



Grimsby Town Sports and Education Trust

Safeguarding Children and Young People

Policy

MANAGEMENT INFORMATION

Policy Name	Safeguarding Children and Young Persons
Effective Date	June 2016
Next Review Date	June 2022
Drafted By:	Martin George (LDSO)
Approved by Board	June 2019

Contents

<u>Item</u>	<u>Subject</u>	<u>Page</u>
1	Safeguarding Policy Statement	5
2	Applies to	6
3	Reason for policy	6
4	Key Principles	7
5	Scope	7
6	Legal Framework	8
7	Definition of a child	9
8	Aims and objectives	9
9	Objectives of the policy	9
10	Aims underpinning the policy	9
11	Role of the Trust LDSO	10
12	Safeguarding Structure and Responsibilities	11
13	Recruitment and Disclosure	12
14	Project delivery SLA Partnership working	13
15	Position of trust and duty of care	13
16	Examples of position of trust	13
17	Protecting children/young people with Disabilities	14

18	Employee training	14
19	Whistle Blowing	15
20	Radicalisation and Extremism	15
21	Identifying abuse and neglect	16
22	Indicators of abuse	17
23	Definitions of Abuse	17
24	Child Exploitation	19
25	Female Genital Mutilation	20
26	Modern slavery	20
27	Peer on Peer abuse	20
28	Codes of Conduct	21
29	Good Practice	21
30	Poor Practice	22
31	Related policies and documents	23
32	Complaints policy	23
33	Safeguarding concerns raised within	23
34	Complaints raised with the LDSO	24
35	Complaints procedure	24
36	Allegations or concerns against staff	24
37	GTSET NCS reporting procedures	29

38	Definitions of NCS/Pharos incident levels	29
39	Reporting to concerns or incidents	31
40	Retention of Safeguarding concerns And documents.	31
41	Critical Incident Management and handling Media interest.	32
42	Contacts	32
43	Monitoring and review	33
APP 1	Trust Consent Form	34
APP 2	Incident/Concern Referral Form	35
APP 3	Version Control	37

This policy was produced by Martin George (Grimsby Town Sport and Education Trust's Lead Designated Safeguarding Officer) who acknowledges the guidance given by the English Football League and Football Association in its writing.

1. Safeguarding Policy Statement:

Grimsby Town Education Trust acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and requirements.

The policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socio-economic background, all children;

- have a positive and enjoyable experience of sport at Grimsby Town Sport and Education Community Trust in a safe and child centred environment
- are protected from abuse whilst participating in, or outside of the activity.

Grimsby Town Sport and Education Community Trust acknowledges that some children, including disabled children and young people or those from ethnic minority communities, can be particularly vulnerable to abuse and we accept the responsibility to take reasonable and appropriate steps to ensure their welfare.

As part of our safeguarding policy Grimsby Town Sport and Education Community Trust will;

- promote and prioritise the safety and wellbeing of children and young people
- ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people
- ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern
- ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored
- prevent the employment/deployment of unsuitable individuals
- ensure robust safeguarding arrangements and procedures are in operation.

The policy and procedures will be widely promoted and are mandatory for everyone involved in Grimsby Town Sport and Education Community Trust. Failure to comply

with the policy and procedures will be addressed without delay and may ultimately result in dismissal/exclusion from the organisation.

2. Applies to:

This policy applies to all staff, including Board of Trustees, of whom Nicola Massingham is the Senior Safeguarding Manager (SSM). Graham Rodger, Project and Marketing Manager, and all other GTSET managers, coaches, paid staff, volunteers or anyone working on behalf of Grimsby Town Sport and Education Trust. The Trust seeks to ensure the safety and wellbeing of all children and young people who engage in activities provided through the Trust.

(It is also recognised that the Trust is engaged in providing activities for Adults at Risk over the age of 18 years. A separate policy is written in relation to this area.)

3. Reason for the Policy:

If you work or intend to work with children, young people, or adults at risk you are automatically placed in a position of trust that carries authority, status, power and responsibility. If the adults involved are positive role models displaying high moral and ethical standards, the benefit to children, young people and vulnerable adult's development can be significant. The work undertaken by Grimsby Town Sport and Education Trust can and does have an effect on children and young people's development and is potentially an inspiration to whole communities.

It is through the application of this Policy and Procedures that the Trust will commit to develop a positive and proactive safeguarding and welfare programme of activities to enable all children, young people and vulnerable adults to participate in an enjoyable and safe environment. This equally applies to the safety and welfare of those working with and responsible for the activities involving children, young people and vulnerable adults.

The activities undertaken by the Trust provide opportunity for children and young people from the age 5 – 16 years and include pre-school sport sessions, Lunch time sport sessions, physical education sessions during curriculum time covering schools national curriculum guidelines, personal, social, health education (PSHE) delivered during curriculum time covering, respect, parliament awareness and health and well-being. After school clubs mainly delivering football sessions. Social Inclusion sessions delivered on evenings and weekends to children and young people from the age of 5 – 16 years who originate from low social economic areas. In addition to this football courses are delivered throughout school holidays. In addition to the above cohorts the Trust also co-ordinates a project working in the primary and secondary sector with children and young people with disability. The Trust also implements a full NCS (National Citizen Service) programme annually.

The Safeguarding and Welfare of Children and Young People under eighteen years are legally regulated through Acts of Parliament (Children Act 1989 and The Children Act 2004) and relevant sections reviewed or amended by the Children Act (2011) and the Keeping Children Safe in Education Act 2016 and the revised KCSIE 2018 guidance whilst vulnerable adults, are legally regulated through the Safeguarding Vulnerable Groups Act 2006. Safeguarding is a term that is broader than 'child protection' and relates to the action to promote high ethical standards throughout of persons in these categories and protect them from harm.

4. Key Principles:

Safeguarding is everyone's responsibility. Safeguarding is defined in Working Together to Safeguard Children 2015 as:

- safeguarding is everyone's responsibility: for services to be effective each professional and organisation should play their full part; and
- a child-centred approach: for services to be effective they should be based on a clear understanding of the needs and views of children. It is important to listen to children and young people (under 18) and to take account of their wishes and feelings, both in individual decisions and in the development of services.

Organizations, which work with children and young people, must always act in their best interests and ensure they take all reasonable steps to prevent harm to them. Having safeguards in place within an organization not only protects and promotes the welfare of children but also it enhances the confidence of directors, staff, volunteers, parents/carers and the general public.

When establishing, developing or improving a service, project or activity GTSET will seek to ensure that any legally-binding Service Level Agreement implements safeguarding measures equivalent to this policy.

5. Scope:

This Policy is written and designed to be observed by all those working with children, young people and vulnerable adults. The standard application of this Policy and Procedures across all activities of the Trust, ensures that safeguarding good practice is mandatory.

All the requirements are obligatory and are to be enforced, as indicated, by the appropriate persons in all cases where there are any suspected instances of poor practice or abuse.

