

# Introduction to Child Protection

The purpose of this introduction is to ensure that everyone that this document applies to has a clear understanding of what is meant by child protection and safeguarding - and thereby has no confusion as to what their responsibilities are.

**Definition of child protection:** Child protection is part of safeguarding and promoting welfare and refers to the activity that is undertaken by HTAFC staff members and volunteers to protect specific children who are suffering, or are likely to suffer, significant harm.

**Definition of safeguarding:** Safeguarding and promoting the welfare of children is defined by the UK Government's guidance, **Working Together to Safeguard Children March 2015** (updated February 2018) as the following:

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

**Definition of child abuse:** Child abuse is any action by another person that causes significant harm to a child. The abuse can be physical, sexual or emotional, but can just as often be about a lack of love, care and attention. An abused child will often experience more than one type of abuse, as well as other difficulties in their lives. Child abuse will often take place over a period of time, rather than being a one-off event. Children may be abused in a variety of settings - such as the family or institutional or community setting. A child can be abused by those known to them or, more rarely, by others - e.g. via the internet. An abuser can be an adult or adults, or another child or children and harm may occur intentionally or unintentionally.

The core definitions of harm are outlined below and are as defined by the UK Government's guidance **Working Together to Safeguard Children**.

**Sexual abuse:** Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities - not necessarily involving a high level of violence - and 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.

Abusers 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 (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Emotional abuse:** Emotional abuse is the persistent emotional maltreatment of a child so as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children 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 the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child 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, though it may occur alone.

It's important to remember that parents and/or caregivers of children with multiple needs may find it difficult to ensure that the full range of the child's needs, including their emotional needs, are met. Whilst it may prove difficult to include such children in everyday activities alongside other family members, not to include them may be harmful.

**Physical abuse:** Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning,

suffocating, or otherwise causing physical harm to a child or young person. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Neglect:** Neglect is the persistent failure to meet a child's basic physical and/or psychological needs and which is 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 caregiver failing to:

- Provide adequate food, clothing or shelter - including exclusion from home or abandonment
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision - including the use of inadequate care-givers
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. However, what is known, is that neglect - in whatever form it takes - can be just as damaging to a child as physical abuse.

Although these four categories of abuse in this introduction are those detailed in the UK Government's guidance "Working Together to Safeguard Children", there are numerous more detailed categories of abuse that it is important all HTAFC staff members and volunteers are aware of. The next section "Recognising the Signs of Child Abuse" provide a fuller breakdown of all the recognised categories and further guidance on how to help safeguard and protect children.

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**HTAFC will review this Introduction to Child Protection at least annually.**

## (18) Recognising the Signs of Child Abuse

Recognising child abuse is not easy. HTAFC does not believe it is the responsibility of its staff members or volunteers to decide whether or not child abuse has taken place - or if a child is at significant risk of harm from someone. However, every HTAFC staff member and volunteer has both a responsibility and duty - as set out in this Handbook - to act in order that the appropriate agencies can investigate and take any necessary action to protect a child.

This section starts by providing greater detail about the four core categories of abuse detailed in the UK Government's guidance "Working Together to Safeguard Children". This Handbook provides more specific guidance on how to help safeguard and protect children in relation to many of the other recognised types of child abuse. The following information is provided to help all HTAFC staff members and volunteers to be more alert to the signs of possible abuse.

**Sexual abuse:** A child is sexually abused when they are forced or persuaded to take part in sexual activities. This doesn't have to be physical contact and it can happen online. Sometimes the child won't even understand that what's happening to them is abuse - or that it is wrong.

**Defining child sexual abuse:** There are two different types of child sexual abuse - "contact abuse" and "non- contact abuse". Further information on each type is detailed below:

- **Contact abuse** involves touching activities where an abuser makes physical contact with a child, including penetration. **It includes the following:**
  - a) Sexual touching of any part of the body - whether the child's wearing clothes or not
  - b) Rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
  - c) Forcing or encouraging a child to take part in sexual activity
  - d) Making a child take their clothes off, touch someone else's genitals or masturbate
- **Non-contact abuse** involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet and flashing. **It includes the following:**
  - a) Encouraging a child to watch or hear sexual acts
  - b) Not taking proper measures to prevent a child being exposed to sexual activities by others
  - c) Meeting a child following sexual grooming with the intent of abusing them
  - d) Online abuse including making, viewing or distributing child abuse images
  - e) Allowing someone else to make, view or distribute child abuse images showing pornography to a child
  - f) Sexually exploiting a child for money, power or status (This is known as child exploitation and is covered in further detail later in this section)

### **Changes in behaviour which can indicate sexual abuse include:**

- Staying away from certain people
- Avoiding being alone with people, such as family members or friends
- Seeming frightened of a person or a reluctance to socialise with them
- Showing sexual behaviour that's inappropriate for their age
- Becoming sexually active at a young age
- Being promiscuous
- Using sexual language or knowing information that you wouldn't expect them to
- Having physical symptoms such as anal or vaginal soreness, an unusual discharge, sexually transmitted infection (STI) and/or pregnancy

**Emotional abuse:** Children who are emotionally abused suffer ongoing emotional maltreatment or emotional neglect. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development as well as causing serious harm.

**Defining emotional abuse:** Emotional abuse is the ongoing emotional maltreatment or emotional neglect of a child.

**Children who are emotionally abused are usually suffering another type of abuse or neglect at the same time - but**

**this may not always be the case.**

**Physical abuse:** It isn't accidental - children who are physically abused suffer violence such as being hit, kicked, poisoned, burned, slapped or having objects thrown at them.

**Defining physical abuse:** Physical abuse is deliberately hurting a child and causing injuries such as bruises, broken bones, burns or cuts. There's no excuse for physically abusing a child. It causes serious, and often long-lasting, harm - and in severe cases, death. Shaking or hitting babies can cause non-accidental head injuries (NAHI). Sometimes parents or carers will make up or cause the symptoms of illness in their child, perhaps giving them medicine they don't need and making the child unwell - this is known as fabricated or induced illness (FI).

**Neglect:** Neglect is the ongoing failure to meet a child's basic needs. It's dangerous and children can suffer serious and long-term harm and neglect is the most common form of child abuse. A child may be left hungry or dirty, without adequate clothing, shelter, supervision, medical or health care. A child may be put in danger or not protected from physical or emotional harm. They may not get the love, care and attention they need from their parents or carers. A child who is neglected will often suffer from other abuse as well. Neglect is dangerous and can cause serious, long-term damage - even death.

**Defining neglect:** There are four specific types of neglect and each is listed below with further detail:

- 1. Physical neglect:** This is failing to provide for a child's basic needs such as food, clothing or shelter. It is also failing to adequately supervise a child, or provide for their safety.
- 2. Educational neglect:** Failing to ensure a child receives an education.
- 3. Emotional neglect:** Failing to meet a child's needs for nurture and stimulation, perhaps by ignoring, humiliating, intimidating or isolating them. This form of neglect is often the most difficult to prove.
- 4. Medical neglect:** Failing to provide appropriate health care, including dental care and refusal of care or ignoring medical recommendations.

Neglect can have serious and long-lasting effects. It can be anything from leaving a child home alone to the very worst cases where a child dies from malnutrition or being denied the care they need. In some cases, it can cause permanent disabilities. Neglect can be really difficult to identify, making it hard even for professionals to take early action to protect a child.

**Changes in behaviour which can indicate neglect:** Having one of the signs or symptoms below doesn't necessarily mean that a child is being neglected. However, if HTAFC staff members or volunteers ever notice multiple - or persistent - signs then it could indicate that there is a serious problem. Children who are neglected may have:

- Poor appearance and hygiene
- Health and development problems
- Housing and family issues

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**HTAFC will review this Recognising the Signs of Child Abuse at least annually.**

## **(19) Child Abuse: Domestic Abuse**

**Domestic abuse:** Domestic abuse is any type of controlling, bullying, threatening or violent behaviour between people in a relationship. However, domestic abuse isn't just physical violence - it also includes any emotional, physical, sexual, financial or psychological abuse. It can happen in any relationship, and even after the relationship has ended. Both men and women can be abused or abusers. Witnessing domestic abuse is also child abuse. Teenagers can also suffer domestic abuse in their relationships. Domestic abuse can seriously harm children and young people.

**Defining domestic abuse:** Domestic abuse can include the following:

- Sexual abuse and rape
- Punching, kicking, cutting, hitting with an object
- Withholding money or preventing someone from earning money
- Not letting someone leave the house
- Reading emails, text messages or letters
- Threatening to kill or harm them, another family member or pet

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**HTAFC will review this Child Abuse: Domestic Abuse at least annually.**

## **(20) Child Abuse: Grooming & Online Abuse**

**Grooming:** Many children do not understand that they have been groomed; or that what has happened is abuse. Children can be groomed online, or in the real world - and this can take place by a stranger or by someone they know - for example a family member, friend or professional. Groomers may be male or female and they can be any age.

**Defining grooming:** Grooming is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse or exploitation.

**How grooming happens:** Grooming happens both online and in person. Groomers will hide their true intentions and may spend a long time gaining a child's trust. They may also try to gain the trust of the whole family so they can be alone with the child. Groomers manage to do this by:

- Pretending to be someone they are not e.g. saying they are the same age online
- Offering advice or understanding
- Buying gifts
- Giving the child attention
- Using their professional position or reputation
- Taking them on trips, outings or holidays.
- Using secrets and intimidation to control children

Once a groomer has established trust, they then exploit the relationship by isolating the child from friends or family and making the child feel dependent on them. They will use any means of power or control to make a child believe they have no choice but to do what the groomer wants. Groomers may introduce 'secrets' as a way to control or frighten the child. Sometimes they will blackmail the child, or make them feel ashamed or guilty, to stop them telling anyone about the abuse.

**Online grooming:** It's easy for groomers to hide their identity online. They may pretend to be a child and then chat and become 'friends' with children they are targeting. Groomers can use social media sites, instant messaging apps including teen dating apps, or online gaming platforms to connect with a young person or child. They can spend time learning about a young person's interests from their online profiles and then use this knowledge to help them build up a relationship. **Groomers may look for:**

- Usernames or comments that are flirtatious or have a sexual meaning
- Public comments that suggest a child has low self-esteem or is vulnerable

Groomers don't always target a particular child. Sometimes they will send messages to hundreds of young people and wait to see who responds. Groomers no longer need to meet children in real life to abuse them. Increasingly, groomers are sexually exploiting their victims by persuading them to take part in online sexual activity.

