

# **Child Safeguarding Policy**

Version:	Date:	Approved by:
1.1	January 2022	Justin Quick



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## 1. AMENDMENT TO STATUS RECORD

Version	Description of Amendment	Authorised by	Date
Issue 1	Policy produced.	The Policy Group	May 2021
Issue 1.1	Contact details update & policy reviewed	Justin Quick	January 2022

#### 2. OVERVIEW

- 2.1 The Company seeks to ensure the safety, safeguarding and wellbeing of all children, young people and adults at risk who engage in its activities.
- 2.2 We will consider any request for this policy to be made available in an alternative format or language. Please contact the Designated Safeguarding Lead for further information. This policy is also available on the Company website.
- 2.3 This policy outlines the responsibilities of the Company and its employees, workers, contractors, consultants, interns, agency workers, volunteers ("Staff") and anyone else under the Company's control who are expected to adhere to the high standards we have set for conducting our business affairs. You will find specific guidance in this policy on the safety and wellbeing of children and young people.
- 2.4 The Child Safeguarding Policy should be read in relation to all other company policies; however, it specifically relates to all Safeguarding Policies, Anti Bullying & Harassment Policy and our Code of Conduct. It also relates to the Disciplinary Policy.
- 2.5 The Company values the diversity of its staff and is committed to promoting equal opportunities and eliminating discrimination, please see our Equality and Diversity Policy. All staff must apply and operate this policy fairly and in doing so ensure that there is no discrimination.
- 2.6 This policy must be followed and a failure to act in line with its provisions could result in disciplinary action being taken. This policy does not form part of your contract of employment, worker, volunteer or service agreement and can be amended at any time.

#### 3. PERSONNEL RESPONSIBLE FOR THIS POLICY

- 3.1 Our board of directors has overall responsibility for the effective operation of this policy but has delegated day to day responsibility for overseeing its implementation to managers including any necessary training requirements.
- 3.2 All managers have a specific responsibility to operate within the boundaries of this policy to ensure that all staff understand the procedures they are required to follow and to take action when behaviour falls below requirements. Managers will be given training should they need it in order to comply with this policy and support their staff in adhering to policy.



#### 4. POLICY STATEMENT AND PRINCIPLES

4.1 The Company is committed to providing a safe and positive environment for everyone involved in its services and activities. We take our extended moral and legal duty of care very seriously in relation to children and young people. We seek to ensure the safety and wellbeing of all children and to protect them from harm or abuse when they engage in any activities conducted by the Company.

#### 5. CHILD PROTECTION STATEMENT

- 5.1 We recognise our moral and legal responsibility to safeguard and promote the welfare of all children. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. We will be child centred and take a coordinated approach to safeguarding. We recognise safeguarding and promoting the welfare of children is everyone's responsibility.
- 5.2 This statement also extends into Modern Slavery involving children. This takes many forms including forced and compulsory labour, slavery, servitude and human trafficking. It is the violation of human rights and we have a zero-tolerance approach to Modern Slavery. We will take any concerns in this area seriously.

#### 6. EXETER CITY FOOTBALL CLUB POLICY PRINCIPLES

- 6.1 Our policy is based on the following principles:
  - Recognise that the welfare of children is paramount in all circumstances.
  - Aim to ensure that regardless of age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socioeconomic background, all children have a positive and enjoyable experience in a safe and child centred environment.
  - Acknowledge 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.
  - Safeguarding is everybody's responsibility. All staff have a responsibility to respond positively in response to any concerns, suspicion or disclosure that may suggest a child is at risk of harm.
  - Children and staff involved in child protection issues will receive appropriate support.
  - Staff with roles and responsibilities for children and young people will be subject to appropriate safe recruitment checks and safeguarding training.

- Staff will receive appropriate learning and training opportunities to ensure that they can make informed and confident responses to safeguarding issues.
- We are committed to providing a safe and positive environment for all children and young people to participate in football to the best of their abilities for as long as they choose to do so.

