.**

Should you have any concern that abuse is occurring you should contact the Senior Safeguarding Manager for The FA, Sara Niblock. Should you ever feel unable to contact the Senior Safeguarding Manager, you may also report concerns to your manager or use The FA whistleblowing policy.

### 1. PHYSICAL ABUSE

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 or young person.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or young person.

One or more of the following might trigger concerns about a child:

- A sudden change in behaviour;
- Something a child says;
- Physical sign of abuse.

**NB:** the signs may vary according to the age and understanding of the child.

Behavioural signs:	Physical signs:
<p><b><i>These include:</i></b></p> <p>Fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others.</p>	<p><b><i>These include:</i></b></p> <p>Unexplained and unusual bruising, finger and strap marks, cigarette burns, bite marks, fractures, scalds, missing teeth.</p>

### 2. SEXUAL ABUSE

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child or young person is aware of what is happening.

These do not necessarily involve a high level of violence.

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 or young people in looking at, or in the production of, sexual images;
- Watching sexual activities
- Encouraging children or young person to behave in sexually inappropriate ways;
- Grooming a child or young person 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 and young people.

<b>Behavioural signs:</b>	<b>Physical signs:</b>
<p><i>These include:</i></p> <p>Apparent fear of someone, nightmares, running away, sexually-explicit knowledge or behaviour, eating disorders, substance abuse, unexplained money or gifts, acting out with toys, self-harm, anger and moodiness..</p>	<p><i>These include:</i></p> <p>Genital and stomach pain, itching, bruising, discharge and bleeding, pregnancy, incontinence, repeated urinary infections and sexually-transmitted infections.</p>

### 3. NEGLECT

Neglect is the persistent failure to meet a child or young persons' basic physical and/or psychological needs.

Such failure is likely to result in the serious impairment of the child or young persons' 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:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);
- Protect a child or young person from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers);
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's or young person's basic emotional needs.

<b>Behavioural signs:</b>	<b>Physical signs:</b>
<p><i>These include:</i></p> <p>Tiredness, being early or late, absent, isolated, regularly left alone, stealing (food and cash), no money, parents/ carers absent or unsupportive/disengaged.</p>	<p><i>These include:</i></p> <p>Weight change, constant hunger, dirty, wearing ill-fitting or inappropriate clothing, untreated conditions and repeated minor illness.</p>

### 4. EMOTIONAL ABUSE

Emotional abuse is the persistent emotional maltreatment of a child or young person, such as to cause severe and persistent adverse effects on the child's or young person's emotional development.

It may involve:

- Conveying to a child or young person that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child or young person opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally-inappropriate expectations being imposed on children or young people. These may include interactions that are:
  - beyond a child's or young person developmental capability;
  - overprotection and limitation of exploration and learning;
  - preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyber bullying), causing children or young people 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 or young person, though it may occur alone.

<b>Behavioural signs:</b>	<b>Physical signs:</b>
<p><i>These include:</i></p> <p>Unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulty, isolated.</p>	<p><i>These include:</i></p> <p>Weight change, lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for age, gender and culture.</p>



## 5. BULLYING

Bullying is the repetitive, intentional physical or hurting of one person or group by another person or group, where the relationship involves an imbalance of power.

This can also include hazing. Hazing is any action or situation, with or without the consent of the participants, which recklessly, intentionally, or unintentionally endangers the mental, physical, or emotional wellbeing of a child or young person.

### Behavioural signs:

#### *These include:*

Difficulty making friends, anxiety over school and other social events, truancy, going missing, withdrawn, anger, moodiness, self-harm and suicide attempts, money and possessions going missing, stealing, distress and anxiety.

### Physical signs:

#### *These include:*

Weight change, unexplained injuries and bruising, stomach and headaches, bed-wetting, disturbed sleep.



# APPENDIX 4

## WIDER SAFEGUARDING CONCERNS

There are a number of potential risks to children and young people in society, and in the course of our work we may become aware of potential risks to particular children.

The purpose of this guidance sheet is to define these risks and their characteristics. It also explains who to contact if you have concerns.

### Domestic violence and abuse

The cross-government definition of domestic violence and abuse is:

Any incident or pattern of incidents of controlling, coercive, 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. The abuse can encompass, but is not limited to:

- Psychological;
- Physical;
- Sexual;
- Financial;
- Emotional.

### Controlling behaviour

Controlling behaviour covers 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.

### Coercive 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 a victim.

### Forced marriage

A forced marriage is one where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used.

It is an appalling and indefensible practice and is recognised in the UK as a form of violence against women and men. It also recognised as domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological (for example, when someone is made to feel like they're bringing shame on their family).

Financial abuse (taking someone's wages or not giving them any money) can also be a factor.