**Online abuse:** Children may experience cyberbullying, grooming, sexual abuse, sexual exploitation or emotional abuse. Children can be at risk of online abuse from people they know, as well as from strangers. Online abuse may be part of abuse that is taking place in the real world - for example bullying or grooming. However, it may also be that the abuse only happens online e.g. persuading children to take part in sexual activity online. A real problem is that children can feel like there is no escape from online abuse, as abusers can contact them at any time of the day or night. Online abuse results in children being abused in what should be considered safe places like their bedrooms - and images and videos can be stored and shared with other people.

**Defining online abuse:** Online abuse is any type of abuse that happens on the web, whether through social networks, playing online games or using mobile phones.

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**HTAFC will review this Child Abuse: Grooming & Online Abuse at least annually.**

## **(21) Child Abuse: Child Sexual Exploitation & Child Trafficking**

**Child sexual exploitation (CSE):** Child sexual exploitation is a type of sexual abuse in which children are sexually exploited for money, power or status. Children may be tricked into believing they're in a loving, consensual relationship. They might be invited to parties and given drugs and alcohol. They may also be groomed online. Some children are trafficked into - or within the UK - for the purpose of sexual exploitation. Sexual exploitation can also happen to young people in gangs.

**Defining child sexual exploitation:** Sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people - or a third person or persons - receive 'something' (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of them performing, and/or another or others performing on them, sexual activities.

Child sexual exploitation can occur through the use of technology without the child's immediate recognition e.g. being persuaded to post sexual images on the Internet and via mobile phones without immediate payment or gain.

In all cases, those exploiting the child have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common. Involvement in exploitative relationships being characterised in the main by the child's limited availability of choice resulting from their social/economic and/or emotional vulnerability.

**Child trafficking:** Child trafficking is child abuse and is a type of abuse where children are recruited, moved or transported and then exploited, forced to work, or sold. They are often subject to multiple forms of exploitation. Children are trafficked for many reasons which include:

- Child sexual exploitation
- Benefit fraud
- Forced marriage
- Domestic servitude such as cleaning, childcare, cooking
- Forced labour in factories or agriculture
- Criminal activity such as pickpocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs and bag theft

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another. Trafficked children experience multiple forms of abuse and neglect because physical, sexual and emotional violence are often used to control victims of trafficking. Children who are trafficked are also likely to be physically and emotionally neglected.

**Defining child trafficking:** The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in human beings'. **Official definition of child trafficking produced by the Council of Europe and ratified by the UK government in 2008**

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**HTAFC will review this Child Abuse: Child Sexual Exploitation & Child Trafficking at least annually.**

## **(22) Child Abuse: Female Genital Mutilation**

**Female genital mutilation (FGM):** There are no medical reasons to carry out FGM. It doesn't enhance fertility and it doesn't make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It's dangerous - as well as being a criminal offence.

**Defining female genital mutilation:** Female genital mutilation is the partial or total removal of external female genitalia for non-medical reasons. It's also known as female circumcision, cutting or sunna.

**The law and female genital mutilation:** FGM has been a criminal offence in the UK since 1985. In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison. Since July 2015, anyone can apply to the court for an FGM Protection Order if they are concerned that someone is at risk of FGM. Breaching an FGM Protection Order is a criminal offence with a maximum sentence of five years' imprisonment.

Since October 2015, the FGM Act 2003 (as amended by section 74 of the Serious Crime Act 2015) introduced a mandatory reporting duty for all regulated health and social care professionals and teachers in England and Wales.

**Professionals must make a report to the Police, if, in the course of their duties:**

- They are informed by a girl under the age of 18 that she has undergone an act of FGM
- They observe physical signs that an act of FGM may have been carried out on a girl under the age of 18

**Changes in behaviour which can indicate a child has undergone female genital mutilation:** A girl or woman who has had FGM may:

- Have difficulty walking, sitting or standing
- Spend longer than normal in the bathroom or toilet
- Have unusual behaviour after an absence from school or college
- Be particularly reluctant to undergo normal medical examinations
- Ask for help, but may not be explicit about the problem due to embarrassment or fear

**Changes to look out for which may indicate a child is at risk of undergoing female genital mutilation:** A girl at immediate risk of FGM may ask a teacher, or another adult for help if she suspects FGM is going to happen, or she may run away from home or miss school. Although the girl may not know what's going to happen, she might talk about:

- Being taken 'home' to visit family
- A special occasion to 'become a woman'
- An older female relative visiting the UK

**Please note: Although this Handbook is specifically concerned with child protection and safeguarding, the following is relevant to this aim:**

There is no requirement for automatic referral of adult women with FGM to adult social services or the Police. Therefore, referral to the Police must not be introduced as an automatic response when identifying adult women with FGM - and each case has to therefore be individually assessed. Adult women with FGM should be supported by offering referral to community groups who can provide the appropriate support, and clinical intervention - or other services as appropriate e.g. through an NHS FGM clinic. However, the wishes of the woman concerned must be respected at all times.

Where this note becomes of relevance to HTAFC's child protection and safeguarding policies is that if the woman who has undergone FGM is pregnant - then the welfare of the unborn child or others in her extended family must be considered at this point - as these children are potentially at risk of FGM also and safeguarding action must be taken accordingly.

If any HTAFC staff member or volunteer is in any way concerned about a girl being at risk of FGM they must



immediately bring their concerns to the attention of HTAFC's Designated Safeguarding Officer.

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HTAFC will review this **Child Abuse: Female Genital Mutilation** at least annually.

## **(23) Child Abuse: Harmful Sexual Behaviour**

**Harmful sexual behaviour:** Children and young people who develop harmful sexual behaviour harm themselves and others. **Harmful sexual behaviour includes:**

- Using sexually explicit words and phrases
- Inappropriate touching
- Using sexual violence or threats
- Full penetrative sex with other children or adults

Sexual behaviour between children is also considered harmful if one of the children is much older - particularly if there is more than two years' difference in age, or if one of the children is pre-pubescent and the other isn't. However, a younger child can abuse an older child, particularly if they have power over them - for example, if the older child is disabled.

**Why children develop harmful sexual behaviour:** Children and young people who develop harmful sexual behaviour have usually experienced abuse and neglect themselves. A 2013 study of children and young people with harmful sexual behaviour suggested that two-thirds had experienced some kind of abuse or trauma such as physical abuse, emotional abuse, sexual abuse, severe neglect, parental rejection, family breakdown, domestic violence, and parental drug and alcohol abuse. Around half of them had experienced sexual abuse.

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**HTAFC will review this Child Abuse: Harmful Sexual Behaviour at least annually.**

## **(24) Child Abuse: Bullying & Cyberbullying**

There is clear evidence that bullying is abusive and will include at least one or more of the four core categories of abuse - sexual abuse, emotional abuse physical abuse and/or neglect. For this reason, bullying in all its forms has been included in HTAFC's Child Protection & Safeguarding Policy.

**Bullying and cyberbullying:** Bullying can happen anywhere - at school, at home or online. It's usually repeated over a long period of time and can hurt a child both physically and emotionally. Bullying that happens online, using social networks, games and mobile phones, is often called cyberbullying. A child can feel like there's no escape because it can happen wherever they are, at any time of day or night.

**Defining bullying:** Bullying is behaviour that hurts someone else - such as name calling, hitting, pushing, spreading rumours, threatening or undermining someone. **Bullying includes the following:**

- **Verbal abuse** - such as name calling and gossiping
- **Non-verbal abuse** - such as hand signs or text messages
- **Emotional abuse** - such as threatening, intimidating or humiliating someone
- **Exclusion** - such as ignoring or isolating someone
- **Undermining** - by constant criticism or spreading rumours
- **Controlling or manipulating** someone
- **Physical assaults** - such as hitting and pushing
- **Making silent, hoax or abusive calls**
- **Online or cyberbullying** - further details are provided below

**Defining online or cyberbullying:** Cyberbullying is an increasingly common form of bullying behaviour which happens on social networks, games and mobile phones. Cyberbullying can include spreading rumours about someone, or posting nasty or embarrassing messages, images or videos. Children may know who's bullying them online - as it may just be an extension of offline peer bullying they are already experiencing - or they may be targeted by someone using a fake or anonymous account. It's easy to be anonymous online and this may increase the likelihood of an individual engaging in bullying behaviour. Because cyberbullying can happen at any time or anywhere - a child can be bullied when they are alone in their bedroom - it can feel like there is no escape. **Cyberbullying includes the following:**

- Sending threatening or abusive text messages
- Creating and sharing embarrassing images or videos
- Trolling – which is the sending of menacing or upsetting messages on social networks, chat rooms or online games
- Excluding children from online games, activities or friendship groups
- Setting up hate sites or groups about a particular child
- Encouraging young people to self-harm
- Voting for or against someone in an abusive poll
- Creating fake accounts, hijacking or stealing online identities - with the aim to embarrass a young person or cause trouble using their name
- Sending explicit messages - also known as sexting
- Pressuring children into sending sexual images or engaging in sexual conversations

**Bullying can also be motivated by a discrimination towards the person being bullied. Further details of these types of bullying are provided below:**

- **Racial bullying** - identified by the motivation of the bully, the language used, and/or by the fact that victims are singled out because of the colour of their skin, the way they talk, their ethnic grouping or by their religious or cultural practices
- **SEN & Disability bullying** - this is where children are singled out because of a disability and which deaf children can be bullied more than other children with SEN's or disabilities
- **Sexual bullying** - behaviour, which whether physical or non-physical, is based on a person's sexuality or gender; and is when sexuality or gender is used as a weapon by boys or girls towards other boys or girls. Sexual bullying is more prevalent towards girls than boys
- **Homophobic/Bi-phobic bullying** - irrational dislike, hatred or fear of individuals that are, or are perceived to be lesbian, gay or bisexual
- **Transphobic bullying** - transphobic is an umbrella term to describe people whose gender is not the same as

- or does not sit comfortably with - the sex they were assigned at birth. Trans people may describe themselves using one or more of a wide variety of terms, including (but not limited to) transgender, cross dresser, non- binary, gender queer

**Changes in behaviour which can indicate a child is being bullied or cyberbullied:** It can be hard for adults, including parents, to know whether or not a child is being bullied. A child might not tell anyone because they're scared the bullying will get worse. They might think that they deserve to be bullied, or that it's their fault. However, the following should be looked out for by HTAFC staff members and volunteers:

- Belongings getting “lost” or damaged
- Physical injuries - such as unexplained bruises
- Being afraid to go to school, being mysteriously 'ill' each morning, or skipping school
- Not doing as well at school
- Asking for, or stealing, money - to give to a bully
- Being nervous, losing confidence, or becoming distressed and withdrawn
- Problems with eating or sleeping
- Bullying others

The damage inflicted by bullying can frequently be underestimated. It can cause considerable distress to children to the extent that it affects their health and development or, at the extreme, cause them significant harm (including self-harm). For this reason, HTAFC has put in place rigorously enforced anti-bullying strategies.

