Rotherham United Football Club

Safeguarding Policy
and
Mandatory Guidance
Children and Adults at Risk

CREATING & MAINTAINING A SAFER CULTURE FOR CHILDREN AND ADULTS AT RISK

Foreword

Rotherham United Football Club and its Board is firmly committed to ensuring the safety and wellbeing of the many individuals and communities we come into contact with; it is fundamental to our operation that we provide a positive experience, particularly for children, young people and adults at risk. We constantly strive to prevent abuse, bullying and neglect in any form to ensure that everyone has access to the opportunities that Rotherham United Football Club (RUFC) provides.

The Club communicates through its monthly steering group, which includes the Head of Safeguarding and departmental DSO's and a member of the HR team, the safeguarding agenda to the board and this is evidenced through the safeguarding meeting minutes. It is vital that information is shared effectively throughout the club and communication procedures are in line with the governments 'Information Sharing: advice for practitioners' – July 2018.
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

It is the responsibility of everyone who has contact with children and other adults at risk to create a positive environment in which they can participate, and to protect them from harm.

The Club acknowledges that all children, adults at risk and other adults at risk have the right to protection, and the needs of those children and other adults at risk who may have additional vulnerabilities must be considered and addressed, such as:

- Physical disabilities.
- Mental health issues.
- Special educational needs.
- Being a displaced or looked after child.

In combination with the Club's Short Good Practice Guide, this policy strives to achieve a framework and guidance for best practice for everyone involved in delivering activities. Implementation of the procedures and guidance in this document will ensure consistency across all Rotherham United Club activities and serve to minimise any risks.

As a Club we have developed a reputation for best practice in the safeguarding field. We are always proactive in adapting to the new challenges that arise in our diverse activities. The Club promotes the Code of Conduct for everyone involved in Club activities and it is important to the Club that we treat all customers, suppliers and employees ethically. This means we have standards and values that are key to this organisation – and these must be adhered to in all of our interactions.

Our ethical stance relates to our values and demonstrates what is important to us:

- Trustworthiness: integrity, honesty
- Reliability: keeping promises
- Respect: dignity, tolerance, privacy, courtesy
- Fairness: equality, consistency, law abiding
- Careful: care not to harm others

This **safeguarding policy is mandatory** and covers all activities within the Club, Stadium, Academy and any externally managed Club activities and may reference the Club's Trust, Rotherham United Community Sports Trust and other partnership agreements. The Club reserves the right to follow its own procedures and policy if there is any doubt or lack of clarity.

For further guidance and a child friendly procedure please see the EFL Young Persons Guide to Safeguarding.

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Paul Douglas
Chief Operating Officer

Rotherham United Football Club Ltd (RUFC)
August 2018

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1. Definitions and Policy

Safeguarding Policy Statement

Providing a safe and positive environment is a vital aspect of any business's operations. Rotherham United Football Club takes its responsibilities very seriously in this regard and in particular where children, adults at risk and other adults at risk are present at any of its Club-led activities and (under the supervision) of one or more members of our workforce.

All participants and visitors to these activities have the **right** to feel safe **and** to be safe. Wherever they come into contact with us they will be treated lawfully and fairly and with both dignity and respect. All the members of our workforce have a **duty** to children, adults at risk and other adults at risk safe and to help protect them from abuse or harm. All managers must ensure that their workforce **understand and apply** that duty wherever they are in the World.

Good safeguarding practice takes many forms. It is a thread that must weave *throughout* all Club activities that involve children, adults at risk and other adults at risk. It should always be there but be proportionate and should allow the core business to flourish.

This policy applies to all members of Rotherham United Football Club, from both the paid and volunteer workforce, and all partner organisations including commercial partners, licence holders, contractors, consultants and Trustees. It also applies to individuals not included in this list who may be conducting related work that involves the children, adults at risk and other adults at risk in our care.

Safeguarding Context

The term safeguarding is a shortening of the phrase "safeguarding and promoting the welfare" of children, young people and adult at risks.

A safeguarding programme broadly means:

1. Creating a positive environment for all participants and the workforce;
2. Protecting all children, adults at risk and other adults at risk from maltreatment, abuse or harm or fear of those;
3. Ensure children are healthy and may develop and grow;
4. Ensuring that staff comply with law, regulations and established good practice when working with these participants; and providing safeguarding guidance and training for employees, workers, volunteers and contractors
5. Having ways to report concerns and know that they will be taken seriously; and
6. Having a clear and robust strategy, policy and related processes to ensure the above
7. Supporting employees, workers, volunteers and contractors to make informed and confident responses to specific safeguarding issues or concerns, and also to understand the reporting mechanisms
8. Providing education and awareness raising, to young players and to parents to understand their role in safeguarding

Club Roles and Responsibilities

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

Chief Executive Officer (Head of Safeguarding) is responsible for all aspects of Club safeguarding, to ensure safeguarding is a key priority at Board Level. And is responsible for providing Club-wide strategic leadership that assists the Club to deliver the safeguarding strategy, vison, values, priorities, policies, promoting the welfare of children, adults at risk and other adults at risk, communicating at Director and Heads of Department level and is also lead point of contact should safeguarding concerns arise.

Designated Safeguarding Officers (DSO) are responsible for embedding safeguarding within their own departments as well as being the point of contact should a concern arise within their own departments.

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

National & International Frameworks

The Rotherham United FC safeguarding programme will seek to work within the guidance provided by the "International Safeguards for Children in Sport" framework and in conjunction with the local frameworks found within any country where our workforce is conducting business or charitable activities.

Purpose of this Policy
By implementing this policy across all Rotherham United Football Club operations, all members of the workforce and volunteers will understand that they have a responsibility to work together to safeguard children, adults at risk and other adults at risk and that:

1. the individual's safety and welfare is the first consideration, particularly where children, adults at risk and other adults at risk are involved;
2. all people, regardless of age, gender, racial origin, political or religious belief, sexual identity and or disability, have a right to enjoy sport, and associated activities of Rotherham United Football Club, free from abuse and all forms of bullying, harassment and discrimination;
3. all individuals and organisations involved with Rotherham United Football Club have responsibilities for the welfare of children, adults at risk and other adults at risk in our activities and are bound by this policy; and
4. All individuals and organisations involved with Rotherham United Football Club must act in accordance with the law in relation to such matters.

For Rotherham United Football Club operations it also means: supporting 'Safer Recruitment' processes through promoting good practice for those working amongst our workforce and volunteers; supporting them where necessary; ensuring they are competent, well-managed and challenged when engaged in poor practice; and, finally, taking action where concerns arise.

2. The Rotherham United Safeguarding Framework

This policy is the basis for a Club safeguarding network that seeks to implement a clear and effective programme of work that is embedded across the workforce.

Our Safeguarding Vision:

The Club will:

- Respect and promote the rights, wishes and feelings of children, adults at risk and other adults at risk.
- Recruit, train and supervise staff to adopt best practice in order to safeguard and protect children, young people and adult at risks from abuse and themselves from false allegations.
- Respond to complaints, concerns and allegations and implement the appropriate disciplinary and appeals procedures.

Our Safeguarding Aims:

1. A safe and welcoming environment for children, adults at risk and other adults at risk involved in any Club-led activities, wherever they are in the World, free from abuse and fear of abuse in all its forms;

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

3. A clear system which promotes and supports: constant vigilance, prevention and early intervention in safeguarding matters and where necessary prompt and thorough action in response to any reported concerns or incidents;

4. To apply legislation, government policy & guidance, and football governing body regulations, policy and guidance where applicable; and

5. To work closely together with local statutory agencies and other partners to promote and safeguard the welfare of children, adults at risk and other adults at risk.

In order to realise these aims we will:

- **Work or liaise with relevant football governing bodies, statutory agencies and other child and adult welfare bodies** (e.g. Child Protection in Sport Unit, Premier League, the FA etc. to ensure we meet all necessary regulations and standards in respect of our safeguarding practice;
- **Listen to children, adults at risk and other adults at risk** and take them seriously, consult with them when developing processes and react appropriately to ideas, feelings and concerns then address them in a fair, effective and timely manner;
- **Develop and communicate a series of clear policies, protocols and guidance** designed to help deliver sound governance and good practice across the Club's activities; including monthly Safeguarding Panel Meetings with representatives from all areas of the Club.
- **Co-ordinate an effective network of designated Safeguarding Officers** across the Club who will promote the highest standards of Safeguarding in their respective areas of the Club.
- **Maintain a visible Safeguarding presence** across all areas of the Club including on internet platforms;
- **Monitor activities** taking place at Club facilities and those at off-site locations;
- **Provide training, advice and support** across all areas of the business where children, adults at risk and other adults at risk are involved in any Club-led activity;
- **Support and help deliver the Club's 'Safer Recruitment' philosophy** in accordance with local legislative and regulatory requirements and in partnership with the Human Resources department;
- **Maintain confidentiality** of all information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with relevant data protection legislation;
- **Share sensitive information with the relevant authorities** when it is appropriate to do so and in the knowledge that the information will be treated confidentially.
- **Prepare annual safeguarding reviews** covering each strategic element of the Club.

Who will we work tirelessly to keep safe?

To illustrate the scope of this work the list below provides an extensive list (though not exhaustive) of examples or situations across the Club where we need to consider the welfare of children, young people and adult at risks in our care:

- Players involved in academy or associated development programmes;
- Under 18 players who are part of open-age/senior squads;
- children, adults at risk and other adults at risk taking part in Rotherham United Community Sports Trusts activities;
- Some disabled supporters and other adults at risk contacting the Club, visiting the stadiums on match days, or visiting for other pre-arranged activities (e.g. stadium tours);
- Young players on tour or living for significant time away from their families in Rotherham United-arranged accommodation;
- Any children visiting the Club's stadium for matches, events, concerts or tours;
- Ball boys & girls, match-day mascots and flag-bearers;
- Support to those who may be vulnerable to bullying or cyber-bullying through their relationship with any of the Clubs activities;
- Participants on commercial football school-type programmes or similar;
- Young people attending as volunteers or on organised work experience;
- Disabled children and disabled adults taking part in any Club activity; and
- Children, adults at risk and other adults at risk involved in activities organised by other agencies benefitting from the Club's charitable programmes.

3. Safeguarding Considerations for Children and Adults at Risk

Age Sensitivity
The term 'children' covers individuals from birth up to their 18th birthday and this policy covers this entire age range and adults at risk above the age of 18. As a general principle we will also be sensitive to the developmental maturity of children in our programmes and ensure that this is taken into account when decisions are made that affect them. We will particularly encourage older children to have more involvement and take more responsibility when decisions are being made that affect them.

Open-Age Players
From time to time players who are not yet 18 will either train or play in adult or 'open-age' teams. This may be a temporary or developmental arrangement, or it may be a permanent contractual arrangement. The decision to do this is not taken lightly and will be taken based on the physical and emotional capacity of the player and in conjunction with the player's parents. Special care will be taken to monitor the welfare of the players that are placed in these positions.

Safeguarding Elite Players
Rotherham United Football Club draws elite players into its talent development programme. Athletes in the high performance pathway face additional vulnerability due to their position in sport. Others may seek to gain advantage (financial or otherwise) or gratification from their talent or enhanced profile through unscrupulous means; some may abuse or coerce them just because they can (eg. via social media). The players themselves will experience the constant pressures of being an elite footballer and as such all staff must be vigilant of the signs and symptoms of issues such as: abuse by those in positions of power or influence over the player; poor mental health; homesickness; eating disorders; addiction; self-harm and other conditions that may manifest themselves.

Additional Vulnerability
'Children' are often easily identifiable. Additional vulnerabilities are not as easy, such as; disability, ethnicity or sexual orientation for example – and may have the potential to make an individual more vulnerable. Children and young people and adults at risk with additional vulnerability are often even more difficult to identify and provide for. It is a priority for the Club to safeguard them when they are in our care and once vulnerability has been identified.

Language & Communication
Some people taking part in our activities may not use English as their first language or may experience difficulty communicating with our workforce in the usual ways. As a principle we will always be patient and try to communicate in an individual's chosen way and where necessary and practical we will use an interpreter (i.e. foreign language) or communicator (e.g. sign language).

Children from Overseas
We will come into contact with children who have moved – temporarily or permanently - from their country of origin. This policy applies equally to them. We will ensure that where this situation does arise, international law and football regulations are correctly applied and that the needs of the child are put first and any arrangements are made in conjunction with those with Parental Responsibility for that child. Where we have a concern that a child may be at risk of harm, or may be being exploited or 'trafficked', the appropriate authorities will be informed at the earliest opportunity.

Consultation
Where appropriate we will consult with children, adults at risk and other adults at risk and their parents or legal guardians in order to understand their needs, concerns and wishes so that these may help shape Club policy, procedure and practice.

4. Standards of Behaviour – Children and adults at risk

We want children, adults at risk and other adults at risk to enjoy themselves when they are attending our activities. We do however expect them to behave in a way that is appropriate to the age, maturity, type of activity and in a way that does not endanger or upset others. Where possible these expectations will be developed in conjunction with the participants themselves and communicated to all those taking part. In areas of the Club where player (or participant) disciplinary procedures are adopted these procedures will be communicated to all those whom they

relate to (including those with Parental Responsibility for a children, adults at risk and other adults at risk participant. CHECK)
The Club does not tolerate activities such as bullying, hazing, abuse or victimisation. Where such activity is suspected, reported or uncovered, this will be fully investigated and dealt with at the earliest opportunity in line with the Club's policies and procedures.

Managing Behaviour

The Club takes a positive approach to behaviour management and where necessary develops policies that the workforce must apply. Such policies will recognise the following general principles:

1. Every person is different and as such has individual needs;
2. Participants should be encouraged to help develop their own codes of conduct or have clear and well communicated guidance on expectations;
3. Behaviour is can be a reflection on how a person is feeling;
4. Staff should recognise that many other factors can effect behaviour – weather, hunger, medical conditions, medication and account for these in any action taken;
5. Challenging, aggressive or violent behaviour presents risks to the individual and others, and physical intervention with any individual displaying such behaviour is only ever a last resort in exceptional circumstances – any response must be reasonable and proportionate.
6. Training will be provided to members of the workforce who may experience challenging behaviour;
7. Physical punishments will **never** be used by our workforce, though diffusion and de-escalation techniques may when necessary; and
8. All incidents should be recorded and passed to the Head of Safeguarding.

5. Data Protection

The Club takes the matter of Data Protection very seriously and particularly the data collected in respect of children, adults at risk and other adults at risk. The Club will apply relevant legislation in respect of our data collection activities.

Where data is collected (in writing or electronically) relating to children, adults at risk and other adults at risk, or if they are asked for personal details, we will make every effort to obtain consent for its use from those with parental responsibility. We will seek parental consent if the collection or use of information about a child and adult at risks is likely to result in:

- disclosure of a their name and address to a third party, for example as part of the terms and conditions of a competition entry or partnership activation;
- use of their contact details for marketing purposes;
- Publication of their image on a website that the public can view; or the collection of personal data about third parties, for example where they are asked to provide information about his or her family members or friends.

6. Photography & Video Image

Celebrating Activity
The Club welcomes photographs and images that celebrate the sport, the values and objectives of the Club, and positive reflections of our Club operations. We understand however that photography and video imagery and its use can present difficulties, risk and sensitivity in a range of circumstances.