All employees, workers, consultants, agency staff and volunteers must make themselves aware of the Trust's Safeguarding Children Policy and Procedures (available through the Handbook or via the Staff Intranet) and where appropriate

their work with children and young people will be supported by a safeguarding training programme.

The designated person with responsibility for safeguarding and welfare within Grimsby Town Sport and Education Trust is the Lead Designated Safeguarding Officer;

Martin George (MSc) contact details; E-mail martin@gtfc.co.uk

Telephone; 01472 696481

Mobile; 07807490319

The Trust fully acknowledges and accepts its responsibility for the safety and wellbeing of children and young people, who engage in any way in any activity carried out with the Trust.

Their welfare is of paramount importance. It is the duty of all adults working within the Trust to safeguard the welfare of children and young people by creating an environment that protects them from harm. This policy should also be read in conjunction with the 'Missing Children/Person Policy' and the 'Safeguarding Adults at Risk Policy'.

Activities undertaken at any venue used in connection with the business and activities of the Trust are under the remit of this policy including.

- Grimsby Town Sport and Education Trust in the Community.
- Blundell Park Stadium
- Schools and other
- Stadium tours, Stewarding and all other activities on match days and roles that comes into contact with children, young people and vulnerable adults

The Trust has in place comprehensive safeguarding procedures that meet the requirements of The FA and English Football League Rules (in particular, The Safeguarding of Vulnerable Groups and Safer Recruitment), The FA Safeguarding Children Rules and The Children Act 1989 and 2004 are applied to ensure the national standards for safeguarding are met and implemented throughout the Trust.

The Trust also has a responsibility to maintain regular dialogue with the Local Safeguarding Children Board (LSCB) and the Local Authority Children's Social Service

6. Legal Framework:

This policy has been drawn up on the basis of law and guidance that seeks to protect children and young people namely;

- Children Act 1989

- United Convention of the Rights of the Child 1991
- Data Protection Act 1998
- Sexual Offences Act 2003
- 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 2015
- Keeping Children Safe in Education 2016 (Revised 2018)
- The Counter-Terrorism and Security Act 2015
- Female Genital Mutilation Act 2003 (as amended by the Serious Crime Act 2015)
- Modern Slavery Act 2015
- Relevant government guidance on safeguarding children.

Whilst incorporating guidelines from the FA, including Guidance to Member Clubs, affiliated policies and NCS plans and policies.

7. Definition of a Child:

Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection. (Working Together 2015)

8. Aims, objectives:

The aims of the Trust's Safeguarding Children/Young Persons Policy are:

- To safeguard all children and young people who interact with the Trust.
- To demonstrate best practice in the area of safeguarding children and young people.
- To develop a positive and proactive welfare programme to enable all children and young people to participate in an enjoyable and safe environment.

9. The Objectives of the policy are:

1. Community – to help improve the lives of young local people through health, fitness and social interaction awareness in a safe environment.
2. Experience – to give a positive experience to young people from use of the programme.

3. Inspiration – through sound partnership working and education develop activities designed to inspire young people to:
 - Be healthy
 - Stay safe
 - Enjoy and achieve
 - Make a positive contribution
 - Achieve economic well-being
 (Every Child Matters outcomes 2003)
4. Opportunity – to provide young people from the area with the opportunity to be involved in football and other funded sports and activities.
5. Positivity – to improve the health and mental wellbeing of young people through activities and positive messages.

10. The Aims underpinning this policy are:

- The child or young person's welfare is, and must always be the paramount consideration. They have the right to speak out and be listened to and account must be taken of their wishes and feelings both in individual decisions with any of the concerns they have about their welfare and in the development of services.
- All children and young people have a right to be protected from abuse regardless of their gender, race, disability, sexual orientation, religion or belief or age.
- All suspicions and allegations of poor practice or abuse will be taken seriously and responded to efficiently and appropriately.
- To ensure that staff, coaches, parents and other adults who come into contact with children and young people are good role models.
- Working in partnership with other organisations, children and young people and their parents/carers is essential.

To provide staff and volunteers with the overarching principles which guide our approach to safeguarding. Grimsby Town Sports and Education Trust believes 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.

11. The role of the Sport and Education Trust Lead Designated Safeguarding Officer is to:

To provide clarity across the Trust, to ensure full compliance with English Football League and FA rules, and the National Citizen Service. The FA safeguarding agenda and Government legislation, whilst also maintaining key relationships with Trust

Senior Management, the English Football League/FA Safeguarding Teams, Club Safeguarding Officers, NSPCC, Police, Children's Services, Local Safeguarding Children Board, Local Authority Designated Officer (for the management of allegations against professionals), the local authority Safeguarding Vulnerable Adults Team and the FA Safeguarding and Case Management teams.

Provide regular reports to Senior Trust Management on the effectiveness of the Trust's Safeguarding strategy. Compliance and updates on current legislation and any changes in English Football League or The FA and NCS Rules or statutory agency legislative changes which will impact on the Trust.

Represent the Trust as Lead Case Manager when cooperating with/reporting directly to external statutory agencies such as the Police, Local Safeguarding Children Board, Children's Services or Safeguarding Vulnerable Adults Team.

Support the promotion of the moral and legal responsibilities in implementing procedures to provide a duty of care for children and young people, safeguard their wellbeing and protect them from abuse and poor practice.

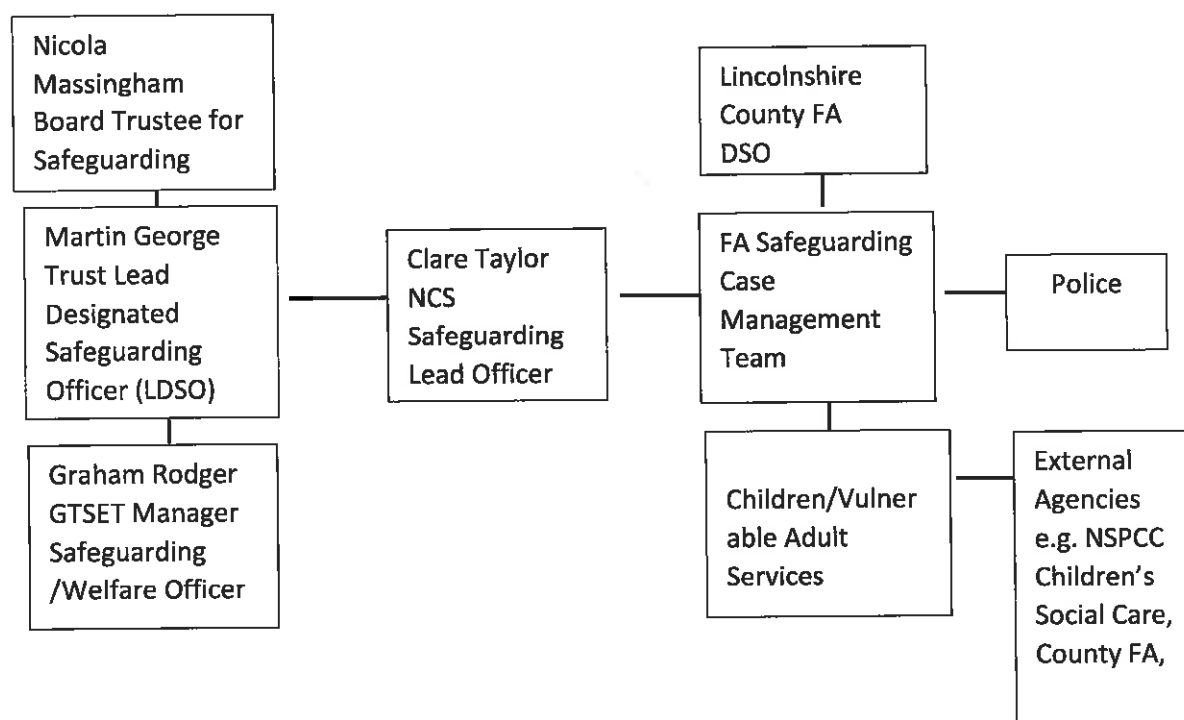
To take responsibility for the, day to day management of safeguarding issues, and proactive promotion of safeguarding awareness and implementation within the Trust, and its departments, by providing specific and general safeguarding training in line with the Staff Support and Development Policy.