### Honour-based violence (HBV)

The terms 'Honour-based violence', 'honour crime' or 'Izzat' embrace a variety of crimes of violence (mainly, but not exclusively against women).

These violent crimes include including assault, imprisonment and murder where the person is being punished by their family or community.

They are being punished for actually, or allegedly, undermining what the family or community believes to be the correct code of behaviour.

In transgressing this correct code of behaviour, the person shows they have not been properly controlled to conform by their family and this is to the 'shame' or 'dishonour' of the family. It can be distinguished from other forms of abuse, as it is often committed with some degree of approval and/or collusion from family and/or community members.

Victims will have multiple perpetrators not only in the UK. HBV can be a trigger for a forced marriage.



## Radicalisation and extremism

Radicalisation and extremism is a form of psychological/emotional abuse. The aim of radicalisation is to attract people to a particular extremist ideology.

In many cases it is with a view to inspiring them eventually to become involved with harmful or terrorist activities.

Radicalisation can take place through direct personal contact, or indirectly through the internet or social media.

Extremism is defined 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.

## Female genital mutilation (FGM)

The NSPCC describes female genital mutilation (FGM) as “the partial or total removal of external female genitalia for non-medical reasons”. It points out that whilst “religious, social or cultural reasons” are sometimes provided for FGM, it is, nonetheless child abuse.

It is dangerous and causes long-term harm to the girls involved. It is sometimes referred to as ‘female cutting’ or ‘female circumcision’.

It is illegal in the United Kingdom to carry out FGM, to assist a girl to ‘mutilate her own genitalia’, to assist a ‘non-UK person to mutilate overseas a girl’s genitalia’ or to ‘fail to protect a girl from risk of FGM’.

Approximately 60,000 girls under 15 are at risk of FGM in the UK ([www.forward.org.uk](http://www.forward.org.uk))

The Government guidance “Working Together to Safeguard Children, 2015” places a duty on Local Safeguarding Children Boards to commission and deliver services for children who have undergone or may undergo female genital mutilation, and to have a clear referral process for concerns.

FGM is not associated with any particular religion nor is it supported by any religious texts. Many religious leaders condemn the practice. However, some people still think the two are linked and claim religious teachings support FGM.

To read the NSPCC guidance on FGM and get helpful advice, please visit:

<https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/female-genital-mutilation-fgm/>

## TO REPORT A CONCERN

If you have a safeguarding concern – related to anything in this document – or in other areas, you should contact:

### Sara Niblock

Senior Safeguarding Manager

T: 0800 169 1863 Ext: 5050

M: 07974 225525

E: [sara.niblock@TheFA.com](mailto:sara.niblock@TheFA.com)

# APPENDIX 5

## PROTOCOLS FOR SEARCHING CHILDREN

Follow these protocols and the process of searching children should promote mutual respect to and from all parties. By law, someone is deemed a child up to their 18th birthday.

### The basics

Stewards should always identify themselves and provide proof that they are an authorised event steward with Wembley Stadium.

Good practice is to have two stewards present for the search, who should both give their name and job title.

Thereafter stewards should:

1. Explain the reason for the search;
2. Ask the child for permission to undertake the search, explain that the person has a right to refuse, but doing so can lead to non-admittance; If an adult is present with the child, obtain their permission to conduct the search.
3. Ask the child if they are carrying anything which may be dangerous or that they plan to use to celebrate during the match;
4. Ask if anyone else has asked them to carry anything into the ground for them;
5. Explain what they think they may might find in the search;
6. Only search people of the same gender as themselves;
7. Follow the correct Stadium procedure (*insert link if available*) when finding unauthorised items and explain these procedures to the people involved;
8. Keep people only for as long as necessary;

### Searching

Stewards should not need to touch the child during the search, as the procedure is to guide the child or young person to demonstrate that they are not carrying/hiding any banned items.

1. Ask the child to empty and turn out their pockets;
2. Ask the child to take off any outer jacket(s) and pass them over to the other steward for searching;
3. Ask the child to roll up their trousers to the knees and roll down their socks;
4. If wearing trousers, ask them to pull out the shirt at the waist and visually ensure there is nothing in the trouser belt area;
5. Request that they replace all clothing before moving on;
6. Thank the child and any adult for their co-operation in the search.

### Recording

7. Log the information on a (Stadium) incident report (*insert link if available*) form providing details of:
  - The time and date;
  - Gate number or identified venue of the search;
  - Name and age given by the child or person;
  - Names of any adults with the child or witnessing the search;
  - Name of stewards in attendance;
  - Name of any police officer involved and the results of the search.

## APPENDIX 6

### REFERRAL PATHWAY FOR SAFEGUARDING CONCERNS/INCIDENTS AT THE HILTON, ST. GEORGE'S PARK