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**HTAFC will review this Child Abuse: Bullying & Cyberbullying at least annually.**

## **(25) Code of Good Practice: Promoting Good Safeguarding Practice when Working with Children**

**Introduction:** Every staff member and volunteer associated with HTAFC has been selected to work with the organisation, because they have demonstrated a desire to provide a positive, fun and safe environment for children and young people. Any person working with young people is automatically placed in a position of trust - that carries with it authority, status, power and responsibility. It has been proven, that where adults are positive role models - and display high moral and ethical standards - the benefits to a young person's development can be significant.

**Duty of Care:** Every staff member and volunteer that works with HTAFC has a legal responsibility to provide a duty of care. This duty of care means that each and every individual adult must take all reasonable steps to ensure the safety of any child involved in an activity for which they and HTAFC are responsible. This duty of care is extended by a moral responsibility to work at developing a culture in which all young people can take part in activities in a safe and enjoyable environment.

**Relationship of Trust:** HTAFC recognises that genuine and appropriate relationships do occur between staff members/volunteers and the children and young people that use the organisations services. While the relationship of trust should always be nurtured, allowing appropriate relationships to lead into sexual, or inappropriate relationships, will always be wrong. HTAFC staff members and volunteers need to be aware of the power and influence that can be exercised over a young person. Where activities undertaken by HTAFC have an element of competitiveness e.g. selection to play, mentoring, assessment etc., a child can become dependent on the adult - and thereby, be more vulnerable. Therefore, it is vital that staff members and volunteers recognise their responsibility - and ensure that they do nothing to abuse their position of trust.

**Good Safeguarding Practice:** Despite having the best safeguarding policies and procedures; and the most effective safeguarding induction training and refresher training - there can still be many situations, that an HTAFC staff member or volunteer may find themselves in, which could be misconstrued and/or misinterpreted by others. HTAFC wants to help reduce such situations from occurring - and which could be viewed from the outside as inappropriate, poor practice, or abusive. **Therefore:**

- **By developing the following standards of good safeguarding practice, HTAFC is seeking to ensure that all of its staff members and volunteers are protected from false allegations relating to child safeguarding concerns.**
- **By HTAFC staff members and volunteers following these standards of good safeguarding practice, we further live and breathe our mission of protecting all children and young people.**

Ultimately though, every staff member and volunteer should never believe that they can rely on their own good reputation; or the good reputation of HTAFC to protect them. All HTAFC staff members and volunteers should always behave and conduct themselves in such a way as to ensure that nothing they do can be misconstrued or misinterpreted.

**Underpinning Principles of HTAFC's Good Safeguarding Practice:** For the avoidance of doubt, the following forms an unequivocal and unalterable core standard and principle that applies to all staff members and volunteers that work with - and for – HTAFC, in any capacity:

- **Never develop or nurture an inappropriate relationship (or any form of inappropriate contact) with a child, that in any way falls outside of the work that you have been authorised to undertake on behalf of HTAFC.**
- An **inappropriate relationship** with a child also includes a sexual relationship, or any form of sexual contact.
- **N.B. Inappropriate contact** would include a breach of any of the good safeguarding practices detailed under any of the headings below, where contact is being made in breach of any instruction to the contrary.

**Important note:** Even if a child is aged 16 years or older, it is forbidden for an HTAFC staff member or volunteer to have a sexual relationship; sexual contact; or an otherwise inappropriate relationship with them. Any such behaviour - by any HTAFC staff member or volunteer - towards any person under the age of 18 years of age, represents a serious breach of trust and is not acceptable under any circumstances.

**In circumstances, where the above underpinning principle is breached by a staff member, they will be subject to HTAFC's disciplinary procedures. Any breach of the above underpinning principle involving a volunteer - or**

**member of staff from another organisation - will result in them being asked to leave HTAFC. Any such breaches of HTAFC's underpinning principle, by staff members or volunteers, will always result in a referral being made to one or more statutory agencies such as the Police, the Local Authority Children's Social Care Department, the FA and the Disclosure and Barring Service.**

Notwithstanding the above underpinning principle, it is HTAFC's intention to regularly review the following guidelines - relating to standards of good safeguarding practice - to ensure that they reflect the very latest best practice; and that they take account of the ever-changing safeguarding risks that children can face.

**General Good Safeguarding Practice:** HTAFC staff members and volunteers must adhere to the following:

- Never exaggerate or trivialise child abuse issues.
- Never make inappropriate promises to a child, particularly in relation to confidentiality.
- Do not ask a child to keep a secret.
- Do not jump to conclusions about others, without first checking the facts.
- Never allow allegations by a child to go unchallenged, unrecorded - or in any way not acted upon.
- Never agree to meet a child or young person on their own on a one to one basis. If such a situation should be requested by a child or young person, then you are required to immediately speak with HTAFC's DSO.

**Behaviour Good Safeguarding Practice:** HTAFC staff members and volunteers must adhere to the following:

- Never act in a way towards a child that can be perceived as threatening or intrusive. This includes verbal aggressiveness and shouting.
- Do nothing that would cause a child to lose self-esteem e.g. by embarrassing, humiliating, undermining them; or otherwise acting in a way that would reduce them to tears.
- Never make sarcastic, insensitive or derogatory comments (or gestures) to a child, even if this was meant to be in fun.
- Never make sexually suggestive comments (or gestures) to a child, even if this was meant to be in fun.
- Never patronise or treat a child as if they are silly.

**In addition to not behaving in any of the ways listed above, HTAFC staff members and volunteers should always be careful not to behave in any of the ways listed above either in front of - or within the presence of - a child, even though it is not intended to be directed towards the child.**

**Communication Good Safeguarding Practice:** HTAFC staff members and volunteers must adhere to the following:

- Never use inappropriate language in the presence of a child.
- Do not allow children to use inappropriate language unchallenged.

**Personal Contact Good Safeguarding Practice:** HTAFC staff members and volunteers must adhere to the following:

- Never allow - or take part in - any form of inappropriate touching of a child.
- Never take part in any rough, physical, or sexually-provocative games - which includes horseplay of anykind.
- Do not undertake things of a personal nature for a child which they can do for themselves, unless you have been requested to provide that assistance by their parent or carer.

**N.B.** It is recognised that some children may need help with such things as tying laces and this is acceptable. This element of good safeguarding practice does not preclude attending to an injured or ill child, or from rendering first aid.

**Personal Information Good Safeguarding Practice:** HTAFC staff members and volunteers must adhere to the following:

- Never let a child have your personal home address.
- Never let a child have your personal telephone number/s.
- Never contact a child via text message using a personal phone.
- Never email a child from a personal email address.

**N.B.** Where emailing or texting a children is an accepted and documented operational procedure of HTAFC, this email and/or text must at all times come from the authorised HTAFC email account or work mobile phone

- and each child's parent/carer must be copied into the email or text.

**Physical Contact Good Safeguarding Practice:** HTAFC staff members and volunteer should only use appropriate physical contact if the sole aim is to:

- Develop sports skills techniques.
- Treat an injury.
- Prevent an injury or accident from occurring.
- To meet the professional requirements of the sport or activity being undertaken.

**Acceptable physical contact - as outlined above - would always take place in an open or public environment; and would never take place in secret or out of sight of others.**

**N.B.** In all circumstances where physical contact is required, the adult must always explain the nature and reason for the physical contact; and reinforce the teaching or coaching skills being used. Unless the HTAFC staff member or volunteer is responding to an emergency situation, the adult must always seek the child's permission for initiating the required physical contact.

**Appropriate physical contact will never involve touching in or around the genital area, the buttocks and/or the breasts. In addition, any physical contact anywhere else on the body should not cause a child distress or embarrassment.**

**Positive Influence Good Safeguarding Practice:** HTAFC staff members and volunteers must adhere to the following:

- Never smoke in front of children - or in any place that you could be seen smoking by them.
- Never consume alcohol in front of children - or in any place that you could be seen drinking alcohol by them.
- Never offer children drugs or other illegal substances.
- Never offer children sexual materials e.g. adult magazines, adult videos and/or adult website addresses etc.
- Never accept bullying, rule violations, cheating or the use of prohibited substances - such as performance enhancers etc.

**Supervision Good Safeguarding Practice:** HTAFC staff members and volunteers must adhere to the following:

- Never leave a child unsupervised.
- Do not treat any child more favourably than others.
- Avoid spending too much time alone with any one particular child where you are away from other adults.
- A child must never be taken to an adults home.
- Never go to a child's home where you would be alone with them.
- Do not be in a dressing room with a child on your own. If this is unavoidable, ensure the door remains open.
- Should circumstances require adults and children to share a dressing room, adults are required to provide the child with privacy and ensure that the adult showers and changes at a separate time to the child.
- Mobile phones - and any technology capable of taken photos or videos - are not permitted to be used in changing rooms.
- Never share a room with a child.

**Social Media Good Safeguarding Practice:** HTAFC staff members and volunteers must adhere to the following:

- Never contact or communicate with a child through social media sites; or via any other form of social media app or interface.
- Never permit a child to be added to your social media feed/s or social media apps.