There is evidence that some people have used sporting events as an opportunity to take inappropriate photographs or film footage children, adults at risk and other adults at risk in potentially vulnerable positions. It is advisable that all colleagues be vigilant, with any concerns to be reported to the Clubs Head of Safeguarding and Designated Safeguarding Officers. The Club utilises colleagues and designated photographers to record activities and events within the Club.

Colleagues should not take unauthorised images or video footage of children, adults at risk and other adults at risk. In addition, colleagues should never use or distribute images of children, adults at risk and other adults at risk without their knowledge or consent and without the permission of Rotherham United Football Club. Photography and video footage includes the taking of still photographs, filmed and moving images and video recordings by whatever means

Written parental consent must be obtained before any children, adults at risk and other adults at risk partaking in Club events and activities are photographed, filmed or their image is captured using any device.

The exception to this, when written parental consent will not apply, is when they enters solely as a spectator the stadium (including all locations owned, occupied or utilised by the Club), at which time the terms and conditions of entry advise that by a parent/carer allowing them to enter the ground they thereby provide consent for their image to be captured/used by the Club. This is in line with existing Club and EFL Ground Regulations 24 and 26.

During the course of our activities it is foreseeable that a child's, adults at risk and other adults at risk's image may be captured by appointed photographers in digital photographs and in film. These images may then be used by Club employees, workers and contractors in both internal and external news and marketing publications and on-line via web-sites and social media. In any situations where they may be subject to 'incidental image capture' (i.e. they are in the background behind a main subject), where practical they should be informed that they may be on camera and have the opportunity to opt out.

Where a person finds that their image or that of their child, young person and adult at risk has been used in these circumstances and they do not wish it to be used then we will endeavour to remove it from circulation where it is practical to do so and where there are reasonable grounds to do so.

Any observers to a Club event or activity involving children under 18 years will be asked not to photograph or film without having firstly obtained the consent of the Club. To be given such, consent must be provided with the following:

Written parental consent of all children, young people and adult at risks involved in the activity and written confirmation of the purpose of the images, how the images may be used. The Club has introduced this Policy in line with guidance from the FA, to avoid the inappropriate use, adaptation or copying of images for use on child abuse websites on the internet, the identification of them when a photograph is accompanied by significant personal information that will assist a third party in identifying them.

The above can lead, and has led, to children and young people being 'groomed.' Also the identification and locating of children in inappropriate circumstances which include: where a child has been removed from his/her family for their own safety;

- Where restrictions on contact with one parent following a parental separation exist e.g. in domestic violence cases and in situations where a child may be a witness in criminal proceedings; or other safeguarding children concerns.

With the exception of professional photographers employed by the Club or media cameras brought in to cover an event, no cameras, other than those owned by the Club and operated by Club employees or contractors, are permitted to be used at any Club event/activity where young people are involved, without the necessary consent as previously outlined.

The Club will provide guidance on the taking of images to all parents, carers, children and staff, volunteers and contractors participating in Club activities and ensure the Club has parental consent to use a child's image if it is to be used in the public domain to ensure that any child who is under care proceedings, is protected by ensuring that their image is not placed in the public domain. This will be done by using a Consent Form, so that parents/carers can identify whether this applies to children in their care. This also provides focus on the activity rather than the individual and ensure all those featured are appropriately dressed and the Club aims to take pictures which represent the broad range of youngsters participating safely in football e.g. boys and girls, disabled people, ethnic minority communities where appropriate.

The Club will not publish photographs with the full name(s) of the child (ren) featured without written consent to do so and having informed the parents as to how the image will be used, use players who are under 18 years profiles with pictures and detailed personal information on websites, use an image for something other than that which it was initially agreed, published in local press when initially produced for a commemorative picture. The Club will not allow images to be recorded in changing rooms, showers or toilets – this includes the use of mobile phones that record images. Where video is to be used as a teaching aid, all participants and their parents/carers should be made aware of the proposed use and written consent to a participant being filmed should be sought prior to the start of filming. All video tapes, still photographs and digital images are retained and stored in accordance with the Club's Data Protection and Retention Policy with access limited to designated individuals.

Consent
Where an activity may allow for the capture, and thus use, of a participant's image, the manager responsible must develop appropriate documentation (forms and guidance) and associated processes to allow for the management of parental consent (or participant consent in respect of an adult at risk) and ensure that those individuals understand what they are consenting to and why.

Data Protection Law & Photography
Data protection law may apply to the photography of children or other adults at risk at Club activity. Where it applies and where practical, if images are captured by a member of the workforce or for Club purposes, consent from the parent or carer should be obtained and the option to opt out is available. If in any doubt a picture should not be taken.

Video or Photographs as a Coaching or Management Aid
The recording of training or match footage is a legitimate coaching aid and as such parents and players are made aware that this is part of the coaching programme. Similarly photographs of matches or players for management purposes (e.g. ID passes or databases) are regularly taken. Both these types may be covered by data protection law. As such all those responsible for the recording of this footage must:

- adhere to this policy;
- take responsibility for the safe storage and distribution of the images;
- give due consideration to the dignity and protection of the players involved; and
- Inform persons with Parental Responsibility where there are changes to the planned use of the footage which will lead to a wider distribution of the images than originally anticipated.

Opt Out
Other than on match/event day (see below), individuals have the right to opt-out (i.e. revoke or not give consent) of being photographed. Here our workforce will endeavour to make suitable arrangements to apply any restrictions required whilst also minimising the disruption to normal Club activities. These arrangements will be agreed in advance with those with Parental Responsibility for the player and must uphold the dignity of the participant opting out.

Storage
All images, whilst held by the Club, will be securely stored on the Club's IT systems and remain the property of Rotherham United FC at all times. Where footage is passed to players and parents for training and development purposes this must not be passed on further or published without the written permission of the Club's Head of Safeguarding. Families must be made fully aware of this restriction at the point of distribution.

Where consent has not been given but images have been captured, those images should follow the guidelines shown below but also should be of a general nature capturing the activity and not the individual and should not use children's names in resulting public use.

Match Day, Events, Incidental Image Capture & Implied Consent
Large crowds create further issues with consent and image use. At events such as matches, concerts and special events, consent is assumed to be 'implied' in that any person attending should expect that their image may be captured or broadcast.

Parents, Other Children and Other Photographers
The Club recognises that in some circumstances parents, other family members and friends may wish to take photographs of their child, young person, and adult at risk or relatives. Each site will develop clear rules on what is acceptable. Where a member of staff or child or parent has a concern about the capture and use of images they should report immediately to the activity, site manager or DSO.

With the advent of smart phones with digital cameras and instant connectivity to the World Wide Web, the scope for the capture and sharing of images has increased dramatically and as such activity managers should take care to apply the policy firmly and fairly.

In general, members of the workforce, volunteers and contractors capturing images must never:

- use own/personal equipment to capture images of participants;
- take images in changing rooms or where children, young persons and adults at risk are not fully clothed;

- take images of children, young persons and adults at risk who wish not to be in the photograph or whose parent does not wish them to be;
- take images where children, young persons and adults at risk are more vulnerable – upset, injury, illness;
- Take images that are sexually suggestive or provocative or the inclusion of young or vulnerable player's full names in any captions, kit or reports.

Meeting with Children: Children, young persons and adults at risk should only be meet with and a discussion held to ascertain their account of the circumstances that prompted the enquiry and gather information and their views about decisions that affect them in the company of a parent/guardian or appropriate adult.

Consent: Consent to meet with and discuss the concern with them needs to be obtained from the person with parental responsibility and/or the child if they are of sufficient age and understanding to make this decision.

Appropriate adult to accompany them: they should always have an appropriate adult (in addition to the person holding the meeting) to accompany them during meetings. Appropriate adults accompanying children must be briefed on the neutrality of their role and understand that they should not attempt to influence or interpret responses during the meeting process. The appropriate adult cannot be a parent who is estranged from the children, young persons or adults at risk or an individual they object to. Rotherham United Football Club will ensure that the meetings are held only those with sufficient experience and expertise are appointed to hold discussing with children or adults at risk.

Rotherham United Football Club will ensure that:

- They adhere to Rotherham United FC policies, procedures and guidance.
- Meetings take place in safe and appropriate environments.
- They request permission to record the meeting through notetaking.
- They maintain professional boundaries at all times.
- Contact by whatever means and meetings with children, young persons and adults at risk should not take place without the agreement and knowledge of Rotherham United FC and their parents/legal guardians.
- They record and report any situation which may place the children, young persons and adults at risk, at risk or which may compromise the Club or his or her own professional standing.
- Information suggesting that the child or adult at risk, or others are at risk of harm is immediately reported to the Head of Safeguarding or DSO in their absence.

Disclosures
Any disclosures of youth, child or adult at risk sexual imagery should be referred to a Designated Safeguarding Officer (DSO). The Designated Safeguarding Officer in turn has a duty to report to the Head of Safeguarding.

7. Match day activity, Travel and Late Collections

Ball Boys and Girls Policy
The Club will endeavour to ensure the safety and protection of Ball Boys and Girls, whilst carrying out their duties at the stadium, through adherence to the Club's Safeguarding Policy and Procedures and Health and Safety Policy.

In addition, the following rules apply all ball boys and girls will be a minimum of 14 years of age and will be subject of a Code of Conduct and a statement of conditions issued by the Club, which must be signed by the child and their parent/guardian, they will be supervised by at least two members of staff. All supervising staff will be subject of Enhanced DBS checks and will have completed the Club's induction. Also a mix of male and female colleagues, wherever possible, will be used to supervise mixed gender groups. Also separate gender appropriate changing areas will be made available if required. No photographs will be taken in the changing areas and colleagues should avoid any situation where they may be left alone with a ball boy or girl. All ball boys and girls will receive a Health and Safety overview prior to carrying out their duties, this shall be notified to that child's parent/guardian. All ball boys and girls and their parent/guardian will be provided with the name and contact details of the Head of Safeguarding of the Club.

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

The following guidance will be applied to all children visiting the Club as a Match Day Mascot. Child mascots must be aged minimum 18 month's old to maximum 14 years old. All colleagues escorting match day child mascots must be subject of an enhanced DBS check and must have completed the Club's induction. There should be a maximum of 11 mascots for any game plus the away mascot's. In cases of a special match where the number of mascots may exceed the recommended number then authorisation from Club's Head of Safeguarding to include additional mascots will be required.

Child mascots must be accompanied by a parent/carer at all times, other than when in secure areas e.g. the tunnel, when the mascot will be supervised by suitably qualified Club chaperones. Parents will be advised to bring their child to the Stadium already wearing their Mascot Football strip (worn under warm clothing if appropriate) thereby avoiding the need for the child to change into their strip whilst on Club premises as the Club maybe unable to offer designated changing areas for Mascots, if a mascot requires help with dressing this will be done by the parent/carer.

If an injured or disabled child is used as a mascot a risk assessment will be carried out to establish if that child can safely participate in the Match Day Mascot itinerary and to identify what additional safety measures may need to be put in place to allow the child to safely participate. The Stadium Manager will be notified of the risk assessment, who will then advise the paramedics of any issues.

Every effort should be made to achieve correct staffing ratios and the best level of supervision of Match Day Mascots at all times. (An individual member of suitably DBS checked employees will be allocated as chaperone to each child with a disability or injury, if they are assessed as requiring additional support). Male and Female chaperones, wherever possible, will be used to supervise mixed gender groups of Mascots. Colleagues should avoid any situation where they may be left alone with a mascot. Parents/carers will be informed of the Club's Images Policy in information sent to them prior to the game; together with the appropriate Mascot Itinerary and details of the Club's Head of Safeguarding.

Late Collection of Children Policy
If an authorised* person does not collect children, young persons and adults at risk, the aim is to resolve the situation causing as little distress as possible to them. The names and telephone numbers of adults who are authorised by the parents/carers to collect their child will be held by the Club. If there are any changes to this information we ask that the Club be notified immediately. When there is a change to the arrangements we ask that parents inform the Club and the coaches will be informed. Children under the age of 16 are not authorised to collect children on their own.

The procedures are as follows:

Coaches will wait with children until the end of the session for no more than 20 minutes and then they will then be taken to the site office, with two staff members present. Parents/carers will be contacted at home or work using all the numbers available and if this is unsuccessful other adults authorised by the parents/carers will be contacted. In the meantime, they will wait under adult supervision.

All late collections will be recorded, this is monitored by the appropriate departmental Designated Safeguarding Officer, (DSO). Any patterns of lateness will prompt action by the DSO in the form of a letter and, if the pattern continues, a meeting will be requested with the parent/guardian. If the employee is unable to find someone to collect the child and they have not been collected within 1 hour, the Club will contact Social Services.

*An authorised person is a person over the age of 16 who has been authorised by the parent/carer.

Scouts
Scouts Code of Conduct – all scouts should:

- Have a job description & role specification dependent upon their employment status within the Club and be cleared for work in football through an enhanced DBS certificate and also have completed the FA '*Safeguarding Children and Young People in Football'* workshop.

- Receive in-house safeguarding training on the Club's policies and procedures, know the Designated Safeguarding Officer contact details for both Club and Academy and follow the football governing bodies' regulations, also know and understand the rules.

- Understand the Code of Conduct for Scouts outlined in the EFL Handbook book and be registered with EFL through the Single Central Record (SCR). Also promote and enhance the Club image and demonstrate Club loyalty, whilst understanding and following the Club's recruitment induction protocols, and adhere to the code of conduct.
- Be issued with and wear Club ID badge*, which should state the current season and have a recent photograph, which should be renewed every season, be empathetic to all aspects of grass-roots football - approach managers / officials at matches explaining that they are observing and introduce themselves, identifying who they are and provide the name of the Club they represent. *ID badges must be returned to the club by any scout who is no longer involved with the Club.

- Understand the talent requirements of the Club and have knowledge of the children's technical and physical development, always be honest and realistic with parents and players and receiving supervision by the Club appropriate to the role and time employed with the Club.

- Always to stay in contact with the Club, and provide with any required paperwork as request or described in the job description and attend Club meetings and training as required by Club.

Scouts should not:

- Abuse their position
- Make unrealistic promises to children, parents, or Club managers.
- Observe games without introducing themselves to the officials at the match.
- Promise trials at Clubs without the permission / agreement of the club.
- As part of their role in football: - Allow any player to stay overnight at their home or share a room with any person U18.
- In terms of best practice, professional Clubs may wish to make contact with grass-roots Clubs in the area and discuss the system and code of conduct that is in place for scouts at the Club and any further good practice guidance they may have in place for scouts.

Travel, Excursions and Events

The Club has an ongoing commitment to the safety and protection of children, young persons and adults at risk who participate in excursions and events organised by the Club.

Through its Academy, the Club is committed to giving its young players the opportunity to travel domestically and internationally to train and/or be involved in tournaments.

The Club recognises that all children, young persons and adults at risk, regardless of age, any disability they may have, gender, racial origin, religious belief or sexual identity have a right to be protected from harm, abuse and discrimination. The Club will endeavour to safeguard them when participating in Club activities by adhering to this Policy, and by the preparation of a documented Risk Assessment and Safeguarding Plan specific to the trip or event, colleagues are expected to ensure that Rotherham United Football Club's Head of Safeguarding is involved at the early planning stages of all events, projects, initiatives and partnerships which involve the children, young persons and adults at risk. The focus for such events and projects should be the welfare and enjoyment of the participants involved.

