



Grimsby Town Football Club, Academy and Foundation

Safeguarding Children Policy

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Safeguarding Policy Statement:

Grimsby Town Football Club (GTFC) and Grimsby Town Foundation (GTF) strive to ensure that everyone in our care or attending our activities feels safe and free from risk of harm. GTFC and GTF take its safeguarding responsibilities very seriously and we are committed to creating a safe and positive environment for everyone.

We believe that everyone at the Club shares the responsibility for safeguarding children and adults at risk, so our policy and practices are applicable to everyone involved. The staff and partners working with the Club will work tirelessly to embed the culture of safeguarding across every aspect of the Club and its activities. We are committed to having the right people involved through a robust recruitment process that includes checks, training, and monitoring.

GTFC and GTF comply with government legislation relating to safeguarding children and other adults at risk. We also adhere to our regulatory requirements set by the Football Association, EFL and North East Lincolnshire Council Safeguarding Partnership guidelines.

We will develop and implement effective policy, appropriate procedures and good practice to protect all children and adults at risk who attend the Club's activities. Our safeguarding policy is a comprehensive resource that provides information on how good practice is embedded and promoted across Club activities.

Introduction

“All organisations have a duty to promote and safeguard the welfare of children and to protect them from actual or likely harm”.

The Board of GTFC and GTF acknowledges and accepts it has a statutory obligation and responsibility for the wellbeing and safety of all children and young people who are under the Club's care or utilising the Club's facilities. Everyone working at GTFC, GTF and its Academy has a “Duty of Care” to safeguard the welfare of children and young people by creating an environment that protects them from harm. The wellbeing of children is paramount, and all staff must make themselves aware of the Club's Safeguarding Children Policy.

Definitions

A “Child” (collectively referred to as “Children”) is defined as anyone under the age of 18 years of age.

An “Activity” means any activity or series of activities arranged for a Child or Children by or in the name of GTFC and GTF. These are deemed to be regulated and therefore activate the required levels of Data Barring and Criminal Record Checks that are associated.

Legal Framework

This policy has been drawn up based on law and guidance that seeks to protect children and young people namely.

- Children Act 1989
- United Nations Convention of the Rights of the Child 1991
- General Data Protection Regulations 2018
- Children Act 2004
- Childcare Act 2006
- Safeguarding Vulnerable Groups Act 2006
- Equality Act 2010
- Protection of Freedoms Act 2012 (Including DBS checks and information)
- Guidance on Child Sexual Exploitation (CSE) - CEOP (2012)
- Working Together 2018
- Keeping Children Safe in Education 2023
- The Counterterrorism and Security Act 2015
- Modern Slavery Act 2015
- English Football League Safeguarding Standards 2023

Rules and Regulations

In the management of its programmes, the discharge of its functions, and in implementing this policy and procedure, GTFC and GTF will remain mindful of its' duty of care and other legal obligations such as those set out in the Health and Safety at Work Act 1974, GDPR Act 2018, Equality Act 2010 and Protection of Freedoms Act 2012.

In the case of children, GTFC and GTF is also mindful of its responsibilities under the following legislation and guidance; Children Act, (1989 and 2004) Working Together to Safeguard Children 2018, Keeping Children Safe in Education 2022, FA Safeguarding Children Rules, Premier League and English Football League Rules and guidance.

GTFC and GTF are fully committed to ensuring that the best practice recommended by these bodies is employed throughout the Club.

The Club recognises the definition and follows the guidance relating to "Position of Trust as defined in the Sexual Offences Act 2003. This includes adults working with 16- or 17-year-olds in regulated activities, where a sexual relationship is a criminal offence.

GTFC and GTF also recognises its responsibility to work with other agencies, including Local Safeguarding Children Partnership to protect vulnerable young people from harm and to respond to safeguarding concerns.

Review

This policy will be reviewed annually or if there is a statutory legislative or organisational change, or following a safeguarding incident, concern, or allegation whereby the policy is found to need revision to ensure the aims and key principles are met. All policy documents and reviews will be submitted to the Board for approval.

Aims and Key Principles

The aims of the GTFC and GTF Safeguarding Children and Young Persons Policy are:

- To safeguard all children and young people who interact with GTFC and GTF through its Football and Development Programme and its Academy

- To demonstrate best practice in safeguarding children
- To positively reflect and promote GTFC and GTF values regarding safeguarding children
- To develop a positive and pro-active welfare programme to enable all children and young people to participate in an enjoyable and safe environment
- To encourage parents and other members of the child or young person's family to be involved in a relationship with GTFC and GTF
- To ensure that coaches, parents, and other adults who meet children and young people provide good role models of behaviour
- To promote high ethical standards throughout GTFC, GTF and its Academy programme

What is Safeguarding?

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of abuse, neglect or exploitation.

Working Together to Safeguard Children (2023) states that safeguarding and promoting the welfare of children is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

It also reminds us that safeguarding “**is everyone's responsibility**”. Everyone who encounters children and families has a role to play. Everyone should consider wider environmental factors in a child's life that may be a threat to their safety and/or welfare.

GTFC and GTF recognises that safeguarding encompasses the duties of child protection and promoting the rights and welfare of children.

