



Grimsby Town Football Club

POLICY AND RELATED PROCEDURES FOR SAFEGUARDING CHILDREN

Version 1.1 - 22nd February 2021

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1. Information

1.1 Policy Statement(s) Covered in this Document

All statements relating to the Grimsby Town Football Club PLC, refers to the Club, the Academy and any ancillary programs run officially on behalf of the Club and will simply be referred to as Grimsby Town Football Club, GTFC or the Club” within this policy for Safeguarding Children.

1.2 Other Relevant Policies

All other policies relating to safeguarding and welfare are published on the Club’s Website: www.grimsby-townfc.co.uk

1.3 Information/Data Security Considerations and Controls

In producing this Policy and Related Procedures Document, careful consideration has been given to the following:

- Applying appropriate permissions regarding who is able to read and modify the document.
- Reviewing security and access permissions and finding that they are not applicable to the content of this document.
- Reviewing data protection requirements and finding that they are not applicable to the content of this document.
- Reviewing employment legislation and codes of practice requirements and applying the appropriate actions to ensure necessary compliance.

1.4 Adherence to Policies and Related Procedures

Failure to comply with this Policy and Related Procedures Document may result in disciplinary action being taken.

2. Policy Statements

2.1 Safeguarding Children, Young People and Adults at Risk (Vulnerable Groups)

Grimsby Town Football Club accepts it has a responsibility for the wellbeing and safety of all vulnerable groups, who are under its care or using the facilities. It is the duty of all adults working at the Club to safeguard the welfare of children by creating an environment that protects them from harm.

The wellbeing of vulnerable groups is paramount for all staff and accordingly, they will be made aware of the Football Club’s Safeguarding Children and Adults at Risk Policy as part of the induction process. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance.

2.2 Child / Young People Protection V Adults at Risk Protection

Both Children, Young People and Adults at Risk can experience the same types of harm and the causes can often be the same. The difference between child protection and adult protection is the right to make a choice.

Where a child is at risk, it is likely that Statutory Services would be involved to protect them whether or not this was in agreement with the parents/guardians.

Adults at Risk may not want Statutory Services to protect them from harm and taking action against their will can cause dilemma. Staff should consult with the Safeguarding Team to ensure the correct action is taken.

Definitions:

A child or Young Person is anyone who is under the age of 18 years, in line with the Children's Act 2004.

An Adult at Risk: within the Care Act 2014, Safeguarding duties apply to any adult aged 18 years and older who:

- ***Has needs for care and support (whether or not the Local Authority is meeting any of those needs); and***
- ***Is experiencing, or at risk or abuse or neglect; and***
- ***As a result of those care and support needs is unable to protect themselves from either the risk of, or the experience of abuse or neglect.***

2.3 Rules and Regulations

Grimsby Town Football Club is governed by the rules and regulations set out in the 1989 Children Act, Care Act 2014, FA Safeguarding policies and EFL Rules.

Grimsby Town Football Club is fully committed to ensuring that the best practice recommended by these bodies is employed throughout.

Grimsby Town Club also has a responsibility to maintain regular dialogue with the joint North East Lincolnshire Council Safeguarding Teams and the Local Safeguarding Children Board.

2.4 Aims and Key Principles

Grimsby Town Football Club is committed to sport and physical activity being inclusive and providing a safe and positive experience for everyone involved in the Club.

Whilst it is hoped that the proactive preventative work, including training, vetting and the provision of clear policies are sufficient to safeguard all Children, Young People & Adults at Grimsby Town Football Club and any of the Club's various premises, the Club also recognises that it has a responsibility to safeguard Children, Young People & Adults from abuse and harm, and to respond where abuse and harm are perceived to have occurred and to report any and all concerns via the Clubs various reporting methods.

The aim of Grimsby Town Football Clubs' Children's Safeguarding Policy is:

- To promote a safe and welcoming environment for all vulnerable groups who interact with the Football Club's activities.
- To demonstrate and promote a culture where safeguarding practice is widely understood, openly discussed and where the workforce recognises the role, they play in keeping vulnerable groups, themselves, and their colleagues safe from any harm.
- To develop a positive and pro-active welfare program to enable all vulnerable groups to participate in an enjoyable and safe environment.
- To promote high ethical standards throughout the Football Club's activities.
- Address the additional vulnerabilities of some participants and the extra barriers they may face such e.g., those in care, looked after children, those with mental health issues, disabilities, living in substitute accommodation etc.

The key principles underpinning this policy are:

- The vulnerable person's safety and welfare is paramount.
- All vulnerable groups have a right to be protected from abuse, exploitation, and poor practice regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity or sexual orientation.
- All allegations of abuse will be taken seriously and responded to efficiently and appropriately.
- To encourage parents and other members of the vulnerable persons family to be involved in a relationship with Grimsby Town Football Club.
- To ensure that coaches, parents and other adults who come in contact with vulnerable people provide good role models of behaviour and standards to follow. All individuals and organisations involved with our Club have the responsibility for the welfare of vulnerable groups and are bound by this policy, where they must act in accordance with the law in relation to such matters.

Promotion of the policy and supporting procedures:

- Where possible participants and beneficiaries (and their Parents/carers where they are children) will be made aware of this policy and supporting procedures upon commencement of any activity or event and will be advised to refer to the club website for more information or if required request a printed copy of this policy.

3. Grimsby Town Football Club – Safeguarding Vision

Grimsby Town Football Club is committed to being inclusive and providing a safe and positive experience for everyone involved in the activities at the club. The welfare and safety of vulnerable groups is paramount, and the club recognises its responsibility to protect them by embedding Safeguarding practice through proactive, preventative work, training, vetting and the provision of clear policies and guidance.

Grimsby Town Football Club is committed to Recognise, Respond, Report, Record and Review all safeguarding concerns and uses application: MyConcern for the recording, monitoring, and actioning of all safeguarding incidents reported in accordance with GDPR regulations.

4. Procedures

4.1 Overview of Documentation

Safeguarding Children Procedure

4.2 Departments Responsible

The following departments are responsible for administering this policy:

- Safeguarding Management Team: Senior Safeguarding Manager, Club Chief Executive, Club Lead Designated Safeguarding Officer (LDSO), Sports & Education Trust DSO & Academy DSO

5. Safeguarding Children

This policy applies to members of the club from both the paid and volunteer workforce including Work Experience, and all partner organisations including contractors, consultants, and Trustees. It also applies to individuals not included in this list who may be conducting related work that involves the children in our care.

All staff and volunteers must ensure that they read the safeguarding policy and procedures and understand what is required of them and their responsibilities, including how to take the correct steps to ensure the safety of all vulnerable groups and to report any concerns immediately.

Ian Fleming is the Chief Executive for Grimsby Town Football Club and is a member of the Club's Safeguarding Team. Ian Fleming's role is to support the Safeguarding Team and provide the resources necessary for the Club to operate safely and to accommodate the safeguarding needs of all Children, Young People and Vulnerable Adults, ensuring a positive outcome for all.

Philip Day Club Chairman is currently the Senior Safeguarding Manager for GTFC (SSM) and is responsible for the overall implementation of safeguarding, safeguarding team management, case / incident management, and the safer recruitment process across the Club.

Nick Dale is on a temporary basis the Lead Designated Safeguarding Officer (LDSO) for the Club, and is responsible for the implementation, update and review of all safeguarding policies and procedures, training and delivery of the Club's safeguarding vision and commitments, together with being a point of contact for all safeguarding concerns or incidents. This is a temporary position as the Club recognises the needs, responsibilities, and commitments that it has with regards safeguarding, where a commitment has been made to employ a full-time person into role of LDSO, operating across all branches of the Football Club and its Community endeavours before the start of the 2021-22 season.