The event safeguarding plan will describe how this policy will operate in the context of the specific event and aims to minimise the risk to participants and staff, encourage the enjoyment of all involved and maximise the opportunity for children, young persons and adults at risk to participate to the best of their ability.

In order to ensure the health, safety and welfare of participants both staff and players, such trips and/or tournaments will only be authorised after the completion of the required actions as indicated in the Club's Trips, Tours and Tournaments guidance document

The Club regards Safeguarding and promoting the welfare and well-being of our young players as of paramount importance. All staff share a responsibility to the players, regardless of the player's ethnic origin, colour, nationality, race, religion or belief, gender, sexual orientation, age or disability and shall recognise that Academy players may be particularly vulnerable when away from home.

Academy staff must therefore ensure detailed planning and careful supervision of players, including under 18s when playing in the first team, when young players are travelling on tours and tournaments, in accordance with the this policy and the EFL Operating Trips, Tour and Tournaments guidance.

Written parental consent will always be required to enable a child under 18 years of age to participate in any trip, tour or tournament, to train or travel as a member of the Clubs First Team.

Key considerations:

- Suitability of colleagues and clearly defined roles and responsibilities.
- Pre-event risk assessments undertaken by suitably qualified colleagues and risk management plans communicated to participating colleagues and partners
- Insurance and safe transport arrangements
- Ensuring that accommodation is in a safe location, is safely managed, of good standard for security, hygiene, first aid and that there is no access to alcohol or other unsuitable materials
- Emergency response procedures covering injury, illness, emergency evacuation, safeguarding concerns, missing participants, local services and emergency contacts including emergency consular assistance details when abroad
- Consent for participation, emergency medical treatment and the use of images
- Ensure the additional needs of any participants are identified and addressed
- Ensure that participants are suitably fit and healthy to participate
- Ensure that participants are correctly equipped to participate fully and safely in all activities
- Principles of participation and codes of conduct for participants, colleagues and spectators and procedures for dealing with challenging behaviour and bullying
- Security and measures to manage the behaviour of spectators.
- Partnership agreements.
- Appropriate colleagues to participant ratios

Transport

Wherever possible and practicable it is advisable that transport arrangements for scholars, and all players U18, during the working day or any official duty, are undertake **other than in staff private vehicles**, with at least one adult (in addition to the driver), acting as an escort. (EFL)

It is inappropriate for colleagues to offer lifts to children, young persons and adults at risk. Any occasion where they require transport in an emergency situation, or where, not to give a lift may place them in harm's way, should be recorded and reported to the Head of Safeguarding. This is covered further in the Club's Transport Policy.

Under 18's travelling as part of the 1st Team

A First Team Match is not an activity designed for U18s, however it is the Club's policy that all First Team staff will hold an enhanced DBS, FA Safeguarding Certificate and the following additional safeguarding measures must be adhered to:

- Young players U18 are defined in law as a child and adults working with children need to not only protect those young players, but to also demonstrate standards of behaviour which do not leave them open to allegations against themselves.
- If the game involves away travel, players U18 should be in a hotel room alone and should not share with an adult over 18. An exception to this would be if two U18s are travelling with the team, in which case they may share a room.
- U18 players will be able to change with the First Team under the supervision of the relevant First Team staff at all times.
- A safeguarding risk assessment will be completed by the departmental Manager responsible for the young players
- Players and staff should not encourage young players U18 to engage in any inappropriate activities such as gambling; the use of alcohol or other inappropriate or illegal substances; or watching or engaging in any inappropriate adult behaviours.
- Players and all staff should recognise the vulnerability of young players U18 and the risks associated with encouraging young players to engage in inappropriate activities.
- A Club Chaperone will be appointed to any U18 player in the First team and contact details of the Chaperone will be provided to the player's parent/guardian.
- In the case of an overnight stay the Chaperone will provide the U18 player with instructions to follow in case of an emergency/fire/evacuation, and for checking the young player has no access to a mini-bar, inappropriate pay to view TV etc. in their hotel room.

8. Prevent agenda, social media and partnerships

Preventing Radicalisation and Extremism Policy
Protecting children, young persons and adults at risk from the dangers of radicalisation is part of the Clubs wider safeguarding duties, and is similar in nature to protecting them from other forms of harm or abuse. All Safeguarding Staff, Academy Coaching, and Medical staff will receive PREVENT and Channel general awareness training and additionally all Academy scholars will be informed about the dangers of radicalisation via their induction. For more information visit:

- http://course.ncalt.com/Channel_General_Awareness/01/index.html
- https://www.elearning.prevent.homeoffice.gov.uk/
- https://www.gov.uk/government/publications/channel-guidance

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help and protection. The Clubs staff should use their professional judgement in identifying children who may be at risk of radicalisation and report their concerns using the incident report form to the Club's Head of Safeguarding, if satisfied the concern is valid, they will make a safeguarding referral and also share the concerns with the Police.

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

- https://www.southyorks.police.uk/find-out/crime-prevention-advice/counter-terrorism/ - or if there is an IMMEDIATE risk of a terror incident taking place you must call 999 or the Anti-Terrorist Hotline on 0800 789321

- http://www.rscb.org.uk/safeguarding/homepage/59/are_you_concerned_about_radicalisation - or call the Multi Agency Safeguarding Hub (MASH) on 01709 336080

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

Sexting
Sexting is when someone shares sexual, naked or semi-naked images or videos of themselves or others, or sends sexually explicit messages. They can be sent using mobiles, tablets, smartphones, and laptops - any device that allows the sharing of media and messages. In the UK the age of consent for sexual intercourse is 16. However, it is an offence to make, distribute, possess or show any indecent images of anyone aged under 18, even if the content was created with the consent of that young person. The law is contained in Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales). The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18

Sexting is the sharing of images or videos of a sexual or indecent nature that are:
- Of children (anyone under the age of 18), of
- Generated by children

It is against the law to take, make, share or possess such images. Sexting can be a form of peer-on-peer abuse.

According to the NSPCC Sexting can be seen as harmless, but creating or sharing explicit images of a child is illegal, even if the person doing it is a child. A young person is breaking the law if they:
- take an explicit photo or video of themselves or a friend
- share an explicit image or video of a child, even if it's shared between children of the same age
- Possess, download or store an explicit image or video of a child, even if the child gave their permission for it to be created.

However, as of January 2016 in England and Wales, if a young person is found creating or sharing images, the police can choose to record that a crime has been committed but that taking formal action isn't in the public

interest. Crimes recorded this way are unlikely to appear on future records or checks, unless the young person has been involved in other similar activities which may indicate that they're a risk.

Staff should:

- Confiscate and secure the device(s) involved
- Inform the Head of Safeguarding before searching a device (searches can only be conducted by the Head of Safeguarding or other authorised person of the same sex)
- Remind the child they can contact *Childline* at any time if they want to talk to someone about how they're feeling, their trained counsellors can give free non-judgmental advice and support
- Record the incident on the incident form and consider making a referral to MASH
- Inform the police, where illegal images are found.

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. **Sexting disclosures should follow normal safeguarding reporting protocols.**

For a more comprehensive understanding of this problem please refer to the EFL's Sexting and Social Media Guidance via the EFL's CPS portal.

Child Sexual Exploitation (CSE)

The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people, (or a third person or persons) receive something, (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing and/or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition; for example being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources.
Violence, coercion and intimidations are common, involvement in exploitative relationships being characterised in the main by the child's or young person's limited availability of choice, resulting from their social/economic and/or emotional vulnerability.

Key facts:
Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8 and it affects both girls and boys and can happen in all communities.

Any person can be targeted but there are some particularly adults at risk: Looked after Children, Children Leaving Care and Children with Disabilities. Victims of Child Sexual Exploitation may also be trafficked (locally, nationally and internationally). Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16.

CSE disclosures should follow normal safeguarding reporting protocols.

Female Genital Mutilation (FGM) is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision or cutting. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous and a criminal offence. There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

If you suspect a child or woman has experienced FGM you must report your concerns so appropriate support and action can be taken. If you think a child may be at risk there are steps you can take to help protect them and prevent them from experiencing FGM. Reporting your concerns, if you think that a child may be at risk of female genital mutilation or if you suspect that FGM has already happened, even if it's not recently, you must seek help and advice following the reporting procedure. The legislation for this is the Female Genital Mutilation Act 2003.

Safeguarding within Partnerships Policy

The Club recognises its responsibility to safeguard the welfare of all children, young persons and adults at risk, at risk participating in Club activities and when participating in activities arranged in partnership with an external service provider. The Club is committed to working within partnerships to provide a safe environment for those

involved, at risk by utilising this Safeguarding Policy and its Procedures to protect adults at risk from physical, sexual or emotional harm, neglect, bullying or exploitation.

The Club commitment to safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to children, young persons and adults at risk, at risk of harm.

Partnership agreements will include the following:

- All partners will be fully aware of their areas of safeguarding responsibilities.
- It will be determined which organisation's Safeguarding Policy and Procedures will be followed in the event of a concern arising.
- An agreement confirming safe recruitment procedures have been followed.
- If appropriate level DBS checks and self-declarations have been undertaken.
- Agreement on the level of supervision to be provided by the partner during the activity.
- If the provider has valid public liability insurance.
- What safeguarding training has been undertaken by the deliverers?
- Who is responsible for the induction of staff and volunteers? Health & Safety, Codes of Conduct etc.
- Who has responsibility for completion of consent forms (e.g. medical and image consent), registration, record keeping and risk assessments and details of First Aid arrangements

9. Residential Accommodation

The Club may, in the course of its activities, be required to provide both short and long term accommodation for children and young persons. This may occur in a range of settings and may be arranged by or involve Club employees, such as:

- Trips and tours involving overnight stays for children, young persons and adults at risk;
- Academy players living in Club facilities or in domestic settings with approved host families;
- Young players on trial with Academy teams;
- Children, young persons and adults at risk participating in RUCST programmes or projects
- Commercial activities delivered in partnership with third party operators responsible for the provision of accommodation.

It is vital that wherever such situations arise that the highest level of diligence is provided to the arrangements. Managers must ensure that all applicable *legislation, regulation and good practice* (from that host country) is applied to any of the above settings and that any relevant authorities are consulted with throughout the planning and operation of these provisions.

The same level of diligence is required where a third party is responsible for making accommodation arrangements for adults at risk in our care. It is the responsibility of our staff to ensure that third party operators maintain our high standards of care.

Selection of Carers
The appointment of any staff or carers with responsibility for the supervision of children, young persons and adults at risk overnight in residential settings must be carried out in accordance with this policy and must apply Safer Recruitment principles to ensure suitable appointments are made.

As a minimum these staff must:

- undertake the appropriate criminal record check (e.g. Enhanced DBS in the UK)
- supply at least two references
- have their qualifications and references checked
- have completed appropriate safeguarding training and/or residential care training
-

Host Families
When sourcing and ultimately providing accommodation for children, the club will adhere to the LFE's guidance for selecting accommodation (version 11 March 2018). In doing so the club will ensure that any property meets the high standards set by the club and RFL and that all accommodation providers are DBS and background checked.

Trips, Tours and Hotel

There is a Trips, Tours and Tournaments guidance provided by the EFL available via CPS. Compliance with this guidance will be evident for each tour. An experienced Tour Leader will hold overall responsibility for the tour group and the creation of the Tour risk assessment.

The PFA (Professional Footballer's Association) Independent Youth Advisory Service is available to all Academy Players, Trialists and their parents. (youthadvisory@thepfa.co.uk) https://www.thepfa.com/players/academy-players-and-parents/pfa-independent-advisory-service

10. Safeguarding & the Club's Workforce

Safeguarding is also about ensuring that all staff, volunteers and partners understand the role that they play in protecting adults at risk. Across the Club there will be a wide range of employment and deployment arrangements involving full-time or part-time permanent staff, consultants, sessional staff or volunteers.

The workforce is what makes this policy 'live'. This means all members of the workforce who are involved in training, managing, supervising or caring for children or other adults at risk.

They must work conscientiously to help keep those in their care safe from harm. They must also be aware of how to keep themselves and their colleagues safe from having allegations made against them by maintaining professional boundaries and avoiding behaviour that may be misinterpreted by others. In turn this has a direct impact on maintaining the reputation of the Club and its companies.

Safeguarding - Safer Working Practices booklet
The Club has published a Safer Working Practices booklet which applies to all individuals who work or volunteer with children and other adults at risk on any Club-led activity. This will needs to be read and signed for during the induction of any new employees.

Safer Recruitment
RUFC are committed ensuring that those who apply for a role that involves working closely with children (and in some cases adult at risks) on any of our activities will be subject to 'Safer Recruitment' principles. As a minimum they will require a criminal record certificate (or check or similar) from the national or local authorities (such as Disclosure & Barring Service checks in the UK) if such checks are available. We will also take and follow up on references, check qualifications and licences, and where necessary conduct medical checks.

Employment of Ex-Offenders
Rotherham United endorses the use of The FA Criminal Records Checks (FACRC) through the Disclosure and Barring Service (DBS) to ensure appropriate assessment for clearance for work in football for those working with children, young people or vulnerable groups.

GBG administer the criminal records checking process on behalf of The Football association. This includes those roles which are defined by law as a Regulated Activity, or those roles for which the National Governing Body (NGB), that is The FA, has identified to require Enhanced Disclosures in football. These are defined as unsupervised roles in football which involve teaching, training and instruction or caring for and supervising.

Rotherham United complies with the DBS and The FA Criminal Records Body (FA CRB) Code of Practice and seeks to treat all applicants for positions fairly. The Club undertakes not to discriminate unfairly against any subject of a disclosure on the basis of a conviction or other information revealed.

Rotherham United is committed to safeguarding children and to the fair treatment of its staff, potential staff or users of its services, regardless of race, gender, religion, sexual orientation, age, physical/mental disability or offending background.

This is Rotherham United written policy on the recruitment of ex-offenders, which should/will be made available to all disclosure applicants at the outset of the recruitment process.

We actively promote equality of opportunity for all. We select candidates for interview based on their skills, qualifications and experience.

A disclosure is requested only after consideration has been given to the roles and responsibilities included in the Job Description. Any decision to request a disclosure will be relevant to the position concerned. For those

positions where an enhanced disclosure is required, the recruitment documents used should/will contain a statement that a disclosure will be requested in the event of the individual being offered the position.

> *"This post requires Enhanced Criminal Records Checks and checks against the Barred Lists and is exempt from Rehabilitation of Offenders Act (1974). Therefore all convictions including spent convictions that have not been subject to filtering by the DBS should be declared".*

The definition of 'spent conviction' has changed in recent years, for further information on if a conviction is considered 'spent' go to:
https://www.gov.uk/exoffenders-and-employment

Where a disclosure is to form part of the recruitment process, we encourage all applicants called for interview to provide details of their criminal record, if any, at an early stage in the application process.

We request that this information is sent under separate, confidential cover, to a designated person at the Club who will be named in the recruitment process. We recognise the importance of confidentiality and therefore this information will only be seen by those who need to see it as part of the recruitment process.

