



COMMUNITY SPORTS & EDUCATION TRUST

REGISTERED CHARITY NO: 1102239

SAFEGUARDING CHILDREN POLICY AND PROCEDURES

Statement

Watford FC's Community Sports and Education Trust (hereafter referred to as the Trust) is committed to creating opportunities for children and young people to participate in a broad spectrum of activities at the Trust at the same time as creating a safer culture for the participants.

The Trust has a moral, legal and social responsibility to provide a fun and safe environment for all those participating in these activities. Working in partnership with children and young people and their support network is essential in promoting and embedding this Policy.

Principles

The Trust seeks to ensure the safety and well-being of all children and young people who engage in activities with the Trust.

It is through the application of this policy and procedures that the Trust will seek to develop a positive and proactive welfare program to enable all children and young people to participate in an enjoyable and safe environment. This equally applies to the safety and security of those working with and responsible for the activities involving children and young people.

If you work or intend to work with children or young people, you are automatically placed in a position of trust that carries authority, status, power and responsibility. If the staff involved are positive role models, displaying high moral and ethical standards; the benefits to children and young people's development can be significant. Football can and does have a positive effect on children and young people's development; and is potentially an inspiration for all sections of our community.

Scope

This policy is for use across the Trust and is to be observed by all those working with children and young people. The application of this policy and procedures across the Trust, promoting safeguarding good practice is mandatory.

All the requirements of this policy are obligatory and are to be enforced 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. Where appropriate to their role with children and young people they will be supported by a safeguarding training program.

The person with responsibility for safeguarding and child protection at the Trust is the Head of Skills and Safeguarding. The Trust fully acknowledges and accepts its responsibility for the safety and well-being of children and young people, who engage in any activity carried out with the Trust.

The Trust has a child orientated approach and child welfare is of paramount importance. It is the duty of all staff working at the Trust to safeguard the welfare of children and young people by creating an environment that protects them from harm.

Activities undertaken at the following locations and departments are under the remit of this policy, including:

- Watford FC's Community Sports & Education Trust (the Trust).
- Watford Ladies FC
- Meriden Community Centre, Watford
- Cedars Youth and Community Centre, Harrow Weald

The Trust has comprehensive safeguarding procedures in place to meet the requirements of The FA and Premier League Rules (Section S, the 'Safeguarding of Vulnerable Groups and Safe Recruitment'); FA Safeguarding Children Rules and the Children Act(s) 1989 and 2004. These procedures ensure that national standards for safeguarding are met and implemented throughout the Trust.

In respect of safeguarding individuals from radicalisation, the Trust works to the PREVENT element of the Government's Counter Terrorism Strategy, and where deemed appropriate seeks external support for children and young people through referrals to the Channel Program. This program aims to work with the individual to address their specific vulnerabilities, prevent them from becoming further radicalised and possibly entering the criminal justice system because of their actions. It is recognised that radicalisation can occur to an individual from any section of society and is not particular to any racial, ethnic or social group. It is further recognised that in many instances the process of radicalisation is essentially one of grooming by others.

The Trust also has a responsibility to maintain regular dialogue with Local Safeguarding Children Boards. The Trust will refer concerns that a child or young person might be at risk of significant harm to the Department for Children and Young Peoples Services, the Police or in cases of suspected radicalisation to the Channel Scheme as appropriate.

The Trust will refer to the Local Authority Designated Officer (LADO) any incident or allegation against a person in position of trust.

Definition of a child

A child or young person is someone under the age of 18 years.

Aims and Key Principles

The aims of the Trust's Safeguarding Children Policy are to:

- Safeguard all children and young people who interact with the Trust and its' employees and volunteers.
- Demonstrate best practice in safeguarding children and young people.
- Develop a positive and proactive welfare program to enable all children and young people to participate in an enjoyable and safe environment.
- Promote high ethical standards throughout.

The key principles underpinning this policy are

- The child or young person's welfare is and must always be the paramount consideration.
- 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.
- Ensuring that staff, coaches and other staff who meet children and young people are good role models.
- Working in partnership with other organisations, children and young people and their parents or responsible person is essential.

Head of Skills and Safeguarding

The role of the Head of Skills and Safeguarding is to:

- Work closely with Board of Trustee's Safeguarding Lead to provide clarity across the Trust to ensure full compliance with Premier League rules, the FA safeguarding agenda and Government legislation.
- Maintain key relationships with Trust's Board of Trustees, Club's Head of Safeguarding, the Premier League Safeguarding Team, Designated Safeguarding Officers, NSPCC, Police, Children's Services, Local Safeguarding Children Board, Local Authority Designated Officer (LADO) (for the management of allegations against professionals); and The FA Safeguarding and Case Management teams.
- Provide quarterly reports to Board of Trustees on the effectiveness of the Trust's safeguarding strategy; compliance and updates on current legislation and any changes in Premier League or FA Rules; or statutory agency legislative changes which impact the Trust.
- Represent the Trust and work in conjunction with the Club's Head of Safeguarding to support as Lead Case Manager when cooperating with and reporting directly to external statutory agencies such as the Police, Local Safeguarding Children Board and Children's Services. This includes the referral of cases of suspected radicalisation to the police or Channel Scheme.