**Where a child requests to be added to any personal social media feed or social media app, you must immediately refuse the request and communicate the attempt to connect with you through social media to HTAFC's DSO. HTAFC's DSO will explain to the child that staff members and volunteers are not permitted to have child participants on their social media feeds; and that they should not send such requests again.**

**N.B.** There may be circumstances where an HTAFC staff member or volunteer may have a child participant on their social media feed - or on social media apps - as a consequence of appropriate contact prior to commencing work with HTAFC. In all circumstances, HTAFC staff members and volunteers should disclose this social media connection to the DSO and then delete all social media connections with that child. HTAFC's DSO will explain to the child and/or their parent/carer the reasons this action has been taken.

**Social media definition:** Social media is an interactive online media that allows users to communicate instantly with each other or to share data in a public forum. It includes social and business networking websites such as Facebook, Myspace, Reddit, Twitter and LinkedIn. Social media also covers video and image sharing and blogging websites such as YouTube, Instagram, Google+, Tumblr and Flickr, as well as personal blogs, any posts made on other people's blogs and all online forums and noticeboards. This is a constantly changing area with new websites and apps being launched on a regular basis and therefore this list is not exhaustive. This element of HTAFC's social media good safeguarding practice policy applies in relation to any social media that staff members and volunteers may use, regardless of whether it is specifically detailed in the definition above or not.

**Transport Good Safeguarding Practice:** HTAFC staff members and volunteers must adhere to the following:

- Never use a mobile phone while driving with a child or children - whether or not the mobile phone meets handsfree legislation.
- No adult is permitted to transport a child or children if they are in an unregulated job category.
- Never transport a child or children if not in possession of the relevant licence entitlement; or the relevant insurances.
- You should not transport a child without another adult being present.

**N.B.** Where such a journey is unavoidable, then the staff member or volunteer required to transport the child **must** first speak to their line manager or HTAFC's DSO and gain the consent of that other person **prior** to making the journey. The staff member or volunteer must also ensure that they communicate with the parent/carer of the child to ensure that they are also fully aware that their child is being transported without another adult being present.

In all cases where the above procedure is used to transport a child without another adult being present, the staff member or volunteer must complete a journey log and submit this at the end of each week to HTAFC's DSO. HTAFC will monitor journey logs to further reduce situations where a child needs to be transported by a lone adult.

**In all cases where a child is transported as a single passenger - without another adult being present - the child should sit in the back seat of the vehicle and wearing their seat belt.**

**Reviewed & Updated: September 2019**

**HTAFC will review these Code of Good Practice: Promoting Good Safeguarding Practice when Working with Children and good practice at least annually.**



## (26) Whistle Blowing Policy

**Policy statement:** Whistleblowing is quite simply when an HTAFC staff member or volunteer reports suspected wrongdoing at HTAFC. Officially this is called 'making a disclosure in the public interest'. HTAFC understands that sometimes things go wrong. If they do, then we ask you to tell us.

- **Purpose:** The purpose of this Whistleblowing Policy is to make it clear that HTAFC staff members or volunteers can whistleblow without fear of victimisation, subsequent discrimination or disadvantage. This Whistleblowing Policy is therefore intended to encourage and enable everyone to raise serious concerns directly to HTAFC, rather than overlooking a problem or seeking a resolution of the problem outside of the organisation.

All HTAFC staff members and volunteers have a responsibility to maintain the highest standards of care towards everyone they come into contact with through their work with and for the organisation. This Whistleblowing Policy aims to ensure that serious concerns can be properly raised and addressed within the organisation and are recognised as a way of enabling the delivery of good practice - and which will help to ensure the protection of every child.

- **Responsibilities:** HTAFC believes that all staff members and volunteers are professional and skilful in the work and tasks they undertake. However, occasionally it may be that a staff member or volunteer has concerns about another person's conduct or standards of practice e.g. they may be worried that a child is not being cared for properly; is being abused; or even at serious risk. It could be that they have concerns about fraud; financial irregularity; or other issues they have become aware of within while working for HTAFC. All HTAFC staff members and volunteers have a responsibility to raise those concerns so that they can be resolved.

HTAFC acknowledges that raising concerns can be an extremely difficult and courageous thing to do. Any HTAFC staff member or volunteer who has good grounds on which to base their concerns - even if they do not have proof - will be listened to.

**Please remember though, that it is not your responsibility to investigate the matter - this is HTAFC's responsibility.**

- **Procedure for raising concerns:** In most circumstances, staff members and volunteers wishing to raise their concerns, should ideally discuss the matter with their line manager. If this is not possible, perhaps because this person is thought to be involved or colluding in the suspected wrongdoing, another HTAFC manager or HTAFC's DSO or SSM should be contacted. The person that the staff member or volunteer raises their concerns to, will be responsible for ensuring the concerns are looked into or passed to the most appropriate person within HTAFC - in line with the organisations Disclosures in the Public Interest Policy contained in the Employee Handbook .
- **Follow-up:** Depending on the nature of the concern raised, a response regarding the action taken will be supplied to the staff member or volunteer raising it as soon as possible. However, it is important to be aware that it might not always be appropriate to reveal the full extent of the investigation, where this relates to personal issues involving a third party.
- **Never keep quiet about wrongdoing:** HTAFC staff members or volunteers - who do not report bad practice or abuse, neglect or ill treatment of a child, young person or adult, or for that matter anything else illegal that they are suspicious about - may be seen as colluding with that unacceptable practice. Such collusion constitutes a disciplinary offence and will be dealt with in accordance with the Company's disciplinary procedure (for staff) and resolving problems with volunteers procedure (for volunteers) and could result in the termination of the working relationship - as well as the information being forwarded to the appropriate authorities.
- **False and/or malicious allegations:** No HTAFC staff member or volunteer will ever be penalised for whistleblowing - even if it is not upheld - unless they made a false accusation which they knew was both untrue and made with malice. If it is found that a false accusation was knowingly made, this would be treated as gross misconduct in accordance with the Company's disciplinary procedure (for staff) and resolving problems with volunteers procedure (for volunteers) and could result in the termination of the working relationship.

**Reviewed & Updated: September 2019**

HTAFC will review this **Whistle Blowing Policy** and good practice at least annually.

## **(27) Procedure for Responding to Signs or Suspicions of Abuse**

The following procedure applies to any HTAFC staff member or volunteer who may be concerned about the safety and protection of a child. The different types of abuse have been detailed in sections 19 through to 24 of this Handbook. HTAFC staff members and volunteers should refer back to these sections when reading this procedure.

Where there is concern relating to a child being vulnerable to radicalisation, extremism, or that they are being drawn into extremism, please refer to section 34 of this Handbook which provides detailed guidance under HTAFC's Prevent Duty.

**Purpose and aim of procedure:** We aim to ensure that those children who attend and/or participate in activities or events organised by HTAFC, and any other children who may come to the attention of HTAFC, receive the protection and support they need if they are at risk of abuse or radicalisation. This procedure provides clear direction to staff and volunteers at HTAFC if they have concerns that a child is in need of protection. **Ways that abuse might be brought to your attention include:**

- A child might make a direct disclosure about him or herself
- A child might make a direct disclosure about another child
- A child might offer information that is worrying but not a direct disclosure
- A member of staff or volunteer might be concerned about a child's appearance or behaviour or about the behaviour of a parent or carer towards a child
- A parent or carer might make a disclosure about abuse that a child is suffering or at risk of suffering
- A parent might offer information about a child that is worrying but not a direct disclosure

**When talking to a child - who has told you that they are/or another child is being abused - please take account of the following guidance:**

1. Reassure the child that telling someone about it was the right thing to do
2. Tell them that you now have to do what you can to keep them (or the child who is the subject of the allegation) safe
3. Let the child know what you are going to do next and who else needs to know about it
4. Let the child tell his or her whole story - but don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying.
5. Ask the child what they would like to happen as a result of what they have said, but don't make or infer promises you can't keep.
6. Give the child the **ChildLine** phone number which is **0800 1111**.

**How to help a child in immediate danger or in need of emergency medical attention:**

- If the child is in immediate danger and is with you, remain with them and call the Police
- If the child is elsewhere, contact the Police and explain the situation to them
- If the child needs emergency medical attention, call an ambulance and while you are waiting for it to arrive, get help from HTAFC's first aider
- If a first aider is not available, use any first aid knowledge that you may have yourself to help the child
- You also need to contact your line manager or HTAFC's Designated Safeguarding Officer to let them know what is happening

A decision will need to be made about who should inform the child's family and the Local Authority Children's Social Care Department and when they should be informed. If you have involved the Police and/or the health services, they should be part of this decision. Consider the welfare of the child in your decision making as the highest priority. **Issues that will need to be taken into account are:**

- The child's wishes and feelings
- The parent's right to know - unless this would place the child or someone else in danger, or would interfere with a criminal investigation
- The impact of telling or not telling the parent
- The current assessment of the risk to the child and the source of that risk
- Any risk management plans that currently exist

Once any immediate danger or emergency medical need has been dealt with, follow the steps set out in the **Flow Chart to Follow when Responding to Signs of Abuse** in this Handbook.

**Keeping a record of your concerns:** Use the **Reporting Concerns about a Child Form** (available for HTAFC's Designated Safeguarding Officer). The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory child protection authorities if a referral to them is needed. The form should be signed and dated by all those involved in its completion and kept confidentially on the child's file and in line with HTAFC's Data Protection Policy. The name of the person making the notes should be written alongside each entry.

**Reporting child protection concerns:** If a child is in need of emergency medical attention or in immediate danger, follow the procedure set out in the earlier section above on **Helping a Child in Immediate Danger or in Need of Emergency Medical Attention**.

**How HTAFC will support employees and volunteers:** HTAFC recognises that employees and volunteers working for the organisation and who have become involved in supporting/working with a child who has suffered harm - or appears to be likely to suffer harm - may find the situation stressful and upsetting. It is HTAFC's paramount concern that all employees and volunteers receive all necessary support in these circumstances.

HTAFC will support all employees and volunteers who find themselves in this situation, by providing an opportunity to talk through any anxieties, concerns and worries with HTAFC's Designated Safeguarding Officer. In all cases - and where required or considered appropriate - HTAFC and the Designated Safeguarding Officer will seek-out further support. This could be provided by, for example, Occupational Health and/or a teacher/trade union representative as appropriate.