#### 7. AIMS

- 7.1 In relation to all its activities the Company will aim to:
  - Protect children and young people from abuse whilst participating in any activity it has organised.
  - Promote and prioritise the safety and wellbeing of children.
  - Create a culture where children, carers, host families, those who interact or engage with children and others who may have a concern are encouraged to report their concerns or the abuse that has happened to them.
  - Ensure that all staff are clear regarding their duties and responsibilities to safeguard children and are provided with the training to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children.
  - Ensure appropriate action is taken in the event of incidents of abuse.
  - Ensure support is 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.
  - Make sure our safeguarding procedures are widely promoted and followed by all staff. Failure to comply with our policy and procedures will be addressed without delay and may ultimately result in employment sanctions.
  - Reinforce the importance of working with all partner agencies with the aim
    of achieving the best possible outcomes for those who we are aiming to
    protect from risk of abuse.
  - Appropriately report the action that will be taken by the Company when a safeguarding concern is reported.
  - Ensure there is a safeguarding governance structure in place with assigned roles and responsibilities including the identification of Designated Safeguarding Lead and the appointment of a Director responsible for the strategic oversight of Safeguarding.
  - Ensure that safeguarding runs as a thread throughout all our activities, both at strategic and operational levels of the Company.



#### 8. APPLICATION

- 8.1 Our policy and procedures apply to <u>all</u> members of staff working for the Company.
- 8.2 In general, the Company operates at two main locations, the Cliff Hill Training Ground and the Premises at St James Park. Our policy and procedures cover those specific locations and any others where company activities may be taking place, for example travel to and from other venues where matches or training are taking place.
- 8.3 The procedures contained in this policy apply to all staff, they are consistent with those of the Devon Children & Families Partnership
- 8.4 A copy this policy must be issued to all members of staff.
- 8.5 It is crucial the Designated Safeguard Lead, promotes this policy and ensures safeguarding is embedded into the culture of the Company.
- 8.6 Where the Company is working in partnership with other organisations, including those which are officially affiliated, it will expect these organisations to have their own safeguarding arrangements and policies in place. It is the duty of the Designated Safeguarding Lead to ensure this is the case and a copy of the policy is recorded.

#### 9. LEGISLATION AND GUIDANCE

- 9.1 The practices and procedures within this policy are based on the principles contained within the UK Legislation and Government Guidance and have been developed to complement the Devon Children & Families Partnership policy and procedures. They take the following into consideration:
  - Children Act 1989
  - The Sexual Offences (Amendment) Act 2000
  - Children Act 2004
  - Sexual Offences Act 2003
  - Children Act 2004
  - Equality Act 2010
  - Serious Crime Act 2015
  - What to do if you're worried a child is being abused (2015)
  - Working Together to Safeguard Children 2018
  - Data Protection Act 2018
  - Keeping Children Safe in Education 2021
  - When to Call the Police: Guidance for Schools & Colleges 2020



• EFL Safeguarding Strategy, Standards & Guidance for EFL Member Clubs

#### 10. DEFINITIONS & TERMINOLOGY

10.1 The following definitions are referred to in this policy and procedure,

#### 10.2 Child<sup>1</sup>:

In England, Northern Ireland and Wales a child is someone under the age of eighteen whether living with their families, in state care, or living independently (Working Together to Safeguard Children 2018).

This generally applies in Scotland but in some cases, for example for parts of the Scotlish Child Protection Process it will be 16.

- 10.3 Safeguarding and promoting the welfare of children:
  - (a) Safeguarding and promoting the welfare of children is defined for the purposes of this guidance as:
    - protecting children from maltreatment.
    - preventing impairment of children's mental and physical health or development.
    - ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
    - taking action to enable all children to have the best outcomes.
  - (b) Safeguarding concern:

When there is information that a child, young person (or an adult at risk has been harmed), or is at risk of being harmed, by their own or someone else's behaviour.

(c) Safeguarding allegation:

Where a person who is either a staff member or volunteer working on behalf of the Company has<sup>2</sup>:

- Behaved in a way that has harmed a child (or adult at risk), or may have harmed a child (or adult at risk),
- Possibly committed a criminal offence against or related to a child (or adult at risk),



- Behaved towards a child or children (or adult at risk) in a way that indicates he or she may pose a risk of harm to children (or adult at risk); or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (or adult at risk).

## (d) Abuse of position of trust

The Sexual Offences (Amendment) Act 2000 section 3 created the offence of abuse of trust. It is an offence for a person aged 18 or over to have sexual intercourse with a person under 18, or to engage in any other sexual activity with, or directed towards such a person, if in either case that person is in a position of trust in relation to the under 18-year-old. This applies even if the relationship is consensual.