Designated Safeguarding Officers (DSO)

The role of the Designated Safeguarding Officer is to:

- Support the Head of Skills and Safeguarding in promoting the moral and legal responsibilities in implementing procedures to provide a duty of care for children and young people, safeguard their well-being and protect them from abuse and poor practice - primarily within a specific department of the Trust.
- To take responsibility for the day to day management of safeguarding issues and proactive promotion of safeguarding within the specified department.
- To be available at all reasonable times as a first contact for staff, parents, children; and if appropriate, external agencies regarding information or referral of safeguarding matters within the department.
- To record and refer on to the Head of Skills and Safeguarding 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 department and around the Trust.
- To attend regular Trust safeguarding team meetings with relevant personnel, and undertake any actions raised at meetings and CPD events to keep up to date with current legislation.
- Be aware of safeguarding guidelines and legislation for compliance.

Recruitment and Disclosure

As part of the Trust's recruitment and selection process, offers of work for positions which involve 'regulated activity' when 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 a satisfactory disclosure has been confirmed, the individual concerned will not be permitted to commence work.

All employees, workers, consultants, agency staff and volunteers engaged in 'regulated activity' 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 Trust will consider whether the nature of the offence or 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 Head of Safeguarding at the Trust and Premier League and/or the Local Safeguarding Children Board Manager may be asked to attend the risk assessment meeting.

All new employees, workers, consultants, agency staff and volunteers working with children or young people at the Trust will be required to complete a self-declaration on commencement of duties. The Trust will ensure that all agency staff and consultants working with children in 'regulated activity' are subject to a satisfactory Enhanced DBS disclosure and sign a self-declaration form prior to engagement. Pending DBS clearance and obtaining references from previous employers they will not have unsupervised access to children and young people during their time with the Trust.

Employee and 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 Head of Skills and Safeguarding and Business Support Officer

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 child 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 and young people.

Employees, workers, consultants, agency staff 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. Examples of positions of trust include (but are not limited to):

- A Head of a Department;
- Member of community staff or volunteer working with children;
- Coach;
- Team manager;
- Physiotherapist;
- Driver;
- Learning mentor/tutor,
- Staff engaged in matchday activity involving children and young people, including supervising mascots, ball boys and photographers.

Protecting Children and Young People with Disabilities

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 or physical and or invasive medical care required. This can make it difficult for the child or young person to know what is an acceptable and, unacceptable 'touch'.
- Lack of speech or limited communication, this makes it harder to report abuse.
- Multiple parent or responsible persons – making it harder to identify who may be abusing.
- History of being told what to do and not given choices.
- Being dependent 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 fully protected but the safest environments are those that assist children and young people to protect themselves by helping them to speak out. Everyone must do their best to stop abuse from happening and take responsibility for observing, challenging and reporting poor practice and suspected abuse.

Safe environments for children and young people with disabilities are also safer for all children and young people.

A safe environment is one where

- Abuse is openly acknowledged to exist and is discussed by adults.
- Training in safeguarding and child protection awareness takes place.
- Policies and procedures are known by all and followed.
- There is support for those who report suspicions or concerns.
- Ensure that those working with children and young people learn the child or young person's communication method. They may need training to do this.
- Ensure that the child or young person's health needs are known, recorded and that sufficient people know how to respond. This may mean knowing how to manage a seizure or an asthma attack. It may mean ensuring that medication is kept to hand, administered correctly, and recorded.
- Ensure a mobile phone is available and switched on.
- Discuss with parents or responsible persons any physical care that is required and how this can best be done with respect and dignity. This will usually mean same gender parent responsible person, and consistent parents or supporters. Consideration needs to be given to the balance of the need for privacy with the need for account- ability and protection against allegations for responsible persons. This is best done by consulting with parents or responsible person and the child or young person concerned.
- Give the child or young person every opportunity to make informed choices and respect their choice.
- Have clear strategies for dealing with difficult behaviour that excludes any kind of physical punishment or restraint.
- Listen to and support children and young people.
- Involve children or young people and their families wherever possible. This helps give all children and young people a voice and may act to deter abusers.

Facilities Hiring and Third Party Working

Clubs or organisations hiring Trust facilities e.g. Cedars Youth and Community Centre and Meriden Community Centre or are employed to provide activities on behalf of the Trust which are regulated through the provision of teaching, training, instruction, care for or supervision of children or adults at risk must provide the Trust details of:

- Club or organisation safeguarding policy
- Name of person responsible for the club's or organisation's safeguarding provisions
- Evidence of Disclosure and Barring Service checks completed for all employees, volunteers and instructors
- Evidence of all employees, volunteers and instructors have undertaken some form of safeguarding children training

The Trust will ensure that all agency staff and consultants working with children and young people are subject to a satisfactory Enhance DBS check and sign a self-declaration on commencement of duties.