Adam Smith is the Academy Operations Manager and Designated Safeguarding Officer (DSO), with responsibility for the day-to-day implementation of Safeguarding and Player Care at the Academy, this is further supported from the Club's Welfare Officer Oliver Cowling.

Nick Dale is the Match Day DSO with responsibility for responding to all safeguarding concerns reported on a Match Day, Incident Management, and the training of the Club's casual Match Day Safety Team with regards all matters relating to safeguarding.

An accountability chart for the Safeguarding Team can be found at appendix 1, the details of the team and their contact details can be found in appendix 2 and External Agencies contact details can be found at appendix 3 of this document.

Anybody with concern about a child's welfare can contact either the Senior Safeguarding Manager, LDSO or any of the DSO's for advice, guidance and / or they can make a referral to the external agencies themselves, where a child is suspected of being at immediate and direct risk of harm. All incidents and concerns are recorded of the Club's reporting software: MyConcern.

5.1 Who are we responsible for?

Below is a list of several examples across the club where we need to consider the welfare of people within our care. This list is not exhaustive:

- Players involved in the academy or associated programs.
- Under 18 players who are part of the senior squad.
- Children and adults at risk taking part in community or Club activities.
- Disabled supporters and other adults at risk visiting the Club.
- Young players on tour or living away from their families.
- Children visiting the stadium for matches, tours, or other events.
- Ball assistants, mascots, and flag bearers.
- Every child, young person or adult at risk that comes into contact with the Club and its facilities.

5.2 Safeguarding and the workforce

Safeguarding is also about ensuring that all staff, volunteers, and partners understand the role that they play in protecting vulnerable groups.

5.3 Position of Trust

Those who have responsibility for, and authority or influence over vulnerable groups are in relationships of trust in relation to the vulnerable groups in their care. A relationship of trust can be described as one in which one party has power and influence over the other by virtue of their work or the nature of the activity.

All staff in a position of trust must understand the responsibility they must exercise as a consequence of being in this position.

Those in a position of trust must not:

- Use their position to gain access to information relating to vulnerable groups for their own or others' advantage.
- Information should only be shared to meet the needs of vulnerable groups.
- Use their power to intimidate, threaten or coerce or undermine vulnerable groups.
- Use their status and standing to form or promote inappropriate relationships; professional boundaries must be always maintained.

5.4 Staff Training

The club has produced a workforce development plan for safeguarding training. All staff working in direct contact with children will be required to complete the relevant training in line with the plan. Training is delivered either directly via group training sessions or via an online safeguarding module via i2Comply.com.

5.5 Health and Safety

Where a child or young person is participating in a Club activity, a risk assessment must be undertaken that takes account of their vulnerabilities, which will include the safeguarding of children. The risk assessment should set out what arrangements are in place for their care and supervision.

5.6 Safer Working Practice

Guidance for safer working practice is issued to all employees at commencement of employment as part of their documented induction, along with the Clubs Codes of Conduct. Whenever possible staff should avoid situations where they are in one-to-one contact with any child, young person, or vulnerable adult. When physical intervention is necessary to restore safety, restraint should not continue longer than absolutely necessary and proportionate. The Code of Conduct is part of this policy and all employees and volunteers sign to confirm their understanding during their induction. See Appendix 4.

5.7 Disclosure and Barring service (DBS)

Grimsby Town Football Club is registered with the Disclosure and Barring Service (DBS) under the umbrella body of the English Football League (EFL). The DBS provides a disclosure service for organisations within the EFL, with all criminal records on any DBS reported through to the Football Association. DBS disclosures enables the Club to undertake more thorough recruitment and selection procedures, especially for positions which involve working with children, young people, or vulnerable adults at risk. The Club has a separate policy for Safer Recruitment and DBS Procedures, with Adam Smith -Academy Operations Manager responsible for the DBS process for the Academy Staffing roles and Nick Dale - Club Operations & Safety Manager responsible for all non-academy personnel and their subsequent DBS checks where required.

All staff requiring a DBS will be rechecked every 3 years, subject to any amendments or policy changes made by the Football Association, EFL or DBS during pandemic times such as COVID-19.

5.8 New Appointments

All staff who are offered a position which involves working with children, young people, or adults at risk, will be required to undertake an enhanced DBS check and supply 2 references before employment commences. All employment offers are subject to the outcome of the Club's screening processes and where applicable, this is set out in their Offer of Employment letter. Until such time as a satisfactory Disclosure Baring Service certificate and 2 references have been received, the member of staff **will not** commence employment in any role at the Club. Any DBS checks where the Football Association (FA) has requested further information from the person subject to the DBS and sight of their DBS report, will see employment commencement placed on hold, until such time as declared safe to recruit by the FA.

Further Information with regards to DBS can be found in the Clubs DBS policy and Procedure

5.9 Temporary Staff and External Consultants

Grimsby Town Football Club will ensure that all temporary staff and external consultants sign a Self-Declaration form, where they will not have unsupervised access to any vulnerable groups during their employment with the Football Club. A Service Level Agreement will be in place which outlines their Safeguarding Responsibilities' and the Clubs control measures.

5.10 Data Protection (GDR)

The Data Protection policy adopted by Grimsby Town Football Club is in line with current legislation and GDPR 2018.

5.11 Parental / Guardian Consent

- Club Activities – Grimsby Town Football Club will make every effort to obtain consent for all activities using the Club's own template for consent. Grimsby Town Football Club will do everything it can to safeguard children in its care. If we do not have consent, the child will not be able to take part in the activity.
- School Activities - It is the responsibility of the school to obtain parental consent and carry out the relevant risk assessments before an activity takes place and Grimsby Town Football Club will carry Public Liability Insurance. The above information is set out in a written agreement with the school which is signed prior to the event taking place.

5.12 Poor Practice

Poor practice occurs when staff or volunteers fail to fulfil the highest standards of care in their working practice. If allowed to continue poor practice can cause harm and become abuse. Poor practice is unacceptable and will be treated seriously by the club taking appropriate action.

Examples of poor practice:

- Allowing Hazing to go unreported.
- Allowing abusive or concerning practice to go unreported (e.g. ridiculing a player).
- Ignoring Health and Safety guidelines.
- Failing to adhere to the Clubs Code of Conduct.

6. Categories of Abuse – Children / Young People

'Child abuse and neglect' are generic terms encompassing all ill treatment of children as well as cases where the standard of care does not adequately support the child's health or development. Children may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the child.

6.1 Recognition – Signs of Abuse

Should you have any concern that abuse is occurring you should contact a Safeguarding Officer (SO) immediately.

6.2 Physical Abuse

Physical abuse may involve hitting, shaking, throwing, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. A person might do this because they enjoy or need the attention, they get through having a sick child. Physical abuse can be caused through omission or the failure to act to protect.

An example of this could be where training is inappropriate for the age group, players are expected to play with an injury or where drugs or alcohol are offered or accepted.

6.3 Sexual Abuse

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of, or consents to, what is happening. The activities may involve inappropriate touching or physical contact. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or grooming a child in preparation for abuse (including via the internet) Boys and girls can be sexually abused by males and/or females, by adults and by other children.

An example in football is sexual abuse through inappropriate touching, or sexually explicit jokes between adults and children.

6.4 Neglect

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs. Likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, shelter and clothing.
- failing to protect a child from physical harm or danger.
- Ensure adequate supervision (including the use of inadequate care givers; or
- Ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

An example of this could be if a child or young person does not have proper supervision, clothing or are allowed/encouraged to play whilst injured.

6.5 Emotional Abuse

Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve making a child feel or believe that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. In addition it includes racist or sexist behaviour and demeaning initiation ceremonies. It may include not giving the child opportunities to express their views, deliberately silencing them or "making fun" of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children, over protection and limitation of exploration and learning or preventing the child participation in normal social interaction.