To be available, at all reasonable times, as a first contact for staff, parents, children, and if appropriate, external agencies in regards to information or referral of all incidents, concerns, allegations, evidence of poor practice and evidence of best practice, in confidence, and in line with Data Protection legislation.

To handle sensitively, in confidence, any safeguarding concerns raised within the club.

To attend regular Trust's Safeguarding Team meetings and undertake any actions raised at meetings/CPD events in order to keep up to date with current safeguarding guidelines and legislation for compliance.

12. Safeguarding Structure and Responsibilities



The above flowchart depicts the safeguarding structure and responsibilities within Grimsby Town Sport and Education Trust. All reports/concerns in relation to a child, young person or adult at risk will be brought to the attention of Trust Safeguarding/Welfare Officer or the Lead Designated Safeguarding Officer (LDSO) who will ensure that the incident/concern is recorded and that all other interested parties and statutory agencies are contacted as appropriate.

13. Recruitment & Disclosure:

Grimsby Town Sport and Education Trust have a 'Safer Recruitment Policy and Procedure' document which expands on the key points below;

As part of the Trust's safer recruitment and selection process, a Single Centre Record process is operated. This involves;

- recording of personal details
- job title and terms of employment, Full Time, Part Time, etc
- recording of dates and types qualifications required for the post
- DBS verification and check
- Criminal record checks if required
- Application and receipt of references
- Start and finish dates
- Record of exit interviews

Offers of work for positions which involve working with children and young people are subject to a satisfactory Enhanced Disclosure Barring Service (DBS) check and appropriate references. All offers of work are subject to a satisfactory outcome to the screening process and until such time as a satisfactory disclosure has been confirmed, the individual concerned will not be permitted to commence work.

All employees, workers, consultants, agency staff and volunteers in a position of trust will be required to undergo regular DBS disclosure clearances, normally every 3 years or earlier if requested.

Should an individual's DBS check reveal any convictions the Club will consider whether the nature of the offence/offences renders the person concerned unsuitable for working with children and young people. In such circumstances, when the nature of any disclosure has to be considered, a risk assessment will be carried out to assess the information contained within the disclosure certificate. The individual may also be asked to attend an interview prior to a recruitment decision being made. On occasions the County FA Safeguarding Officer and/or the Local Safeguarding Children Board Manager and the Local Authority Designated Officer (LADO) may be asked to attend the risk assessment meeting.

Grimsby Town Sport and Education Trust also have a policy for the Recruitment of Ex-Offenders in line with safer recruitment responsibilities.

All new employees, workers, consultants and volunteers working with children or young people at the Trust will be required to complete a self-declaration on commencement of duties.

14. Project Delivery/Service Level Agreements in Partnership working;

Grimsby Town Sport and Education Community Trust deliver sporting programmes supported by Premier League Primary Stars and have in place a Service Level Agreement (SLA) with schools in the area. Within the SLA there is a statement explicitly stating that each individual delivering the programme will have the correct level of qualification to do so whilst also having in place current first-aid, safeguarding and enhanced DBS checks in line with the Trust's Safer Recruitment Policy.

(The Trust does not undertake any project delivery that involves them using other partners or sub-contractors to deliver on their behalf)

15. Responsibility of safeguarding children – position of trust and duty of care:

The Trust acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment. All employees, workers, consultants, agency staff and volunteers are accountable for the way in which they exercise authority, manage risk, use resources and protect children from discrimination and avoidable harm. To ensure best practice at all times employees, workers, consultants, agency staff and volunteers must be fully aware of this Safeguarding Children Policy and Procedures and the responsibilities. All employees, workers, consultants, agency staff and volunteers have a duty of care to keep children and young people safe; this can be exercised through the development of respectful, caring and professional relationships between adults and children/young people.

Employees, workers, and volunteers must demonstrate integrity, maturity and good judgement whilst working with children and young people.

Any person responsible for a child or young person, whether solely or jointly, is in a position of trust which requires behaviour to be in accordance with this policy.

16. Examples of positions of trust (but are not limited to) include:

A Manager of a Department, member of community staff or volunteer working with children, a coach, a team manager, a scout, a physiotherapist, a driver, a learning mentor/tutor, as well as staff engaged in match day activity involving children and young people, including supervising mascots, stewards, catering personnel and photographers.

All employees, workers, and volunteers working with children and young people have signed up to and thereby agree to the principles as set out in the policy.

17. Protecting Children, Young People with Disabilities:

The Board of Trustees recognise that for many years, children and young people with disabilities were not considered to be vulnerable to abuse. It is now known that this is not the case and that children and young people with disabilities are at an increased risk of abuse and that the greater the disability the greater the risk. There are a number of factors that contribute to this and these include:

- Lack of friends and peer group to support and protect.
- Intimate/physical care/invasive medical care required. This can make it difficult for the child or young person to know what is acceptable and unacceptable touch.
- Lack of speech or limited communication. This makes it harder to report abuse.
- Multiple carers – making it hard to identify who may be abusing.
- History of being told what to do and not given choices.
- Depending on the abuser for a service or basic need.
- Having medical conditions that are used to explain injuries.

Children and young people with disabilities may also be less valued than their peers and poor care may be observed but tolerated by others. This might include such things as not speaking directly to the child or young person; not offering choices; not moving and handling them safely; not respecting their privacy and dignity; not treating them according to their age; allowing physical restraint to occur; or using derogatory language.

There is no one way to ensure that children and young people with disabilities are protected but the safest environments are those that help children and young people to protect themselves by helping them to speak out and do their best to stop abuse from happening and take responsibility for observing, challenging and reporting poor practice and suspected abuse.

18. Employee/worker training:

All employees or workers working in direct contact with children and young people shall be required to complete The FA Safeguarding Children workshop and will receive regular training appropriate to their position. Details of those satisfactorily completing this course are retained by the Trust's Designated Safeguarding Officer.