Delivery of regulated curriculum activity, the Trust will work with and adhere to the school's, college or education providers safeguarding policy and procedure as directed. If the school, college or education establishment is unable to provide a 'fit for purpose' safeguarding policy and procedure, the Trust's own policy will be used and supersede that of the school, college or education establishment.

The hiring of facilities outside of the school day e.g. after school club, to provide activities which are regulated through the provision of teaching, training, instruction, care for or supervision of children or adults at risk the Trust will adhere to their own policy and notify school, college or education establishment of any incidents, concerns or allegations made.

Good Practice

All employees, workers, consultants, agency staff and volunteers working with children or 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).
- Adhere to the Lone Working Policy, Lone Worker Risk Assessment, Late Collection and Missing Person Procedure.
- 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.
- Maintain a safe and appropriate distance with children and young people and avoid unnecessary physical contact.
- Where any form of manual or 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 Trust officials are required to transport children and young people.
- Gain written parental or guardian consent for any significant travel arrangements e.g. overnight stays.
- Staff or volunteers 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 Trust to act in loco parentis, to give permission for the administration of emergency first aid or other medical treatment if needed.
- Keep a written record of any injury that occurs, and details of any treatment given using CPOMS reporting system
- Adopt all other good practice and common-sense principles given the varying situations.

Poor Practice

The following are regarded as poor practice and may be considered as high-risk offending factors and therefore should be avoided:

- 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 Communicate with a child or young person via social media on a personal basis – please refer to Trust’s Social Media Policy.
- Communicate with a child or young person using electronic communication unless this is on a business level
- If in doubt... Do not do it!

Challenging poor practice such as racism, sexism, homophobia, bullying, foul, aggressive or provocative language or any controlling behaviour that upsets children or young people is vital. Never ignore bullying or verbal abuse by supporters, parents, coaches, children or young people. Listen to and support the person being targeted. Explain to the bully that poor behaviour is unacceptable. Refer to the Trust’s Anti-Bullying and Harassment Policy where appropriate.

Signs, indicators and forms of poor practice and abuse

“Child abuse” is a term used to describe what happens when a person, or a group of people, harm a child or young person under the age of 18. Abuse and neglect are forms of maltreatment of a child; somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm.

Children and young people may be abused in a family, institutional or community setting, by those known to them or, more rarely by a stranger. They may be abused by an adult or adults, or another child or children or young person. There are different types of abuse to be aware of that can arise in a football situation, they are as follows:

- Neglect
- Physical abuse
- Sexual abuse, including internet grooming & sexual exploitation
- Emotional abuse
- Bullying

Full details of signs and indicators of abuse can be found in Appendices 1 and 6 to this policy. You may also become aware that a child and young person is potentially becoming radicalised. The possible signs of radicalisation are shown in Appendix 1.

Signs, indicators and forms of poor practice and abuse

If you are concerned about the welfare of a child or young person or you are concerned about an adult’s behaviour towards a child or young person you must act.

Do not assume that someone else will help the child, safeguarding children is everyone’s responsibility It is important that you report your concerns to one of the following:

- Designated Safeguarding Officer
- Head of Skills and Safeguarding

Taking no action is not an option

What to do if you receive a safeguarding disclosure from a child or young person

Children or young people who may be vulnerable are likely to disclose abuse, or radicalisation to those they trust and how one responds to a disclosure is crucial.

Stage 1

Deal with the disclosure as it happens and ensure that the child or young person's immediate needs are met and that they feel supported. When a disclosure is made, it is most important to understand that you must not investigate the disclosure yourself. The disclosure must always be taken seriously and dealt with according to the guidance in this Policy, even if the truth of the disclosure is uncertain.

You are not expected to act as a social worker, counsellor, judge, jury, or avenge the abuser; you are expected to act in the best interest of the child or young person who may be at risk.

You must:

- **Put your own feelings aside and listen** as if the information is not sensational.
- **Allow** the child or young person to lead the discussion and to talk freely.
- **Listen** to what the child or young person is saying. Try not to interrupt them or ask lots of questions. Being asked a lot of questions can feel like being interrogated.
- Let them tell you at their own pace. Don't worry if the child or young person stops talking for a while - silences are OK. You do not have to rush to fill in the gaps.
- **Accept** what the child and young person says without challenge.
- **Listen** to the child and young person without investigating.
- **Allow** the child or young person to talk but protect them from sharing the information with too many other people.
- **Provide reassurance** that you are taking them seriously.
- Let the child and young person know that you understand how hard it is for them to tell.
- Let them know they are doing the right thing by speaking out.
- It is ok to let them know if you are unable to answer all their questions.
- **Avoid** using questions such as "Is there anything else you would like to tell me?"
- **Avoid** asking leading questions like "Did the coach hit you?"
- Never ask questions that may make the child or young person feel guilty or inadequate.
- If physical abuse has taken place, you may observe visible bruises and marks but do not ask a child or young person to remove or adjust their clothing to see them.
- Tell the child and young person who you will be contacting e.g. the Head of Skills and Safeguarding, statutory agencies etc., and that you will support them throughout.
- Once you have established that they have been harmed or are at risk of being harmed, do not pursue the conversation any further. This is important to ensure that questions cannot be raised later about possible manipulation of the disclosure.
- **Respect** the confidentiality of the disclosure and do not share the information with anyone other than those who need to know. Those who need to know are those who have a role to play in protecting children and young people