Unless the nature of the position allows the recruitment officer / disclosure body to ask questions about an applicant's entire criminal record, we only ask about unspent convictions as defined in the Rehabilitation of Offenders Act 1974 and as filtered by the Disclosure and Barring Service.

Having a criminal record will not necessarily bar you from working with Rotherham United**.** This will depend on the nature of the position and the circumstances and background of your offence(s).

More information on the recruitment of offenders through GBG is available at:
http://www.eeyfl.co.uk/files/The_FAs_Policy_Statement_on_the_recruitment_of_Ex-Offenders.pdf

Positions of Trust

As a result of the roles and authority that many members of our workforce hold, they are considered to be in a Position of Trust in relation to those in their care. This means that where staffs, or other members of the workforce, are in a position of power and influence over children or other adults at risk they must not abuse their position for personal advantage or gratification or that of others.
Staff must also report any concern they have about another member of the workforce to a designated safeguarding officer.

Age of Consent, Children and Positions of Trust

This policy considers a child to be someone who is not yet 18 and as such emotionally dependent. Intimate or sexual relationship between a member of the workforce and a child or adult at risk in their care is prohibited and will be subject to disciplinary action. A breach to this rule is considered an act of gross misconduct and will result in a referral to the relevant statutory agency.

For the absence of doubt, this applies to members of the workforce and participants who may have travelled overseas from their country of origin or those travelling abroad as representatives of Rotherham United.

Standards of Behaviour – Adults

Our workforce will adopt the highest standards of behaviour at all times in order that they will maintain the confidence and respect of children, adults at risk, parents, customers, supporters and colleagues. Within the scope of their duties their actions should always be reasonable, appropriate, warranted, proportionate, and safe and applied equitably.

Whistleblowing

Members of the Club's workforce should also act where concerns are raised about the behaviour of others – meaning other members of the workforce or participants (children or adults) on Club activity. Failure to act is contrary to this policy and may be subject to disciplinary action.

Information and Communication Technology (ICT)

ICT is used across Rotherham United in many and varied ways. Its use will continue to grow and change with new developments in technology and fashion. It is used to communicate with supporters, customers, players and the media. The Club will:

- develop and maintain clear policies on suitable and appropriate safe use of internet, email, SMS, and social media, in line with the Information Management and Security Policy;

- ensure that **consent of parents** is obtained if staff use SMS, email or other electronic means of communication with a child for programme-related reasons
- raise awareness amongst young participants (especially Academy players) regarding safer internet/social media use in respect of their position;
- raise awareness, through training and internal communications, with the workforce regarding appropriate use of such media and the importance of both professional and personal online activity;
- Have a zero-tolerance approach to 'cyber-bullying', sexting, grooming etc. exploitation.
- Respond quickly and appropriately to inappropriate use of the internet and social media by players, participants and members of the workforce.

Training
Safeguarding personnel will receive training across broad range of the safeguarding landscape.
All new staff joining the workforce will complete a detailed induction to the Club and this will include suitable safeguarding training relevant to their role. They will be required to sign the **Safer Working Practices Guide**. The induction is completed by Human Resources or the Departmental Manager. We will also work with players and parents to raise awareness of safeguarding issues that may affect them (such as social media issues). Refresher training is complete by all staff as required and covers children and adults at risk and adults at risk.

11. Consent

The Club recognises the importance of approaching the individual needs of children, young persons and adults at risk in the appropriate way and according to the law and statutory guidance.

Where they is at risk of harm, consent to act on concerns is not normally required in law although consent from and consultation with those with Parental Responsibility is considered good practice unless this would put them at greater risk of harm.

Consent & Best Interests

Children: We will always respect the right of a child to have their say when a decision that effects them is being taken. We will take their views into account and always act in their best interests when a decision is made, especially when a child is at risk of harm or may have come to harm. A child's parent will also be consulted and consent obtained as a matter of course before any action is taken unless this may put the child at increased risk of harm. Care should be taken to seek and establish the consent of all those with Parental Responsibility for that child. Where a parent or legal guardian cannot give consent at a point where it may be required, group staff will always act in the best interests of the child.

Adults: If an adult who may be at risk of abuse *has* the capacity to consent then they *must* have the opportunity to consent before a decision is made that affects them – e.g. passing on a concern to statutory agencies. Club staff will assume that an adult has the capacity to consent unless it is established that they lack this capacity. **A seemingly unwise decision should not be mistaken as lacking capacity.** We will always act swiftly (and possibly without consent) where the individual is put in immediate and significant risk of harm and always act in their best interests.

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

12. Staff Recruitment

Rotherham United Football Club recognises that anyone may have the potential to harm or abuse children in some way and is committed to taking all reasonable steps to ensure that unsuitable people are prevented from working with children or young adults.

Recruitment of Employees, Workers and Contractors
The Club's full recruitment policy and procedures are available from the Human Resources Department. These include information and guidelines on advertising, selection procedures, offers of employment, checks and references.
Further policies and procedures relating to employment are available from the HR Department and in the Colleague Handbook.

Pre-selection
When recruiting for a position that involves significant contact with children, young persons or adults at risk, Rotherham United Football Club operates a comprehensive recruitment procedure that includes:

- Completion of a Self Disclosure Form, which requires any applicant to declare unspent convictions
- Verification of identity and eligibility to work in the UK
- Verification of professional qualifications
- Screening via the Disclosure and Barring Service (DBS). Anyone requiring a (DBS) for their role will complete a self-declaration form.
- Two references, including one from the applicant's most recent post working with children, young persons or adults at risk

Interview
Applicants will be required to undergo an interview to acceptable protocol and recommendations that includes questions relevant to Safeguarding adults at risk.

The applicant's qualifications, identity and eligibility to work in the UK are also substantiated, and any areas for concern discussed.

Post – Interview
In the event that the DBS Disclosure reveals undisclosed offences or issues are raised in the references and pre-employment checks, a risk assessment interview will be convened at the earliest opportunity to include a member of the Safeguarding Team. An offer of employment can be withdrawn if this interview fails to satisfy the interviewers of the employee's suitability to work with children.

In the event that an applicant commences work prior to their DBS Disclosure being received, they will be restricted from working with children and young adults unsupervised. This can only be sanctioned by the Chief Operating Officer and covered under a risk assessment.

Induction
All employees will receive a formal induction. As part of this induction process they will be required to read and acknowledge the **Safer Working Practices Guide**.

Training
In addition to the initial safeguarding induction every person in a Position of Trust is required to attend ongoing, regular safeguarding training events.

13. Raising Concerns, Information Sharing and Whistleblowing

Employees are not expected to be experts in recognising concerns; however, they should be vigilant and respond swiftly and appropriately. It is not the responsibility of anyone employed by the Club, in a paid or unpaid capacity to decide whether the alleged harm or abuse has taken place. However, it is the responsibility of all Club's employees to act, by reporting any concerns or allegations of abuse of a child to the Safeguarding Team and/or by contacting the appropriate authorities.

Safeguarding concerns fall into one of the following types:

1. the behaviour of an adult towards a child, young person or adult at risk; or you observe another adult hurting them or you accidently hurt them
2. the behaviour of a young person towards other children (including bullying by peers);
3. risks identified through recruitment processes (e.g. criminal records information);
4. information about an individual provided by statutory agencies or other route;
5. allegations of abuse, bully or an observation of injuries or marks that cannot be accounted for, or a sudden change in behaviour, if it is suspected that a child or adult at risk has been exposed to indecent images or discloses such, If the child or adult at risk seems distressed in any manner and you have concerns for their emotional state or welfare or if they appear to be sexually aroused by your actions or may have developed an infatuation with you or another member of staff and If they misunderstand or misinterpret something you have done, which may compromise your position or working relationship with that child or concerns about

harm to a child that has taken place *outside* of a Club activity (e.g. at home or school) but identified *within* a Club activity.

Raising Concerns & Mandatory Reporting
If any member of the Club's workforce has a concern about a child or adult at risk they have a duty to refer this to a Designated Safeguarding Officer (DSO). The Designated Safeguarding Officer in turn has a duty to report to the Head of Safeguarding. If there is immediate risk of harm, a serious injury, or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity.

The circumstances of the concern will be fully investigated by the Head of Safeguarding who may decide to refer the concern to Children's Services or other agency. Do not worry that you may be mistaken. Being worried about doing the wrong thing is not a reason not to act. It is better to have discussed it with somebody with the experience and responsibility to make an assessment.

Where a very serious concern is raised that involves a child or adult at risk, involved in Club-led activity or a member of the workforce is involved in an allegation against a person, the Head of Safeguarding must be informed.

Action to be taken when Abuse is suspected:

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

Any suspicion that a child has been harmed or abused by an adult, peer, member of staff, player, volunteer or contractor should be immediately reported to the Club's Head of Safeguarding or Designated Safeguarding Officers. The member of staff reporting the suspicion of abuse will also record the incident, using the incident report form and immediately forward the document to the Club's Head of Safeguarding or DSO. The member of staff dealing with the child at that time, must take steps to ensure the immediate safety of the child in question and any other child who may be at immediate risk of harm.

The parents/carers of the child will be contacted as soon as possible, unless they are suspected to have abused the child in question. In such circumstances, advice will be obtained, by the Head of Safeguarding / DSO or staff member dealing, from Police or Social Services with regards to when and who should inform the parents of the concern or allegation.

The Head of Safeguarding will refer the allegation to the appropriate authorities, and if a child is at immediate risk of harm then the Head of Safeguarding may also report the incident directly to the Police and/or Children's Services. The Head of Safeguarding will follow the communications policy in terms of any media enquiries.

If the Head of Safeguarding the subject of the suspicion/allegations, the report must be made to the Chairman who will refer the allegations to the relevant authorities.

In certain cases, where forensic evidence from a scene is required then staff must attempt to preserve any such evidence e.g. locking a room to prevent other people disturbing the scene, advising the child not to wash, go to the toilet or change clothes if the assault was relatively recent. Staff should also be mindful of documentary or other evidence, which may be present on mobile phones, computers or other devices which may need to be retained. Advice should be sought from the Head of Safeguarding as to the preservation of evidence in such cases, pending police involvement.

If a child, young person or adult at risk discloses abuse, in the first instance try to stay calm and listen carefully to what is said whilst reassuring the child that they have done the right thing in telling you. Do not promise to keep secrets –find an appropriate early opportunity to explain that to keep them safe it is likely that the information they tell you may need to be shared with others. Allow the child to continue at her/his own pace and keep questions to a minimum; use the following as a guide to establish the brief, basic facts of the allegation:

- WHO? – Names of who is involved.
- WHAT? – What happened?
- WHERE? – Where did it happen?
- WHEN? -When did it happen?

When they have finished, make a detailed record of what they have said, using the child's own words, as soon as possible using an incident report form recording what actions you have taken so far. There is no requirement to get a lengthy account from the child at this stage. Remember that if the child discloses abuse you are only making a

record of that child's initial disclosure and it is likely he/she will subsequently be fully interviewed by Police. Tell them what you will do next and with whom the information will be shared and then contact the Club's Head of Safeguarding or a Designated Safeguarding Officer immediately. If the Head of Safeguarding or DSO are unavailable, and you feel the child is in immediate danger or at immediate risk of harm, then report your concerns direct to Karen Thomas, kthomas@asdlighting.com or hrsafeguarding@rotherhamunited.net. Do not make contact with any alleged abuser.

Referral Management
Where a concern is raised relating to the behaviour of a member of staff towards a child or adult at risk participant there is a need to manage that referral in a swift and confidential manner.

Where the concerns could be of a serious nature a referral to the police or social services should be made at the earliest opportunity.

Record Keeping & Confidentiality
The company will keep a record of all incidents and concerns reported to its Safeguarding team. Any such reports will be taken seriously, carefully recorded, acted upon where appropriate, and confidentially retained. Records will be regularly reviewed in order to identify patterns of behaviour that may give rise to concern. All information collected and stored, whether verbal or written, will be treated with the utmost sensitivity and handled in accordance with data protection legislation. They may be required to report or refer these matters to another agency such as a sport governing body or local authority.

Complete the incident form and where possible include the following:

1. Name of persons, age and date of birth, home address and telephone number
2. Details of person's parents/carers, name(s), address (es), date(s) of birth, contact telephone number(s). Indicate who has parental responsibility if known.
3. Indicate if the person making the report is expressing their own concerns or those of someone else? If it is not the person making the disclosure has the child, young person or adult at risk concerned been spoken to? If so what was said?
4. What is the nature of the allegation? Include dates, times, location(s), person(s) involved and any other relevant information. Include a description of any visible bruising or other injuries, but do not ask the person to remove or adjust an item of clothing. Record the explanation as to how any bruising or other injuries occurred.
5. Record your own observations about their behaviour e.g. tearful, shaking, reluctant to make eye contact etc. Do not record your own opinion of the incident on the incident report form e.g. "She appeared genuine", "I doubt they could have been alone together", "why would he have gone into that room?" etc.
6. The account, if it can be given, of what has happened. Use the person's own words where possible, put significant comments in speech marks and include details of any witnesses to the incident?
7. Have the parents/guardian been contacted? If so what has been said?
8. Details of other people consulted.
9. Details of the suspect, name, nickname or description and their relationship to them (e.g. parent/coach/stranger).

When to Inform the LADO
If the allegation relates to a person who works with children or adult at risk (including employees) then the Club's Head of Safeguarding will refer the incident to the LADO (Local Authority Designated Officer) if that person has:

Behaved in a way that has harmed or may have harmed a child or adult at risk and where possibly a criminal offence has been committed and/or behaved towards a them in a way that indicates they may pose a risk of harm to children or adult at risks

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

1. A Criminal Investigation – by Police.
2. A Safeguarding Investigation – by Social Services and the Club.
3. A Disciplinary or Misconduct Investigation – by the Club and/or FA.

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

Making a Referral to the League / F.A.

On making any referral of an allegation of or incident of suspected abuse of or unsuitable behaviour towards a child or adult at risk to any external agency (including the police, the local authority or the DBS), the Club's Head of Safeguarding will ensure that the safeguarding team are kept fully appraised of the progress of the referral and any subsequent investigation or action.

The Club will notify the League and the F.A. of the referral or incident (through the submission of the Affiliated Football Safeguarding Referral Form) and provide them with appropriate updates in respect of:

- Any evidence obtained by the Club demonstrating the abuse of, or unsuitable behaviour towards, a child or adult at risk (whether the evidence relates to conduct by a member of Staff in the performance of their duties as a member of Staff, or otherwise);
- A third (or subsequent) incident or allegation of 'poor practice' (as defined in Affiliated Football's Safeguarding Procedures) in relation to a child or adult at risk involving the same member of Staff;
- Any referral of an allegation or incident of suspected abuse or of unsuitable behaviour towards a child or adult at risk the Club has made to any external agency.
- Any investigation by an external agency into suspected abuse of or 'unsuitable behaviour' towards a child or adult at risk involved in an Activity of which the Club becomes aware.
- A referral is made by completing an 'Affiliated Football Referral Form' and sent to The FA Safeguarding Team or County FA (depending on level of risk assessed) within 24 hours. Referrals can be made over the phone but a written referral needs to be sent within 24 hours. The FA's Safeguarding Team can be contacted on 0844 9808200 (ext. 6401 or 6876) or email safeguarding@thefa.com
- As a provider of a "regulated activity" the Club is required to follow DBS referral guidance, and recognises its legal duty to make referrals to DBS in certain circumstances. The Head of Safeguarding is responsible for actioning and managing this process.
- Escalation routes for any external complainant who is unhappy with the Club's response can contact the Club, LADO, EFL and the FA. Contact information below.