All policies appertaining to the Trust including those in the list below, are placed on the Trust's Staff Intranet Site within the website along with a form on which staff can then indicate that they have accessed them.

Staff are informed through the same process of any updates or changes made to any policy.

Periodic training is then given by the Lead Designated Safeguarding Officer with staff to determine their knowledge and understanding of the policies and processes.

19. Whistleblowing:

If you disclose information about wrongdoing the law protects you from being treated unfairly or losing your job.

A disclosure qualifies for protection if you are an employee or volunteer and you disclose something about an organisation.

A disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed
- an legal obligation has been breached
- there has been a miscarriage of justice
- the health or safety of any individual has been endangered
- the environment has been damaged
- information about any of the above has been concealed.

This is set out in the Public Interest Disclosure Act 1998.

Also refer to the Sport and Education Trust's Whistle Blowing Policy with regards to further information and procedures.

20. Concerns around Radicalisation & Extremism:

Protecting children from the risk of radicalisation should be seen as part of Football's wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse.

During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer.

The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with other safeguarding risks, coaching staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a referral to the Channel programme.

The Counter-Terrorism and Security Act 2015, places a duty on specified authorities, including local authorities and childcare, education and other children's services providers including Sport, in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism ("the Prevent duty").

The Prevent duty of care relates to reducing or eliminating the risk of individuals becoming involved in terrorism.

Radicalisation refers to process by which a person comes to support terrorism and extremist ideologies associated with it.

Safeguarding is the process of protecting children, young people and vulnerable persons from being drawn into terrorist activity.

Grimsby Town Sport and Education Community Trust recognizes its responsibilities to the "Prevent duty of care", supporting the strategy in all activities involving children, young people and vulnerable people with any aspect of the Trust.

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- An injury for which an explanation seems inconsistent
- The young person describes what appears to be an abusive act involving them
- Another young person or adult expresses concern about the welfare of a young person
- Unexplained changes in a young person's behaviour e.g. becoming very upset, quiet, withdrawn or displaying sudden outbursts of temper
- Inappropriate sexual awareness
- Engaging in sexually explicit behaviour
- Distrust of adult's, particularly those whom a close relationship would normally be expected
- Difficulty in making friends
- Being prevented from socialising with others
- Displaying variations in eating patterns including over eating or loss of appetite
- Losing weight for no apparent reason
- Becoming increasingly dirty or unkempt.

23. Definitions of Abuse:

Physical Abuse: is deliberately physically hurting a child. 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.¹ Babies and disabled children also have a higher risk of suffering physical abuse.

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 as a result 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 in a position 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 opportunities 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 of time, 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 frequents 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 GTSET to decide that child abuse is occurring. It is their responsibility to act on and report any concerns.

Grimsby Town Sport and Education Trust 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:

24. Child Sexual Exploitation (CSE)

This is not a specific crime but is strongly linked to the sexual exploitation of children and young people through the internet. (The Trust has a policy covering E-Technology which applies).

The Child Exploitation Online Protection Centre (CEOP) was set up in 2012 to govern this practice through use of the internet.

All information or concerns should be reported to the Lead Designated Safeguarding Officer who will inform CEOP of the circumstances.

25. Female Genital Mutilation (FGM Act 2003 as amended by the Serious Crime Act 2015)

FGM has been a criminal offence in the UK since 1985 since 2003 it is also a criminal offence for UK nationals or permanent UK residents to send children abroad to have female genital mutilation, also referred to as 'female circumcision', or 'cutting'.

Known cases of Female Genital Mutilation (in under 18 year olds), or where a verbal disclosure is made by a person under 18 years of age, must be reported to the police using the Non-emergency number 101.

26. Modern Slavery Act (2015)

This legislation covers human trafficking, including children and young people for the purposes of exploiting them for sexual or non-sexual purposes.

Any information or concerns in this area should be reported to the Lead Designated Safeguarding Officer immediately for further action.

27. Peer on Peer abuse

Peer on peer abuse occurs when a young person is exploited, bullied and / or harmed by their peers who are the same or similar age; everyone directly involved in peer on peer abuse is under the age of 18. 'Peer-on-peer' abuse can relate to various forms of abuse (not just sexual abuse and exploitation), and crucially it does not capture the fact that the behaviour in question is harmful to the child perpetrator as well as the victim.

Any such reports or concerns must be reported to the Trust Lead Designated Safeguarding Officer as soon as possible.

It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. The child or young person should never be given the impression that they are creating a problem or made to feel ashamed for making a report.

Procedure to follow;

- recognise that the child/young person is trusting you to help them.
- Listen to the child/young person account carefully, being non-judgemental, clear about boundaries and how the report will be progressed.
- Do not ask leading questions and only prompt the child/young person where necessary with open questions.
- Record what the child says using their words, only recording the facts as the child presents them. The notes should not reflect the personal opinion of the writer.
- Where the account includes online elements or the taking of photographs, reference should be made to the 'Youth Sexual imagery' policy for advice on viewing or down loading the material or images.
- Inform the lead designated safeguarding officer or deputy as soon as practically possible. (If they are not involved in the initial report)

(Keeping Children Safe in Education 2018 and Working Together 2015)

28. Codes of Conduct:

Grimsby Town Sport and Education Trust 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 the Grimsby Town Sport and Education Trust, sports coaches are expected to conform to ethical standards in a number of areas: humanity, relationships, commitment, co-operation, integrity, confidentiality, abuse of privilege, safety and competence. (This is produced as a separate document)

29. Good Practice

All employees, workers, consultants, agency staff and volunteers working with children, young people or vulnerable adults 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 in adverse weather conditions of cold or heat. If the weather is cold or wet ensure that the 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 have to be supervised in changing rooms always ensure coaches etc 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.

30. Poor Practice:

The following are regarded as poor practice and should be avoided by all employees, workers, consultants, agency staff and volunteers (list is not exhaustive);

- Unnecessarily spending excessive amounts of time alone with children and young people away from others.
- Being alone in changing rooms, toilet facilities or showers used by children and young people.
- Taking children or young people alone in a car on journeys, however short.
- Taking children or young people to your home where they will be alone with you.
- Sharing a room with a child or young person.
- Engaging in rough, physical or sexually provocative games, including horseplay.
- Allow or engage in inappropriate touching of any form.
- Allowing children or young people to use inappropriate language unchallenged.
- Making sexually suggestive comments to a child or young person, even in fun.
- Reducing a child or young person to tears as a form of control.
- Allow allegations made by a child or young person to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature that the child or young person can do for themselves

(Procedures for implementing this policy are produced in a separate document)

31. Related Policies and Documents:

Grimsby Town Sport and Education Trust will also have in place the following policies, related to this policy, they being;

Vulnerable Adult Policy
 Equality and Diversity Policy
 Privacy Policy
 E – Technology Policy
 Anti-Bullying Policy
 Safer Recruitment Policy
 Recruitment of Ex-Offenders Policy
 Staff Training Policy
 Safeguarding Retention of Data Records Policy
 Procedures Document for all policies
 Code of Conduct for Manager(s) Coaches
 Code of Conduct for Players.
 Code of Ethics for Coaches
 Complaints and Appeals

32. Complaints Policy

In order to ensure that complaints that contain safeguarding issues are centrally recorded and actioned appropriately, the following procedure has been agreed:

33. Safeguarding concerns raised within

- Any safeguarding disclosure received which states a complaint is running alongside a safeguarding investigation - The Lead Designated Safeguarding Officer will notify the Board of the complaint. If appropriate, the Lead Designated Safeguarding Officer will send copies of minutes of the relevant meetings, planning, agree next steps and conclusion.
- Safeguarding Disclosures which identify they have been closed as a referral and should be treated as a complaint not a safeguarding issue – The Lead Designated Safeguarding Officer will notify the Board of Trustees of the information received and decide who will manage the complaint.
- The Lead Designated Safeguarding Officer will work with the Board of Trustees in the formulation of any letters that are required to be sent.
- Complaints will be acknowledged in line with the Trust's procedures.