REMEMBER

When a child and young person discloses, they may feel:

- **Guilt:** They may blame themselves for the abuse and often feel guilt for telling.
- **Ashamed:** They may feel mortified about the abuse itself.
- **Confused:** They may be muddled about their feelings for the alleged abuser.
- **Scared:** They may be scared of the repercussions. They may be scared of the alleged abuser.

Be careful about touching (e.g. hugging or cuddling) the child or young person if they have not initiated the contact. They may be upset by physical contact.

Stage 2

As soon as possible, once the immediate comfort and safety of the child and young person is secured, you must inform the Trust's Head of Skills and Safeguarding of the disclosure. You may make a referral yourself directly to a statutory agency if you are concerned about the child and young person's immediate safety and/or are having difficulty contacting either the Head of Skills and Safeguarding or if the Head of Skills and Safeguarding is the alleged abuser the contact the designated Board of Trustees Safeguarding Lead or Community Director. Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only.

Stage 3

You should note down details as soon as possible after the disclosure has been made. What is clearly etched at the time can become blurred after a few hours. It is vital that you make clear and concise notes soon after the disclosure in order to complete a more detailed record and safeguarding incident sheet later.

Immediate notes should include:

- **Date and time.**
- **Place and context of disclosure or concern.**
- **Important facts provided, e.g. names mentioned.**

Wherever possible, you must record information as it was relayed to you using the language of the child and young person rather than your own interpretation of it. It is important to report factual information rather than your assumption or interpretation. Please follow the guidance on the safeguarding incident report form.

What happens next?

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. You should be informed by the Trust's Head of Skills and Safeguarding within 24 hours what has happened following the report being made. If you do not receive this information, you should be proactive in seeking it out.

If you have concerns that the disclosure has not been acted upon appropriately, you should inform the designated Board of Trustees Safeguarding Lead or if unavailable the Community Director, and ultimately contact the relevant statutory agency.

A disclosure is not the only way that you may be made aware of a problem. Sometimes another adult or even a child may say something about a possible abusive situation.

Deal with it in the same way!

On occasions, you may witness an incident that may cause concern or indeed you may pick up on things that cause concern to you. Information may be passed to a coach or manager anonymously by a person or persons who do not want to be directly involved for whatever reason. However, you come upon information that causes concern and may put others at risk, the action should always be the same.

Taking no action is not an option

All matters will be fully investigated, and appropriate action will be taken. Action may include referral to the Police, Children's Services, Premier League or The FA if deemed as appropriate by the Head of Skills of Safeguarding. Any referral to an external agency shall also be reported to the Board of Trustees Safeguarding Lead and Community Director. Full contact details can be found in Appendix 5.

Remember the child's welfare is of paramount importance

Full details of dealing with concerns in a football setting at the Trust can be found in Appendix 2 to this policy. Full details of dealing with concerns outside the football setting can be found in Appendix 3 to this policy.

Safeguarding procedures

The Trust takes any form of safeguarding poor practice or abuse seriously in order to promote a culture of best practice and accountability.

The Trust encourage all employees, workers, consultants, agency staff and volunteers to raise concerns they may have about any safeguarding poor practice or abuse as early as possible to the relevant personnel. The Trust will respond accordingly to promote a safer environment.

If you have any questions regarding this section of the Safeguarding Children Policy and Procedures, please contact the Trust's Head of Skills and Safeguarding.

Procedure for raising a safeguarding concern

How to raise a concern? You do not need to have firm evidence before raising a concern. But we do ask that you explain as fully as you can the information or circumstances that gave rise to your concern.

Stage 1

If you have a concern of any form of safeguarding poor practice or abuse, raise it first with the Designated Safeguarding Officer, who will raise it with the Trust's Head of Skills and Safeguarding.

Stage 2

If you feel unable to raise the matter with the Designated Safeguarding Officer for whatever reason, raise the matter with the Trust's Head of Skills and Safeguarding.

Stage 3

If these channels have been followed and you still have concerns, or if you feel that the matter is so serious that you cannot discuss it with any of the above, please contact The Head of Safeguarding at the Premier League on Tel: 020 7864 9000 - please refer to Trust's Confidential Reporting Procedure

Steps will then be taken to fully investigate the matter to decide what appropriate action should be taken. The Trust is committed to protecting children and young people and will take action to uphold this commitment.

Historical/non-recent concerns of abuse

Referral of concern about historical and non-recent abuse should be continued to be made directly to the Head of Skills and Safeguarding or alternatively, directly to the FA's Safeguarding Team via safeguarding@thefa.com. A helpline is available 24 hours a day on 0800 023 2642.