It is everyone's responsibility to safeguard children and provide a safe environment. All professionals should make sure their approach is child centred. This means that they should always consider what is in the best interests of the child (KCSiE 2023).

We believe:

- All children have the right to be protected from harm
- Children need support that matches their individual needs, including those who may have experienced abuse

The Club will fulfil local and national responsibilities as laid out in the following documents:

- Keeping Children Safe in Education - Statutory guidance 2024
- Working Together to Safeguard Children, December 2023
- What to do if you're worried a child is being abused - March 2015
- Northeast Lincolnshire's LSCB
- Children Act 1989 as amended July 2021
- The Counterterrorism and Security Act 2015 (section 26 The Prevent Duty)

We also work within the guidance and standards set out in the EFL Safeguarding Standards

Key Staff

Lead Designated Safeguarding Officer

The Lead Designated Safeguarding Officer has overall responsibility for the safeguarding of children and young people at GTFC and GTF.

The Lead Designated Safeguarding Officer will:

- Report to the Board on recommendations for changes to the Safeguarding Policy and Procedures considering legislative changes
- Make the decision to investigate any allegations or concerns of abuse
- Address any immediate protection issues
- Make the decision to refer to an appropriate agency (FA, EFL, Police or Social Services)
- Liaise with Local Safeguarding Children Partnerships
- Ensure the Board of Directors and staff are trained on GTFC and GTF safeguarding procedures
- Ensure they undertake regular and appropriate training for the role
- Source appropriate external training for safeguarding
- Undertake regular monitoring and risk assessments of activities involving children (or will designate this task to a trained activity lead, the Safety & Stadium Operations manager, or an external assessor as appropriate)
- The Lead Designated Safeguarding Officer (LDSO) for the Club is Vikki Harries
- The Academy Safeguarding Officer is Oliver Cowling
- Our Academy player care officer is Kris Hoskins
- David White Stadium Operations Manager is responsible for match day safety
- Ruth Fleet is the match day safeguarding steward who reports to David and Vikki and is responsible for matchday safeguarding

The Senior Safeguarding Manager (SSM) for the Club is Adam Smith.

Anybody with a concern about a child or young person's welfare should contact the SSM or LDSO direct, or their line Manager for advice in the first instance. Contact details can be found at the end of this policy.

All employees, contractors and volunteers are expected to:

- Be alert to signs of abuse and radicalisation and take responsibility for referring concerns to the SSM or Lead Designated Safeguarding Officer
- Be prepared to listen to and take seriously the concerns of children
- Abide by the codes of conduct for employees, coaches, and volunteers
- Promote the health, safety, and welfare of children
- Maintain records, as necessary
- Set a good example to children by their own behaviour

The Lead Safeguarding Officer should:

- Ensure all policies are used appropriately

- Ensure the Club's Safeguarding policy is reviewed annually, and the procedures and their implementation are updated and reviewed regularly
- Ensure the Safeguarding policy is on the Club's website
- Link with the Local Safeguarding Partners to make sure staff are aware of training opportunities and the latest local policies on safeguarding
- The Safeguarding Poster, stating the name of the Designated Safeguarding Leads, must be clearly displayed at GTFC, GTF and the Academy.

Human Resources and Safer Recruitment

As part of GTFC and GTF's safer recruitment and selection process, offers of work for positions which involve working with children are subject to a satisfactory Disclosure & Barring Service (DBS) Criminal Records Check (CRC) at the level deemed suitable for the position offered and subject to appropriate references. GTFC and GTF follows 'safer recruitment' guidance in the employment of its new staff. The Club adopt a tiered approach and will complete additional checks for those members of staff with additional responsibilities which may involve working with children. This may include online web searches of social media. The Club follow the guidance set out within our internal 'Safer Recruitment' policy.

Safeguarding Training & Awareness

This policy and procedure are issued to all GTFC and GTF employees and casual workers who meet children at induction and is also available to all employees on the staff Intranet and members of the public through the GTFC and GTF website. The DSO holds a specific Safeguarding & Safer Working Practice Induction with all new fixed-term, permanent starters, and volunteers during which the key elements of the GTFC and GTF Safeguarding Children Policy are discussed in more detail and specifically to the individuals' role.

All staff working in direct contact with children are required to complete The FA's, 3-hour Safeguarding Children Awareness workshop and undertake a refresher course, as advised by The FA, at least once every 3 years. Details of training and qualifications are retained in the staff member's personal file. Safeguarding Awareness courses are also offered by the Club to develop knowledge which are department specific.

Contractors

Contractors carrying out work on an area that is usually occupied by children will, where possible, be undertaken when children are not present.

Service Level Agreements / Partnership Agreements

GTFC and GTF commitment to Safeguarding is outlined in any partnership agreements, its service level agreement and any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to children.

Ratios and the Supervision of Children

Any activity undertaken by GTFC and GTF will always be given full consideration to the appropriate number of staff members available depending on the age of the children involved, the degree of risk the activity involves and whether there are any additional

disability needs. The lower the age of the participants, the greater the need for supervision.