It can be inflicted by other children and as well as adults and can include serious bullying or cyberbullying causing children to feel frightened or in danger.

An example of this could be, coaches or parents emotionally abuse children if they constantly criticise, abuse their power, or impose unrealistic pressure to perform.

6.6 Bullying & Hazing

Anyone can be the target of bullying, but children or perceived as different may be at greater risk; this may include children from minority groups, or children with a disability.

Bullying can include:

- Physical – hitting, kicking, theft.
- Verbal – name calling, teasing, sarcasm, racist or homophobic taunts, threats.
- Emotional – tormenting, text messaging, ridiculing, humiliating, and ignoring.
- Sexual – unwanted physical contact or sexually abusive comments.

Although bullying can take place anywhere it is more likely to take place in an unsupervised area. This would include changing rooms, or on the way to the pitch or training sessions.

6.6.1 Hazing

Is the practice of rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group. Hazing is seen in many different types of social groups, including gangs, sports teams and schools.

6.7 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 vulnerable people do not 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.

7. Signs and Indicators

Children are reluctant to tell someone when they are being abused so it is essential that every member of the workforce is aware of the possible signs, and that there may be many pieces of information that piece together and alert you that something is not right. It is not the individual's responsibility to decide if a child or young person is being abused, however it is essential that all concerns are escalated to a member of the safeguarding team.

There is no clear dividing line between one type of abuse and another. The following section is divided into four areas to help categorize what may be seen or heard. Children/may show signs or symptoms from one or all the categories. This should not be used as check list. All staff should be aware of anything unusual displayed by the child.

7.1 Physical Signs of Abuse:

- Bruise marks consistent with either straps or slaps.
- Undue fear of adults – fear of going home to parents or carers.
- Aggression towards others.
- Unexplained injuries or burns-particularly if they are recurrent and especially in non-mobile babies.
- Any injuries not consistent with the explanation given for them.
- Injuries that occur to the body in places which are not normally exposed to falls, rough games etc.
- Reluctance to change for or participate in games or swimming.
- Bruises, bites, burns, fractures etc. which do not have an accidental/satisfactory explanation.
- Cuts/scratches/substance abuse.
- Hitting (with the hand or implement) smacking, punching, kicking, slapping, twisting/pulling ear, hair or fingers, holding/squeezing with tight grip, biting, and burning.
- Fabricated illnesses.

7.2 Neglect Signs of Abuse:

- Exposure to danger/lack of supervision.
- Neglects – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care etc.
- Injuries that have not received medical attention.
- Constant hunger.
- Poor standards of hygiene.
- Untreated illnesses.
- Persistent lack of attention, warmth, or praise.

7.3 Emotional Signs of Abuse:

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy. Also, depression/aggression/extreme anxiety.
- Nervousness, frozen watchfulness.
- Obsessions or phobias.
- Sudden under achievement or lack of concentration.
- Attention seeking behaviour.
- Persistent tiredness.
- Running away/stealing/lying.
- Humiliating taunting or threatening a child whether in form of others or alone.
- Persistent lack of attention warmth or praise.
- Shouting/yelling at a child.
- Radicalization- use of inappropriate language, possession of violent extremist views, advocating violent actions and means, association with known extremists, seeking to recruit others.

7.4 Indicators of Possible Sexual Abuse:

- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour.
- Regularly engages in inappropriate sexual play.
- Sexual knowledge inappropriate for their age.
- Wariness of being approached.
- Bruises on inner thigh/buttock.
- Any allegation made by a child concerning sexual abuse.
- Sexual activity through words/play or drawing.
- Child who is sexually provocative or seductive with adults.
- Unaccounted sources of money.
- Telling you about being asked to “keep a secret” or dropping hints or clues about abuse.

Remember: Signs and symptoms often appear in a cluster, but also many of the indicators above may be caused by other factors, if in doubt report your concerns. The most important factor is a report by the child and the actions that we take in response to any reports or concerns raised.

8. Additional Safeguarding Categories of Abuse

8.1 Child Sexual Exploitation (CSE)

A type of abuse in which children in exploitative situations and relationships receive something such as gifts, money, or affection as a result of performing sexual activities or others performing sexual activities on them.

Children or young people may be tricked into believing they are in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

8.2 Female Genital Mutilation (FGM)

FGM involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act 2003 makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country. It also makes it illegal to aid, abet, counsel, or procure the carrying out of FGM abroad.

There are no health benefits to FGM, and it is likely to cause severe immediate medical effects (such as bleeding, shock, wound infections, severe pain) as well as longer term medical consequences (such as abnormal periods, damage to the reproductive system including infertility, complications in pregnancy and new-born deaths) Longer term consequences, also include psychological damage such as low libido depression and anxiety. FGM is a very complex issue and should be dealt with sensitively. Issues will likely involve several agencies working together including specialist police officers, health and social care and education.

8.3 Forced Marriage

A forced marriage is a marriage in which one or both of the parties are married without their consent or against their will. It is recognised as a form of violence against women, men or children and is a serious abuse of human rights.

A forced marriage differs from an arranged marriage where family members take the lead in choosing the partner but both parties are free to choose whether they marry the chosen partner or not.

Forced marriage is illegal in England and Wales. The Anti-Social Behaviour, Crime and Policing Act 2014 made it a criminal offence from June 2014 to force someone to marry.

In a situation where there is concern that an adult is being forced into marriage they do not or cannot consent to, there will be an overlap between action taken under the forced marriage provisions and the adult safeguarding process. In this case action will be co-ordinated with the police and other relevant organisations. The police must always be contacted in such cases as it involves a criminal offence and urgent action may need to be taken.

8.4 Honour Based Violence

Honour based violence is a violent crime or incident which may have been committed to protect or defend the honour of the family or community.

It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour-based violence might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion.
- want to get out of an arranged marriage.
- want to get out of a forced marriage.
- wear clothes or take part in activities that might not be considered traditional within a particular culture.

Women and girls are the most common victims of honour-based violence however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse.
- threats of violence.
- sexual or psychological abuse.
- forced marriage.
- being held against your will or taken somewhere you don't want to go.
- Assault.

8.5 Child Trafficking and Modern Slavery

Child trafficking is the movement of a young person for the purpose of exploitation. This includes:

- A young person being bought or sold for money.
- A young person being tricked into leaving home.
- A young person who is given away by their family because the family need money.
- A young person who is made to leave their home because of war.
- A young person who chooses to leave home, thinking they are going to a better life.

The move of the young person can be international or within the same country. There could be lots of reasons the person has moved including:

- Sexual Exploitation.
- Forced Labour
- Domestic Servitude.
- Organ Harvesting.
- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc.
- Forced marriage and illegal adoption (if other constituent elements are present).

The reasons for the move generally benefit the people who take the young person and the people who exploit or abuse them. The young person does not benefit from the move. In fact, in most cases the young person suffers because they have been forced or tricked into moving.

8.6 What are the signs of someone being trafficked?

One or two of these signs might not necessarily mean a person has been trafficked, but if you have any concerns about a vulnerable person please contact a safeguarding officer.

- Physical signs that someone has tried to hurt them (bruises/cuts).
- Does not come into school all the time.
- Has different adults around them quite a lot.
- Often seems tired or worn out.
- Does not often speak to other people or seems withdrawn.
- Seems to be afraid of people in authority (teachers/adults).
- Gets angry easily or can be violent.
- Looks like they find it difficult to concentrate or focus on something.
- Have moved to the UK a while ago, but still don't really know the language.
- Have suggested they don't live with family or have a bad time at home.
- Child exploiters and traffickers are targeting both boys and girls.

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking. These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after.

Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

It is possible to be a victim even if consent has been given to be moved. Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence.