HTAFC will ensure that the Designated Safeguarding Officer and Deputy Designated Safeguarding Officer have access to support and appropriate workshops, courses or meetings as organised by the Local Authority and/or the FA to enable them to manage such situations.

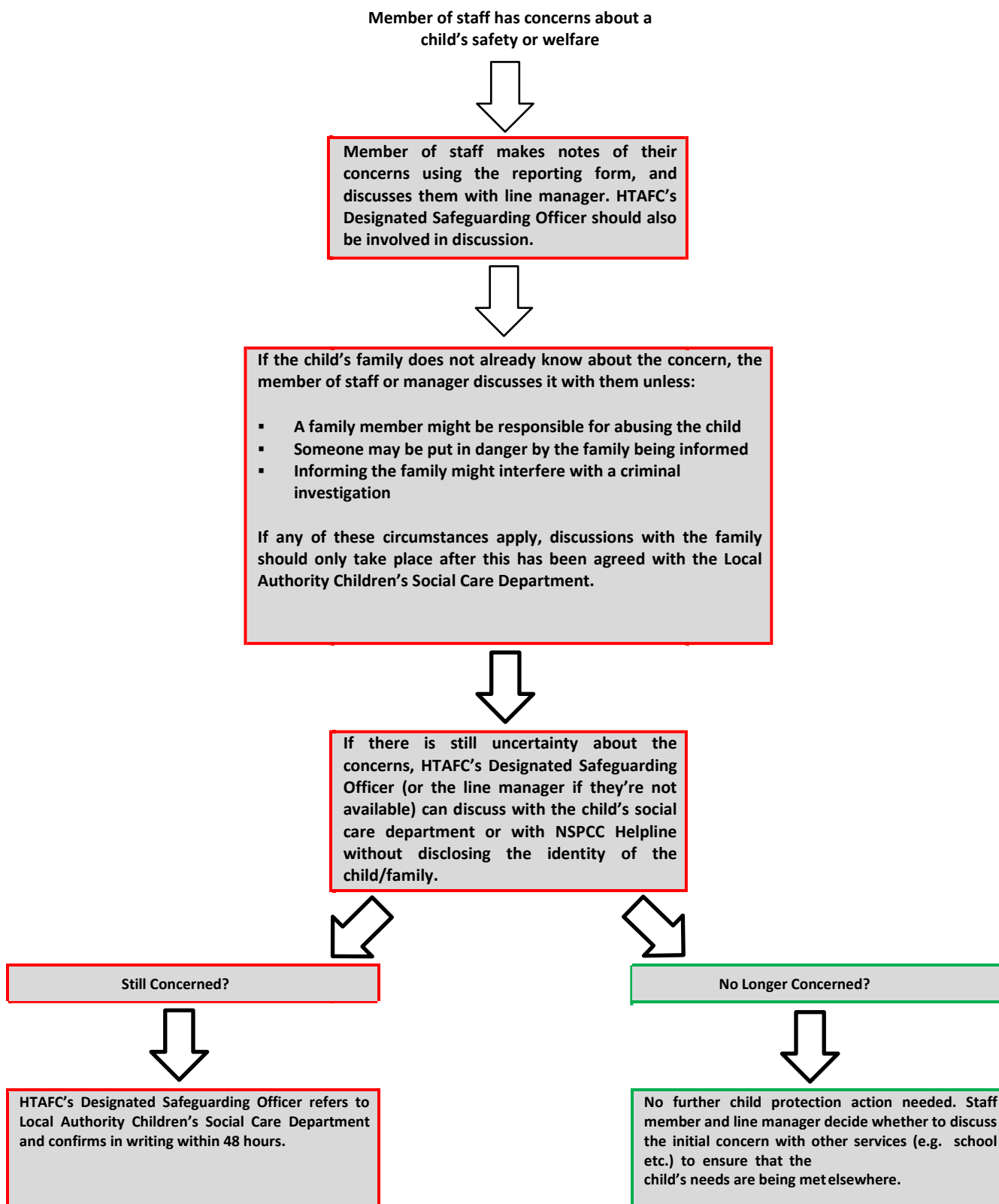
**Any HTAFC employee or volunteer - who is struggling with any issues or concerns as a consequence of their safeguarding responsibilities - are encouraged to speak with the Designated Safeguarding Officer, who will be able to provide, or access, the appropriate support.**

**HTAFC staff members and volunteers should then take the steps set out in the flowchart on the following page to ensure the concern is dealt with...**

**Reviewed & Updated: September 2019**

**HTAFC will review this Procedure for Responding to Signs or Suspicions of Abuse and good practice at least annually.**

## (28) Flow Chart to Follow when Responding to Signs of Abuse



**Reviewed & Updated: September 2019**

HTAFC will review this Procedure for Responding to Signs or Suspicions of Abuse and good practice at least annually.

## **(29) Code of Conduct for Children**

**This Code of Conduct has been developed in order to provide children with advice on the behaviour that is expected of them when attending and using the facilities and services of HTAFC. It has been shaped by the views of children and young people.**

**Purpose:** To ensure children are treated fairly by all adults working with them at HTAFC - and so they know what is expected of them.

**Basic principles:** This code of behaviour for children is intended to:

- Identify acceptable behaviour for children
- Promote self-respect and self-control
- Raise children's self-esteem and self confidence
- Encourage individual responsibility for behaviour and outline the consequences of poor behaviour
- Encourage children to recognise and respect the rights of others
- Encourage cooperation at all times and in all situations
- Promote the values of honesty, fairness and respect
- Anticipate and resolve any conflict that may arise
- Ensure that children are aware of when sanctions will be put into place

**Dos and don'ts:** Children are expected to:

- Co-operate with each other
- Be friendly
- Listen to each other
- Be helpful
- Follow this code of behaviour and other rules
- Stick to the e-safety agreement when using the internet, social networking sites, mobile phones etc.
- Have good manners
- Join in
- Respect each other's differences
- Treat all staff and volunteers with respect
- Report anything that worries or concerns them to HTAFC's Designated Safeguarding Officer

**Children shouldn't:**

- Pick on or make fun of each other
- Bully each other
- Stare at others
- Yell or shout at others
- Be abusive
- Use equipment to be abusive or to cyberbully e.g. by using mobile phones to send nasty messages, taking and sharing photos without permission, sending nasty emails, or 'trolling' (leaving unkind comments on a webpage or social network profile)

**Breach of this Code:** This Code of Conduct is only useful if it forms part of a process for guiding children to receive appropriate support. Therefore, it is the responsibility of HTAFC's Designated Safeguarding Officer to ensure that all children attending HTAFC are informed of this Code and to confirm with them that they have seen, understood and agreed to follow it. HTAFC will always ensure that all children are made aware of the consequences if they should breach the code. **Following the traffic light system:**

1. If a child breaches the Code of Conduct, the most appropriate sanction for a minor or first time breach will be to remind them about the Code and ask them to comply with it. Children will be given the opportunity to reflect - enabling them to plan a positive response - with support from either a staff member or volunteer.
2. **If, having followed the above step, the child continues to exhibit inappropriate behaviour, they will be referred to the appropriate member of HTAFC staff - who will give them a formal, green light warning.**

**Supportive interventions may need to be identified at this stage. The action will also be recorded in the discipline book and parents/carers informed.**

- 3. Any further persistent inappropriate behaviour will result in a more serious sanction being imposed e.g. restriction/suspension from HTAFC's facilities. This is the yellow light warning.**

Again, supportive interventions may need to be identified at this stage. This action will also be recorded in the discipline book and parents/carers informed.

- 4. If these interventions are still not effective in helping the child to change their behaviour, a red light warning may be needed, with further sanctions. It may be that at this point, HTAFC will discuss with the child and their family a possible referral for further support from other services.**

**Use of child protection procedures:** If staff or volunteers at HTAFC become concerned that a child's behaviour suggests either that they may be at risk of significant harm - or that they may present a risk of significant harm to other children - HTAFC's child protection procedures will be followed and a referral may be made to the Local Authority Children's Social Care Department.

Such a referral will be discussed with the child and their family at the earliest possible opportunity, except in situations where this could possibly endanger a child's safety, or interfere with a Police investigation.

**Reviewed & Updated: September 2019**

HTAFC will review all **Code of Conducts** and good practice at least annually.

### **(30) Dealing with Allegations of Abuse made against an Employee or Volunteer Policy**

**Policy statement:** HTAFC has developed clear policies and procedures for dealing with allegations against HTAFC employees or volunteers who work with children. Examples of allegations that would be covered by this policy, although no intended to be exhaustive, include:

- Behaviour that has, or may have, harmed a child
- Criminal acts against or related to a child
- Behaviour towards a child or children in a way that indicates they may pose a risk of harm to children

**Principles:** In the first instance, any such allegation against an HTAFC employee or volunteer must be reported immediately to HTAFC's Designated Safeguarding Officer. HTAFC's Designated Safeguarding Officer must immediately make HTAFC's Community Manager aware of the allegation; and the Community Manager will then be responsible for notifying the named Board Safeguarding Lead and the Senior Safeguarding Manager - if different from the Community Manager.

**Reporting time limits:** HTAFC's Designated Safeguarding Officer is accountable for contacting the Local Authority's Designated Officer and informing them of all allegations that have come to their attention **within 24 hours of the allegations being made.**

HTAFC's Designated Safeguarding Officer will notify The FA Case Management Team, where an allegation at HTAFC results in a safeguarding referral being made to any of the following:

- The Police
- The Local Authority Designated Officer
- Any other statutory agency, social care or Children's Services Directorate

HTAFC's Designated Safeguarding Officer is accountable for contacting The FA Case Management Team as soon as possible after the allegations have been made - but in any event **within 72 hours of the allegations being made.**

**DBS Referral:** Where any HTAFC employee or volunteer - working in regulated activity - is suspended from their duties as a consequence of concerns, allegations and/or internal investigations related to their work with children, then HTAFC's Designated Safeguarding Officer will notify The FA Case Management Team as soon as possible after the suspension takes place - but in any event **within 72 hours of the suspension happening.**

As a provider of Regulated Activity, HTAFC has a legal duty to make a referral to DBS in certain circumstances. HTAFC's Designated Safeguarding Officer - supported by HTAFC's Senior Safeguarding Manager - will seek support from The FA Case Management Team, when a DBS referral needs to be made.