Regardless of these ratios a minimum of 2 members of staff or delivery partner will always be available to supervise an activity. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).

- For children under 5 the recommended ratio should be no more than 1:6
- For children under 8 the recommended ratio should be no more than 1:8
- For children over 8 the recommended ratio should be no more than 1:10, but this varies depending on the activity
- Advice should be sought from the Safeguarding Senior Manager or Lead Designated Safeguarding Officer if unsure
- For Academy activities, the English Football League's Youth Development Rules prescribe a ratio of 1 Coach to 8 Players (over 8s)
- For organised groups of children attending a match day at GTFC's Blundell Park stadia, the minimum ratio is 2 responsible adults to 20 Children

Where the Club is taking responsibility for the care of the children, these ratios are partially based on Ofsted's guidelines which are as follows:

Child's age Ratio of adults: children

0-2	1:3
2-3	1:4
4-8	1:6
9-12	1:8
13-18	1:10

Parents/carers should not be included in supervision calculations.

Lone Working Guidance

Working one to one with children should only occur in exceptional circumstances, and if it does, the staff member must seek and follow the specific guidance from the Lead Designated Safeguarding Officer for the Academy.

Scouts

References are sought for all Scouts and, on registration with GTFC, Scouts identifying players under the age of 18 are issued with a copy of the Premier League's/EFL Practice booklet on Player Recruitment, a Club Code of Conduct, and the Club's Safeguarding Children Policy.

GTFC and GTF only permits scouts from other Clubs to attend its Academy Games Programme matches in accordance with the provisions of the EFL Youth Development Rules.

Academy

GTFC's Academy is committed to the welfare and safety of all children, both within the Academy and at the Club as a whole. The Academy also realises the importance of

communication and works closely with parents, carers, host families, schools, and local authorities to ensure that the wellbeing of all children is paramount.

Host Families

Prior to the commencement of an agreement between the Academy and a host family an Enhanced DBS plus barred list check is carried out on the designated house parent along with an enhanced check on any other person residing at the house who is over 16 years of age.

At present the Academy does not have any accommodation arrangements that fall within the regulations of Private Fostering, however if such a situation did occur then the Club would ensure that suitable dialogue takes place with the Local Authority to ensure that all statutory requirements are met.

References from previous employers and local authorities (where applicable) are also sought.

House visits and full Health & Safety risk assessment are also conducted by the Lead Designated Safeguarding Officer and a guidance manual is issued.

A Host Family Induction Evening is held at the Academy on an annual basis which includes a Safeguarding Children briefing, and the Lead Designated Safeguarding Officer maintains constant dialogue with all Host Families throughout the season.

Youth Loans, Trials & Work Experience

If a GTFC Academy Player or young Professional under the age of 18 is selected to the Club's professional team, or 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, GTFC will insist that, where possible, players are placed in host family accommodation during their time away from the Club and not in hotel accommodation, and as good practice the Club should designate a member of Academy Staff who will be nominated by the Lead Designated Safeguarding Officer, 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.

For players under the age of 18 who are joining the Club on trial, parental consent will be sought prior to the trial taking place, along with suitable checks e.g., medical forms.

Where accommodation is required during the trial period, this will be in designated host family accommodation or, if the player's parent/guardian is also travelling with the player then a local hotel may be used as an alternative. Transportation will be arranged during the trial period via the Academy and agreed with parents/guardians.

U18, 23 & First Team Progression

As players progress through the Academy system, they may have the opportunity to train and play with the adult provisions of the Club. This may raise concerns for the individual and/or their parent/guardians as they will be entering an adult provision and as such may

witness adult behaviours and language. The Club will support the player(s) during this transition and ensure that the welfare of the player concerned is paramount. Parents will be included, and consent sought.

Medical

There will be occasions where medical treatment is necessary during training sessions and weekend fixtures and unfortunately, due to staffing numbers, the Club is unable to guarantee that two members of staff are present during treatment sessions. All members of the medical department have a valid DBS check and are required to attend The FA's Safeguarding Children awareness workshop and internal Safer Working Practice training.

The Club is fully committed to equal opportunities for all individuals and, as such, the Club employs both male and female staff to work within the medical department.

The Club is more than happy for parents and carers to attend pre-booked medical treatments if required. If, due to the first team's schedule, this is not possible an alternative appointment may need to be arranged. The Medical Department has a separate Code of Conduct for use when dealing with children and young people that is issued to all staff within the Medical Department.

Transport

When children/young people are being transported on behalf of the GTFC Academy they shall, where possible, be accompanied by their Team Manager, a coach, or a designated leader. In some cases, where children need to be transported unaccompanied, this will be with an approved travel company (who have signed up to relevant Academy Policies), or by a member of Club staff who has a satisfactory DBS check and has been issued with (and received training on) the Academy Transport Policy. In either case a child will only be transported under these circumstances with the specific prior consent of their parent or guardian

Highlighting Concern

Although GTFC and GTF is committed to doing the utmost to safeguard children from harm there may be occasions when concern is raised over the treatment of a child. "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 and may be of the same or opposite sex.

There is often a common misconception that only a certain type of person can abuse children, but this is simply not the case - abuse can take place in any setting, by someone of either sex, of any sexual orientation and of any age.