Peer-on-Peer Abuse

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

Peer-on-peer abuse can take various forms, including (but not limited to): serious bullying (including cyberbullying), relationship abuse, domestic violence and abuse, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or prejudice-based violence including, but not limited to, gender-based violence.

Online peer-on-peer abuse is any form of peer-on-peer abuse with a digital element, for example, sexting, online abuse, coercion and exploitation, peer-on-peer grooming, threatening language delivered via online means, the distribution of sexualised content, and harassment.

County Lines

It often involves the exploitation of children, as gangs use young people and those with mental health or addiction problems to transport drugs and money. These gangs establish a base in the location they are targeting, often taking over the homes of local vulnerable adults by force or coercion in a practice referred to as 'cuckooing'. Cuckooing is the term used when gangs establish a base in the location they are targeting, often taking over the homes of vulnerable adults by force or coercion.

Signs and indicators

- Lone children from outside of the area
- Individuals with multiple mobile phones or tablets or 'SIM cards'
- Young people with more money, expensive clothing, or accessories than they can account for
- An increase in anti-social behaviour around the property.

Use of photography and film images.

The Trust takes its guidance on the use of images from guidelines issued by The FA and Premier League. All images are taken by Trust officials who have been briefed by a Trust's Head of Skills and Safeguarding or by the Impact and Communication Officer responsible for the activity being photographed or filmed.

- Before taking images of children or young people, parental consent must be sought in writing, at the start of the season or prior to the event.
- Parents or responsible person are responsible for informing the Trust of any change of circumstances within the season which may affect consent.
- Parents or responsible person will be informed of how the image will be used.
- The Trust will not allow an image to be used for something other than that for which it was initially agreed.
- All children or young people featured in Trust publications will be appropriately dressed.
- If possible, the image will focus on the activity taking place and not a specific child.
- Where appropriate, images will represent the broad range of people participating safely in the event.
- Trust photographers will, where applicable, undertake a DBS check and attend an FA Safeguarding Children Workshop; and in any case will be personally responsible for keeping up to date with the latest guidelines on the 'Use of Images' policies from the Premier League. Trust identification will be worn at all times.
- Children who are the subject of a court order will not have their images published in any Trust document.
- No images of children featured in Trust publications will be accompanied with personal details such as their home address.
- Recordings of children for the purposes of legitimate coaching aids will only be filmed by Trust officials and

stored safely and securely at the Trust's premises.

- Mobile phone cameras are not to be used in changing rooms.
- Any instances of inappropriate images in football should be reported to a Designated Safeguarding Officer or Head of Skills and Safeguarding.

Social Networking Guidance

The Trust recognises that social media and social networking services provide opportunities to effectively engage with a wide range of audiences in a positive manner. However, the Trust is also aware of the potential safeguarding risks especially to children and young people when using these forms of media.

- Do not add or invite children or young people you have responsibility for in football to be 'friends' within social networking sites such as Facebook, Instagram.
- Do not follow or accept children or young people you have responsibility for in football on social media if they try and "add" you on sites such as Twitter
- Avoid 'one to one' electronic communications. Where you do communicate electronically ensure you send this communication to the parent or responsible person as well as the child or young person.
- Social networking is dealt with in full in the Trust's Social Media Policy, available on the Trust's SharePoint.

Confidentiality

Employees, workers, consultants, agency staff and volunteers may have access to confidential information about children and young people in order to undertake their responsibilities. In some circumstances, employees, workers, consultants, agency staff or volunteers may be given highly sensitive or private information. They should never use confidential or personal information about a child or young person or his/her family for their own or others' advantage.

Information must never be used to intimidate, humiliate or embarrass children or young people. Confidential information about a child or young person should never be used casually in conversation or shared with any person other than on a need to know basis. In circumstances where the child or young person's identity does not need to be disclosed, the information should be used anonymously.

There are some circumstances in which an employee, worker, consultant, agency staff or volunteer may be expected to share information about a child, for example when abuse is alleged or suspected. In such cases, individuals have a duty to pass information on without delay, but only to those with designated safeguarding responsibilities.

If an employee, worker, consultant, agency staff or volunteer is in any doubt about whether to share information or keep it confidential, they should seek guidance from the Trust's Head of Skills and Safeguarding. Any media or legal enquiries should in the first instance be referred to the Impact and Communications Officer.

The storing and processing of personal information about children is governed by the Data Protection Act, 2018. For further information on the Trust's (and your) obligations under the Data Protection Act 2018, please see the Trust's Data Handling and Protection Policy, For, further information, please contact the Trust's Data Protection Officer DPO@watfordfc.com.

This means that employees, workers, consultants, agency staff and volunteers:
Are expected to treat information they receive about children/young people in a discreet and confidential manner.
Should seek advice from the Head of Skills and Safeguarding if they are in any doubt about sharing information they hold, or which has been requested of them.

List of Appendices

Appendix 1

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Appendix 1

Signs and indicators of abuse.