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

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

Internal enquiries and Suspension
The Head of Safeguarding will make a decision about whether any individual accused of harm, inappropriate behaviour or abuse should be temporarily suspended pending further employer, police and social services enquiries. Irrespective of the findings of the social services or police enquiries the Head of Safeguarding in conjunction with legal advisors, will assess all individual cases to decide whether a member of staff or volunteer can be reinstated and how this can be sensitively handled.

Should the investigation reveal any breaches of the Club's Code of Conduct and/or the Safeguarding Policy those matters will also be subject of an internal investigation and may result in disciplinary action up to and including dismissal. The FA/ League should be informed by the Club's Head of Safeguarding of any serious safeguarding concern or complaint in order that they may consider the risk posed across football.

If the Club decides to withdraw permission for a member of staff to engage in regulated activity with children and/or adults at risk the Club is legally obliged to refer that person to the Disclosure and Barring Service when it is also believed that member staff has caused harm or poses a future risk of harm to children and adults at risk. This includes situations when the Club would have taken the above action, but the person was re-deployed, resigned, retired, or left.

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

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

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

Confidentiality

The Club will operate on the premise that all information imparted to a member of staff will be treated in confidence. Confidentiality is a key issue in the lives of young people and adults at risk. They may trust a member of staff with issues of a personal nature and wherever possible their confidences should be respected. Staff must not however make promises on confidentiality they may be unable to keep. Furthermore, staff should always make any complainant fully aware of any situation where confidentiality must not be maintained. Where there is a concern that the child may be suffering, or is at risk of suffering, abuse or significant harm, the child's safety and welfare must be the overriding consideration. Children, young people and adults at risk may disclose information that is difficult for the member of staff to deal with without further advice/support, or which must be reported to statutory agencies. In this case the complainant should be told that the situation will be discussed with the Head of Safeguarding or Designated Safeguarding Officer with a speciality in that area, but confidentiality will be maintained where possible.

Information sharing

The Club is committed to sharing information for the purposes of safeguarding and promoting the welfare of children, young people and adults at risk in line with and in conjunction with, Working Together to Safeguard Children (2018), The Children's Act 1989 and 2004, Keeping Children Safe in Education 2016, Equality Act 2010, 'Information Sharing: advice for practitioners' – July 2018 and with respect for The General Data Protection Regulation (2018). Every effort though should be made to ensure that confidentiality is maintained for all concerned. Information must be shared on a need to know basis, with or without the consent of the person to whom the information relates or the consent of that child's parent, carer or guardian. Whilst it is good practice to obtain consent wherever possible, it is not a prerequisite. Information may be shared with (but is not limited to) the following people:

- The Head of Safeguarding and Designated Safeguarding Officers and Human Resources, The parents/guardian of the person who is alleged to have been abused.
- The person making the allegation.
- Social Services/Police.
- The Chairman and Media/Communications Manager.
- The alleged abuser (and parents if the alleged abuser is a child)

In the event of a Criminal Investigation the Head of Safeguarding, Designated Safeguarding Officer or Human Resources will seek Social Services/Police advice on who should first approach the alleged abuser. 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. Information will be retained for the relevant period as specified in the Club's Data Retention Policy.

Support to deal with aftermath

Consideration should be given about what support may be appropriate to children, adult at risks, parents and colleagues, workers and volunteers. Use of help lines, support groups and open meetings will maintain an open culture and help the healing process.

Social Services can signpost children and their families to support services within the community so can be consulted for advice and consideration should also be given about what support may be appropriate to the alleged perpetrator of the abuse.

Contact Rotherham MASH	01709 336080
Childline	0800 1111
www.childline.org.uk	

FA/NSPCC Child Protection Helpline (10.00am-6.00pm) 0808 800 5000

Preventing extremism in schools and children's services:
counter.extremism@education.gov.uk 020 7340 7264

Child Protection in Sport Unit: 0116 2347278/7280
www.thecpsu.org.uk

FGM helpline 0800 028 3550
fgmhelp@nspcc.org.uk

NSPCC British Sign Language Helpline:
ISDN videophone: 0208 4631148
Stonewall: 08000 502020 LGBT

CEOP (Child Exploitation and Online Protection): https://www.ceop.police.uk/safety-centre/

Go to their website to report concerns about online abuse or grooming
The British Association for Counselling and Psychotherapy Directory is available from:
British association for Counselling and Psychotherapy
BACP House, Leicestershire
LE17 4HB
Tel: 01455 883300
E-mail: bacp@bacp.co.uk Internet: www.bacp.co.uk

EFL www.efl.com/-more/governance/safeguarding
PFA www.thepfa.co.uk
LMA www.leaguemanagers.com
FA www.TheFA.com/football-rules-governance/safeguarding
County FA www.TheFA.com/about-football-association/who-are-we/county-fas
Sporting Chance www.sportingchanceclinic.com

Information sharing advice for practitioners
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

Rotherham Local Safeguarding Children Board
1st Floor, Wing A, Riverside House, Main Street
Rotherham S60 1AE. Telephone 01709 382121
Email CYPS-SafeguardingBoard@rotherham.gcsx.gov.uk

Rotherham Safeguarding Adults Board
https://www.rotherham.gov.uk/rsab/

LADO – Local Authority Officer (Rotherham) 01709 336080
Multi Agency Safeguarding Hub (MASH)

Allegations of Non-recent abuse (Historic abuse)
Non-recent abuse (also known as historic abuse) is an allegation of neglect, physical, sexual or emotional abuse made by or on behalf of someone who is now 18 years or over, relating to an incident which took place when the alleged victim was under 18 years of age. Many people who were abused in childhood believe that they are to blame and that the abuse was their fault. But this is never the case - a child cannot consent to abuse.

In countless circumstances children are too young to fully understand or articulate what is happening to them. Some spoke out at the time but weren't believed. Others were too embarrassed to tell anyone or did not know who to turn to. In some cases, the non-recent allegation may be made against a member of staff who is still currently working with children, either within or outside the Club. Where such an allegation is made to the Club, follow the "Action to be taken when abuse is suspected", other children, either within or outside the club, may be at risk of harm from this person.

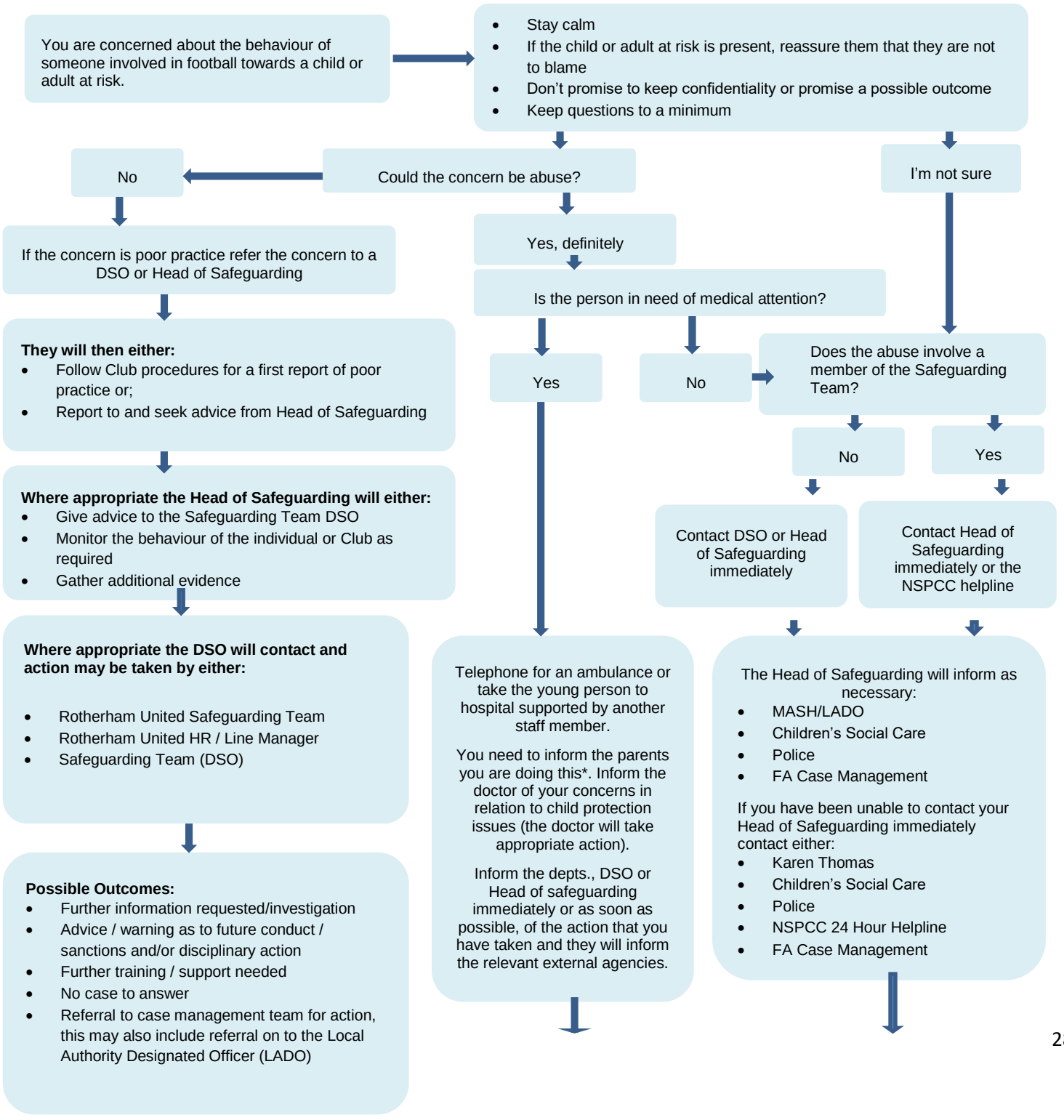
Advice and Support for victims can be obtained from:

NAPAC – National Association for People Abused in Childhood Free help-line:
0800 8010331 - Office - 0207 614 1801 (9am-5pm)
Support for survivors of childhood sexual abuse
07765 052282 support@survivorsintransition.co.uk

Victims of non-recent Sexual Abuse in Football can contact:
The FA/NSPCC Helpline – 24/hours 0800 0232642
The Professional Footballers' Association – wellbeing@thepfa.co.uk
The FA Directly via safeguarding@thefa.com (Monday to Friday 09.00 – 17.00 0800 0835 902)
The Police, by going to a police station or dialling 101.

EFL www.efl.com/-more/governance/safeguarding

14. Responding to concerns



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Complete:

- Incident report form and forward to Head of Safeguarding (or DSO)

Possible Outcomes:

- *Referral to Local Authority Designated Officer (LADO)*
- *Referral to the FA*
- Police Enquiry
- Criminal Proceedings
- Civil Proceedings
- Referral to Independent Safeguarding Authority (ISA)
- Disciplinary action or no further action (HR Case Management)
- Referral to DBS/Inclusion on DBS Barred list
- Sanctions by the FA

REMEMBER – You can always contact the 24 hour NSPCC Helpline **(0808 800 5000)** for advice and guidance.

If referred to FA Case Management the case will be considered by the FA Safeguarding Review Panel. The possible outcomes include:

- Advice and / or warning as to future conduct
- Independent assessment
- Further support or training
- Supervision and / or monitoring
- Suspension
- No case to answer

All appeals regarding the FA's decisions will be dealt with by the FA appeals procedures which can be found in the FA Handbook, available on www.thefa.com

REMEMBER – You can always contact

Head of Safeguarding Paul Douglas 07724 550688 and 01709 827762

IF IN DOUBT CONTACT A MEMBER OF THE CLUB'S SAFEGUARDING TEAM

pdouglas@rotherhamunited.net OR email hrsafeguarding@rotherhamunited.net

*If the parents are allegedly involved in the abuse, only inform them that you are taking the child to hospital. Do not share any other information.

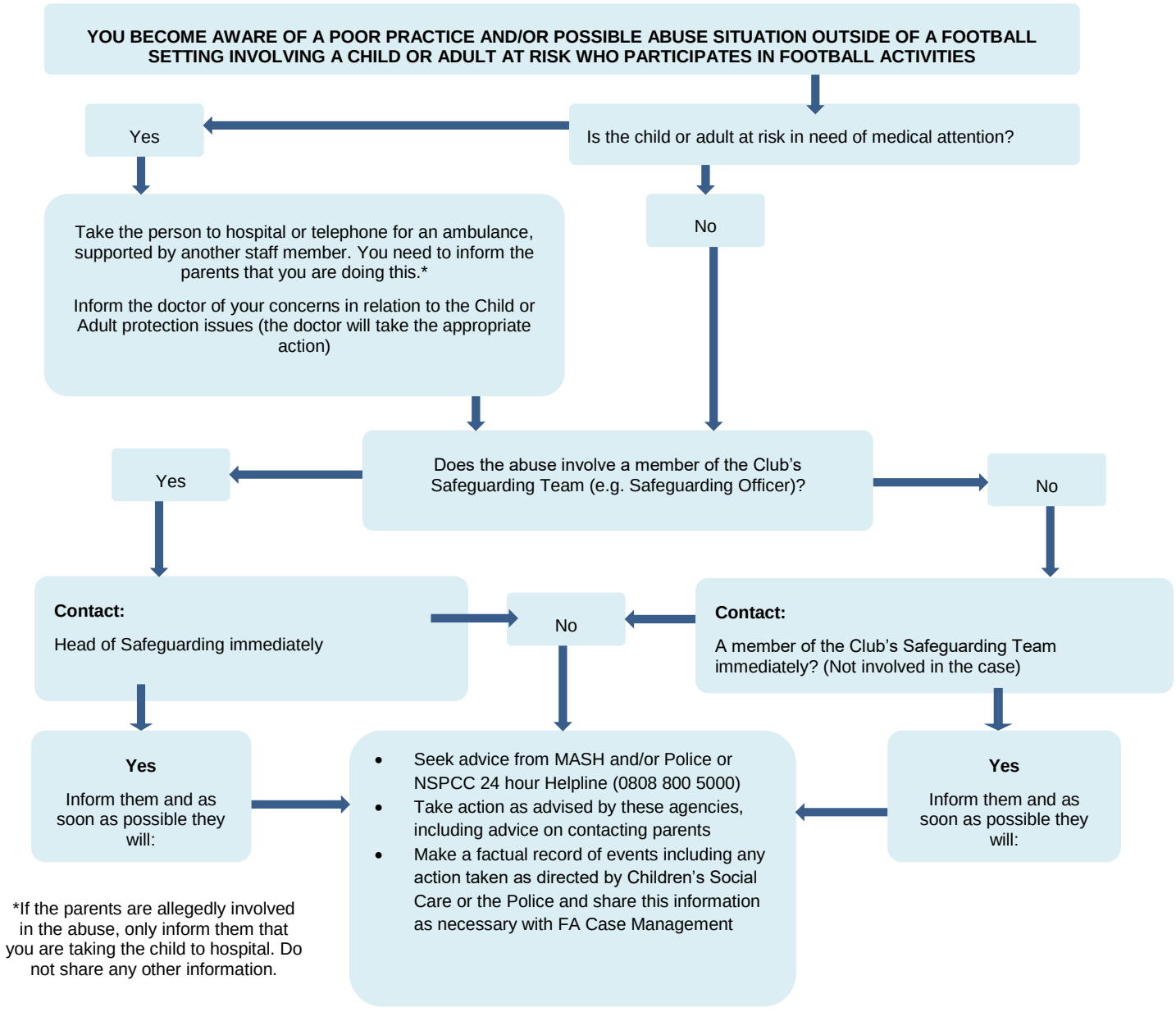
Dealing with concerns outside the Club

You may receive information regarding the welfare of a child, young person or adult at risk who is involved in a Club activity, yet the concern itself does not relate to someone within the game. In this instance you will still need to follow the FA procedures outlined below and described in the flow diagram.