To provide staff and volunteers with the overarching principles which guide our approach to safeguarding, GTFC and GTF believe that a child or young person should never experience abuse of any kind. We have a moral and legal responsibility to promote the welfare of all children and young people and to keep them safe. We are committed to this practice in a way that protects them by responding to the 5 Rs of safeguarding children.

- **Recognise** - signs and symptoms of abuse
- **Respond** - an allegation from a child against a member of staff/volunteer, a disclosure from a child, suspicions regarding the conduct of other staff members or concerns from a staff member regarding a child
- **Report** - to the designate safeguarding lead, it is their responsibility to make further decisions
- **Record** - exactly what has happened using the words said by the child. This information should be signed, dated, and kept in a secure place as agreed within the Safeguarding Policy
- **Refer** - this will be the role of the Designated Safeguarding Manager who will make further decisions. The only agencies that can investigate child protection cases are the Police and the multi-agency safeguarding hub of the Local Authority

Whistle Blowing

Whistleblowing in a safeguarding context which means revealing and raising concerns over misconduct or malpractice within an organisation, or within an independent structure associated with it.

It can be used as an early-warning system or when it is recognised that appropriate actions have not been taken. This approach or policy is adopted in many different walks of life. GTFC and GTF have an applicable 'Whistleblowing' policy and procedure.

Any adult or young person with concerns about a colleague's conduct towards a child or young person can also use whistleblowing by calling 0800 169 1863 and asking for The FA's safeguarding team, or via email to: safeguarding@TheFA.com.

Definitions of Abuse

Physical Abuse: Is deliberately physically hurting a child/young person. It might take a variety of different forms, including hitting, pinching, shaking, throwing, poisoning, burning, or scalding, drowning, or suffocating a child. Physical abuse can happen in any family, but children may be more at risk if their parents have problems with drugs, alcohol, and mental health or if they live in a home where domestic abuse happens. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Physical abuse can also occur outside of the family environment.

Neglect: Is a pattern of failing to provide for a child's basic needs, whether it be adequate food, clothing, hygiene, supervision, or shelter? It is likely to result in the serious impairment of a child's health or development. Children who are neglected often also suffer from other types of abuse. It is important that practitioners remain alert and do not miss opportunities to take timely action. However, while you may be concerned about a child, neglect is not always straightforward to identify. Neglect may occur if a parent becomes physically or mentally unable to care for a child. A parent may also have an addiction to alcohol or drugs, which could impair their ability to keep a child safe or result in them prioritising buying drugs, or alcohol, over food, clothing, or warmth for the child. Neglect may occur during pregnancy because of maternal drug or alcohol abuse.

Sexual abuse: Is any sexual activity with a child. You should be aware that many children and young people who are victims of sexual abuse do not recognise themselves as such. A child may not understand what is happening and may not even understand that it is wrong. Sexual abuse can have a long-term impact on mental health. Sexual abuse may involve

physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can commit acts of sexual abuse, as can other children.

Emotional Abuse: Is the persistent emotional maltreatment of a child. It is also sometimes called psychological abuse, and it can have severe and persistent adverse effects on a child's emotional development. Although the effects of emotional abuse might take a long time to be recognisable, practitioners will be able to observe it, for example, in the way that a parent interacts with their child. Emotional abuse may involve deliberately telling a child that they are worthless, or unloved and inadequate. It may include not giving a child opportunity to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. Emotional abuse may involve serious bullying - including online bullying through social networks, online games, or mobile phones - by a child's peers.

Bullying: Bullying may come from another young person or an adult. Bullying is defined as deliberate hurtful behaviour, usually repeated over a period, where it is difficult for those bullied to defend themselves.

Signs of bullying include:

- Behavioural changes such as reduced concentration and/or becoming withdrawn, depressed, tearful, emotionally up and down, reluctance to go training or competitions, an unexplained drop in performance.
- Physical signs such as stomach aches, headaches, difficulty in sleeping, bed wetting, scratching, and bruising, damaged clothes, bingeing e.g., on food, alcohol or cigarettes.
- A shortage of money or frequent loss of possessions

It must be recognised that the above list is not exhaustive, but also that the presence of one or more of the indications is not proof that abuse is taking place. It is NOT the responsibility of those working at GTFC and GTF to decide that child abuse is occurring. It is their responsibility to act on and report any concerns.

GTFC, GTF and its Academy also recognise that they have responsibilities to the welfare and reporting of issues or concerns by young people in any of the following subjects below.

Child on Child Abuse (including sexual harassment, sexual violence, online abuse, and bullying)

We recognise that children can abuse their peers, and that child-on-child abuse can manifest in many ways, including on-line bullying, sexting, initiation/hazing and inappropriate/harmful sexualised behaviours. We take a no tolerance approach to peer-on-peer abuse and will work with all learners concerned along with their families to prevent harm.

Where children and young people have exhibited inappropriate/harmful sexualised behaviour and/or exhibited inappropriate/harmful sexualised behaviours towards others an AIM (Assessment, Intervention, Management) checklist must be completed, and contact made with Integrated Front Door (01472 326292).