8.7 Peer-on-Peer Abuse

Peer-on Peer abuse is any form of physical, sexual, emotional, and financial abuse, and coercive control exercised between and within children’s relationships (both intimate and non-intimate).

It can take many various forms including serious bullying (including cyber bullying), physical abuse, teenage relationship abuse, domestic violence, sexting, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or gender-based violence.

8.8 Non-Recent Historic Abuse

Non recent historic abuse is the term used to refer to disclosures of abuse that were perpetrated in the past.

It can also be about a disclosure of neglect physical sexual or emotional abuse from someone who is now 18 years or over, relating to an incident that took place when the alleged victim was under 18 years old.

Allegations of abuse can be received by anyone and can be made against relatives, friends, carers, people in the public eye or in a position of trust, or any other person who currently has or previously had contact with vulnerable groups.

All concerns or disclosure relating to no recent historic abuse must be reported and referred to the Football Association via the team that deals with such incidents.

9. Reporting Concerns

It is not the responsibility of Staff, or Volunteers to decide if abuse has taken place, it is their responsibility to take appropriate steps to ensure that all suspicions and allegations of abuse and poor practice are taken seriously and reported immediately and appropriately together with recording the matter within MyConcern (see Recording allegations or suspicions below).

If a member of the Club’s workforce has a concern about a child or young person, it is their “duty to refer” these to a Designated Safeguarding Officer (DSO) who will in turn report it to the Senior Safeguarding Manager or the Local Authority’s Families First Team or Designated Officer (DO) where immediate harm or threat or harm is suspected and potentially Humberside Police.

With regards to adults at risk, there is no requirement to gain consent to refer it to the Senior Safeguarding Manager, however consent must be obtained to refer it to an outside agency. The member of staff should record whether consent was given or not however any situations of doubt for referral to external bodies such as the Local Authority or Humberside Police can be discussed with the EFL for guidance and further advice, especially where there is risk of significant harm.

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.

9.1 Recognise

It is important to recognise possible abuse or poor practice and act when it is first suspected and not wait. Do not ignore any concerns. All concerns must be reported to the safeguarding team who can find out more information.

9.2 Respond

When abuse or harm is disclosed or suspected it is important to report the basic facts to the safeguarding team or statutory agencies to take action, you may receive a direct disclosure or it may be a suspicion. It is important to ask open questions:

- Tell me.....
- Explain to me.....
- Describe to me.....

Make sure you **LISTEN** to the person making the disclosure and reassure them that they are doing the right thing.

9.3 Refer

Once you have the initial facts it is important to refer it immediately to the Safeguarding Officer or Head of Safeguarding. If referring to the Safeguarding Officer, they must immediately refer all incidents or concerns to the Head of Safeguarding and record the incident details on MyConcern.

The Head of Safeguarding may refer the case to the EFL, or The Football Association, or North East Lincolnshire Council's Children's Services Families First Team (or Designated Officer formerly known as LADO), or Humberside Police before setting up an internal inquiry having taken on advice from the EFL and or external authorities.

9.4 Recording allegations or suspicions

The Club will keep a record of all incidents and concerns reported to its Safeguarding team within its electronic recording system MyConcern. The person reporting the concern will be asked to provide written details for our records on an internal referral form, which must be entered onto MyConcern within 24 hours, it is important to capture all the information as above i.e., who, what, where etc. Where possible always record the vulnerable persons wishes. All reports will be taken seriously, carefully recorded and acted upon.

Any details taken from a child should be reported in their own words. These reports should be confined to facts and should not include any opinion, interpretation, or judgment.

A flow chart showing the course of action can be found at appendix 5.

9.5 Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all staff at Grimsby Town Football Club is that no guarantee of confidentiality can be given to a child or adult at risk. All staff have a professional responsibility to share information with other agencies to safeguard a child, young person, or vulnerable adult.

There are actions which staff are obliged to take once we are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. Any report, incident or interview must be strictly confidential on a need-to-know basis, where staff should not have any reservations about referring any safeguarding issue to a Clubs Safeguarding Officer. The key issue is that the welfare of the child, young person or vulnerable adult is protected.

10. Allegations Against a Person in a Position of Trust

Any situation in which an allegation or concern arises about the conduct of a member of Club staff, Contractor or volunteer will be referred to the EFL Safeguarding Team and North East Lincolnshire Council's Safeguarding Children's Board, where the Club will be guided by their policies and procedures for dealing with allegations against a person who works with children.

Allegations and concerns will be referred to the Local Authority Family First Team or Designated Officer (DO), EFL and potentially Humberside Police within 24 hours the allegation being made.

In the first instance the process is to make contact with the Emergency Duty Team, EFL Safeguarding Duty Manager and the Duty Local Authority DO who will advise as the next stage of referral if required, including any notification and reporting to Humberside Police.

11. Managing Low Level Concerns

It has been recognised by the Club that there is a need to manage issues that fall under the umbrella of safeguarding, including those which are considered to be of a minor nature. These matters are classified as 'Low Level Concerns'. Handling such concerns appropriately and proportionately will strengthen confidence of staff and volunteers in the Club.

Where Low Level concerns are shared with a designated safeguarding member of staff in accordance with the Clubs safeguarding policy, where they must be recorded as per the normal process for managing Safeguarding issues on MyConcern.

What is a Low-Level Concern?

A low-level concern for this purpose is any concern, no matter how small and even if no more than a 'nagging doubt', that a person may have acted in a manner inconsistent with the Club's Safeguarding Code of Conduct or simply – even if not linked to a particular act or omission – a sense of unease as to their behaviour. By reporting such concerns, it helps us to build a picture and potentially identify and resolve issues before any child, young person or vulnerable adult is subject to abuse or harm.

Low Level Concerns where no emergency actions are required, should be managed internally, and recorded within the MyConcern electronic Safeguarding management system and entitled 'Low Level Concern' in the '**Concern Summary**' section.

Low Level Concerns do not in any way override or replace the Clubs 'Whistle Blowing Policy' but compliment and work alongside that process.

Two Examples of Low-level Concerns:

Physical - Staff error causing no/little harm, e.g. skin friction mark due to ill-fitting bib during football/PE session

Psychological – This could be an isolated incident where an adult, adult at risk or child is spoken to in a rude or inappropriate way – respect is undermined but little or no distress caused.

This list is not limited to the above but is extensive and any uncertainty should be discussed with the Head of Safeguarding or Club Safeguarding Officers.