If the child, young person or adult at risk informs you directly, the follow the guidance detailed in the flow diagram below. If your concerns are via a third person or through observation, report your concerns directly to the relevant person or organisation as outlined in the flow diagram below.

If you are unable to contact the relevant person immediately, refer your concerns directly to local MASH or to the local Police. These agencies will advise you whether a formal referral is necessary and what further action you may need to take. If you are advised to make a formal referral, make it clear to them that this is a child protection or adult at risk referral.

There may also be other issues where a child, young person or adult at risk is in need and where the family consents to a referral being made to Children's Social Care for support. Make a factual record of events using the FA Information and Referral Form including any action as directed, indicating clearly whether or not the allegation refers to someone involved in football. Forward this to FA Case Management.



*If the parents are allegedly involved in the abuse, only inform them that you are taking the child to hospital. Do not share any other information.

Whistleblowing

The Club views the reporting of concerns by members of the workforce as a vital element of maintaining its core values. Individuals are strongly encouraged to report incidents of malpractice where the law, Club policy, Procedure or Protocol has been breached. The Whistleblowing Policy in the colleague handbook outlines how reports may be made. Failure to do so may result in disciplinary or criminal action.

What is abuse and what things might raise concerns?

Children and Abuse

In respect of children, the Football Association of England defines abuse into five categories. These help to explain what abuse and harm is. The categories are based on the Working Together 2015 mandatory guidance published by the UK Government. They also form the foundation of the "International Safeguards" framework and are: **neglect, physical abuse, sexual abuse, and emotional abuse.**

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

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

The Club recognises 'hazing' as a form of abuse; "hazing is any action or situation, with or without the consent of the participants, which recklessly, intentionally, or unintentionally endangers the mental, physical, or academic health or safety of a person"; this is a term that originates in the United States but is becoming more widely used.

The Club have adopted this framework and also considers that these categories also apply to adults who may have additional vulnerability but a more detailed explanation in respect of adults is presented below. The Club also considers financial abuse and fraud as further risks that may apply to both young professional players and adults.

Neglect
Neglect takes place if adults fail to meet a child or young person's basic physical needs, e.g. for food, warmth and clothing, or emotional needs such as attention and affection. It occurs if children or young people are left alone or inadequately supervised or where they are exposed to danger, injury or extreme weather conditions.

In Group activities, neglect could occur if children or young people do not have proper supervision, clothing or are allowed or encouraged to play whilst injured. It could occur if a child or young person's needs are disregarded before, during, or after a game or training.

Examples of neglect could include:

- Not ensuring children or adults at risk are safe
- Exposing them to extremes of heat, cold or extreme weather conditions without ensuring adequate thermal protection or hydration
- Exposing them to unnecessary risk of injury by ignoring safe practice guidelines or failing to ensure the safe use of equipment.
- By requiring young people to participate when injured or unwell

Physical abuse
Physical abuse occurs if people physically hit, throw, bite, scald, suffocate, drown, burn, poison, shake or in some way hurt or injure children and young people, or fail to prevent these injuries from happening. This category of abuse can also include when a parent or carer reports non-existent symptoms of illness or deliberately causes ill health in a child they are looking after, known as fabrication and induced illness.

In sport, physical abuse could happen where training methods are inappropriate for the developmental age of the child or young person, where they are allowed to play with an injury or where inappropriate drugs or alcohol are offered or accepted. It would clearly happen if a child or young person is hit or physically restrained or manhandled by those supervising the game or training session.

Examples of physical abuse in sport may be:

- When the nature and intensity of training or competition exceeds the capacity of the child's immature and growing body.
- Where the child is given drugs to enhance performance or delay puberty.
- When sanctions imposed by coaches involve inflicting pain.
- When harmful physical initiations or challenges are set by peers. (Hazing)

Sexual abuse
Sexual abuse occurs if children or young people are used to meet another person's sexual needs. This includes any form of sexual behaviour with a child or young person (by an adult or another child or young person), the use of sexually-explicit language and jokes, inappropriate touching and exposure to pornographic material.

Sexual abuse can occur in sporting settings. For example, where there is inappropriate touching, or where sexually-explicit jokes occur between adults and children or young people or if indecent images are taken or adapted and placed on child pornography sites.

The following are all examples of sexual abuse:

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

Communication and Contact
Communication with child (ren), by whatever method, should take place within professional boundaries. This includes the wider use of technology such as mobile phones, text messaging, emails, websites, blogs, etc.

This means that colleagues should:

- Not share any personal information and should not request any personal information from children or adults at risk other than that which might be appropriate as part of their professional role.
- Be circumspect in their communications with and about children or adults at risk to avoid any possible misinterpretation of their motives or behaviour.
- Only contact children or adults at risk for professional reasons, if it is part of their role and it is in accordance with this policy.

Physical contact
Work with child(ren) and adults at risk may involve physical contact, such as medical intervention, responding to success or distress, preventing an injury or accident, sporting skills instruction or demonstrating the safe use of a piece of equipment.

There may be some jobs where physical contact is commonplace and/or a requirement of the role, particularly in sports science or medicine. These tasks should only be undertaken by properly trained and qualified practitioners. This guidance does not seek to replace the specific guidance and codes of practice developed for those professionals.

It is important to avoid making assumptions about whether a child or adult at risk wants any form of physical contact or not. Wherever possible and before initiating contact, colleagues should seek the child's or adult at risk's permission and explain the nature and reason for any physical contact. Colleagues should listen, observe and take note of the child's or adult at risk's reaction and feelings.

Child (ren) and adults at risk are entitled to respect and privacy at all times, and especially when in a state of undress, changing clothes, showering or undertaking any form of personal care and staff should not assist with personal care tasks that can be undertaken independently.

Behaviour Management
All children and adults at risk have a right to be treated with respect and dignity even in circumstances where they display difficult or challenging behaviour.

Physical intervention should always be avoided unless it is absolutely necessary to prevent a potentially dangerous or harmful situation, such as an offence being committed, self-harm or injury to others. Acceptable interventions may include physically interposing, blocking a path, leading by the hand or arm or shepherding by placing a hand in the centre of the back. When such physical intervention is used, it must be done in such a way that the safety and dignity of all concerned are maintained, and it must be proportionate both to the behaviour of the individual to be controlled and to the nature of the harm they may cause.

It is important that colleagues operate within the law, as inappropriate use of physical interventions may give rise to criminal charges. The consequences of an error of judgement in administering physical contact or restraint could be serious. Where physical intervention is employed, the incident and subsequent actions should be recorded and reported the Head of Safeguarding.

Child: Parents should be informed.
Adult at risk: Carers may be informed, where appropriate, with the consent of the adult at risk.

First Aid
When administering first aid, colleagues should ensure that another adult is aware of the action being taken, wherever possible. Colleagues should understand the extent and limitations of their role in carrying out basic care and hygiene tasks for minor abrasions and should recognise when an injury requires more experienced intervention and also to record any administration of first aid or medication

Children: Parents should always be informed when first aid has been administered.
Adults: Carers may be informed, where appropriate, with the consent of the adult at risk.

Emotional abuse
Examples of emotional abuse include frequent and/or persistent threatening, taunting or sarcastic behaviour, along with with-holding affection or being extremely over-protective. It includes racist or sexist behaviour and demeaning initiation ceremonies. It can be inflicted by other children and young people as well as by adults. Children and young people who are being abused or bullied in any way will also experience emotional abuse.

In sport, coaches or parents emotionally abuse children and young people if they constantly criticise, abuse their power, or impose unrealistic pressure to perform to a high standard. It may also occur if a club allows members to deride people with disabilities or from minority cultures and use derogatory language about them.

Examples of emotional abuse in sport include:

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

Bullying & Hazing (in line with the Anti-harassment and Bullying Policy)
Although anyone can be the target of bullying, children and young people who are perceived as "different" from the majority may be at greater risk of bullying. This includes children and young people from minority cultures or

children and young people with disabilities. Victims are often shy and sensitive and perhaps anxious or insecure. Bullying can be defined as:

Bullying can include:

- Physical: hitting, kicking and theft, taking of possessions
- Verbal: name calling, constant teasing, sarcasm, racist or homophobic taunts, threats
- Emotional: tormenting, mobile text messaging, ridiculing, humiliating, ignoring, constant teasing and Racist or homophobic taunts. Also threats or gestures and sexually abusive or insulting comments.
- Sexual: unwanted physical contact or sexually abusive comments and online “cyberbullying,” using abusive texts or humiliating images.

Bullying can take place anywhere, but is more likely to take place where there is inadequate supervision. In sport it is more likely to take place in the changing rooms or on the way to and from the pitch - but can also take place at a training session or in a competition. Attention must be given to potential for peer on peer bullying and abuse.

Hazing involves coercing, requiring, forcing or wilfully tolerating any humiliating, unwelcome or dangerous activity that serves as a condition for joining a group or being socially accepted by a group’s members.

Sport’s competitive nature can create and even support an environment for the bully if individuals and the Club are unaware. The bully in sport can be a parent who pushes too hard, a coach or manager who has a win-at-all costs philosophy; a child or young person intimidating another; or an official who places unfair pressure on a child or young person. The victim is often weaker and less powerful and the outcome is always painful and distressing.

The Club acknowledges that all settings in which children are provided with services, or are living away from home, should have rigorously enforced anti-bullying strategies in place. Bullying can lead to physical injury, social problems, emotional problems, and even death. Children and adolescents who are bullied are at increased risk for mental health problems, including depression, anxiety, headaches, and problems adjusting to school. Bullying also can cause long-term damage to self-esteem.

Children can be bullied by an adult or by another child (ren), however, any allegations of bullying by a member of staff towards a child or young person will be fully investigated and dealt with as a potential breach of the Clubs code of conduct. Disciplinary action will be considered if appropriate. In serious cases of bullying, for example where physical or sexual assaults have allegedly occurred, then those cases will be referred to Children’s Services and/or the Police by the Club’s Lead Safeguarding Officer.

Grooming
Grooming is when someone builds an emotional connection with an individual to gain their trust for the purposes of abuse or exploitation.

Many children or other adults at risk don't understand that they have been groomed, or that what has happened is abuse. Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time (this could be years) gaining an individual's trust. They may also try to gain the trust of the whole family so they can be alone with the person.

Grooming activity may include:

- offering advice or understanding
- buying gifts
- giving the child attention
- using their professional position or reputation
- Taking them on trips, outings or holidays.
- using secrets and intimidation to control children

Once they have established trust, groomers will exploit the relationship by isolating the individual from friends or family and creating a dependent relationship. They will use any means of power or control to make the individual believe they have no choice but to do what they want. Groomers may introduce 'secrets' as a way to control or frighten the individual. Sometimes they will blackmail them, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

Signs and indicators
Children and young people are reluctant to tell someone when they are being abused, so it is essential that every adult is aware of the possible signs and indicators that a child and young person's welfare or safety is being threatened. However, there is rarely a clear sign and you may often have to piece together various snippets of information and rely on your instinct that something does not seem quite right. Never allow a child or young person's disability or cultural difference to explain away concerns.

You may have one piece of information that, when added to that of others, forms a clear picture of abuse. This is often compared to fitting pieces of a jigsaw together. Only when you have a few pieces can you start to see the true picture. Remember, it is not your job to decide whether or not a child or young person is being abused - however it is your responsibility to share your concerns.

However, there are some behaviours that are commonly seen in children and young people who have been abused:

- The child appears distrustful of a particular adult, or a parent or a coach, with whom you would expect there to be a close relationship.
- He or she has unexplained injuries such as bruising, bites or burns – particularly if these are on a part of the body where you would not expect them.
- If he or she has an injury which is not explained satisfactorily or properly treated.
- A deterioration in his or her physical appearance or a rapid weight gain or loss.
- Pains, itching, bruising, or bleeding in or near the genital area.
- A change in the child's general behaviour. For example, they may become unusually quiet and withdrawn, or unexpectedly aggressive. Such changes can be sudden or gradual.
- If he or she refuses to remove clothing for normal activities or wants to keep covered up in warm weather.
- If he or she shows inappropriate sexual awareness or behaviour for their age.

Some disabled children may not be able to communicate verbally about abuse that they may be experiencing or have witnessed and so it is important to observe these children for signs other than 'telling'. Remember that the above signs should be seen as a possible indication of abuse and not as a confirmation. Changes in a child's behaviour can be the result of a wide range of factors. Even visible signs such as bruising or other injuries cannot be taken as proof of abuse without expert opinion. For example, some disabled children may show extreme changes in behaviour, or be more accident prone, because of their impairment. However, if you are concerned about a child or young person you have a responsibility to act on those concerns. A child or young person may also try to tell you directly about abuse. It is very important to listen carefully and respond sensitively.

A child may indicate by signs or behaviour that he or she is being bullied. Adults should be aware of these possible signs and that they should investigate if a child:

- says he or she is being bullied
- is unwilling to go to club sessions
- becomes withdrawn anxious, or lacking in confidence
- feels ill before training sessions
- Regularly presents with clothing torn or training equipment damaged.
- has possessions go "missing"
- asks for money or starts stealing money (to pay the bully)
- has unexplained cuts or bruises
- is frightened to say what's wrong
- gives improbable excuses for any of the above

Action to Help the Victim and Prevent Bullying

The Club has a duty of care and should:

- Take all signs and complaints of bullying very seriously. Bullying is not "banter"
- Encourage all children to speak and share their concerns. Create an open environment.
- Reassure the victim that you can be trusted and will help them, although you cannot promise to tell no one else. Keep records of what is said - What happened? Who is involved? When & Where? (Using the incident report form).

- Report any bullying concerns or allegations to the Safeguarding Officer who will report the incident to the Safeguarding lead who will coordinate the investigation and assess whether the circumstances require the involvement of Police or Social Services.
- Seek advice from the Safeguarding Lead as to further action and who is to inform parent/carer of the child.
- With the guidance of the club Safeguarding Lead, assist in the Investigation of allegations and take action to ensure the victim is safe and supported.
- Report any signs of self-harm, or intentions to self-harm, immediately.
- Preserve any evidence e.g. torn clothing, abusive text messages etc.
- Regularly reinforce the club's anti-bullying stance, and expected level of behaviour and conduct, to players and parents.
- Encourage team work, inclusion, tolerance and acceptance of other's differences and promote communication and collaboration among players.