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

- A sudden change in behaviour
- Something a child says
- Physical signs of abuse

The signs may vary according to the age and understanding of the child.

Type of abuse	Physical signs	Behavioural signs
Physical abuse	Physical signs such as unexplained and unusual bruising, finger and strap marks, injuries, cigarette burns, bite marks, fractures, scalds, missing teeth.	Behavioural signs such as fear of contact, aggression, temper, running away, fear of going home, reluctance to change or uncover body, depression, withdrawal, bullying or abuse of others.
Neglect	Physical signs such as constant hunger, ill-fitting or inappropriate clothes, weight change, untreated conditions, continual minor infections, failure to supply hearing aids, glasses and or inhalers.	Behavioural signs such as always being tired, early or late, absent, few friends, regularly left alone, stealing, no money, parent or responsible person not attending or supportive.
Sexual abuse	Physical signs such as genital pain, itching, bleeding, bruising, discharge, stomach pains, discomfort, pregnancy, incontinence, urinary infections or STDs, thrush, anal pain on passing motions.	Behavioural signs such as apparent fear of someone, nightmares, running away, sexually explicit knowledge or behaviour, masturbation, bed-wetting, eating problems, substance abuse, unexplained money or gifts, acting out with toys, self-harm.
Bullying	Physical signs such as weight change, unexplained injuries and bruising, stomach and headaches, bed-wetting, disturbed sleep, hair pulled out.	Behavioural signs such as difficulty making friends, anxiety over school, truancy, withdrawn, anger, moodiness, suicide attempts, reduced performance, money and possessions reported as lost, stealing from within the family, distress and anxiety on reading texts or e-mails.
Emotional Abuse	Physical signs such as weight change, lack of growth or development, unexplained speech disorders, self-harm, clothing inappropriate for child's age, gender or culture etc.	Behavioural signs such as unable to play, fear of mistakes, fear of telling parents, withdrawn, unexplained speech and language difficulties, few friends.
Radicalisation	Physical signs such as they are observed downloading, viewing or sharing extremist propaganda from the web. They may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.	They become withdrawn and focused on one ideology. They express a desire/ intent to take part in or support extremist activity. Their views become increasingly extreme regarding another section of society or government policy. An individual becomes increasingly intolerant of more moderate views.