Contact Details for the NELC Families First Team & NELC DO

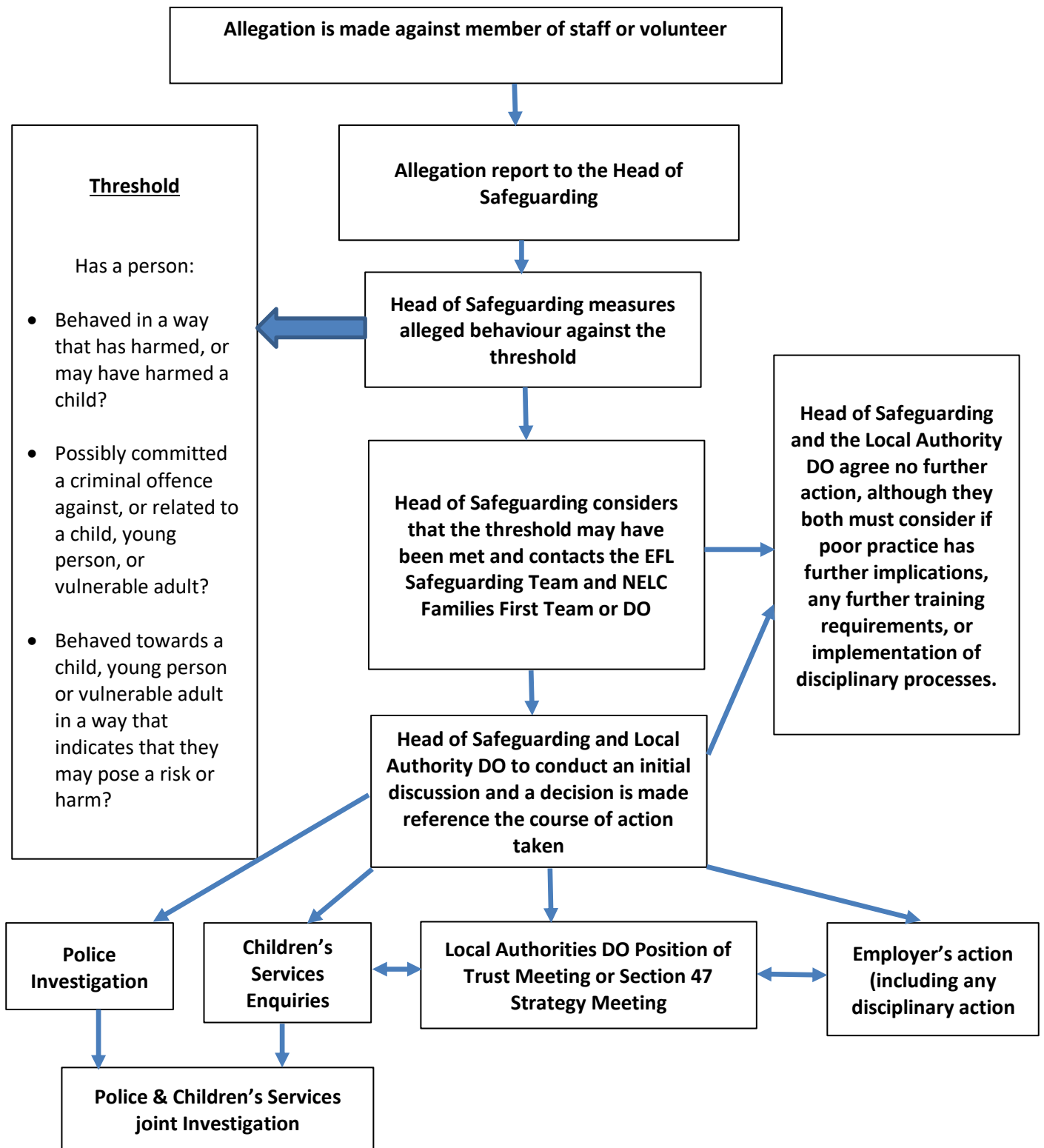
Families First Team: 01472 326292 Option 2

(This line diverts to the out of hours team outside of the teams normal working hours)

Designated Officer Charlotte Allenby: 01472 - 326118 Email: CSRS@nelincs.gov.uk

The DO or Families First Team will advise the Club on the action to take in certain situations, where a concern or allegation has been received relating to staff, the employee will be removed from working with vulnerable groups until the investigation has been concluded.

In all circumstances the allegation details will be reported to the Football Association and the English Football league (EFL).



NELC DO tracks progress in conjunction with the Clubs Head of Safeguarding, where they will monitor and record outcomes, and advise the Club about duty to report to Disclosure and Barring Service (DBS) when appropriate.

12. Supervision of Children and Young People

Grimsby Town Football Club follows EFL Regulations (and Youth Development Rule 119), in respect of the supervision of children. This Rule clearly stipulates the ratio of staff to children be no less than 1:10 (save that the ratio for Category 1 Academies using the Full Time Training Model which shall be 1:8).

However, NSPCC guidance recommended adult to child ratios. These are based on Ofsted guidelines. **Remember that regardless of the overall ratio, a minimum of two supervisors must be present at all times.**

It is to be noted that a dynamic risk assessment may well indicate the need for an enhanced level of supervision and staffing for a particular activity.

The following table shows NSPCC recommendations:

Child / Young person's age	Number of adults	Number of children
0 – 2	1	3
2 – 3	1	4
4 – 8	1	6
9 – 12	1	8
13 – 18	1	10

Grimsby Town Football Club will endeavour to follow NSPCC guidance regarding staff to child ratios whenever possible but in **all circumstances** will always adhere to EFL Rules.

If the group is mixed gender, the supervising staff should also include both male and female staff wherever possible.

Where **Lone Working** is an integral part of a role e.g., Academy Teacher or Driver then additional Risk Assessment Strategies will be put in place e.g.:

- Remain visible and/or teach in a communal area.
- Ensure a colleague is made aware of when and where you are and why.
- Prop a door open (so long as this does not constitute a fire safety hazard).
- When transporting a lone child, they should be seated in the rear of the vehicle.

Staff must never work alone if they are concerned about risks to themselves or others in the situation of:

- Being a risk for abuse
- Being accused of perpetrating abuse

A full policy for the Supervision of Children and Young People is available on request from the Club.

12.1 Late Collection / Non-Collection of Children or Young People

There are several reasons why a child, young person or vulnerable adult may remain uncollected at the end of the day. Some of the possible causes may be a delayed parent, traffic, or confusion about finishing times.

Staff must respond sensitively and consistently to ensure the safety and welfare of such children, young people, and adults at risk.

Staff should ensure that full contact & emergency information is collected for each young person in advance of the session starting.

For those people that attend weekly sessions contact and emergency information will be updated annually.

The Club sure families are aware of this procedure and understand the process that will be followed if children, young people or adults at risk are not collected on time.

If a child, young person, or adult at risk is not collected within 15 minutes after the end of the session, the following steps should be taken:

- Any child, young person or adult at risk should be taken to the main reception/entrance at the Club, Academy office or other venue if off site. Their name(s) should be recorded, and a member of staff assigned to lead on the late collection.
- A check should be made for information about changes to collection routines, this should be with the event lead, coach, leader, or other Club person helping with the session.
- Reasonable attempts should be made to contact:
 - Parents / carers
 - Any other adults authorised to collect the child, young person, or vulnerable adult.
 - Transport providers where necessary as a last resort and subject to strict guidelines.
- The child, young person, or adult at risk should only leave the premises with the person(s) named on their registration documents or a person authorised by a parent / carer, where this authorisation has been provided in writing to the Club.
- If no-one can be contacted to collect the child one hour after the event has finished, North East Lincolnshire Council's Families First Team and / or the Police will be contacted:
 - Families First Team: **01472 326292**
 - Police: 101
- The child, young person or adult at risk should stay at the setting in the care of two DBS checked staff members until safely collected by the mother, father, a nominated carer, social worker or police officer.
- Under no circumstances should staff attempt to look for the parents / carers.
- Staff should never take the child, young person, or adult at risk home with them or take them to their home on their own. Strict control measures are in place for the taking children, young people or vulnerable adults home in Club vehicles that must always be followed.
- A full written report of the incident and outcome must be recorded on the safeguarding incident form and passed to the Designated Safeguarding Officer and recorded on Club app MyConcern.

12.2 Ball Assistants

The Club will endeavour to ensure the safety and protection of all Ball assistants whilst they are at the club.

- Ball assistants are aged between 12 and 18 and will be subject to the Code of Conduct issued by the club which must be signed by the child and their parent/guardian unless they are from our Academy system where consent has already been granted.
- No ball assistant will be able to attend (Excluding the Academy players) without the completion of written consent forms from parents/guardians, completion of medical information and emergency contact information.
- Ball assistants will be supervised by 2 members of staff who have a DBS certificate and have undertaken the appropriate Safeguarding training.
- Ball assistants will be signed in an out of the stadium by a member of staff who will be responsible for them.
- The Ball assistants attend a briefing at the beginning of each match which outlines Health and Safety for the match and Safeguarding protocols, this is delivered by the Clubs Co-ordinator for Ball Assistants.