**Information relating to a DBS referral as well as further advice relating to making a DBS referral being available here:**

<https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs>

**Reviewed & Updated: September 2019**

**HTAFC will review this Dealing with Allegations of Abuse made against an Employee or Volunteer Policy and good practice at least annually.**



## **(31) Procedure for Dealing with Allegations made against an Employee or Volunteer**

**Purpose of procedure:** This procedure outlines what should happen if a child protection allegation is made against an adult working for, or involved in HTAFC. The procedure provides clear direction to those HTAFC staff who are called upon to deal with such allegations - and to manage the investigations that may result from them.

### **The aims of this procedure are:**

- To ensure that children who access the services and facilities provided by HTAFC - and any other children who may come to its attention - are protected and supported following an allegation that they may have been abused by an adult from within HTAFC
- To ensure that there is a fair, consistent and robust response to any allegations made, so that the risk posed to other children by an abusive individual is managed effectively
- To facilitate an appropriate level of investigation into allegations - whether they are said to have taken place recently; at any time the person in question has been employed by/volunteered with HTAFC; or prior to the person's involvement with HTAFC
- To ensure that HTAFC continues to fulfil its responsibilities towards members of staff and volunteers who may be subject to such investigations
- To ensure that individuals are able to continue in their role if they have been at the centre of allegations that are unfounded or deemed to be malicious in origin

### **This procedure applies to:**

- Any HTAFC staff member or volunteer to whom an allegation of abuse has been made and which involves another HTAFC staff member or volunteer
- Anyone in a managerial position (including HTAFC's Designated Safeguarding Officer, line managers and supervisors) who may be required to deal with such allegations and manage investigations that result from them

**How an allegation of possible abuse may be disclosed:** Allegations might be made against an adult working for, or who is involved with HTAFC in the following manner:

- A child or parent/carer making a direct allegation against an HTAFC staff member or volunteer
- A child or parent/carer expressing discomfort with the behaviour of an HTAFC staff member or volunteer that falls short of a specific allegation
- Another HTAFC staff member or volunteer directly observing behaviour that is a cause for concern
- HTAFC being informed by the Police or another statutory authority that an HTAFC staff member or volunteer is the subject of an investigation
- Information emerging from the renewal of a DBS check that suggests that an HTAFC staff member or volunteer may have committed an offence - or may have been involved in an activity - that could compromise the safety of the children they work with at HTAFC
- A HTAFC staff member or volunteer telling someone at HTAFC that they have been the subject of allegations; have actually harmed a child; or committed an offence against (or related to) a child

**What to do if an allegation is made, or information is received:** There are potentially two issues that need to be dealt with as a matter of urgency:

### **1. Is a child in immediate danger or do they need emergency medical attention?**

- If a child is in immediate danger and is with you, remain with them and call the Police
- If the child is elsewhere, contact the Police and explain the situation to them
- If the child needs emergency medical attention, call an ambulance and, while you are waiting for it to arrive, get help from HTAFC's first aider
- If a first aider is not available, use any first aid knowledge that you may have yourself to help the child. You

must also contact your line manager and HTAFC's Designated Safeguarding Officer to let them know what is happening.

The HTAFC staff member or HTAFC manager should also inform the child's family if the child is in need of emergency medical attention - and arrange to meet them at the hospital or medical centre.

The parents/carers should be informed that an incident has occurred; that the child has been injured; and that immediate steps have been taken to get help.

- 2. Is the HTAFC person at the centre of the allegation working with children now?** If this is the case, the concern needs to be discussed immediately with HTAFC's Community Manager and the Designated Safeguarding Officer. Either the Community Manager or Designated Safeguarding Officer should then, in a sensitive manner, remove the staff member or volunteer involved in the allegation from direct contact with children.

It should then be explained to the person, in private, that there has been a complaint made against them, although the details of the complaint should not be given at this stage. The person should be informed that further information will be provided as soon as possible but that, until consultation has taken place with the relevant agencies and within the organisation, they should not be working with children. It may be best, under the circumstances, for the person to return home on the understanding that the either HTAFC's Community Manager or Designated Safeguarding Officer will telephone them later in the day.

The information provided to them at this stage will need to be very limited. This is because discussions need to take place first with other agencies who may need to be involved, such as the Local Authority's Designated Officer, the Local Authority's Children's Social Care Department, the Police, as well as the FA and EFL Trust.

If the person is a member of a Trade Union or other professional organisation, they should be advised to make contact with that Body. Arrangements should also be made for the HTAFC staff member or volunteer to receive ongoing support in line with the responsibilities the organisation has towards their welfare.

**Conducting an investigation:** Once any urgent necessary steps have been taken, attention can be given to dealing with the full implications of the allegations. **There are up to three possible lines of enquiry when an allegation is made:**

- 1. A Police investigation of a possible criminal offence.**
- 2. Enquiries and an assessment by the Local Authority Children's Social Care Department about whether a child is in need of protection.**
- 3. Investigation by HTAFC and possible disciplinary action being taken against the person in question. This will include implementing a plan to manage any risk posed by the individual to children connected with HTAFC until the outcome of the other investigations and enquiries are known.**

**Reporting an allegation or concern:** If the allegation is made by a child or family member to an HTAFC staff member or volunteer - or if an HTAFC staff member or volunteer observes concerning behaviour by a colleague at first hand - this should be reported immediately to the staff member/volunteer's line manager and HTAFC's Designated Safeguarding Officer - who will be HTAFC's lead in relation to handling the allegation.

If a staff member has received an allegation or observed something of concern about their own manager, the staff member should report the allegation or concern to the person more senior to their manager.

If the person who is the subject of the concern is the Designated Safeguarding Officer, the matter should be reported to HTAFC Managing Director and SSM Garry Plant.

**When to involve the Local Authority's Designated Officer:** The Designated Safeguarding Officer **must** report the allegation to the Local Authority's Designated Officer **within 24 hours** if the alleged behaviour suggests that the person in question:

- May have behaved in a way that has harmed or may have harmed a child
- Has possibly committed a criminal offence against or related to a child
- Has behaved towards a child in a way that suggests that they may be unsuitable to work with children

**This should also happen even if the individual has volunteered the information themselves.**

The Local Authority's Designated Officer may be told of the allegation from another source. If this is the case, then the first information received by HTAFC may be when the Local Authority's Designated Officer makes contact with HTAFC's Designated Safeguarding Officer in order to explain the situation.

Whoever initiates the contact, there will be discussion between the Local Authority's Designated Officer and HTAFC's Designated Safeguarding Officer to share information about the nature and circumstances of the allegation, and to consider whether there is any evidence to suggest that it may be false or unfounded.

If there is any reason to suspect that a child has suffered (or be likely to suffer) significant harm and there are no obvious indications that the allegation is false, the Local Authority's Designated Officer, in cooperation with HTAFC, will make an immediate referral to the Local Authority Children's Social Care Department to ask for a strategy discussion.

The Local Authority's Designated Officer and HTAFC's Designated Safeguarding Officer will take part in the strategy discussion. HTAFC's Designated Safeguarding Officer - and any other representative from HTAFC - will co-operate fully with this and any subsequent discussion with the Children's Social Care Department.

HTAFC will ask from the outset that the Children's Social Care Department shares any information obtained during the course of their enquiries with HTAFC's Designated Safeguarding Officer where it has any relevance to the person's employment or volunteering with the organisation.

**Dealing with a criminal offence:** If there is reason to suspect that a criminal offence may have been committed (whether or not the threshold of 'significant harm' is reached), the Local Authority's Designated Officer will contact the Police and involve them in a similar strategy discussion, which will include HTAFC's Designated Safeguarding Officer.

The Local Authority's Designated Safeguarding Officer - and any other representative from HTAFC - will cooperate fully with any discussion involving the Police and will ask for similar cooperation from the Police in terms of the sharing of information relevant to the person's employment or volunteering with the organisation.

Discussions with the Police will also explore whether there are matters that can be acted on in a disciplinary process while the criminal investigation takes place - or whether disciplinary action must wait until the criminal process is completed.

**Talking to parents about the allegation or concern:** If the child's parents/carers do not already know about the allegation, HTAFC's Designated Safeguarding Officer and the Local Authority's Designated Officer will discuss how they should be informed and by whom.

**Talking to the person who is the subject of the allegation:** The person at the centre of the allegation will be informed as soon as possible after the initial consultation with the Local Authority's Designated Officer. However, if a strategy discussion with Children's Social Care or the Police is needed, this might have to take place before the person concerned can be spoken to in full. The Police and Children's Social Care Department may have views on what information can be disclosed to the person.

Only limited information will be given to the person in question, unless the investigating authorities have indicated that they are happy for all information to be disclosed - or unless there is no need for involvement from these statutory agencies.

HTAFC's Designated Safeguarding Officer will keep in close communication with the Local Authority's Designated Officer and the other agencies involved, in order to manage the disclosure of information appropriately.

**Taking disciplinary action:** If the initial allegation does not involve a possible criminal offence, HTAFC's Designated Safeguarding Officer and the line manager of the person at the centre of the allegation will consider whether formal disciplinary action is needed.

If the Local Authority Children's Social Care Department has undertaken any enquiries to determine whether a child or children are in need of protection, HTAFC's Designated Safeguarding Officer will take account of any relevant information from these enquiries when considering whether disciplinary action should be brought against the person at the centre of the allegations. **The following timings should be kept to wherever possible, depending on the nature of the investigation:**

- If formal disciplinary action is not needed, other appropriate action should be taken within **three working days**
- If disciplinary action is required - and can be progressed without further investigation - this should take place **within 15 days**
- If HTAFC decides that further investigation is needed in order to make a decision about formal disciplinary action, HTAFC's Designated Safeguarding Officer will discuss with the Local Authority's Designated Officer the possibility of this investigation being done by an independent person to ensure that the process is objective. Whether or not the investigation is handled internally or independently, the report should be presented to HTAFC's Designated Safeguarding Officer within **10 working days**
- Having received the report of the disciplinary investigation, HTAFC's Designated Safeguarding Officer should decide **within two working days** whether a disciplinary hearing is needed
- If a disciplinary hearing is needed, it should be held within **15 working days**
- HTAFC's Designated Safeguarding Officer will continue to liaise with the Local Authority's Designated Officer during the course of any investigation or disciplinary proceedings - and will continue to use the Local Authority's Designated Officer as a source of advice and support

If a criminal investigation is required, it may not be possible to make decisions about initiating disciplinary proceedings - or about the person's future work arrangements - until this is concluded. The Police are required to complete their work as soon as reasonably possible and to set review dates, therefore HTAFC's Designated Safeguarding Officer will either liaise with the Police directly or via the Local Authority's Designated Officer to check on the progress of the investigation and criminal process.