34. Complaints raised with the Designated Safeguarding Officer

- Any complaints received which potentially have safeguarding issues.
- The Sport and Education Trust will discuss with the Lead Designated Safeguarding Officer to check if there is a need to alert services regarding safeguarding issues.

Any complaints received, direct to or from the Trust relating to coaching practice may also need to be referred to the Designated Safeguarding Officer and/or The Football Association Case Management Team as required.

35. Complaint Procedures:

Safeguarding is everyone's responsibility if you have concerns or are worried about the welfare of a child or young person, or receive a disclosure from a child or young person it is important that you report those concerns – **no action is not an option.**

36. Allegations or concerns against staff or volunteers:

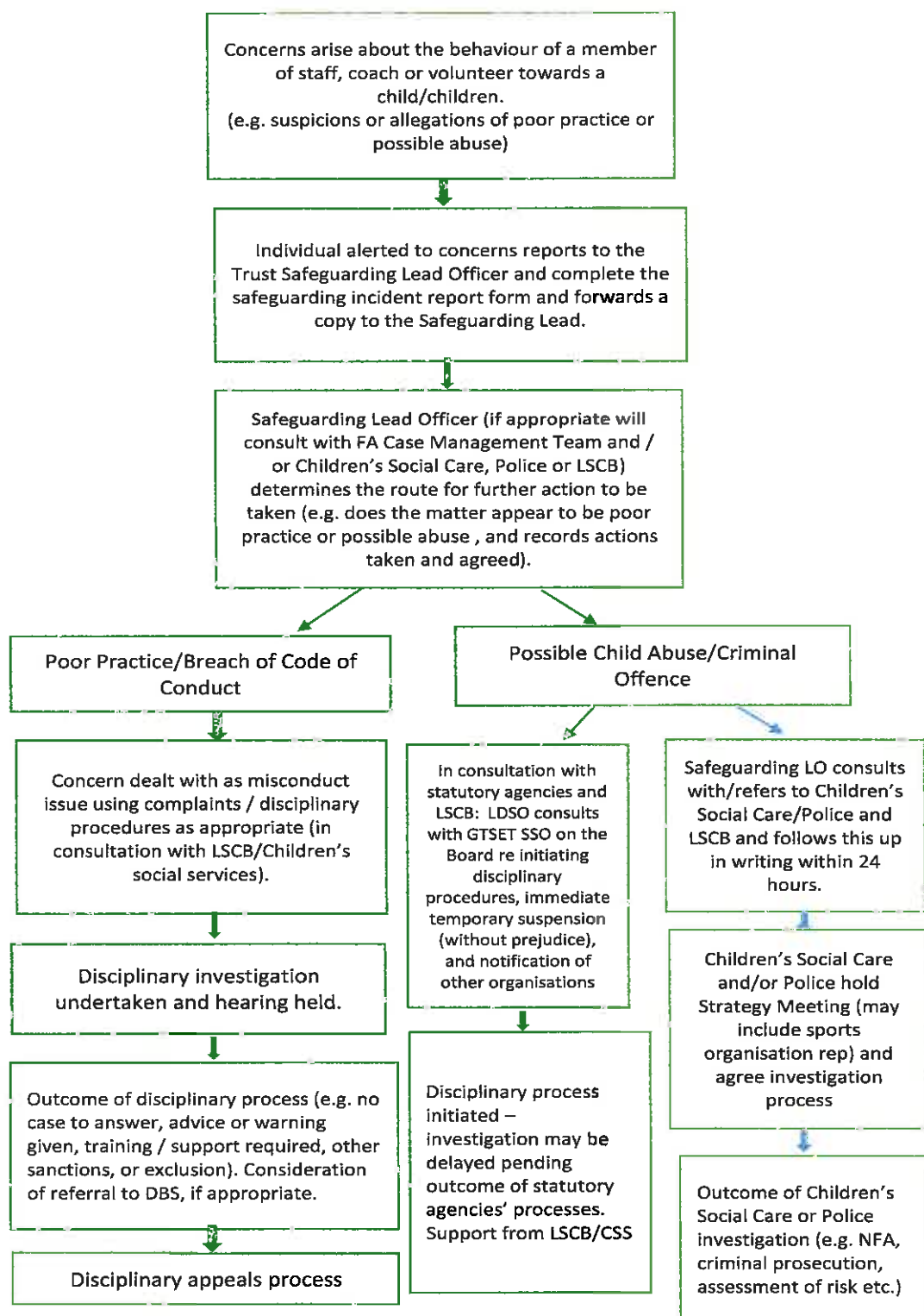
Where there are concerns or suspicions about abuse being committed by a member of staff or volunteer employed by the Grimsby Town Sport and Education Community Trust the Lead Designated Safeguarding Officer must be notified immediately. On receipt of the information and details the LDSO will inform the Senior Manager on the Board of Trustees and if appropriate other outside agencies that may have an interest for example; the Local Authority Designated Officer and Children's Social Services.