A person aged 18 or over ("Person A") is in a position of trust in relation to a person under that age ("Person B") if any of four conditions are satisfied. One relates to the education field and is as follows: "Person A" looks after persons who are under 18 and are receiving full-time education in an institution and "Person B" is receiving such education within that institution. This applies within the Company and includes those in a professional support role and volunteers.

It is a defence to show the person charged did not know, or could not reasonably have known, that the other party was a person in relation to whom he or she was in a position of trust.

## (e) Abuse<sup>3</sup>:

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

Please see Appendix B for types of abuse

#### (f) Poor practice:

Sometimes, concerns may relate to poor practice, where an adult's or another young person's behaviour is inappropriate and may be causing distress to a child or young person. In the application of this policy, poor practice includes any behaviour which contravenes the principles of this document or our Code of Conduct. Where poor practice is serious or repeated this could also constitute abuse and



should be reported immediately. Examples of poor practice towards children, which should never be sanctioned include:

- use of excessive, physical or humiliating punishments.
- failure to act when you witness possible abuse or bullying.
- spending excessive amounts of time alone with young people away from others.
- inviting or allowing young people into your home where they will be alone with you.
- engaging in rough, physical or sexually provocative activity.
- allowing young people to use inappropriate language unchallenged.
- making sexually suggestive comments even in fun.
- reducing a person to tears as a form of control.
- allowing allegations made by a young person to go unchallenged, unrecorded or not acted upon.
- doing things of a personal nature for young people that they can do for themselves.
- sharing a bedroom with a young person you are not related to, even with parental permission.

It is essential all staff, particularly coaches understand and maintain professional boundaries when working with children (and adults at risk).

## 11. CHILD SAFEGUARDING PROCEDURES

- 11.1 The aim of these procedures is to detail how the Company should respond if they have a safeguarding concern or suspect that a child is suffering abuse. It outlines what to do if:
  - a child makes a disclosure or reports that they, or someone else, has been abused,
  - the behaviour of an adult or child towards a child gives them cause for concern,
  - they have a safeguarding concern
  - they identify a breach of the Safeguarding Code of Conduct
- 11.2 It also details the action that will be taken by the Designated Safeguarding Lead when a safeguarding concern is reported.

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11.3 Our definition of a safeguarding concern is:

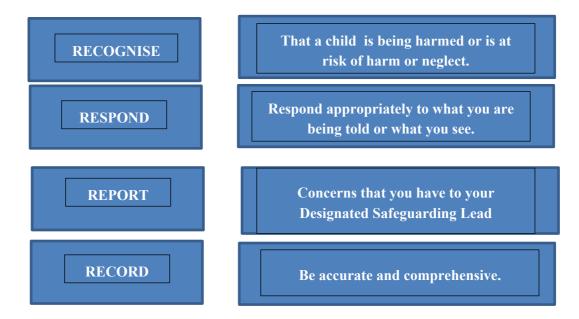
Any situation when there is information that a child or an adult at risk<sup>4</sup> has been harmed, or is at risk of being harmed, by their own or someone else's behaviour.

If the information identifies the involvement of a staff member of the Company this will be known as a <u>'Safeguarding Allegation''</u>.

This will apply where a person in connection with their employment, membership or volunteering position with the Company has:

- Behaved in a way that has harmed a child or adult at risk, or may have harmed a child or adult at risk,
- Possibly committed a criminal offence against or related to a child (or adult at risk,
- Behaved towards a child or children or adult at risk in a way that indicates he or she may pose a risk of harm to children or adult at risk; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children or adult at risk.
- 11.4 The Safeguarding Code of Conduct outlines the behaviour expected of staff and those assisting the company's activities when they are engaging with children. Following the Code of Conduct will help to protect children from abuse and/or inappropriate behaviour.
- 11.5 Any breach of the Code of Conduct should be reported to a Designated Safeguarding Lead. Serious breaches of the Code of Conduct may also result in a referral being made to the police or a Local Authority if it is thought the breach amounts to a risk of harm to a child and/or constitutes a crime.
- 11.6 All staff have a responsibility to be alert to the fact that vulnerable people are abused and that they **MUST** report safeguarding concerns.
- 11.7 By following the four simple safeguarding principles of Recognise, Respond, Report and Record we can keep those children who may be at risk of abuse safe from harm.