For further advice contact North-East Lincolnshire Harmful Sexualised Behaviour Team:

Creating Stronger Communities Programme Manager
Civic Offices, Knoll Street, Cleethorpes, DN35 8LN
Tel: 01472 323303

- We will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims
- All staff understand the importance of challenging inappropriate behaviour between children and young people. Downplaying behaviours as 'just banter' can lead to a culture of unacceptable behaviour, an unsafe environment for children and young people and a culture that normalises abuse
- Staff understand that where there are no reports of child-on-child abuse in the Club, they must operate with a 'it could happen here' approach and report any concerns they have to the DSL
- Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment
- Staff understand that Early help and the option to manage a report internally do not need to be mutually exclusive and are aware that reports could be managed internally and by seeking early help for both the victim and perpetrator(s).

Links to resources information and guidance for young people who have displayed harmful sexualised behaviour can be found here: [Keeping children safe in education 2023 \(publishing.service.gov.uk\)](https://www.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/672212/Keeping-children-safe-in-education-2023.pdf)

Harmful Sexual Behaviour Support Service - Provides expert-led advice and guidance in tackling harmful sexual behaviours to professionals working with children and young people.

Marie Collins Foundation - Charity that, amongst other things, works directly with children, young people, and families to enable their recovery following sexual abuse.

Radicalisation: Radicalisation is the process by which individuals come to support terrorism or violent extremism. Young people may express extremist ideas, be in possession of extremist literature or express extremist views. They may associate with known extremists or seek to recruit others to an extremist ideology. Concerns that a child's behaviour indicates involvement with extremist ideas should be considered a safeguarding issue and reported as such. (Refer to Prevent Policy for further information)

Codes of Conduct

GTFC have Respect Codes of Conduct for Managers, Coaches and Players, Parents and Spectators that have been developed to ensure that behaviour and good practices are followed throughout all age development groups and youth teams.

In addition to the below good practices, in GTFC and GTF, sports coaches are expected to conform to ethical standards in several areas: humanity, relationships, commitment, co-operation, and integrity, and confidentiality, abuse of privilege, safety and competence.
Good Practice

All GTFC and GTF employees, workers, agency staff and volunteers working with children, young people should adhere to the following principles and action (list is not exhaustive):

- Always work in an open environment (e.g., avoiding private or unobserved situations and encouraging open communication with no secrets)
- Make the experience of the sporting activity fun and enjoyable: promote fairness, confront, and deal with bullying
- Treat all children and young people equally and with respect and dignity
- Always put the welfare of the child or young person first. For example, if the weather is cold or wet, ensure that children have adequate and suitable warm clothing to wear for outside activities or travelling to and from activity venues. Likewise in warm or excessively hot weather that children are suitably clothed, frequent breaks are given for drinks and fluid whether indoors or outside. If outside that they are protected from potential harm from the sun by application of protective creams.
- IT MUST BE NOTED THAT COACHES WILL NOT PHYSICALLY APPLY SUN PROTECTIVE CREAMS TO CHILDREN AND YOUNG PEOPLE BUT CAN ENSURE THAT THE CHILD OR YOUNG PERSON APPLIES IT TO THEMSELVES
- Maintain a safe and appropriate distance with children and young people 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 child or young person. Physical contact can be appropriate so long as it is neither intrusive nor disturbing and the child or young person's consent has been given
- If groups must be supervised in changing rooms always ensure coaches work in pairs
- Request written parental consent if Club officials are required to transport children and young people
- Gain written parental consent for any significant travel arrangements e.g., overnight stays. Coaches are qualified and a qualified first aider, is in attendance
- Ensure that at away events adults should not enter a child or young person's room or invite children and young people to their rooms
- Be a good role model, this includes not smoking or drinking alcohol in the company of children and young people
- Always give enthusiastic and constructive feedback rather than negative criticism
- Secure written parental consent for the Club to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if the need arises
- Keep a written record of any injury that occurs, along with details of any treatment given
- All other good practice/common sense principles given the varying situations

Responding to a Report or Suspicion

Children with SEND (Special Educational Needs and Disabilities) may face additional barriers to reporting abuse. All staff will be trained to recognise these and ensure all children are supported to disclose concerns safely.

A Lead Designated Safeguarding Officer or the Safeguarding Senior Manager should be contacted as early as possible and within 24 hours in any circumstance, however it is recognised that an individual may need to respond to a situation immediately. The following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice.

Do:

- Ensure the child or young person's safety
- Always treat any allegations extremely seriously and act towards the child as if you believe what they are saying, although do not directly say the words "I believe you"

- Tell the child they are right to tell you
- Reassure the child that they are not to blame
- Be honest about your own position, who you must tell and why
- Tell the child what you are doing and when and keep them up to date with what is happening
- Take further action - you may be the only person able to prevent future abuse
- Write down everything said and what was done (handwritten is preferable) and sign and date the notes. An Incident Report Form should be used where possible and within 24 hours
- Seek medical advice if necessary

Do not:

- Make promises you cannot keep or to keep secrets
- Interrogate the child - it is not your job to carry out an investigation - this will be up to the Police and Children's Services who have experience in this
- Cast doubt on what the child has told you, do not interrupt or change the subject
- Say anything that makes the child feel responsible for the abuse
- Inform parents/carers - the Safeguarding Senior Manager or Academy Designated Officer will make this decision based on whether there is suspicion of their involvement
- DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT
- Make sure you tell the Lead Designated Safeguarding Officer immediately; they will know how to follow this up and where to go for further advice

Recording Allegations or Suspicions

An Incident Report Form must be completed and submitted within 24 hours to the Lead Designated Safeguarding Officer or Safeguarding Senior Manager.