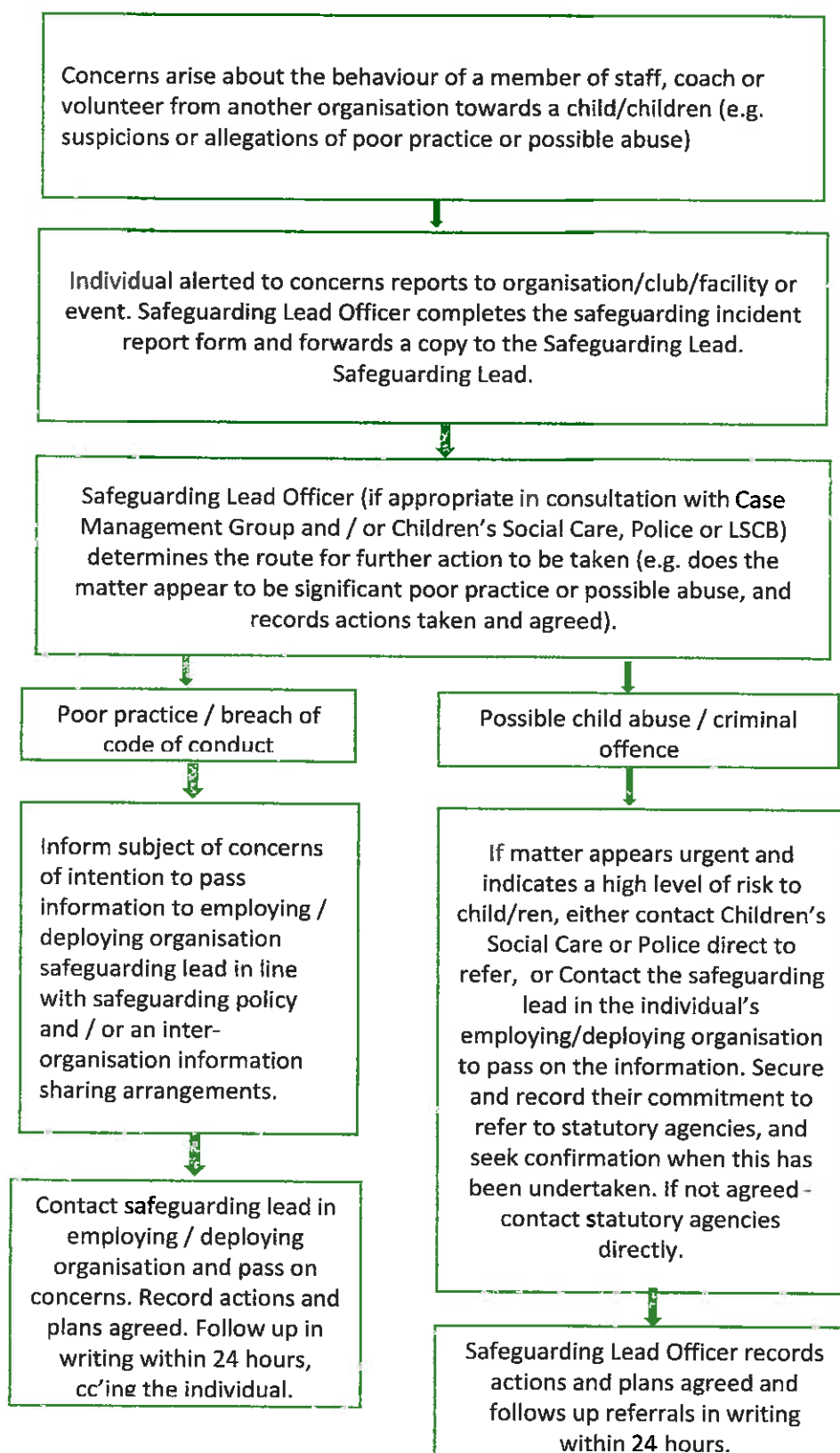
If the member of staff or volunteer also has a role in football outside of their work with the Trust, then the EFL Guidance to Member Clubs Policy and Procedures will be complied with and the Trust LDSO will make a referral to the FA Safeguarding Case Management Team for consideration.

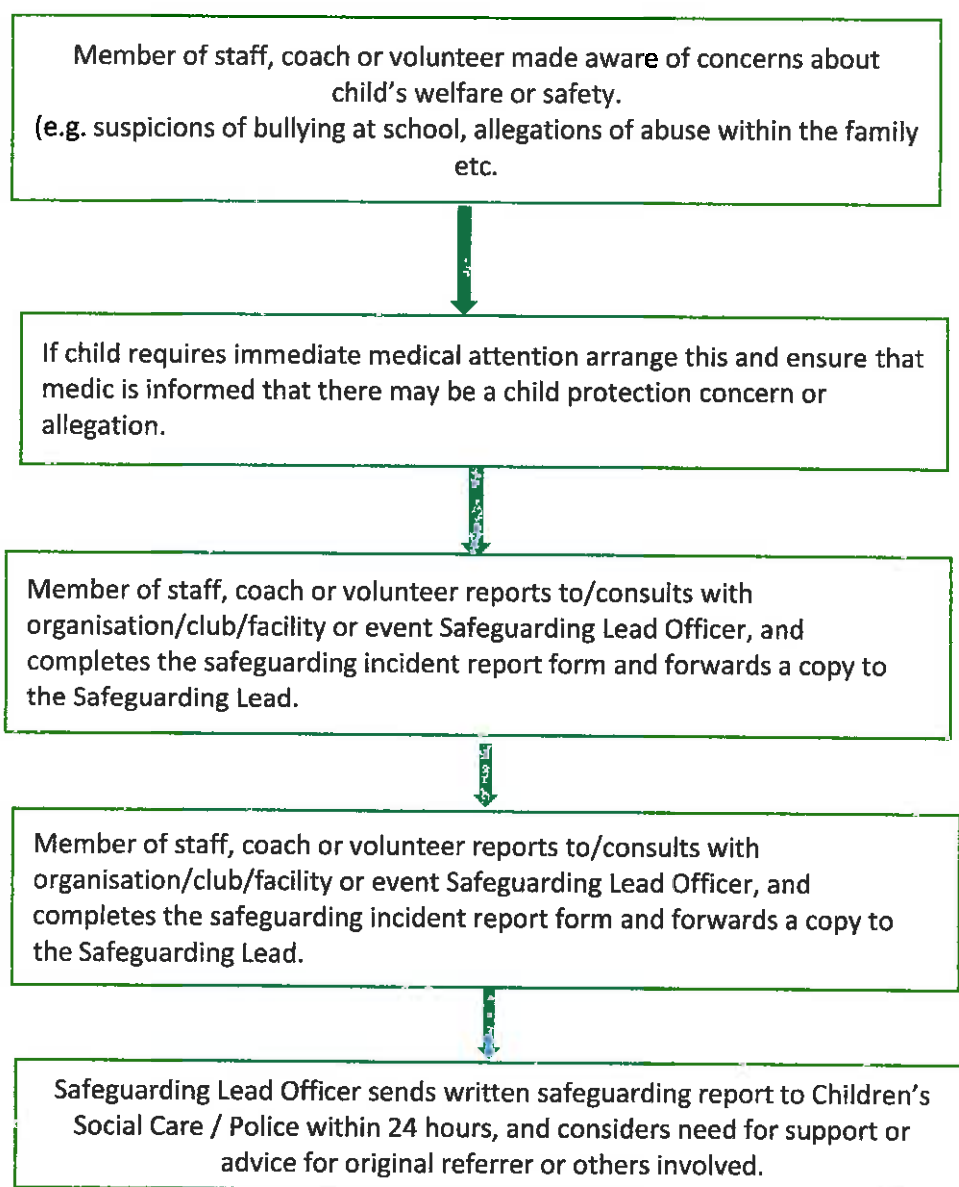
If any person employed or volunteering in a Regulated Activity within Grimsby Town Sport and Education Community Trust is suspended as a result of a concern, or internal investigation, for reasons connected to their role with children, young people or vulnerable adults then the Trust must notify all other interested parties as soon as practicable.