#### 11.8 Recognise

## Signs and indicators of abuse and neglect

We should all be alert for the signs and indicators that children and young people who interact or engage with the Company may be suffering abuse. We should remember that children may be abused by other children and young people as well as by adults.

- 11.9 Indicators that a child may be being abused may include the following:
  - 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 the explanation seems inconsistent,
  - the young person describes what appears to be an abusive act involving him/her,
  - someone else (a young person or adult) expresses concern about the welfare of another,
  - unexplained changes in behaviour (e.g., becoming very quiet, withdrawn or displaying sudden outbursts of temper),
  - inappropriate sexual awareness,
  - engaging in sexually explicit behaviour,
  - sudden or unusual distrust of adults, particularly those with whom a close relationship would normally be expected,
  - · having difficulty in making friends,
  - being prevented from socialising with other young people,



- displaying variations in eating patterns including overeating or loss of appetite; or a sudden weight change and
- becoming increasingly dirty or unkempt.
- 11.10 It should be recognised that this list is not exhaustive and the presence of one or more of the indicators is not proof that abuse is actually taking place. A good working relationship, particularly with those children in the Academy, with parent/guardians will help to identify any other concerns that a young person may be experiencing. For example, a family bereavement, which could cause some of the changes listed above.

#### 12. RESPOND

It is always difficult to hear about or witness harm or abuse experienced by a child or young person. The following points will be helpful for both you and the child should they choose to disclose abuse to you:

- Stay calm.
- Listen carefully to what is said and try not to interrupt.
- Find an appropriate point early on to explain that it is likely that the information will need to be shared with others – do not promise to keep secrets.
- Allow them to continue at their own pace.
- Ask questions for clarification only and avoid asking questions that suggest an answer (leading questions).
- Reassure them that they are not to blame and have done the right thing in telling you. If the concern is serious explain that you will need to get support from other trained people to help keep the child safe. This must be shared even if the child doesn't want you to tell anyone else.
- Tell them what you will do next and with whom the information will be shared. If they are adamant that they do not wish the information to be shared, explain that you will have to tell the Designated Safeguarding Lead and that it will be discussed further with them.
- Be aware of the possibility of forensic evidence if the disclosure relates to a recent incident of physical harm or injury and try to protect any supporting materials e.g. clothing.
- Report the disclosure to the Designated Safeguarding Lead **at the earliest** opportunity.

Where you are unable to contact Designated Safeguarding Lead, advice can be sought from statutory agencies or by calling or emailing the NSPCC Helpline on 0808 800 5000 or help@nspcc.org.uk



Where the concern or allegation is about a member of staff or a volunteer, this must like all other instances be reported to the Designated Safeguarding Lead (DSL) or Deputy. If the DSL or Deputy considers the circumstances to relate to a 'Safeguarding Allegation', they must report the incident to the Local Authority Designated Officer (LADO). Depending on the circumstances it may also be necessary to inform the police.

When a safeguarding concern or poor practice has been identified concerning a specific child the parents/guardians/carers of that child should be notified, unless doing so may put the child or another child at increased risk. Where the DSL has reported the incident to a statutory agency, for example the LADO or police, advice should be sought from them regarding this duty before notifying the parents/guardians/carers.

## 13. REPORT

- 13.1 Remember it is not the responsibility of anyone at the Company to decide if child abuse is occurring, but it is our responsibility to act on any concerns by reporting them.
- 13.2 You must report concerns that you have to the Designated Safeguarding Lead.
- 13.3 The preferred process for this will be via the MyConcern system, however this should not be seen as a barrier to reporting concerns on the telephone, in person or where appropriate, via email. The Club Safeguarding email address is <a href="mailto:safeguarding@ecfc.co.uk">safeguarding@ecfc.co.uk</a> Any member of staff or volunteer can contact the Designated Safeguarding Lead for advice, support or guidance.
- 13.4 If a member of staff or volunteer is working away from premises controlled by the Company for example in a school or within a Further Education College, in partnership with another organisation the Safeguarding Policy of that organisation should be followed. Concerns must also still be reported to the Designated Safeguarding Lead, they will in turn offer any assistance to the other organisation.
- 13.5 Safeguarding concerns MUST be reported immediately (or where this is not possible at the earliest opportunity) so that the report can be assessed, and action taken to protect the person involved. If any person is at immediate risk of harm or requires medical attention, then the emergency services should be contacted immediately by telephoning 999.