The Police are required to inform HTAFC immediately if the person is either convicted of an offence or acquitted or, alternatively, if a decision is made not to charge them with an offence, or to administer a caution. In any eventuality, once the outcome is known, HTAFC's Designated Safeguarding Officer will contact the Local Authority's Designated Officer to discuss the issue of disciplinary proceedings.

**If the allegation is substantiated and if, once the case is concluded, HTAFC dismisses the person or ceases to use their services, or the person ceases to provide their services, HTAFC's Designated Safeguarding Officer will consult with the Local Authority's Designated Officer about referral of the incident to the Disclosure and Barring Service (DBS). This should take place within a month.**

**Managing risk and supporting the person at the centre of the allegation:** The first priority of HTAFC must always be the safety and welfare of children. However, as an employee or volunteer of HTAFC, the person who is the subject of the allegation has a right to be treated in a fair, sensitive and non-judgemental manner - and to have their privacy respected - as far as this ensures the safety of the child and other children.

Information about the allegation must only be shared on a need to know basis with those directly responsible for

supervising and managing the staff member or volunteer. Any other information (for example, explanations to other staff members as to why the person is not at work or working to different arrangements) should be agreed and negotiated with the individual concerned.

If the person is a member of a Trade Union or a professional organisation, they should be advised to make contact with that body as soon as possible after being informed that they are the subject of an allegation. Arrangements should also be made for them to receive ongoing support and information about the progress of the investigation.

The possible risk of harm to children presented by the person who is the subject of an allegation needs to be carefully managed both during and after any conclusion to the investigation processes following the allegation. This means that HTAFC may need to consider suspending the person if there is cause to suspect that a child may be at risk of significant harm, or if the allegation is serious enough to warrant investigation by the Police - or if it is so serious that it could lead to dismissal. However, a decision to suspend should not be taken automatically, as there may be other ways of managing any risk presented by the person.

The situation should be discussed fully between HTAFC's Designated Safeguarding Officer, the individual's line manager and the Local Authority's Designated Officer - who will seek the views of the Police and the Children's Social Care Department on the question of possible suspension. The conclusions of the discussion should also be carefully documented. Grounds for suspension should be clearly set out if this is the conclusion. If suspension is not the conclusion, then a clear plan should be made as to how any possible risk posed by the individual is to be managed. This could involve, for example, changes to the person's duties so that they do not have direct contact with children, and/or increased levels of supervision whilst at work.

If it is decided, once the case has been concluded, that a person who has been suspended - or who has taken sick leave due to the stress induced by the allegation - is able to return to work, HTAFC's Designated Safeguarding Officer and the line manager of the person who has been the subject of the allegations should consider how best to support the individual in this process. A plan to facilitate a return will be drawn up in consultation with the individual themselves and should take into account the need to manage any remaining child protection risks; as well as supporting the person concerned, after what will have been and will remain a very difficult experience.

If the decision is that the person cannot return to work and has to be dismissed or chooses to resign, the HTAFC's Designated Safeguarding Officer and the Local Authority's Designated Officer will discuss the need for the matter to be referred to the Disclosure and Barring Service and/or to any professional body to which the person may belong.

**HTAFC does not enter into compromise agreements with individuals who resign following the conclusion of investigations into allegations made against them, and will always comply with its statutory obligations to share information about the individual in the interests of protecting children and young people.**

If the allegation is found to be without substance or fabricated, HTAFC will consider referring the child in question to the Children's Social Care Department for them to assess whether they are in need of services or whether they may have been abused by someone else. If it is felt that there has been malicious intent behind the allegation, HTAFC will discuss with the Police whether there are grounds to pursue any action against the person responsible.

**Keeping a record of the investigation:** All those involved in dealing with the allegation should keep clear notes of the allegations made; how they were followed up; any actions and decisions taken; together with the reasons for these.

These notes should be compiled gradually as the situation unfolds, with each entry being made as soon as possible after the event it describes. The notes should be signed and dated by the person making them, and the person's name should be printed alongside.

The notes should be kept confidentially on the file of the person who is the subject of the allegation. Discussion should take place with the Local Authority's Designated Officer to determine whether any aspects of the notes may not be shared with the person concerned. If there are no reasons not to do so, a copy of the records should be given to the individual.

The notes should be held on file for a 10-year period, whether or not the person remains with HTAFC for this period.

**Reviewed & Updated: September 2019**

**HTAFC will review this Procedure for Dealing with Allegations made against an Employee or Volunteer and good practice at least annually**

### **(32) Procedure for Dealing with Allegations Made Against another Child**

The different types of abuse that one child can do to another have been detailed in sections 19 through to 24 of this Handbook. HTAFC staff members and volunteers should refer to these sections when reading this procedure.

**Purpose of procedure:** The purpose of this procedure is to provide a clear direction to staff that are called upon to deal with allegations made against a child, by another child and to manage investigations and care plans which may result from them. **This procedure applies to:**

- Any HTAFC staff member or volunteer to whom an allegation of abuse has been made which suggests that another child is responsible
- Anyone in a managerial position, including HTAFC's Designated Safeguarding Officer, line managers and supervisors who may be required to deal with such allegations and manage investigations and care plans that result from them

**The aims of this procedure are:**

- To ensure that children who attend HTAFC - and any other children who may come to the attention of HTAFC - are protected and supported following an allegation that they may have been abused by another child involved with HTAFC
- To ensure that there is a fair, consistent and robust response to any allegations of this nature so that the risk posed to other children by the child in question is managed effectively
- To facilitate an appropriate level of investigation into allegations, whether they relate to recent alleged activity, said to have taken place during the time that the child in question has been involved with HTAFC, or whether they relate to abuse which allegedly took place prior to the child's involvement with HTAFC
- To ensure that HTAFC continues to fulfil its responsibilities towards children who may be subject to such investigations and are in need of support
- To ensure that there is an appropriate response in situations where allegations are unfounded or deemed to be malicious in origin

**Ways that allegations might be made against another child or young person involved with HTAFC could include the following:**

- A child or parent/carer might make a direct allegation against another child
- A child or parent/carer might express discomfort with the behaviour of another child that falls short of a specific allegation
- Another child, HTAFC staff member or volunteer may directly observe behaviour from one child towards another that gives cause for concern
- HTAFC may be informed by a parent, or by the Police, or another statutory authority that a child is the subject of an investigation
- A child may volunteer information to HTAFC that they have harmed another child - or is at risk of doing so - or has committed an offence against or related to a child

**Is this a child protection issue or bullying?** When faced with a situation of one child behaving inappropriately towards another, a decision needs to be made about whether the problem behaviour constitutes bullying or a child protection concern. This is a decision that needs to be reached by HTAFC's Designated Safeguarding Officer, in consultation with the staff member/volunteer responsible for the child; the staff member/volunteer's line manager; and, if necessary, the Local Authority Children's Social Care Department. If the conclusion is that the behaviour is an example of bullying, and if both children attend HTAFC, it needs to be dealt with under the **Anti- bullying Policy & Procedure** detailed in this Handbook.

If, however, it is behaviour that could be described as child abuse and has led to the victim possibly suffering significant harm, then it must be dealt with under child protection procedures. This should include all incidents of sexual assault and all but the most minor incidents of physical assault. **The following checklist can be used to help inform the decision:**

## **Bullying**

- The difference of power between the bully and the person being bullied is relatively small
- The bullying behaviour may be from a number of children/young people acting in a group rather than from one child acting alone
- It may also, but not necessarily, be directed towards a group of other children rather than an individual child
- The behaviour involves teasing or making fun of someone, excluding a child from games and conversations, pressurising other children not to be friends with someone, spreading hurtful rumours or circulating inappropriate photographs/images/drawings, cyberbullying, shouting at or verbally abusing someone, stealing someone's possessions, making threats, or harassment on the basis of race, gender, sexuality or disability
- The behaviour has not previously been a concern and the bully or bullies may have been responding to group pressure
- The behaviour is perceived as bullying by the victim

**Please note:** Physical or sexual assault, or forcing someone to do something embarrassing, harmful or dangerous is also included in the list of bullying behaviours, but are the most likely to constitute a child protection concern if the victim suffers significant harm as a result of the behaviour.

## **Child protection concerns**

- The difference of power between the child who is abusing and the person being abused is significant e.g. there is an age difference of more than two years, there is a significant difference in terms of size or level of ability, the abuser holds a position of power (such as being a helper, volunteer or informal leader) or the victim is significantly more vulnerable than the other child or young person
- The behaviour involves sexual assault or physical assault (other than the most minor physical assault)
- The child who is the victim of the behaviour may have suffered significant harm
- The behaviour may not necessarily be perceived by the victim as abusive, particularly if it is sexual in nature
- The behaviour is not a one-off incident and is part of a pattern of concerning behaviour on the part of the child who is abusing
- The behaviour, if sexual, is not part of normal experimentation that takes place between children

**Is this sexual abuse or normal experimentation?** All children develop an interest in their own sexuality from a young age and seek to learn about sex from their peers. It is important not to label normal, healthy behaviour as deviant or abusive. It is equally important not to allow sexually abusive behaviour perpetrated by one child towards another to go unchecked - as this is harmful both for the victim and the perpetrator. There are ways of assessing whether sexual behaviour between children is abusive or not. **Indicators of abusive behaviour include:**

- There is a significant difference in age, dominance or understanding between the children
- The behaviour was accompanied by the use of threats or bribes
- The behaviour was carried out in secret

For the purposes of this procedure however, it is enough to say that if there is any question that the behaviour could be abusive, the matter should be discussed - by HTAFC's Designated Safeguarding Officer - with the Local Authority Children's Social Care Department or with the **NSPCC Helpline** which is **0800 800 5000**.