Below are the procedures to be followed in the following concerns or allegations relating to 'poor practice' circumstances;

1. Concerns raised about the behaviour/conduct of a member of staff, coach, or volunteer.
2. Concerns raised about the behaviour/conduct of a member of staff, coach or volunteer from another organisation.
3. Concerns raised around a child's, young person or adult at risk in situations outside of the Trust.







37. Grimsby Town Sport and Education Trust – NCS Reporting Procedures.

When concerns and critical incidents occur as part of the NCS Programme Grimsby Town Sport and Education Trust have a responsibility to ensure that all staff on this programme are aware of the Safeguarding and Reporting procedures.

At the beginning of each NCS Programme all staff and volunteers will undertake awareness induction including on Safeguarding presented by the Trust's Designated Safeguarding Officer (DSO).

This will include;

- Arrangements which set out clearly the processes for making a report/referral involving concerns, incidents and disclosures as soon as possible to the Trust's LDSO who will then evaluate the information to ensure that it is recorded at the appropriate level and that the information is shared appropriately with all other interested parties including the Board of Trustees, local authority children services including the LSCB, the police, EFL and NCS Trusts and the Football Authorities where appropriate.
- Contact details for the GTSET Safeguarding Senior Manager and Lead Designated Safeguarding Officer.

38. Definitions of NCS/Pharos Incident Levels

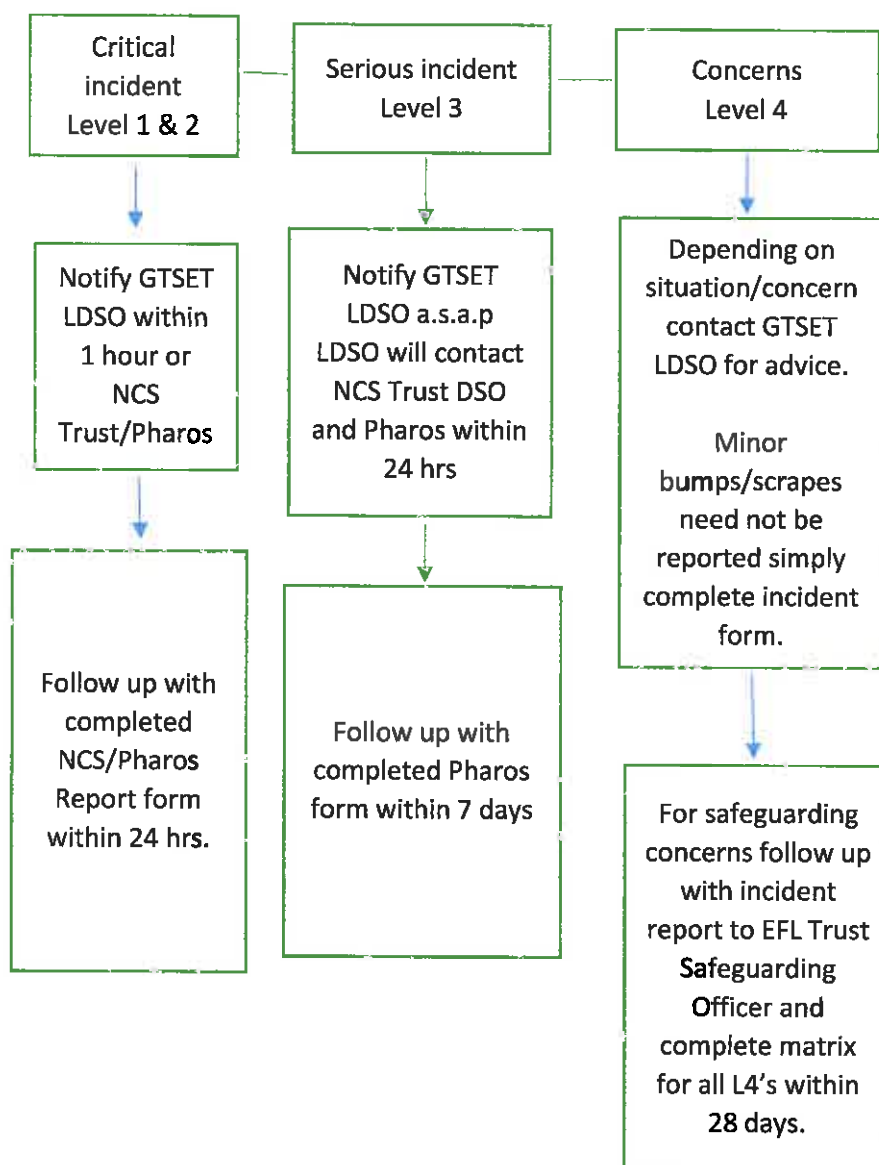
Level 1: Critical Safeguarding concerns or incidents which require urgent attention of the LDSO.

Level 2: Serious concerns and incidents that have an immediate and possible long term effects on the delivery of the programme.

Level 3: Serious incidents which with short to medium term impacts on individuals involved and the Trust.

Level 4: Incidents that are dealt with on a more regular basis by the LDSO and the Trust.

38.1 The below flowchart shows procedures:



For any further guidance or information on NCS Safeguarding processes contact:

Martin George Trust Lead Safeguarding Officer – Tel: 01472 696481 Mob: 07807490319

Email – martin@gtfc.co.uk or

Clare Taylor NCS Safeguarding – 07964905652

Email – ctaylor@efltrust.com

39. Responding to concerns and incidents:

The below table gives information on how to respond to concerns and incidents. In all cases firstly ensure that the young person is safe. **If you feel the young person is in immediate risk of harm or imminent danger, telephone 999.**

Stay calm	If the young person is present reassure them that they are not to blame. Listen to what they have to say. Keep questions to a minimum. Obtain Factual information about the young person and the circumstances by using sensitive and tactful means.
Communicate	Speak to the young person in a way that is appropriate to the age, understanding and preference. Do not frighten or question the young person excessively ‘Do not’ ask leading questions. ‘Do not’ put words into their mouths. You must merely try to establish facts in order to report the issues on.
Never	Do not make promises you may be unable to keep. Be honest and tell the young person you will listen and may have to inform others to keep them safe.
Record	You will be required to provide information including the young person’s details and information of the incident or allegation including where and the time you became involved.

40. Retention and Storage of Safeguarding concerns/documents.

The following is taken from the Trust’s policy on the retention of records under the Data Protection Act 1998.

Where information is received that contains concerns about a child or young person’s welfare or safety (e.g. concern about a physical injury, neglect at home or other abusive behaviour) or concerns about an employees or volunteer of the Grimsby Town Sport and Education Community Trust (e.g. if they hurt a child, breach a code of conduct, or do something that is considered to be poor practice) it is vitally important to record all relevant details regardless of whether these concerns are shared with the police or other outside agencies.