Any statement made by the child should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, questions kept to a minimum, and where used, they should be of an open format.

No suggestion of who the perpetrator was or how any concern or incident happened should be suggested.

The Club will ensure that any child concerned is immediately removed from any possible risk of harm.

Investigations into possible abuse will require careful management. In these cases, the Lead Designated Safeguarding Officer or Safeguarding Senior Manager will first seek the advice of the Safeguarding Children Team, Children's Social Care, a Local Authority Designated Officer (LADO), the Police, or the Football Association Safeguarding Children Team, before setting up an internal inquiry and take their advice on informing the child's parents.

In any case of suspected abuse, as soon as the Local Authority or the Police have been informed, the Club must provide a report to the FA Head of Safeguarding Children and inform the Club's Senior Safeguarding Manager, the Board of Directors and the Chief Executive Officer. Any external local authority provision will naturally take the lead on any case.

Providing it is appropriate to do so the Safeguarding Senior Manager will maintain constant dialogue with all parties involved with the allegation until such time as the matter has

reached a reasonable outcome, taking the lead from the external agency. Escalation to inform Board level will take place at the Safeguarding Senior Manager's earliest opportunity.

Specific information regarding allegations against members of staff

Low-Level Concerns:

All staff are encouraged to report low-level concerns—behaviours that do not meet the harm threshold but may indicate a pattern of inappropriate conduct. These must be reported to the DSL or SSM and will be recorded and monitored accordingly.

If the report involves an allegation about any member of the GTFC and GTF staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc.) and the Club believes that the report could demonstrate that the member of staff in question has:

- Behaved in a way that has harmed a child or may have harmed a child
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she is unsuitable to work with children, then the Safeguarding Senior Manager or Lead Designated Safeguarding Officer shall immediately inform the Local Authority Designated Officer (LADO) where the alleged incident took place so that he or she can consult with the Police and Local Authority Children's Social Care colleagues as appropriate.

Where the Safeguarding Senior Manager or Lead Designated Safeguarding Officer s are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.

The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation.

The member of staff in question will be asked to stay away from activities pending the conclusion of any investigation.

This process would only be carried out once the advice of the above-mentioned external bodies had been sought and only then in consultation with the Safeguarding Senior Manager or Lead Designated Safeguarding Officer.

Confidentiality

There is always tension and caution around issues of confidentiality. The advice for all staff at the Club is that no guarantee of confidentiality can be given to a child (although this does not necessarily mean that the parents / carers must be told).

A child should never be pressured to give information or show physical marks unless they do so willingly. If they choose to show markings, two members of staff should be present and any marks raising concern should be recorded on the incident and report form.

There are actions which staff must and 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.

A matter is confidential on a need-to-know basis, and nobody should have any reservations about referring any issue to the Safeguarding Senior Manager or any Lead Designated Safeguarding Officer. The key issue is that the welfare of the child is protected.

Online Safety (including filtering, monitoring, and mobile technology)

It is the responsibility of the LDSO and SSM to ensure that the appropriate measures are taken by the Club to protect users from online harm. This includes relevant checks to online filters, processes, training.

The Lead Safeguarding Officer will complete an audit document at all GTFC and GTF locations to ensure appropriate filters and monitoring are in place, aligned with DfE standards.

Related Policies and Documents

GTFC and GTF will also have in place the following policies, related to this policy, they are being.

- Vulnerable Adult Policy
- Equality Policy
- Prevent Policy
- Anti-Bullying Policy
- Safer Recruitment Policy
- Codes of Conduct

Who can I contact?

Polly Bancroft, Chief Executive Officer	07918 363428 Polly@gtfc.co.uk
Adam Smith, Senior Safeguarding Manager	07415454153 Adamsmith@gtfc.co.uk
Vikki Harries, Lead Designated Safeguarding Officer	07498 926776 safeguarding@gtfc.co.uk
Tara Lawson, Safeguarding & Incident manager EFL Trust	07964 905652 tlawson@efltrust.com
Sarah Boyer, Regional Safeguarding Manager, EFL	07583 138032 sboyer@efl.com
NEL Local Authority Safeguarding Officer	01472 326118
Ben Pearce, Lincolnshire County FA DSO	01522 596580 Ben.Pearce@lincolnshirefa.com
FA/NSPCC Safeguarding	0808 500 5000 (24 hrs)
FA Safeguarding Management Team	0800 169 1863 #6300