- 13.6 If a member of the public, police or Local Authority reports a safeguarding concern to the Company then the matter must be referred to the Designated Safeguarding Lead.
- 13.7 If for any reason the DSL cannot be contacted, the following organisations can be contacted for advice:
  - Concern about a child You should contact the Devon Multi Agency Safeguarding Hub (MASH) on 0345 155 1071
  - Local Police Telephone 101 for non-emergency referrals and 999 for emergency response.

#### 14. RECORD

- 14.1 Be accurate and comprehensive. Wherever possible you should use the MyConcern system and ensure you also notify the relevant Designated Safeguarding Officer that you have made an entry on the system.
- 14.2 It is essential all potential safeguarding issues are recoded on MyConcern. Sometimes what can be seen as a trivial matter could be an indicator of the onset or identification of more complex harm. Identifying issues at an early stage is also essential, early help and intervention are invariably more effective.
- 14.3 It is important that you keep an accurate record of any safeguarding concern that you have or that someone raises with you. Your record must,
- 14.4 be made as soon as possible after the event/concern is raised,
- 14.5 contain the date, time, people present, anything said (verbatim if possible),
- 14.6 detail the behaviour and demeanour of the person disclosing the safeguarding issue.
- 14.7 detail any action you have taken (for example how you have reduced risk or whether you have referred the matter to a Designated Safeguarding Officer),
- 14.8 be a factual account of what has happened
- 14.9 Do not record any opinion about what has happened. You are not there to judge or ascertain whether what you are being told is correct.

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#### 15. CONFIDENTIALITY AND SHARING INFORMATION

- 15.1 Effective and timely sharing of information is essential for the early identification of a child's needs and to ensure that the most appropriate services are provided in order to keep them safe.
- 15.2 Those with concerns should be proactive in sharing information as early as possible to help the Designated Safeguarding Lead and other professionals identify, assess and respond to risks or concerns about the safety and welfare of children.
- 15.3 Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children, which must always be the paramount concern. The Data Protection Act (2018)<sup>5</sup> and/or the General Protection Regulations (2018) **do not** prevent you from sharing information in relation to safeguarding.
- 15.4 You should not assume that someone else will pass on information that you think may be critical to keeping a child safe.
- 15.5 Staff or those acting on their behalf should aim to gain consent to share information but should be mindful of situations where to do so would place a child at increased risk of harm. Advice concerning consent should be sought from the Designated Safeguarding Lead.
- 15.6 The Designated Safeguarding Lead must always be informed before information is shared with an external organisation except in cases where there is a risk of immediate or serious harm and an emergency referral is necessary. The Designated Safeguarding Lead will manage the process of sharing information with the police, local authority services and/or any third-party organisation.
- 15.7 Information should be kept confidential and should only be shared with other staff members and those working on their behalf who need to know the information. If there is any doubt about whether to share information, or who to share it with, advice should be sought from the Designated Safeguarding Lead.

#### 16. SAFEGUARDING STRUCTURE

16.1	The details and contacts of the Safeguarding Team can be found at A  A. The structure will be as follows:		
		Safeguarding Director Lead (Strategic)	



Designated Safeguarding Lead **DSL** 

Designated Safeguarding Officers **DSO** 

#### Academy

## Match Day

#### First Team

Academy
Designated Safeguarding
Officer

Match Day
Designated Safeguarding
Officer

First Team
Designated Safeguarding
Officer

## **Academy Designated Safeguarding Officer**

Josh Cann - josh.cann@ecfc.co.uk

## Match Day & Lead Designated Safeguarding Officer

Kay Crawford <a href="mailto:kay.crwaford@ecfc.co.uk">kay.crwaford@ecfc.co.uk</a>

## First Team Designated Safeguarding Officer

Andy Gillard andy.gillard@ecfc.co.uk

## **Designated Safeguarding Lead**

Justin Quick safeguarding@ecfc.co.uk

There is an expectation all members of the Safeguarding Team work closely together and where circumstances dictate share agreed responsibilities and functions. However, it will be the DSL, , that has primacy in terms of decision making around safeguarding concerns or allegations.