An accurate record should be kept of;

- Date/Time of incident/disclosure.
 - Parties who were involved, including any witnesses to the event.
 - What was said or done by whom.
 - Name of person reporting on the concern, name and designation of the person to whom the concern was reported, date and time and their contact details.
 - Any further action taken.
-
- Any action taken by the Sport and Education Trust to look into the matter.
 - Where relevant, the reasons why a decision was not taken to refer the concerns onto a statutory authority.
 - Any interpretation/inference drawn from what was observed, said or alleged should be clearly recorded as such.
 - The record should be signed.

Normally personal information should not be retained for longer than 6 years after the subject has left Grimsby Town Sport and Education Trust.

For exceptions to this period and other information please see policy on the Retention and Storage of Records GDPR policy.

41. Critical incident management and Handling media interest.

Critical incident management including internal escalation of serious incidents will be the responsibility of the Trust Lead Designated Safeguarding Officer who will advise the Board of Trustees Safeguarding Manager who will deal with and handle any media interest.

42. Contacts

The Trust Lead Designated Safeguarding Officer is the first point of contact for reporting concerns or if advice is required;

Martin George – T: 01472 696481 M: 07807490319 – email – martin@gtfc.co.uk

Other available contacts for information are;


Lincolnshire FA DSO – Sarah Pridmore – Tel: 0844 9670708 ext. 103
mob: 07973666778
Email – Sarah.Pridmore@lincolnshirefa.com

NEL Local Safeguarding Partnership – phone 01472 326570
Email – LSCBenquiries@nelincs.gov.uk

NSPCC helpline – 0808 800 5000

43. Monitor and review the policy and procedures:

The Board of Trustees acknowledge and adopt this policy and implementation of its monitoring procedures as above. The Lead Designated Safeguarding Officer for the Trust should regularly report progress, challenges, difficulties, achievements, gaps and areas where changes are required, including new activities involving contact with those at risk or significant organisational change, to the Board of Trustees. The policy will be reviewed and amended annually or sooner if there is a change to legislation or guidance as the result of a major incident.

Signed: 
(on behalf of Trustees)

Dated: 10th June 2019

Appendix 1



GRIMSBY TOWN SPORTS & EDUCATION TRUST CONSENT FORM

PERSONAL DETAILSFull Name: _____ Gender (please tick): Male ☐ Female ☐

Home Address: _____

Post Code: _____

Telephone Number (including STD code): Day: _____ Evening: _____

Mobile: _____ Email Address: _____

Age: _____ Date of Birth: _____ / _____ / _____

School or College: _____ Current School Year group: _____

Have you taken part in any sport or fitness outside of school in the last 12 months? (please tick) Yes ☐ No ☐**ETHNICITY (PLEASE TICK):**

Asian <input type="checkbox"/>	Indian <input type="checkbox"/>	Pakistani <input type="checkbox"/>	Black (African) <input type="checkbox"/>	Black (Caribbean) <input type="checkbox"/>
Polish <input type="checkbox"/>	Latvian <input type="checkbox"/>	Romanian <input type="checkbox"/>	Lithuanian <input type="checkbox"/>	Black (Other) <input type="checkbox"/>
Chinese <input type="checkbox"/>	Russian <input type="checkbox"/>	White (European/UK) <input type="checkbox"/>	Other: (give details) _____	

DISABILITY

Would you consider your child to have a disability? (Please delete) Yes/ No

If Yes: please state the type of disability and if any special considerations are needed?

EMERGENCY INFORMATION**Emergency Contact Details of Parent/Guardian/Carer:**

Name: _____ Telephone number: _____

Alternative Emergency Contact Details:

Name: _____ Telephone number: _____

Does your child take any medication or have any medical requirements that the coach should be aware of? If so, please give details: _____

Parent/Guardian Disclaimer

I agree to let my child take part The Trust's Activity. I understand that The Trust are under no liability in respect of any loss or injury which the applicant may sustain, other than death or personal injury resulting from negligent acts of its employees or agents. I authorise emergency treatment to be administered if necessary during the activity by the appropriate person/people. I consent in photographs being taken during the activity which may be used in any publicity/promotional material including web pages produced by The Trust.

Grimsby Town Sports & Education Trust recommend that all participants wear the correct protective equipment/footwear at all sessions and failure to do so is at your own risk*

Signed (parent/guardian/carer): _____ Date: _____



Appendix 2



GTSET INCIDENT/CONCERN REFERRAL FORM

Your name:		Name of organisation:	
Your role:			
Contact information (you):			
Address:		Postcode:	
Telephone numbers:		Email address:	
Child's name:		Child's date of birth:	
Child's ethnic origin: <i>Please state</i>		Does child have a disability: <i>Please state</i>	
Child's gender:			
<input type="checkbox"/> Male <input type="checkbox"/> Female			
Parent's / carer's name(s):			
Contact information (parents/carers):			
Address:		Postcode:	
Telephone numbers:		Email address:	
Have parent's / carer's been notify of this incident?			
<input type="checkbox"/> Yes <input type="checkbox"/> No			
If YES please provide details of what was said/action agreed:			
Are you reporting your own concerns or responding to concerns raised by someone else:			
<input type="checkbox"/> Responding to my own concerns <input type="checkbox"/> Responding to concerns raised by someone else			
If responding to concerns raised by someone else: <i>Please provide further information below</i>			
Name:			
Position within the sport or relationship to the child:			
Telephone numbers:		Email address:	
Date and times of incident:			
Details of the incident or concerns: <i>include other relevant information, such as description of any injuries and whether you are recording this incident as fact, opinion or hearsay.</i>			
Child's/Young Persons account of the incident:			

Please provide any witness accounts of the incident:
Please provide details of any witnesses to the incident: <i>Name:</i> <i>Position within the club or relationship to the child:</i> <i>Date of birth (if child):</i> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <i>Address:</i> <i>Telephone number:</i> </div> <div style="width: 45%;"> <i>Postcode:</i> <i>Email address:</i> </div> </div>
Please provide details of any person involved in this incident or alleged to have caused the incident / injury: <i>Name:</i> <i>Position within the club or relationship to the child:</i> <i>Date of birth (if child):</i> <div style="display: flex; justify-content: space-between;"> <div style="width: 45%;"> <i>Address:</i> <i>Telephone number:</i> </div> <div style="width: 45%;"> <i>Postcode:</i> <i>Email address:</i> </div> </div>
Please provide details of action taken to date:
Has the incident been reported to any external agencies? <input type="checkbox"/> Yes <input type="checkbox"/> No
If YES please provide further details: <i>Name of organisation / agency:</i> <i>Contact person:</i> <i>Telephone numbers:</i> <i>Email address:</i> <i>Agreed action or advice given:</i>

Your Signature:		Print name:	
Date:			

Contact your organisation's Lead Designated Safeguarding Officer in line with GTSET reporting procedures.

Appendix 3

Version Control

Version	Date	Amendment	By whom
V 1	23/01/2019	Appendix 2 – Incident/Concern Referral Form	M. George (DSO)
V 2	20/04/2019	Amendment made to paragraph on Monitoring and Review – covering new activities involving contact with those at risk or significant organisational change.	M. George (DSO)
V3	08/06/2019	Lincolnshire County FA Safeguarding Officer details updated.	M. George (DSO)

21