Action towards the Bully (ies):

Following consultation with the Safeguarding Lead the following actions may be taken, where appropriate:

- The bullying behaviour or threats of bullying will be investigated, risk assessed and steps to stop the bullying behaviour will be put in place immediately. If necessary and appropriate, the police and/or Social Services will be consulted
- Parents of the bully (ies) will be informed and asked to come in to a meeting to discuss the problem.
- An attempt will be made to help the bully (bullies) change their behaviour and to understand the consequences of their actions. Seek an apology to the victim(s) and, where appropriate, insist on the return of any borrowed items and that the bully (ies) compensate the victim for any loss.
- Issue a warning as to future conduct: If the bullying continues a more severe approach will be taken under the disciplinary policy.
- Hold meetings with the family (ies) involved to report on progress.
- Impose sanctions or exclude the offender(s), where necessary.
- Ensure relevant coaching staff are aware of the outcome and that they monitor the situation to reduce the chances of re-occurrence.
- A written record of action taken and outcome of the complaint will be kept by the club Safeguarding Lead, for future reference.

Promoting Good Practice with Children and Young People – An Introduction
Child abuse, physical, emotional, neglect and in particularly sexual abuse, can result in strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about any action to take.

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

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

Good Practice Guidelines
All colleagues are encouraged to demonstrate exemplary behaviour to best safeguard children but also to protect themselves from allegations.

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

Good practice means:
- All staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.
- Treating all children and young people equally, and with respect and dignity.
- Putting the welfare of each young person first and act in their best interest.

- Building balanced relationships based on mutual trust and maintain professional boundaries at all times; for example, never have an intimate relationship with a child U18 (even if they are over 16 years old) when you are responsible for their supervision, care, support or coaching.
- Give enthusiastic and constructive feedback rather than negative criticism.
- Making football fun, enjoyable and promoting fair play.
- Being an excellent role model - this includes not smoking, drinking excessive amounts of alcohol, using drugs or using bad language in the company of children and young people.
- Have access to and be familiar with the club's Code of Code of Conduct and Safeguarding policies and procedures. The Code of Conduct relates to participants, players, parents, staff, volunteers and contractors.
- Know who is their Safeguarding Lead and DSO and how to contact them.
- Ensure any concerns or allegations pertaining to a child's safety and welfare are recorded and acted upon, in line with the club's safeguarding policies and procedures.
- Promote an environment where poor practice is challenged and reported.
- Help maintain an ethos whereby colleagues, children, young people and their parents/carers feel able to articulate any concerns, safe in the knowledge that effective action will be taken as appropriate.
- Ensure there is always an appropriate staff to participant ratio, determined by:
    - Age and needs of the participants.
    - Nature of the activity and environment.
    - Risk assessments identifying potential behavioural or other issues.
    - Expertise and experience of the staff involved.
    - Male and female supervising (as required)

Ratios
Staffing ratios as per NSPCC guidance:

4 - 8 years. 1 adult to 6 children.
9 - 12 years. 1 adult to 8 children.
13 - 18 years. 1 adult to 10 children.

However, regardless of the number of children participating in the Club's activities, **staff are expected to work in pairs**, particularly if there is a requirement to be in dressing rooms or undertake any personal care. Staff should never work alone with children and adults at risk if they are concerned about risks to themselves or others in the situation.

View the *NSPCC - Recommended adult to child ratios for working with children guidance* on appropriate levels of supervision for children and young people for more information.

When travelling with children and young people, the recommended adult to child ratio can vary depending on:

- size of the group, experience and expertise of the colleagues involved
- age of the children and their behaviours, nature of the activity
- size of the vehicle that you are travelling in
- male and female supervision if mixed gender activities

If travelling in a car, it is recommended that there is 1 adult driving and 1 adult supervising the children. Larger groups and vehicles will require more adults to ensure adequate supervision. Think about having 1 adult driving and at least 1 adult supervising the children, depending on the size of the group.

Lone working and one-to-one situations
A lone worker, for the purpose of this policy, is defined as a member of staff who is engaged in activities which place them in a situation without direct contact with other colleagues, or without direct supervision. Lone working and one-to-one situations with children or adults at risk require additional and specific safeguards to be in place, as they have the potential to make children and adults at risk more at risk of harm by those who seek to exploit their relationship of trust. Colleagues working in one-to-one situations with children adults at risk may also be more exposed to allegations of abuse or malpractice.

Where lone working is an integral part of a role, risk assessment strategies which identify, assess and manage risk will be put in place by the Designated Persons and regularly reviewed.

Under no circumstances should colleagues visit children or adults at risk in their homes outside agreed work arrangements. Nor should they invite them to their own home or to that of a family member, colleague or friend. Contact by whatever means and meetings with adults at risk outside agreed working arrangements should not take place without the agreement of Rotherham United Football Club, and in the case of a child, they should not take place without a parent being present. The Designated Safeguarding Officer should be consulted in all such instances.

This means that colleagues should:

- Ensure that social contact, lone working and home visits only take place if they are an integral part of their role.
- Adhere to this policy and any agreed risk management strategies.
- Carefully consider the needs and circumstances of the child or adult at risk when in one-to-one situations.
- Work in an open and transparent way, and avoid conduct which could raise concern.
- Record and report any situation which may place an adult or child at risk or which may compromise the Club's or colleagues' own professional standing.

Where lone working is an integral part of a role e.g. an Academy teaching position, then additional risk assessment strategies will be put in place e.g. If conducting a one-to-one tutorial staff should aim to have the tutorial take place in a communal area, e.g. canteen or an office with other people present. Staff should ensure a colleague is made aware of when and where the tutorial is being held. If Staff are on their own in a room with a student the staff member should prop open the door of the room (so long as that does not constitute a fire safety hazard).

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

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

Personal Contact

- Ensure that if any form of manual/physical contact is required, it should be provided openly and according to the guidelines provided within the FA Safeguarding Children Workshop. Care is needed as contact may be difficult to maintain when a child is constantly moving. Young people/young players should always be consulted and their agreement gained. Some parents are becoming increasingly sensitive about manual support and their views should be carefully considered.
- Keeping up to date with the technical skills and qualifications in football to the appropriate level.
- All care givers must be subject to DBS checks at the highest level in line with EFL guidance
- Ensuring that if mixed teams are taken away they should always be accompanied by a male and female member of staff. NB - however, same sex abuse can also occur.
- All staff should be vigilant and ensure adults around children and young people act in accordance with the standards set by the Club. Staff are also responsible for those who enter changing rooms etc.
- Ensuring that at tournaments or residential events, adults should not enter children's rooms or invite children or young people into their rooms.
- When coaching giving enthusiastic and constructive feedback recognising the development needs and capacity of young people/young players – avoiding excessive training or competition and not pushing them against their will.
- Being an excellent role model – this includes not smoking, not using bad language, not using drugs or being under the influence of alcohol in the company of young players.
- Secure parental consent in writing to act in loco parentis, if the need arises to give permission for the administration of emergency first aid and/or other medical treatment.
- Keeping a written record of any injury or accident that occurs, along with the details of any treatment given and/or action taken. Advise parents of the incident.
- When an injury occurs because of an accident, where the Club or an individual's actions could amount to negligence, then an accident report form must be submitted to the Club Lead Safeguarding Officer.
- Request written parental consent if club officials are required to transport children/young people/young players in their cars and ensure that coaches/staff are accompanied by another member of staff. Such transport arrangements should be avoided, unless absolutely necessary.
- Achieve the best level of supervision of children, always
- Record and report any situation which may place a child at risk or which may compromise the Club's or the member of staff's own professional standing.

- Adhere to the Club policy, guidance and agreed risk management strategies.

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

- Accept as a “friend”, players or referees who are under 18 years, on social networking sites they are members of or share their own personal social networking sites with children, young people or adults at risk involved in the Club’s activities
- Contact children or young people known through football outside of the football context on social networking sites.
- Use internet or web based communications to send personal messages of a non-football nature to a child or young person.
- Engage in any personal communications, ‘banter’ or comments. (For further guidance refer to the Club’s Safeguarding Social Media Policy)

Practices to be avoided:

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

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

Practices never to be sanctioned:

The following should never be sanctioned. You should never:

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

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

If you are unsure this must be checked with parents or carers and the Head of Safeguarding or Designated Safeguarding Officers within the Club.

Home visits
There are circumstances and occasions in which a member of staff’s responsibilities may include home visits, such visits should not be undertaken alone. Contact by whatever means and meetings with adults at risk outside work arrangements should not take place without the agreement of the Club, and in the case of a child, they should not take place without a parent/carer being present.

15. Adults and abuse

Adults at Risk

The Club is committed to safeguarding and protecting adults at risk and fully accepts a duty of care for the safety and welfare of all adults at risk who engage with the Club. The welfare of adults at risk is of paramount importance and the Club acknowledges that all adults at risk have a right to be protected from abuse and discrimination regardless of their gender, race, disability, sexual orientation, religion, belief or age. This is also in line with Working Together to Safeguard Children 2018.

The Care Act 2014 replaces the No Secrets 2000 guidance.

The term "Adult at risk" in the No Secrets guidance was replaced by the title "Adult at Risk." An "Adult at Risk" is defined as any person aged 18 years and over who:

- Has needs for care and support (whether or not the local authority is meeting any of those needs), is experiencing, or is at risk of, abuse or neglect, and as a result of those needs is unable to protect himself or herself against the abuse or neglect or the risk of it.
- the adult's needs arise from or are related to a physical, mental, sensory, learning or cognitive disability or illness, substance misuse or brain injury

Club activities may include adults at risk. In particular adults at risk will be present at match day events, other large scale events and some foundation activities. The Club's staff has a duty to refer any concerns they may have about an individual or group who work with adults at risk who may be vulnerable or at risk of harm.

Abusive behaviour towards adults at risk can range from poor practice to Serious Criminal Offences and can be any form of physical, financial, emotional or sexual mistreatment or lack of care that leads to injury, harm or financial loss. Abuse cannot be easily measured as an action alone. In the UK, the Care Act 2014 provides a useful list of different categories of abuse that adults may be subjected to these are:

- ***Physical abuse*** – including assault, hitting, slapping, pushing, misuse of medication, restraint or inappropriate physical sanctions.
- ***Domestic violence*** – including psychological, physical, sexual, financial, emotional abuse; so called 'honour' based violence.
- ***Sexual abuse*** – including rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault or sexual acts to which the adult has not consented or was pressured into consenting.
- ***Psychological abuse*** – including emotional abuse, threats of harm or abandonment, deprivation of contact, humiliation, blaming, controlling, intimidation, coercion, harassment, verbal abuse, cyber bullying, isolation or unreasonable and unjustified withdrawal of services or supportive networks.
- ***Financial or material abuse*** – including theft, fraud, internet scamming, coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions, or the misuse or misappropriation of property, possessions or benefits.
- ***Modern slavery*** – encompasses slavery, human trafficking, forced labour and domestic servitude.
- ***Discriminatory abuse*** – including forms of harassment, slurs or similar treatment; because of race, gender and gender identity, age, disability, sexual orientation or religion.
- ***Organisational abuse*** – including neglect and poor care practice within an institution or specific care setting such as a hospital or care home, for example, or in relation to care provided in one's own home.
- ***Neglect and acts of omission*** – including ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services, the withholding of the necessities of life, such as medication, adequate nutrition and heating
- ***Self-neglect*** – this covers a wide range of behaviour neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.
- ***Institutional or organisational abuse*** - includes neglect and poor care practice within an establishment or specific care setting such as a hospital or care home, or where care is provided within adult's own home. This may range from one off serious incidents to on-going ill-treatment.

What to Look Out For
There are some situations that will alert you to the possibility that an adult is being abused. These are not proof in themselves that abuse has taken place, as each indicator may have a different explanation other than abuse, but you must report your concerns to the Club Head of Safeguarding or DSO.

Signs and Symptoms of Abuse
Below is a list of examples of signs and symptoms of typical forms of abuse of Adults at Risk. This list is not exhaustive and often some signs may be typical of more than one type of abuse:

Physical Abuse Indicators
- Injuries that are not explained satisfactorily
- Unexplained bruising to any part of the body, particularly collections of bruises which form a pattern which may correspond to the shape of an object or a person's hand
- Unexplained burns especially on "unlikely" areas of the body, soles of the feet or palms of the hands
- Immersion burns. Rope burns and burns from an electrical appliance
- Unexplained fractures to any part of the body or cuts or scratches to mouth, lips, gums, eyes or genitalia
- Person flinches at physical contact or indicates that someone has threatened them with physical harm
- Reluctance to undress or uncover parts of the body, person may appear afraid of or "anxiously" try to avoid certain members of staff, family members or other people they know
- Injuries at different stages of healing
- Unexplained loss of hair in clumps

Sexual Abuse Indicators
- Person exhibiting "untypical" self-harm
- Person discloses fully or partially that sexual abuse is occurring or has occurred in the past
- Person has urinary tract infections or sexually transmitted diseases that are not otherwise explained
- Person appears unusually subdued, withdrawn or has poor concentration and appears reluctant to be alone with a person known to them
- Person experiences pain, itching or bleeding in genital or anal area
- Bruising to thighs or upper arms and/or bites on various parts of the body
- Person exhibits significant change in sexual behaviour or outlook
- A woman, who lacks the capacity to consent to sexual intercourse, becomes Pregnant

Psychological/ Emotional Abuse Indicators
- Untypical ambivalence, deference, passivity, resignation
- Person appears anxious, withdrawn or fearful, especially in the presence of specific people
- Person appears to have a poor opinion of themselves
- Person appears to lack the opportunity to make choices or have adequate privacy
- Untypical changes in behaviour or routines of daily living
- Person appears isolated and deprived of social contact
- Person voices concerns about being abandoned or "put away"
- Bullying via social networking internet sites and persistent texting.

Financial Abuse Indicators
- General lack of money especially soon after benefits are claimed
- Person lacks belongings or services they can clearly afford and/or inadequately explained fall in living standards
- Inadequately explained withdrawals from bank accounts and/or inadequately explained inability to pay bills
- Person does not appear to possess items which are known to have been purchased
- Recent acquaintances expressing interest in the person or their money
- Inadequately maintained financial systems, when a person's money is being managed by others, including a failure to produce receipts for major items.
- Susceptible to "Mate Crime", befriended and then exploited for money, goods and accommodation.

Neglect & Self-Neglect Indicators
- Person lives in accommodation which falls below minimum practical standards
- Person has inadequate heating and/or lighting
- Person's physical appearance, condition or general hygiene is poor and/or appears to be malnourished
- Person is observed to be left in wet clothing

- Medical problems that go unattended
- Person does not appear to be taking the prescribed medication
- Person is exposed to unacceptable risks

Discriminatory Abuse Indicators

- An adult may reject their own cultural background and/or racial origin or other personal beliefs, sexual practices or lifestyle choices.
- An adult making complaints about service/s not meeting their needs.
- Physical attacks such as assault, damage to property, offensive graffiti or arson.
- Threat of attack including offensive letters, abusive or obscene telephone calls, groups hanging around to intimidate, and unfounded, malicious complaints.
- Verbal abuse, insults or harassment - taunting, abusive gestures and bullying.
- Offensive leaflets and posters, dumping of rubbish outside homes.