12.3 Flag Bearers

As with Ball Assistants the Club will endeavour to ensure the safety and protection of all Flag Bearers whilst they are at the Club.

The Club accepts Flag Bearers of any age, in groups of up to 12 persons, from schools, businesses and sports clubs. All groups are always accompanied by their own "Group Leader" who has overall responsibility for their Group and the Clubs Supporters Liaison Officer and their team. All individuals and groups are supported and managed by the Clubs Supporter Liaison Officer and their team, who are all DBS checked at an enhanced level.

Group leaders and parents/carers are given the Flag Bearers policy prior to attendance which includes an outline of the Match Day Experience including Health and Safety and Safeguarding.

12.4 Mascots

Grimsby Town Football 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 Children Policy and Safer Recruitment Policy and process.

- Child mascots must be aged minimum 4 years old with an upper limit of 14 years old.
- All staff escorting match day child mascots will be subject of an enhanced DBS check and must have completed the Safeguarding Induction training.
- Child mascots must be always accompanied by a parent/carer, other than when in secure areas e.g., the tunnel, when the mascot will be supervised by Club staff.
- If a mascot requires help with dressing this will be done by the parent/carer and not by Club staff.
- 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.
- Every effort should be made to always achieve the correct staffing ratios and the best level of supervision of match day mascots.
- Staff should avoid any situations where they may be left alone with a mascot e.g., do not go into a room where they are left alone with just the 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
- Should a mascot be subject to a Court Order, or a Child in Care, special reference must be made to the Image Permission form, where images must not be used unless permission has been granted by the authorities.

13. Safeguarding within Partnerships Policy

The Club recognises its responsibility to safeguard the welfare of all Children, Young People and Adults at Risk participating in Club activities and when participating in activities arranged in partnership with an external service provider.

The Club is committed to working within partnerships to provide a safe environment for all Children, Young People and Adults at Risk by utilising the local Safeguarding Policies and Procedures to protect vulnerable groups from physical, sexual or emotional harm, neglect, bullying or exploitation.

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

Partnership agreements will include the following:

- All partners will be made fully aware of their areas of safeguarding responsibilities.
- In the event of a safeguarding concern arising, local safeguarding policies and procedures will be followed.
- 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.
- Health & Safety, Codes of Conduct etc.
- Who has responsibility for completion of consent forms (e.g., medical and image consent), registration, record keeping and risk assessments?
- Details of First Aid arrangements.
- Clear guidance on the reporting of Safeguarding concerns or concerns regarding Poor Practice during and outside of normal office hours.
- Name and contact details of staff to whom Safeguarding concerns, or concerns regarding poor practice, should be reported.
- Information for participants and their parents/carers that provides details of how to report a Safeguarding concern.
- What evaluation procedures are in place to gain the vulnerable groups' views about the activity.
- The period by which the safeguarding arrangements in the agreement will be reviewed.

14. Use of Images

The Club welcomes photographs and images that celebrate the sport, the values and objectives of the Club.

Grimsby Town Football Club takes its guidance on the use of images from guidelines issued by the FA and EFL. All photographs are taken by persons who have been briefed by the Activity Manager responsible for the activity being photographed.

- Before taking photographs of children please refer to the Grimsby Town Football Club policy located on the Club website.
- Parents/carers are responsible for informing the person running the activity of any change of circumstances which may affect consent.
- Parents and carers will be informed of how the image will be used. The person running the activity will not allow an image to be used for something other than that for which it was initially agreed.
- All children and featured in publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific child / young person.
- Where appropriate, images represent the broad range of youngsters participating safely in football.
- Designated photographers will undertake a DBS check, attend a Safeguarding Children workshop and will be personally responsible for keeping up to date with the latest guidelines on the Photography and Filming policy. Identification will be always worn by the Clubs designated photographers.
- Children who are under a court order or a Child in Care of the Local Authority will not have their images published in any document.
- No images of children and young persons featured in publications will be accompanied by personal details such as their school or home address.
- Any instances of inappropriate images in football should be reported to the Head of Safeguarding and the police without delay.

15. Guidance for Accommodating U18 's within the First Team Environment or whilst on Work Experience

If an Academy Player or young Professional under the age of 18 joins another club on trial, work experience or a Football League Youth Loan the Academy will seek written parental consent (additional to the standard consent sought at the start of every season) prior to the activity taking place. Consideration will also be given to the player's education programme, travel, and accommodation arrangements. If the new club is not located within a reasonable travelling distance from the player's current address the Club will insist that, where possible, players are placed in host family accommodation recruited by the receiving Club in line with the relevant English Football League (EFL) guidelines during their time away from the Club. The Club considers the use of hotel accommodation as inappropriate and must not be used, especially as it's a legal requirement for hotel guests under the age of 18 to have a parent or guardian with them at all times. The Club has standard good practice where a designated member of Academy Staff is assigned to check on the players on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience. The receiving Club must also take on formal visits for any Club player under the age of 18 that is living with host families and report by to the Club on a weekly basis.

For players under the age of 18 who are joining the Club on trial (including Work Experience) parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer. Where accommodation with a host family is required during the trial period, a matching form will be completed by the player to ensure they are placed with the appropriate host family. If the player's parent/guardian is also travelling with the player then a local hotel may be used as an alternative means of accommodation. Appropriate transportation will be arranged during the trial period.

As players progress through the academy system, they may have the opportunity to train and play with the adult provisions of the Club. Obviously, this carries several safeguarding concerns as they will be entering an adult provision and be susceptible to adult behaviours and language. The Club will support the player(s) during this transition, where parents / guardians will be included with consent sought. Separate procedures are available to support this progression. A fully policy is available on request.

16. Key Legislation, Regulations, Rules and Guidelines

Working Together to Safeguard Children 2018

Keeping Children Safe in Education

Children Act 2004 & 1989

Affiliated Football Safeguarding Policies and Procedures

Sexual Offences Act 2003

Please refer to the Grimsby Town Football Club website and the FA website for further information:

https://www.grimsby-townfc.co.uk/club/club_policies/

<http://www.thefa.com/football-rules-governance/safeguarding/introduction-to-safeguarding-children/>

17. Safeguarding Code of Conduct

All staff and employees are expected to uphold the Clubs values and expectations of behaviour as detailed in the Safeguarding Codes of Conduct.

A Breach of the Safeguarding Code of Conduct may result in disciplinary action, possibly leading up to dismissal. Serious breaches may result in a referral to the DBS (Disclosure and Barring Service).

Cases of poor practice will be reported to the relevant Football authorities.

18. Club Safeguarding Policy Amendment – COVID-19

This amendment should be read in conjunction with the Club Safeguarding Policy, Safeguarding Code of Conduct, Players Code of Conduct and the Clubs various COVID-19 policies and risk assessments.

CLUB STATEMENT:

The way in which Grimsby Town Football Club is currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, several of our important safeguarding principles remain the same:

- With regards to safeguarding, the best interests of children and adults at risk will always continue to come first.
- If anyone has a safeguarding concern about any child, young person or adult at risk connected to the Club, they should continue to report and report concerns / incidents immediately.
- A Designated Safeguarding Officer or Deputy will always be available to assist and help.
- Unsuitable people are not allowed to enter the Clubs workforce and / or gain access to children, with DBS checks still in place as part of the Clubs Safer Recruiting procedures.
- Children, young people and adults at risk continue to be protected when they are online.