Additional Key Contacts

- North East Lincolnshire Safeguarding Children's Board www.safernel.co.uk
- Local authority children's social care team 01472 326292 (option 2)
- Local authority Designated Officer (LADO) 01472 326118
- Local Authority referral team 01472 326292
- Local Authority Out of Hours Team 01472 326292 (option 2)
- Local Safeguarding Children Partnership 01472 326292 (option 2)

- Local Early Help services **01472 326292 (option 2)**
- NSPCC **0808 800 5000**
- Ofsted **0300 123 1231**
- Emergency police **999**
- Non-emergency police **101**
- Government helpline for extremism concerns **020 7340 7264**
- Local authority PREVENT duty officer **Prevent@humberside.pnn.police.uk**
- Child exploitation and Online protection command (CEOP)
<https://www.ceop.police.uk/safety-centre/>

Monitoring and review

GTFC's and GTF's Lead DSO will meet monthly to report to the Senior Safeguarding Manager and Head of Community with any issues or concerns and will be monitored on compliance with the EFL Safeguarding Standards.

The LADO (Emma Horton), the CEO of GTFC/GTF, SSM of GTFC and Head of Community approved the contents of this policy which will be reviewed annually, or sooner due to changes in legislation or lessons learned from any public enquiry into safeguarding issues.

Signed:
(Acting Head of Community)

Dated: 22nd August 2025

Signed: 
(Designated Safeguarding Lead)