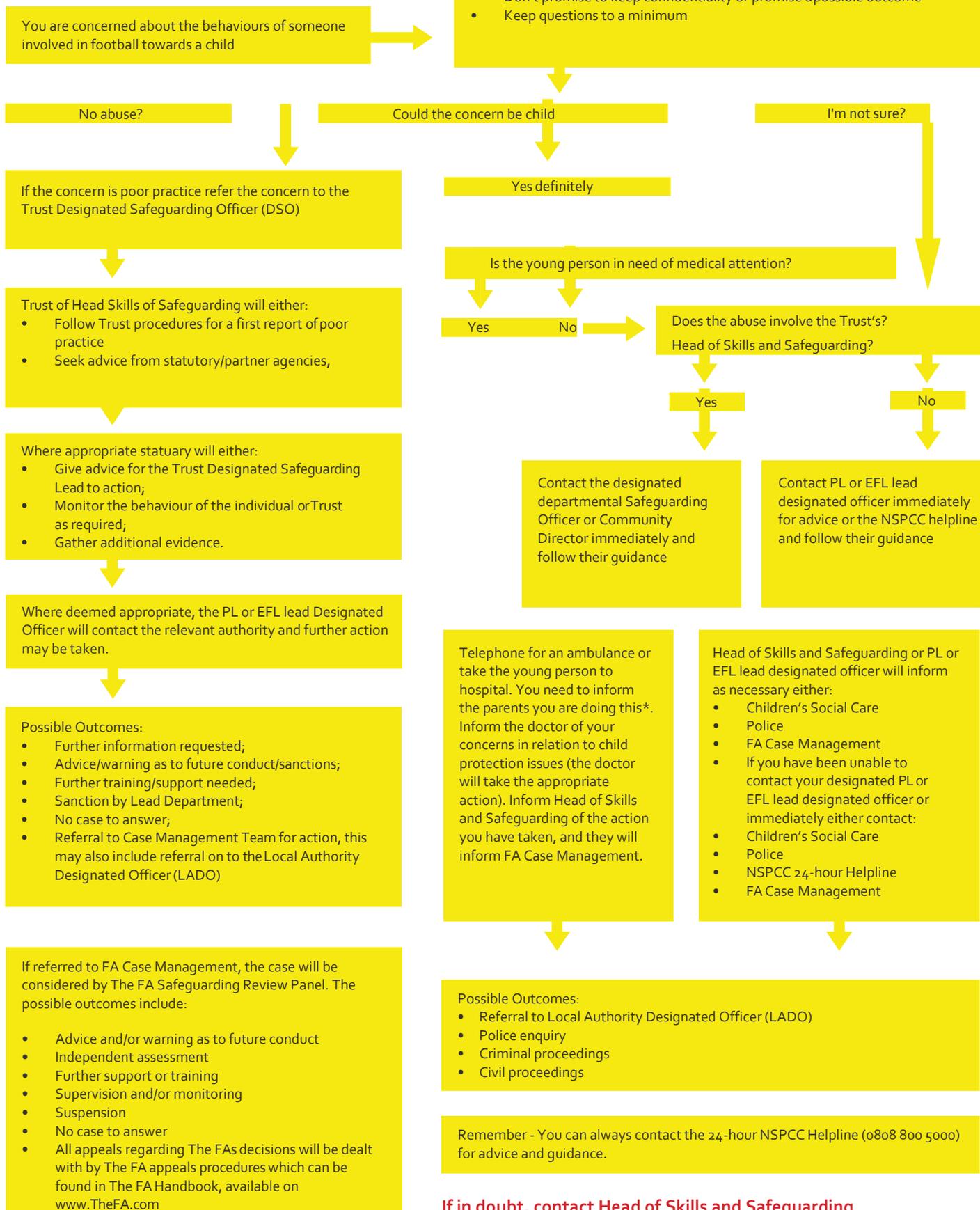


SAFEGUARDING

SAFEGUARDING

Appendix 2

Concerns in a football setting.



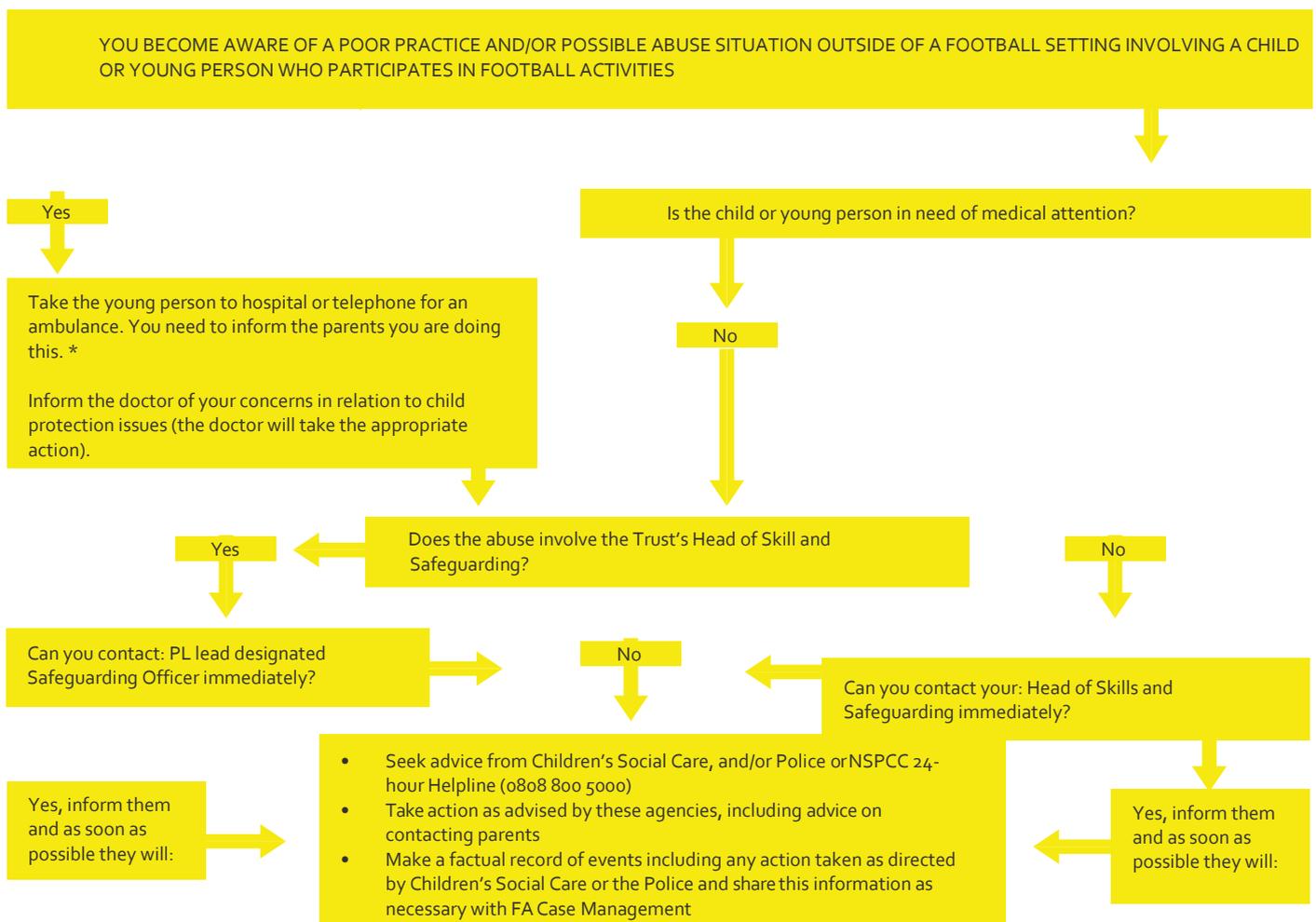
*If the parents are allegedly involved in the abuse, only inform them that you are taking the child to hospital. Do not share any other information. Please note the Trust's Head of Skills and Safeguarding details can be found in Appendix 5

Appendix 3

Dealing with concerns outside the football setting

You may receive information regarding the welfare of a child or young person who is involved in football, yet the concern itself does not relate to someone within the game (e.g. the child's home or school). Nevertheless, you need to follow The FA's Procedures outlined below and described in the flow diagram.