19. Safeguarding Contacts in Football

Whilst any safeguarding concern should be raised with the Club Safeguarding contacts in the first instance, we recognise that this may not always be possible or appropriate. Below are the contact details for footballing partners with whom safeguarding concerns in relation to the Club can be discussed:

The English Football League Safeguarding Team
Tel: 01772 325940
Email: safeguarding@efl.com

North East Lincolnshire Council, Families First Team
Tel: 01472 326292
Designated Officer: Charlotte Allenby
Tel: 01472 326118
Email: CSRS@nelincs.gov.uk

If the concern regards a person employed in footballs conduct towards a child:

The FA Safeguarding Team
Tel: 0800 169 1863
Email: Safeguarding@TheFA.com

19.1 Procedures and Safety Measures for Online Learning

The Club expects all staff and players to adhere to the relevant policies in place, where professional boundaries must be maintained at all times. We have put extra measures in place to reduce the risks in relation to online learning. These are fully detailed within the Club Electronic Communication Guidance Policy and the Academy Electronic Communication Guidance Policy.

19.2 Mental Health

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of us all. Players who are struggling under the current circumstances should contact the Club safeguarding staff as outlined above. Support can also be accessed through a number of national organisations including:

The Samaritans
Tel: 116 123 (call are free of charge)
Website: <https://www.samaritans.org/>
Email: jo@samaritans.org

Child Line
Tel: 0800 1111
Website: <https://www.childline.org.uk/>

NSPCC
Tel: 0808 800 5000
Website: <https://www.nspcc.org.uk/>

19.3 Online Safety

It is important that internet safety and security messages are re-enforced during this time when we are expecting young people to be online more often. They may also be increasing their usage on devices during their own free time during this lockdown period. It is important that both players and parents are aware of the help and support available should they be concerned about something they have seen or experienced online.

These include:

UK Safer Internet Centre	https://reportharmfulcontent.com/
CEOP	https://www.ceop.police.uk/safety-centre/
Internet Matters	https://www.internetmatters.org/
NetAware	https://www.net-aware.org.uk/
ParentInfo	https://parentinfo.org/
ThinkuKnow	https://www.thinkuknow.co.uk/

20. Other Related Polices, Procedures and Guidance

Adults at Risk Safeguarding Policy
Changing Room & Shower Guidance
Complaints Procedure
DBS Policy and Procedure Disciplinary Procedures
Employment of U18's Equality and Diversity
Guidance for Safer Working Practice
Health & Safety Policy
Match Day procedures for Vulnerable Groups
Photography and Filming Policy
Preventing Radicalisation and Extremism
Safer Recruitment Policy
Social Media Policy
Work Experience Accommodation
Supervision of Children and Young People Policy
Transport Policy
Trips and Events for Vulnerable Groups
Whistleblowing

21. Appendices

1. Safeguarding Team Accountability Chart
2. Safeguarding Team Internal
3. Safeguarding External Contacts
4. Staff and Volunteers Code of Conduct
5. Reporting Flow Chart

22. Document Control

22.1 Approval, Review Procedure and Dissemination to all Departments and Staff

The Chief Executive and Chairman of the Club are both responsible for reviewing annually this policy, including any updates and must issue approval for publication before this policy is released to staff.

It is the responsibility of the Lead Designated Safeguarding Officer to update this policy with regards any legislation changes or changes to Club policies and to make sure that it is reviewed and updated as a minimal standard annually.

The Clubs Designated Safeguarding Officers are responsible for ensuring all branches of the Football Club has received, read and understood this policy and to provide guidance and assistance where required for all safeguarding issues / incidents.

The Academy Manager is responsible for reviewing this document, ensuring that the Academy meets the defined Safeguarding standards and that all staff have read this policy and received Safeguarding training.

Department Heads or Managers are responsible for the reading of this document, implementing the required adherence to safeguarding standards and for ensuring that all team members have read and understood the policy. Department Heads or Managers also have within their responsibilities a duty to ensure that training has been provided for all new starters, with refresher training for all staff every 2 years.

22.2 Author, Reviewed and Approved for Publication

Document Author:	Reviewed by:	Date Approved: (or re-approved on changes)
Nick Dale Operations & Safety Manager & Lead Designated Safeguarding Officer	Philp Day Club Chairman & Senior Safeguarding Manager (SSM)	22 nd February 2021
	Ian Fleming Chief Executive & Executive Management Team Lead	22 nd February 2021

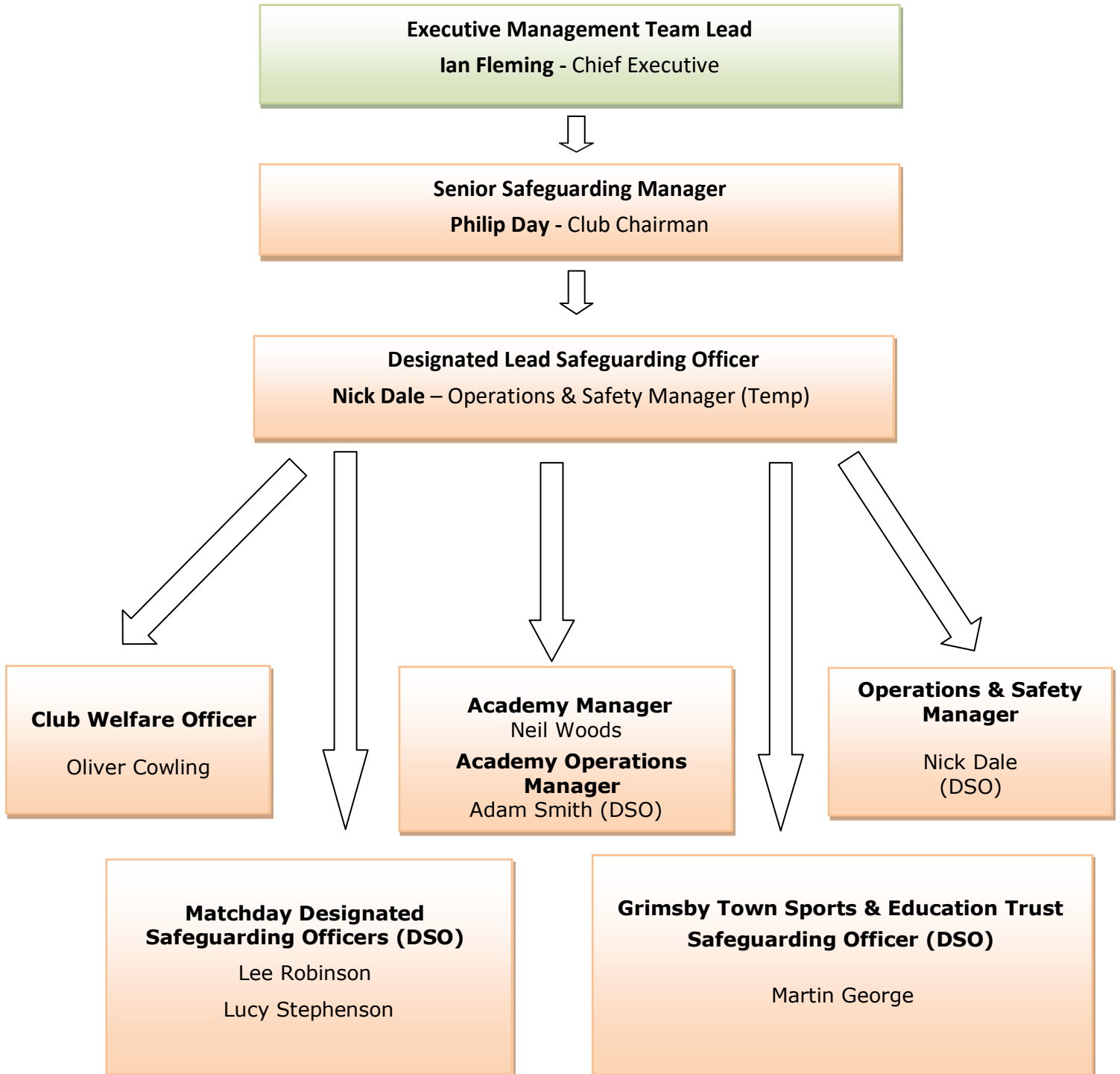
22.3 Document Issuer, Read by and Date Read