Domestic Abuse Indicators

- Bruises or injuries that look like they came from choking, punching, or being thrown down. Black eyes, red or purple marks at the neck, and sprained wrists are common injuries in violent relationships. Attempting to hide bruises with makeup or clothing
- Making excuses like tripping or being accident-prone or clumsy. Often the seriousness of the injury does not match up with the explanation.
- Having few close friends and being isolated from relatives and co-workers.
- Having to ask permission to meet, talk with, or do things with other people
- Having little money available; may not have credit cards or car
- Having low self-esteem; being extremely apologetic and meek
- Referring to the partner's temper but not disclosing the extent of the abuse
- Having a drug or alcohol abuse problem
- Having symptoms of depression such as sadness or hopelessness, or loss of interest in daily activities
- Talking about suicide, attempting suicide. (Encourage this person to talk with a health professional). (24-hour National Domestic Violence Freephone Helpline 0808 2000 247 Run in partnership between Women's Aid and Refuge)

Modern Slavery Indicators

- Adult is not in possession of their legal documents (passport, identification and bank account details) and they are being held by someone else
- The adult has old or serious untreated injuries and they are vague, reluctant or inconsistent in explaining how the injury occurred.
- The adult looks malnourished, unkempt, or appears withdrawn and has few personal possessions and often wears the same clothes
- What clothes they do wear may not be suitable for their work.
- The adult is withdrawn or appears frightened, unable to answer questions directed at them or speak for themselves and/or an accompanying third party speaks for them.
- They appear under the control/influence of others, rarely interact or appear unfamiliar with their neighbourhood or where they work.
- Many victims will not be able to speak English
- Fear of authorities
- The adult perceives themselves to be in debt to someone else or in a situation of dependence.

Good practice and Code of conduct

To ensure adults at risk have the most positive and safe experience when engaging with the Club, all staff should display high standards of personal conduct and, by doing so, this will reduce the risk of potential allegations of abuse occurring.

Staff who undertake working with adults at risk need to understand and acknowledge the responsibilities and relationships of trust inherent in their role. Staff should maintain appropriate professional boundaries when working with adults at risk and must not use their status or standing to form or promote inappropriate relationships with individuals from those groups. Engaging in sexual contact with any child or adult at risk, with whom a member of staff comes into contact through their role, is considered a breach of trust and may lead to a referral to the appropriate football authorities and statutory agencies.

Staff Guidance

- Challenge unacceptable behaviour and report poor practice;
- Record and report any situation which may compromise the Club's or the member of staff's own professional standing.
- Achieve the best level of supervision of adults at risk based upon; the need and capacity of the participants; nature of the activity and environment; risk assessments or intelligence information identifying potential behavioural or other issues; expertise and experience of the staff involved; utilising appropriate staffing ratios and mixed gender supervision wherever possible.
- Inappropriate contact initiated by a child or adult at risk should be recorded and reported to the Head of Safeguarding or DSO.
- Treat all adults at risk equally not showing favouritism;
- Always work in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets);
- Promote fairness, confront and deal with bullying
- Do not accept gifts on a regular basis or any gift of significant value from an Adult at Risk. Avoid giving personal gifts to an Adult at Risk.
- Do not loan or borrow money or property from adults at risk.
- Listen carefully to adults at risk about his/her needs, wishes, ideas and concerns and take them seriously;
- Adhere to the Club's Photography and Digital Images policy.
- Maintain a safe and appropriate distance with adults at risk and avoid unnecessary physical contact;
- Where any form of manual/physical support is required it should be provided openly and with the consent of the adult at risk.
- Promote fairness, confront and deal with bullying
- If adults at risk must be supervised in changing rooms always ensure coaches etc. work in pairs;
- Adhere to the Club's Transport Policy if required to transport adults at risk.
- Coaches maintain their qualifications and professional development.
- Ensure a qualified first aider is in attendance or readily available when engaging in activities with adults at risk.
- On tours, ensure that adults should not enter an adult at risk's room unless there is a safety concern, in which case two adults should enter. Staff should also not invite adults at risk into their rooms;
- Be a good role model, this includes not swearing, smoking or drinking alcohol in the company of adults at risk;
- Always give enthusiastic and constructive feedback rather than negative criticism;
- Promote the Club's vision and values and be an ambassador for those values;
- Only make contact with adults at risk for professional reasons, if it is part of your role and in accordance with club policy and guidance.
- Ensure adults at risk adhere to his/her relevant Code of Conduct, where appropriate.
- Adhere to the club's Safeguarding Social Media Policy.
- Encourage adults at risk to take responsibility for their own behaviour and performance;
- Keep a written record of any incident or injury that occurs, along with details of any treatment given or action taken using the Club's Accident Report Form;
- Promote the Club's Policy on Equality, Inclusion and Diversity.

This list is not exhaustive.

Poor Practice

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

The following are regarded as poor practice and should be avoided by staff:

- Unnecessarily spending excessive amounts of time individually with an adult at risk away from others;
- Being alone in changing rooms, toilet facilities or showers used by adults at risk.
- Taking adults at risk alone in a car journey unless unavoidable in an emergency, (report to Head of Safeguarding).
- Taking adults at risk to your home or in a place where they will be alone with you.
- Sharing a room with an adult at risk;
- Engaging in rough, physical or sexually provocative games, including horseplay;
- Allowing or engaging in inappropriate touching of any form;
- Allowing adults at risk to use inappropriate language unchallenged;

- Making sexually suggestive comments to an adult at risk, even in fun;
- Reducing an adult at risk to tears as a form of control;
- Allowing allegations made by an adult at risk to go unchallenged, unrecorded or not acted upon;
- Doing things of a personal nature that the adult at risk can do for themselves;
- Not recording or reporting safeguarding concerns.
- Having adults at risk engaged with the staff as 'friends' or 'followers' within social networking sites such as Facebook, Twitter and Instagram;
- Sending inappropriate text messages or social media messages to adults at risk.
- Engaging with adults at risk on 'one to one' personal electronic communications.

This list is not exhaustive

Reporting
The leader of any activity involving adults at risk at the Club will ensure that the participants know how to get help, how they can report abuse, who to report it to and what response they can expect. Some people who have been abused appear able to speak to someone about it and wish action to be taken. Others seem to be very reluctant to talk about the experience. People with Mental Health problems are particularly under-represented in safeguarding referrals. It is very important, if abuse is suspected, to try and create the opportunity for the person to disclose what is happening. It is crucial to give participants the confidence to know that they will be listened to.

Every member of the Club, volunteers, workers and self-employed staff and agency workers has a duty to report safeguarding concerns to the Club Head of Safeguarding or DSO in the first instance, except in emergency situations where anyone can make a referral to Adult Social Care or the Police if they are concerned for an Adult at Risk's immediate safety by using the reporting mechanism described on page 26 of this policy.

Adults at Risk may not give their consent to the sharing of safeguarding information for several reasons. For example, they may be frightened of reprisals, they may fear losing control, they may not trust statutory bodies or other agencies or they may fear that their relationship with the abuser will be damaged. Reassurance and appropriate support along with gentle persuasion may help to change their view on whether it is best to share information.

Explore the reasons for the person's objections, explain the concern and why you think it is important to share the information, tell the person who you would like to share the information with and why and explain the benefits, to them or others, of sharing information. Also discuss the potential consequences of not sharing the information, reassure them that the information will not be shared with anyone who does not need to know, reassure them that they are not alone and that support is available to them.

If the person cannot be persuaded to give their consent then, unless it is considered dangerous to do so, it should be explained to them that the information will be shared without their consent. The reasons should be given and recorded. If a person refuses intervention to support them with a safeguarding concern, or requests that information about them is not shared with other safeguarding partners, their wishes should be respected. However, there are circumstances where such a decision can be overridden. If it is not clear that information should be shared outside the organisation, a conversation can be had with safeguarding partners in the police or local authority without disclosing the identity of the person in the first instance. They can then advise on whether full disclosure is necessary without the consent of the person concerned.

Further Reading (CPS Site)

Keeping Football Safe and Enjoyable	FA	2017
Recommended Adult and Child Ratios Working with Children Guidance	NSPCC	2018
Guidance Residential Activities Work with Children and Young People	EFL	2017/18
Guidance Operating Trips Tours and Tournaments V3 March	EFL	2018
Guidance Residential Activities Work with Children and Young People	EFL	2017
Guidance on School Trips and Outdoor Activities	HSE	2018
DBS Eligibility Guidance	EFL	2018
Furry Mascot – All Guidance Notes and Forms March	EFL	2018
Risk Assessment Guidance	EFL	2018
Safeguarding Legislative Framework and Guidance Documents	EFL	2018
Club Scout Code of Conduct	EFL	2018
Guidance Document & Toolkit – First Team Appearance U18's	EFL	2016
Mini Bus Code of Practice and Guidance Documents	EFL	2018

USEFUL CONTACTS

Head of Safeguarding (Lead Safeguarding Officer) (reports to The Chairman)
Paul Douglas - Chief Operating Officer
pdouglas@rotherhamunited.net
07724 550688 and 01709 827762

Safeguarding Email
hrsafeguarding@rotherhamunited.net
Karen Thomas – 01709 843355

Designated Safeguarding Officers (reporting to the Head of Safeguarding)

John Bird - Safeguarding Officer – Rotherham United Football Club
jbird@rotherhamunited.net
01709 827770

Paul Davis - Safeguarding Officer – Rotherham United Football Club (Stadium)
jdavis@rotherhamunited.net
01709 827790

John Williams - Safeguarding Officer - Rotherham United Academy
jwilliams@rotherhamunited.net
01709 827766

Jamie Noble Safeguarding Officer - Rotherham United Community Sports Trust
jnoble@rotherhamunited.net
01709 827767

Carole Foster – Safeguarding Officer - Rotherham United Community Sports Trust
cfoster@rotherhamunited.net
01709 827767

Human Resources

Jill Kay - Human Resources Officer
jkay@rotherhamunited.net
01709 843396

Policy Update

This policy will be reviewed annually, or in light of any changes in legislation or guidance, or following any learning outcomes from safeguarding incidents, concerns or allegations. This policy also operates in conjunction with the Club's other policies.

The policies link in terms of Equality, Ethics, Values, and the Club's Commitment to Safeguarding and its way of working.

1. Safer Recruitment and Selection Policy
2. Equal Opportunities, Diversity and Inclusion. (Includes Anti-bullying)
3. Whistleblowing (Public Interest Disclosure) Policy
4. Health and Safety Policy.
5. Safeguarding Within Partnerships Policy
6. Safeguarding Social Media Policy.
7. Excursions and Events Policy.
8. Photography and Digital Images Policy
9. Disciplinary Procedure and Grievance Procedure
10. Club Code of Conduct and Academy Code of Conduct
11. Guidance for the Searching & Ejecting of Adults at Risk is included in the RUFC Seasonal Operational Order.
12. Preventing Radicalisation & Extremism (see below)
13. Academy specific policies (Transport, Accommodation, Trips and Tours, more?)
14. Club Ethics Policy
15. Club Complaints Policy
16. Club Transport Policy
17. Club trips, tours and tournaments policy
18. Club late collection of children policy
19. Club Information Management and Security Policy (Includes Club use of IT)
20. Club Privacy Policy

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

- Working Together to Safeguard Children 2018
- Sexual Offences Act 2003.
- S. 67 Serious Crime Act 2015
- S. 1 Protection of Children Act 1978.
- Protection of Children Act 1978
- S.160 Criminal Justice Act 1988
- Safeguarding Adults at risk Act 2006
- The Human Rights Act 1998.
- UN Convention on the Rights of the Child (UNCRC)
- Achieving Best Evidence 2011.
- Premier League Guidance for Safer Working Practice.
- Premier League Youth Development Rules

- FA Grassroots Football Safeguarding Children 2016.
- FA Safeguarding Rules and Regulations.
- The F.A. RESPECT Campaign.
- NSPCC Child Protection in Sport Unit guidance.
- Keeping Children Safe in Education (Statutory guidance for schools and colleges) July 2016
- The Children's Act 1989 and 2004
- The Equality Act 2010
- The Female Genital Mutilation Act 2003

Table of Policy Amendments

	TABLE OF AMENDMENTS	
	New Addition Date	**Revised Date**
Added link in for 'Information Sharing: advice for practitioners' – July 2018.	24.04.19	

Policy will be reviewed on an annual basis or amended with legislation change or in response to an incident.

Incident Reporting Form (page 1 of 2) Appendix 1

Child / Adult at risk's Details			
Name		**Telephone No.**	
Address		**Parents/Guardian Details (if known)**	
		Programme(s)	
Postcode		**enrolled on /**	
D.O.B		**Team plays for**	
Gender			
Consent to refer to outside agencies (Adult at Risk)	Yes No		

Referrer's Details (or mark as above)			
Name		**Relationship to Child / Adult at risk**	
Address		**Telephone No.**	
		E-mail Address	
Postcode		**Date of referral**	
Job Title			
Department			

Details of Concern(s)	
Incident(s) Details **Please summarise the incident in as much detail as possible. Please ensure to clearly highlight the reason for concern and make reference to any specific dates, times and events.**	
Do you think that this referral relates to:	☐ High Level Poor Practice ☐ Risk of harm to Child / V. Adult ☐ Unknown
Action Taken **Please specify if you have referred the case onto a statutory agency or any other organisation.**	

Other Relevant Information	
Please include any additional information that you think may be relevant to the investigation. **Date and time reported to Head of Safeguarding or DSO?**	_____ _____ _____

Professional Network (please provide name, contact no. and e-mail for any person who you have received advice from in relation to this referral)	
LADO	
Social Services	
Police	
Other (e.g. NSPCC)	

Appendix 2

ROTHERHAM UNITED FOOTBALL CLUB

Images/Video used for marketing and promotional purposes
Parental Consent Form

PARENTS PERMISSION /GUIDANCE INFORMATION

To all Parents /Guardians

We occasionally use photographs or images of the children in our academy or from our supporter base for promotional or marketing purposes. This could be in our match day programme, the club website or on the various items of literature we produce and publish to promote different aspects of the club's activity.
As we may wish to use your child's image and in anticipation this, we are seeking your consent and permission to do so.

If you agree to this we would be grateful if you could sign below and return this form to the club as soon as possible via post, hand or scan.

If you would like further information or have and questions on this matter please contact our Head of Supporter Services John Bird on 01709 827768 or jbird@rotherhamunited.net

Name of Child……

Date ……./……/…….

As parent/guardian of the above child I give permission to Rotherham United Football Club for the following:

- Taking and/or publication of images/video of my child for the season 2018/2019.
- Images of my child taken by Rotherham United Football Club to be used on the Official Rotherham United Club Website.
- Images of my child taken by Rotherham United Football Club to be used on promotional and marketing materials for the club.
- Images of my child taken by Rotherham United Football Club to be used in the official match day programme.

Signed
(Parent/Carer) …….

Print name
(Parent/Carer) ……

Date / / Please note that Images of children under a court order cannot be used

Signed
(Child) ……

Print name
(Child) ……..
Under

(I.e. U9/U10) …….