## 17. ACTION BY THE DESIGNATED SAFEGUARDING LEAD

- 17.1 The relevant Designated Safeguarding Officer, will manage the response to all safeguarding concerns.
- 17.2 When a safeguarding concern has been reported the Designated Safeguarding Officer will:
  - Make an initial assessment of the information received and ensure, if not already done so, the details are recoded on MyConcern. If necessary, the



DSO will advise the reporting person on the quality of the submission and can ask for further detail to be added.

- If necessary the DSO will escalate to the DSL immediately
- Identify any immediate risks to individuals contained within the report and respond accordingly. This could include calling 999, ensuring all possible action is taken to remove, reduce or control the risks identified.
- If the risk is not immediate the DSL or Deputy will use the <u>Devon Children</u> & <u>Families Partnership Threshold Tool</u> to make an assessment of the information.
- The purpose of this assessment is to ascertain, using all the information that is available, which level of need is appropriate. The levels are children with no additional needs (Level 1), children with additional needs showing early signs of vulnerability (Level 2), children in need who require statutory or specialist services (Level 3) and children who are suffering or likely to suffer significant harm (Level 4). Further advice and detailed information on each level can be found in <a href="Devon's Children & Families Procedures Manual">Devon's Children & Families Procedures Manual</a>
- If after assessment of all the information, it is ascertained that the
  circumstances outline a child with no additional needs (Level 1) there is no
  need to make a referral. Those who have responsibility for the child should
  be encouraged to access services in the usual way. This does not mean
  that any responsibility for monitoring the welfare needs of that child are
  absolved. Where circumstances do change there may be a need to
  reassess the level of need and act accordingly.
- If after assessment of all the information, it is ascertained that the circumstances outline a child with additional needs showing early signs of vulnerability (Level 2) there is no need to make a referral. However, the DSL should engage with <a href="Devon Children & Families Partnership: Early Help for Professionals">Devon Children & Families Partnership: Early Help for Professionals</a> in order to engage appropriate early help services to address any identified needs. It is recognised identifying and providing early help before matters escalate often provides a better outcome for children.
- If after assessment of all the information, it is ascertained that the circumstances outline a child in need who require statutory or specialist services (Level 3) or a child who is suffering or likely to suffer significant harm (Level 4) the DSL should make a <a href="Mash Contact">Mash Contact</a>. Following this the guidance of the statutory agencies should be followed and where appropriate the Company will work in partnership with the agencies around the needs of the child.
- In addition, the EFL Safeguarding Manager should be notified of Safeguarding Concerns using the referral form contained within the <u>EFL</u> <u>Safeguarding Policy</u>
- Should the DSL dispute the outcome from the Local Authority consideration will be given to follow the <u>Devon Children & Families Partnership</u> <u>Procedures: Escalation Policy</u>



- Where it is decided that the information contained in the safeguarding concern constitutes a Safeguarding Allegation the Designated Safeguarding Lead will follow company procedure for the Management of a Safeguarding Allegation. This could include contacting the Local Authority Designated Officer (LADO) and following the <a href="Devon County Council">Devon County Council</a>: Managing Allegations against Adults Working with Children
- Information regarding all of the above will be recorded on MyConcern.
- The DSL will actively monitor all referrals made and will make reasonable enquiries around progress with the Local Authority.

#### 18. PROCEDURAL IMPLEMENTATION AND REVIEW

- 18.1 These procedures were implemented on 1 June 2021
- 18.2 These procedures will be reviewed on an annual basis or in response to changes in safeguarding legislation and/or best practice.
- 18.3 The following additional polices are also relevant to this document:

## Following will have links

- Safeguarding Adults at Risk
- Bullying
- Female Genital Mutilation
- Peer on Peers Sexual Abuse
- Photography and Video Guidance
- Managing a Safeguarding Allegation
- Whistle Blowing
- · Responding to challenging Behaviour
- Safe Recruitment
- Sexting