Document Issuer:	Read by:	Date Read:
<p>Nick Dale Operations & Safety Manager & Lead Designated Safeguarding Officer (LDSO)</p>	<p>Adam Smith Academy Operations Manager (DSO)</p>	24 th February 2021
	<p>Lucy Stephenson Event Safety Manager (DSO)</p>	24 th February 2021
	<p>Lee Robinson Deputy Safety Officer (DSO)</p>	24 th February 2021
	<p>Neil Woods Academy Manager</p>	24 th February 2021
	<p>Steve Wraith Accounts Manager</p>	24 th February 2021
	<p>David Smith Commercial Manager</p>	24 th February 2021
	<p>Rae Walker Shop Manager</p>	24 th February 2021
	<p>Lisa Piggott Ticket Office & McMenemy's Manager</p>	24 th February 2021
	<p>Paul Hurst First Team Manager</p>	24 th February 2021
	<p>Dale Ladson Media Manager</p>	24 th February 2021

22.4 Document History

Version	Date	Comment	Author
1.0	19 th February 2021	Draft	Nick Dale
1.1	22 nd February 2021	Final Version	Nick Dale

Appendix 1 Safeguarding Accountability Chart



Appendix 2 Internal contacts

Club Chairman & Senior Safeguarding Manager (SSM)

Email: philip.day7@icloud.com

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Neil Woods

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Adam Smith

Academy Operations Manager & Designated Safeguarding Officer (DSO)

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Lee Robinson

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Appendix 3 External Contacts

Alex Richards
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North East Lincolnshire Council – Safer and Stronger Communities
Email: Safer.Communities@nelincs.gov.uk
Tel: 01472 324981

Charlotte Allenby
North East Lincolnshire Council – Safeguarding Designated Officer (DO)
Email: CSRS@nelincs.gov.uk
Tel: 01472 326118

North East Lincolnshire Council, Families First Team
Tel: 01472 326292

Humberside Police
Tel: 101 non-emergency
Tel: 999 Emergency

North East Lincolnshire Council Adult Social Care – Single Point of Contact
Tel: 01472 256256

NSPCC Helpline
Tel: 0808 800 5000
Text phone for Deaf Users: 0800 056 0566
Text: 88858
Email: help@nspcc.org.uk
Online: [help@nspcc.org.uk/reportconcern](https://www.nspcc.org.uk/reportconcern)

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

Appendix 4



Grimsby Town Football Club

SAFEGUARDING CODE OF CONDUCT

Staff & Volunteers

Version 1.5 – 19th February 2021

Overview:

Everyone plays a role in safeguarding the welfare and development of children, and the protection of other vulnerable people. As an individual responsible for children or other vulnerable people taking part in a Grimsby Town Football Club activity you have a duty to:

1. Ensure the safety and welfare of vulnerable groups is a priority and taken into consideration when planning any activity or session,
2. Respond quickly and appropriately to any concerns about a child, young person, or vulnerable adult,
3. Report safeguarding concerns or allegations to your Line Manager, Designated Safeguarding Officer, Lead Designated Safeguarding Officer, or the Senior Safeguarding Manager.
4. Ensure high standards of propriety and behaviour at all times and always maintain professional boundaries.
5. Ensure that staffing ratios are adhered to, taking into account additional vulnerabilities, age, and disability.
6. Challenge unacceptable behaviour including rough play, bullying and report any issues, complaints, or concerns.
7. Carry out and check risk assessments as appropriate, ensuring you are familiar with the emergency action and first aid procedures.
8. Ensure the correct permission has been received for the taking of images and video recording of vulnerable groups, and only use authorised equipment.
9. Listen to, encourage & praise vulnerable groups and involve them in decision making, take their ideas seriously and give constructive feedback.
10. Treat children, young people, and other vulnerable groups with respect, regardless of their gender, ethnic or social background, language, religious or other beliefs, disability, sexual orientation, or other status and encourage them to treat others the same way. Always consider the age, maturity, understanding and emotional condition of participants when working with them.

Staff and volunteers should follow guidance for safe working practices, maintaining clear boundaries between professional and personal life. Staff should protect themselves from compromising situations such as:

1. Do not give lifts to children, young people, or vulnerable adults except when organised by the Club and in line with Club policies.
2. Do not have inappropriate physical, verbal, or written contact with vulnerable people or take part in rough or physical or sexually provocative games, including horseplay.
3. Do not have personal direct electronic communication with any child, young person, or vulnerable person (e.g., email, text, Facebook) All Contact should be professional and in line with club policy.
4. WhatsApp and its use are strictly prohibited for use with any person aged under 18 and for use with vulnerable adults.
5. Do not engage in sexual activity, betting, gambling, or related activities or have discussions about these activities in front of and child, young person, or vulnerable adult except in a clear educational context where it's your documented responsibility to deliver such training.
6. Do not allow inappropriate or bad language, always challenge unacceptable behaviour.
7. Do not reduce a child, young person, or vulnerable adult to tears as form of control of bullying.
8. Do not allow allegations made by a child, young person, or vulnerable adult to go unchallenged, unrecorded, or not acted upon, report all concerns to your Line Manager, Designated Safeguarding Officer or Club Chief Executive.
9. Do not do things of a personal nature for a child, young person or vulnerable adult that they can do for themselves.
10. Wherever possible, ensure that more than one member of the workforce is present when working in the proximity of children, young people, or vulnerable adults. It is inappropriate to spend excessive time alone with any vulnerable person you supervise, or care for, or to take them to your home.
11. Do not accept bullying, rule violation or the use of prohibited substances, including alcohol.
12. Do not be under the influence of alcohol or non-prescribed drugs whilst performing any function for the Club.
13. You are strictly prohibited from smoking whilst on duty and can only smoke during authorised breaks, where you must be off the Club property. You must not smoke during any break in front of children, young people, or vulnerable adults.
14. Do not take, or use unauthorised images, or video footage of any child, young person, or vulnerable adult. This includes uploading images or video footage to social media sites such as Facebook, LinkedIn, twitter etc. Written consent for the taking of images and their subsequent use must be sort from a parent or guardian.
15. Do not use personal devices to take photos or videos of vulnerable people.
16. Ensure you maintain healthy, positive, and professional relationships with all children, young people, and vulnerable adults. Staff in positions of authority and trust in relation to aged 16 and 17 years or adults at risk must not engage in sexual relationships.

A Breach of the Safeguarding Code of Conduct may result in disciplinary action, possibly leading up to dismissal. Serious breaches may result in a referral to the DBS (Disclosure and Barring Service), Humberside Police and North East Lincolnshire Council (Local Authority).

Cases of poor practice will be reported to the relevant Football authorities including the EFL's Safeguarding Team.

Discriminatory, Offensive and Violent behaviour are unacceptable, and complaints will be acted upon and are dismissible offences.

* The term “child”, “children”, or “young Person” applies to anyone under 18 years of age. Vulnerable adults refer to any person aged over 18, who is, or may be in need of community care services by reason of mental, or other disability, age, or illness; and who is or may be unable to take care of themselves against significant harm or exploitation, discrimination: prejudice, unacceptable oppressive or offensive behaviour or language in relation to age, culture, disability, ethnicity, gender, sexual orientation, marital status, race, religion, or belief, transgender status. *

Signature of Staff member or Volunteer:	
Print Name of Staff member or Volunteer:	
Club Role / Post:	
Date:	

Appendix 5

Reporting Flow Chart