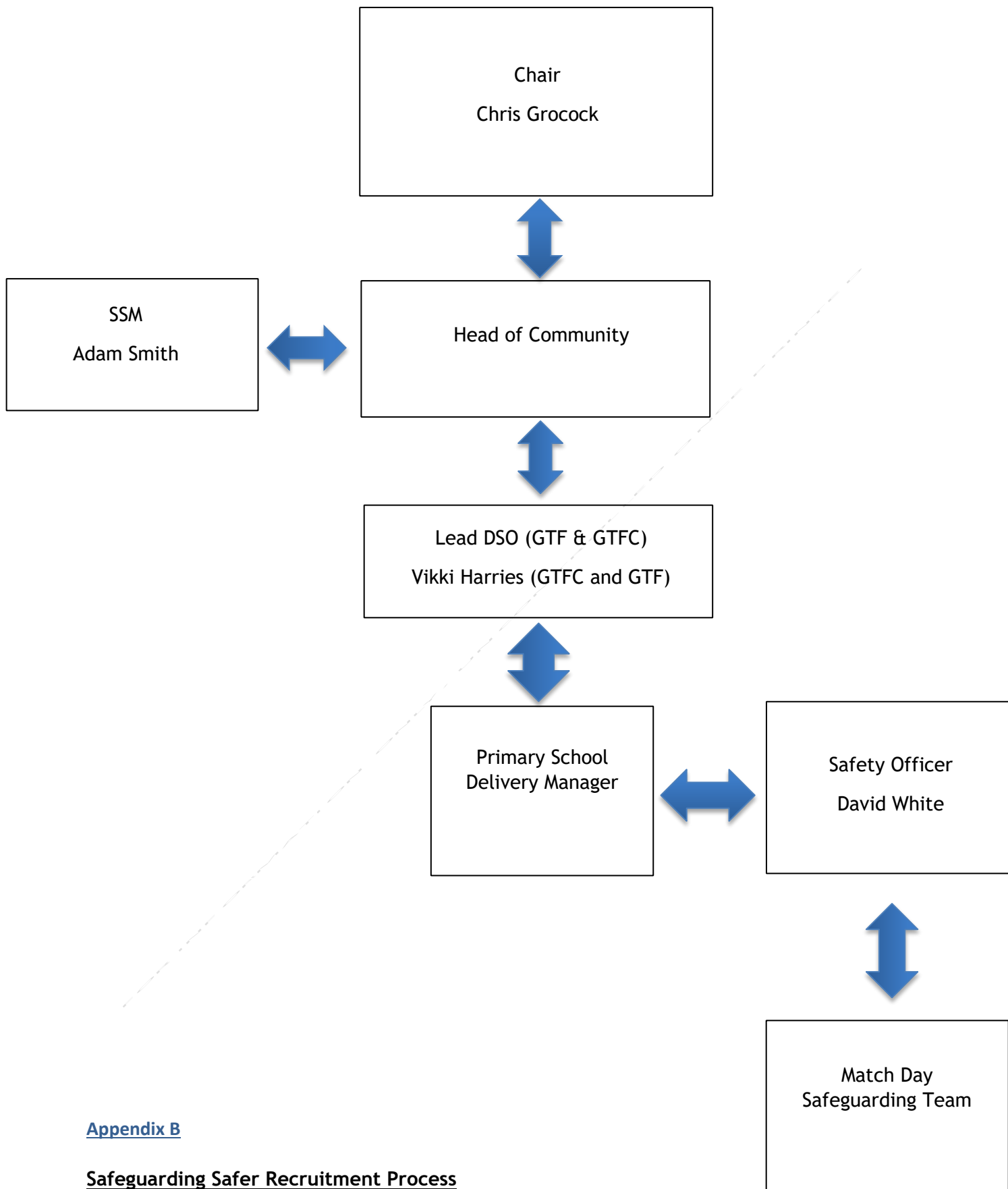
Dated: 22nd August 2025

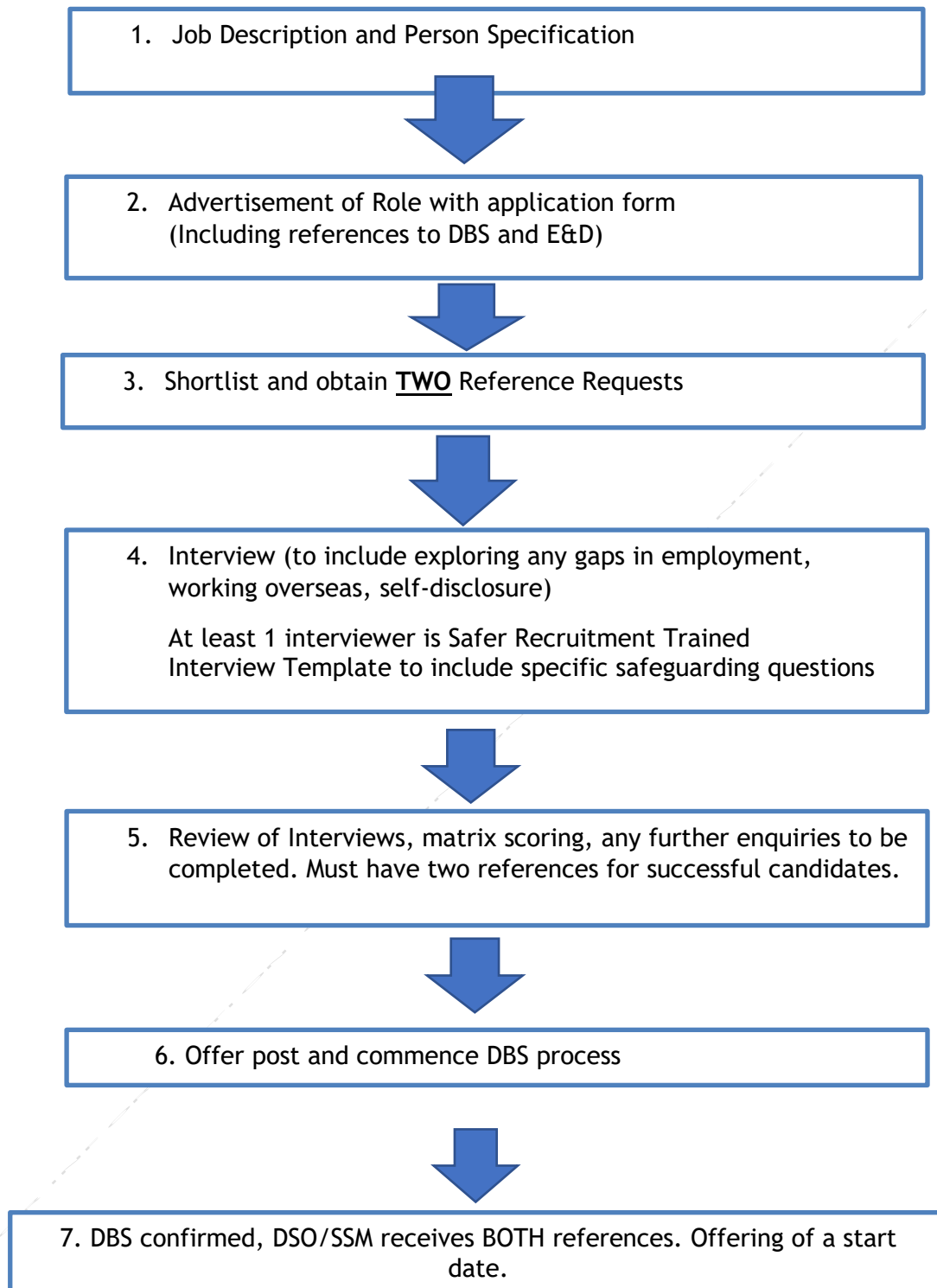
Signed: 
(Chief Executive Officer)

Dated: 22nd August 2025

Appendix

Foundation Safeguarding Accountability Chart





Version Control

Date	Amendments	By Whom
14/06/21	Full policy review to update recent legislation and recommendations in relation to FA/EFL safeguarding practices and recommendations from the Sheldon Report into Abuse in Football.	Martin George
14/06/21	Policy Update	Martin George
26/09/22	Policy Update KCSIE Guidance Child on Child Abuse	Pete MacLeod
07/01/23	Recruitment Flowchart & New branding standards added	Pete MacLeod
10/07/23	Formatting Changed Changed references from KCSIE 22 to 23 Changes in staff details New section (34) added to reflect changes to KCSIE and online access Section 10 - Online checks of social media added (to be also added to safe recruitment policy) in line with KCSIE requirements	Pete MacLeod
11/03/24	Template change and CEO/DSO updates	Vikki Harries
05/09/24	Reviewed by the LADO and amendments in line with new staffing structure and contact details update	Vikki Harries
22/08/2025	Reviewed by LDSO	Vikki Harries