## Appendix A

## **Key Contacts**

## **Exeter City Football Club Safeguarding Team**

Club Safeguarding email address: safeguarding@ecfc.co.uk

Academy Designated Safeguarding Officer: Josh Cann

Telephone: 07736 912049 email: josh.cann@ecfc.co.uk

Match Day& Lead Designated Safeguarding Officer: Kay Crawford

Telephone: 01392 413951 (Match days only)

email: kay.crawford@ecfc.co.uk

First Team Designated Safeguarding Officer: Andy Gillard

Email: andy.gillard@ecfc.co.uk

**Designated Safeguarding Lead: Justin Quick** 

Telephone: 07855 814236

Email: safeguarding@ecfc.co.uk

**Director Lead for Safeguarding: Clive Harrison** 

Email: <a href="mailto:clive.harrison@ecfc.co.uk">clive.harrison@ecfc.co.uk</a>

**EFL Safeguarding Manager: Alex Richards** 

Telephone: 01772 325940 Email: <a href="mailto:arichards@efl.com">arichards@efl.com</a>

## **Devon County Council Multi Agency Safeguarding Hub**

Telephone: 0345 155 1071

Email: mashsecure@devon.gov.uk

**NSPCC** 

0808 800 5000

help@nspcc.org.uk

## Appendix B

## Types of Abuse

Physical abuse<sup>6</sup>: A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse<sup>5</sup>: The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Sexual abuse<sup>5</sup>: Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities 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 of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue.

Neglect<sup>5</sup>: The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: a. provide adequate food, clothing and shelter (including exclusion from home or abandonment) b. protect a child from physical and emotional harm or danger c. ensure adequate supervision (including the use of inadequate caregivers) d. ensure access to appropriate medical

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care or treatment It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Related issues** in addition to the above categories, there are other forms of harm or abuse that should involve the notification of the police and other organisations working together to protect children. These include:

## **Bullying**

Bullying is deliberately hurtful behaviour, usually repeated over a period of time, where it is difficult for the victims to defend themselves.

The damage inflicted by bullying is often underestimated. It can cause considerable distress to children, to the extent that it affects their health and development and can be a source of significant harm, including self-harm and suicide. Bullying can include emotional and/or physical harm to such a degree that it constitutes significant harm.

The four main types of bullying are:

- Physical abuse: hitting, kicking, stabbing and setting alight including for filming with mobile telephones and theft, commonly of mobile phones
- Verbal or mobile telephone / online (internet) message abuse (e.g. racist, sexist or homophobic name-calling or threats: this type of physical bullying may include sexual harassment
- Mobile telephone or online (internet) visual image abuse: these can include real or manipulated images
- Emotional abuse e.g., isolating an individual from the group or emotional blackmail

Information and Communication Technology (ICT) based forms of child physical, sexual and emotional abuse can include bullying via mobile telephones or online (internet) with verbal and visual messages.

#### Child Sexual Exploitation which can include Human Trafficking

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology (WTSC, 2018).

#### **Criminal Exploitation**

Criminal exploitation is also known as 'County Lines' and is when gangs and organised crime networks threaten or trick children into trafficking their drugs for them. They might threaten a young person physically or they might threaten the young person's family or friends. The gangs might also offer something in return for the young person's



cooperation, this could be money, food, alcohol, drugs, clothes and jewellery, or improved status.

Gangs target vulnerable children who are homeless, living in care, or trapped in poverty. These children are unsafe, or unable to cope, and the gangs take advantage of this.

#### **Hate crimes**

Hate incidents and hate crime are acts of violence or hostility directed at people because of who they are or who someone thinks they are.

For example, it includes being verbally abused by someone in the street because of disability or sexual orientation.

#### **Female Genital Mutilation**

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

#### **Domestic Violence & Abuse**

The cross-Government definition of domestic violence and abuse is:

Any incident of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological
- physical
- sexual
- financial
- emotional

#### Honour based violence

So-called 'honour-based' violence (HBV) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBV are abuse (regardless of the motivation) and should be



handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

## Forced marriage

A forced marriage (as distinct from a consensual "arranged" marriage) is defined as one which is conducted without the valid consent of both of the parties and where duress is a factor. Duress includes both physical and emotional pressure and cannot be justified on religious or cultural grounds. Forced marriage is child abuse and can put children and young people at risk of physical, emotional and sexual violence including rape. Forced marriage can have a negative impact on a child's health and development (Forced Marriage Unit, 2018)