- If the child or young person informs you directly, then follow the guidance detailed in the flow diagram below.
- If your concerns are via a third person or through observation, report your concerns directly to the relevant designated person as outlined in the flow diagram below.
- If you are unable to contact the relevant person immediately, refer your concerns directly to local Children's Social Care or to the local Police. These agencies will advise you whether a formal referral to Children's Social Care is necessary and what further action you might need to take. If you are advised to make a formal referral, make it clear to Children's Social Care or the Police, that this is a child protection referral.
- There may also be other issues where a child is in need and where the family consents to a referral being made to Children's Social Care for support.
- Make a factual record of events using The FA Information and Referral Form including any action as directed, indicating clearly whether or not the allegation refers to someone involved in football. Forward this to FA Case Management.



Appendix 4

Other applicable Club Policies:

- Bullying and Harassment Policy (Employment Policy).
- Data Handling and Protection Policy.
- Disciplinary Policy (Employment Policy).
- Equal Opportunities Policy (Employment Policy).
- Grievance Policy (Employment Policy).
- Health and Safety Policy.
- Safeguarding Adults at Risk Policy & Procedures.
- Whistleblowing Policy.
- Recruitment and Selection Policy
- PREVENT Guidance.

Relevant Legislation/Regulations:

- Children Act 1989.
- Children Act 2004.
- Crime and Disorder Act 1998.
- Data Protection Act 2018.
- FA Safeguarding Children Rules.
- FA Respect Codes of Conduct.
- Human Rights Act 1998.
- Police Act 1997.
- Premier League Guidance for Safer Working Practice.
- Premier League Rules.
- Protection of Children Act 1999.
- Protection of Freedoms Act 2012.
- Rehabilitation of Offenders Act 1974.
- Safeguarding Vulnerable Groups Act 2006.
- Sex Offenders Act 1997.
- Sexual Offences Act 2003.
- Youth Evidence & Crime Evidence Act 1999.
- Working Together 2018

Please note that these lists are not exhaustive.

Appendix 6 - Key Safeguarding Contacts

Trust's Head of Skills and Safeguarding – 01923 496256 / 07855 300439

Watford FC's Head of Safeguarding – 01923 496246 / 07876 786910

Police - 101 or 999 in an emergency

Police – Child Abuse Investigation Unit – 01707 354 000

Hertfordshire Children Schools and Families (24hrs) - 0300 123 4043

FA NSPCC – 0808 800 5000

Child Line – 0800 1111

www.notinourcommunity.org Protecting against grooming & sexual exploitation

Appendix 7 - Internet Grooming

The message to all children and young people is that it is not okay for someone to expect them or their friends to do things that they do not want to. They should listen to their instinct; if it doesn't feel right then they should tell a trusted adult such as a parent, grandparent, carer, teacher, youth, health or social worker.

It is important that we can identify the signs of internet grooming and sexual exploitation. This involves understanding the answers to the following questions:

- What does it feel like to be groomed?
- What might a friend see?
- What might sexual exploitation feel like?
- What is sexual exploitation?

The table below has been researched and produced from real cases of child sexual exploitation. Further information is available at www.notinourcommunity.org

<p>What does it feel like to be groomed?</p> <p>Special Loved What you want Understood You have control Normal New friends Exciting You've changed Grown up Sexualised conversations</p>	<p>What might a friend see?</p> <p>Gifts or money Increased Secrecy Drug and alcohol misuse Criminal activity Changing appearance Going missing Self-harm STI's and pregnancies Online relationships with strangers Suicidal thoughts Injuries</p>
<p>What might sexual exploitation feel like?</p> <p>You owe something In love and no one else matters It is normal No going back Humiliated or threatened Scared or trapped You deserve it No-one will believe you Fooling yourself that it is okay Pressured to get friends involved Used</p>	<p>What is sexual exploitation?</p> <p>Doing sexual things, you find horrible Sexual things with an older person Forced to have sex with strangers Made to send naked pictures Having sex in front of others Rape Drink or drugs addiction Being hurt or beaten up Forced not to leave when you want to keep from friends or family</p>

Policy completed by:

Position:

Date:

Policy signed off by:

Signature:

Position:

Date:



Incident Report

Failure to complete this form properly could result in the Trust being unable to investigate an allegation/incident.

Name of person completing form:

Contact Details:

Time & Date Incident Form completed:

Date of incident:

Time of incident:

Location of the incident