This can initially take place without the names of the children being disclosed, although such information will have to be provided if the view of the Children's Social Care Department or the NSPCC is that the behaviour may constitute significant harm and that an investigation is needed.

## **What to do if you have child protection concerns**

If you believe that the child who has been allegedly abused, or the child who has allegedly perpetrated the abuse, is in immediate danger or requires emergency medical attention you must take the following action:



- If either child is in immediate danger and is with you, remain with them and call the Police if you are unable to remove the danger yourself
- If the child is elsewhere, contact the Police and explain the situation to them
- If a child needs emergency medical attention, call an ambulance and while you are waiting for it to arrive, get help from your first aider
- If the first aider is not available, use any first aid knowledge that you may have yourself to help the child
- You also need to contact your line manager or HTAFC's Designated Safeguarding Officer to let them know what is happening

A decision will need to be made about when and who should inform the families of both the child who has been abused and the child who has allegedly perpetrated the abuse, as well as the Local Authority Children's Social Care Department.

**Please note:** If the child who is the alleged victim is not known to HTAFC, it is not your role to inform the child's family. Even if the child who is the alleged victim is known, the Police and/or the Health Services, should be part of the decision making process if they have been contacted.

The paramount consideration should always be the welfare of the children involved. **Issues that will need to be taken into account are:**

- The children's wishes and feelings
- The parents' right to know (unless this would place the child who has allegedly perpetrated the abuse in danger, or would interfere with a criminal investigation)
- The impact of telling or not telling the parents
- The current assessment of the risk to the child who has been abused and the source of that risk
- The current assessment of any risk to the child who has allegedly perpetrated the abuse and the source of that risk
- Any risk management plans that currently exist for either child

**Once any immediate danger or emergency medical need has been dealt with, the procedure set out below should be followed:**

1. The member of staff/volunteer who has been informed of the allegation or who has the concern, should make notes of what they have been told - or their direct concerns - using the reporting form and should discuss these with their line manager **within 24 hours**. HTAFC's Designated Safeguarding Officer should also be involved in the discussion.
2. If both children are known to HTAFC and if their families do not already know about the allegation or concern, the member of staff/volunteer, line manager or HTAFC's Designated Safeguarding Officer should discuss it with them unless:
  - The view is that someone (for example the child who has allegedly perpetrated the abuse) may be put in danger by the family being informed
  - Informing the family might interfere with a criminal investigation

**If either of these circumstances applies, discussions with the families should only take place after this has been agreed with the Local Authority Children's Social Care Department.**

3. If only the child who is alleged to have harmed another child is known to HTAFC then, subject to the considerations set out above, discussions with only this child's family should take place.
4. The child who is the subject of the allegation should also be informed of what has been said about them. However, if the view is that Children's Social Care Department or the Police should be involved, the child should only be informed after discussion and agreement with these agencies. These agencies may have views about what information should be disclosed to the child at this stage.
5. If there is still uncertainty about whether the allegation or concern constitutes a child protection issue, HTAFC's Designated Safeguarding Officer should discuss with Children's Social Care Department or with the NSPCC Helpline without disclosing the identity of either child/family.
6. If, having discussed the situation fully and taken advice if necessary, HTAFC's Designated Safeguarding Officer concludes that the alleged behaviour does not constitute a child protection issue, then consideration should be

given to whether the **Anti-bullying Policy and Procedure** should be used (if both children are known to the organisation) and whether either or both children should be referred for other services.

7. If the view is that the behaviour does indeed amount to a child protection issue, then HTAFC's Designated Safeguarding Officer should refer both children to the Local Authority Children's Social Care Department and confirm the referral in writing **within 24 hours**.
8. Pending the outcome of the referral to the Children's Social Care Department and the possible investigation or assessment that may follow from this, any risk that may be posed to other children by the child who has allegedly harmed another child will need to be carefully managed. This should be done on an inter-agency basis in accordance with procedures developed by the Local Safeguarding Children Board for children who display harmful behaviour towards others.
9. HTAFC's Designated Safeguarding Officer should enquire of the Children's Social Care Department whether these procedures are being used and, if so, should ask to be involved in or at least kept informed of inter-agency decisions made in accordance with these procedures.
10. If the procedures are not being used but HTAFC remains concerned that the child could pose a risk to other children, then HTAFC's Designated Safeguarding Officer should consider whether the child can continue to be involved with HTAFC and if so, on what basis. This is a situation that needs to be kept under regular review as the investigation and assessment conducted by the statutory agencies is carried out and reaches a conclusion. It may also need to be reviewed regularly following the conclusion of the assessment process, as the child may be receiving support that should, with time, reduce the level of risk they present.
11. If the allegation is found to be without substance or fabricated, HTAFC will consider referring the child who was said to have been harmed to the Children's Social Care Department for them to assess whether they are in need of services (for example, the child may have been abused by someone else).
12. If it is felt that there has been malicious intent behind the allegation, HTAFC will discuss with the Police whether there are grounds to pursue any action against the person responsible.

#### **How to respond to a child who says that they - or another child - is being abused by another child:**

- Reassure the child that they have done the right thing by telling someone about it
- Tell them that you now have to do what you can to keep them (or the child who is the subject of the allegation) safe
- Let the child know what you are going to do next and who else needs to know about it
- Let the child tell their whole story - don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying
- If possible, explain to the child's parent/carer what has happened. Do this first without the child there, and then summarise it again in front of the child so that it is an open subject between parent/carer and child. This may enable them to talk about it together more easily.
- Check out what the child would like to happen as a result of what they have said, but don't make or infer promises you can't keep
- Give the child the **ChildLine** phone number - which is **0800 1111**
- Make sure that the parent/carer has support too

#### **How to respond to a child who says that they have abused another child:**

- Reassure the child that they have done the right thing by telling someone about it
- Tell them that you now have to do what you can to keep them and the child who has been abused safe
- Let the child know what you are going to do next and who else needs to know about it
- Let the child tell their whole story - don't try to investigate or quiz the child, but make sure that you are clear as to what they are saying
- If there is no risk to the child from the child's parent/carer, then explain to the parent/carer what has happened. Do this firstly without the child there, and then summarise it again in front of the child so that it is an open subject between parent/carer and child. This may enable them to talk about it together more easily.
- Check out what the child expects to happen as a result of what they have said - offer reassurance where appropriate but don't make or infer promises you can't keep
- Reassure the child that, with help, the problem can be sorted out and that what has happened does not make them an abuser for life
- Give the child the **ChildLine** phone number - which is **0800 1111**
- Remember that the child who has behaved in this way is a child in need of support

- Make sure that the parent/carer has support too

**Recording the concerns:** Use the **Reporting Concerns about a Child Form** (available from HTAFC's Designated Safeguarding Officer) to record the concern and for clear steps on how you should deal with it. The relevant sections of the form should be completed and signed at each stage of the procedure. It can be used to forward information to the statutory child protection authorities if a referral to them is needed.

**Reviewed & Updated: September 2019**

**HTAFC will review this Procedure for Dealing with Allegations Made Against another Child and good practice at least annually.**

### **(33) E-Safety Policy**

**This policy - and the procedures that it underpins - apply to all HTAFC staff members and volunteers, as well as anyone else that works for and on behalf of HTAFC. The purpose of HTAFC's e-safety policy is to:**

- 1.** Protect children and young people who receive HTAFC's services and make use of information technology (such as mobile phones, games consoles and the Internet) as part of their involvement with the organisation
- 2.** To provide HTAFC staff members and volunteers with the overarching principles that guide the organisations approach to e-safety;
- 3.** To ensure that, as an organisation, HTAFC operate in line with its values and within the law in terms of how information technology is used

#### **HTAFC recognises that:**

- The welfare of the children who come into contact with HTAFC's services is paramount and should govern the approach to the use and management of electronic communications technologies
- All children, regardless of age, disability, gender, racial heritage, religious belief, sexual orientation or identity have the right to equal protection from all types of harm or abuse
- Working in partnership with children, their parents, carers & other agencies is essential in promoting children's welfare & in helping children to be responsible in their approach to e-safety
- The use of information technology is an essential part of everyone's lives; it is involved in how HTAFC as an organisation gather and store information; as well as how we all communicate with each other. It is also an intrinsic part of the experience of the children who use HTAFC's services - and is greatly beneficial to all. However, it can present challenges in terms of it is used responsibly and - if misused either by an adult, young person or a child - can be actually or potentially harmful to them.

#### **HTAFC will seek to promote e-safety by:**

- a.** Developing a range of procedures that provide clear and specific directions to HTAFC staff members and volunteers on the appropriate use of ICT
- b.** Supporting and encouraging the children using HTAFC's services to use the opportunities offered by mobile phone technology and the internet in a way that keeps themselves safe and shows respect for others
- c.** Supporting and encouraging parents and carers to do what they can to keep their children safe online and when using their mobile phones and game consoles
- d.** Incorporating statements about safe and appropriate ICT use into the codes of conduct, both for HTAFC staff members and volunteers, as well as for children
- e.** Developing an e-safety agreement for use with children and their parents/carers
- f.** Use HTAFC's procedures to deal firmly, fairly and decisively with any examples of inappropriate ICT use, complaints or allegations, whether by an adult or a child (these may include breaches of filtering, illegal use, cyberbullying, or use of ICT to groom a child or to perpetrate abuse)
- g.** Informing parents and carers of incidents of concern as appropriate
- h.** Reviewing and updating the security of HTAFC's information systems regularly
- i.** Providing adequate physical security for ICT equipment
- j.** Ensuring that user names, logins and passwords are used effectively
- k.** Using only official email accounts provided via the organisation, and monitoring these as necessary

- l.** Ensuring that the personal information of HTAFC staff members, volunteers and service users (including service users' names) are not published on HTAFC's website
- m.** Ensuring that images of children and families are used only after written permission has been obtained - and then only for the purpose for which consent has been given
- n.** Any social media tools used in the course of HTAFC's work with children and families will be risk assessed in advance by the member of HTAFC staff or volunteer wishing to use them
- o.** Providing effective management for HTAFC staff and volunteers on ICT issues, through supervision, support and training
- p.** Examining & risk assessing any emerging new technologies before they are used within the organisation

**Reviewed & Updated: September 2019**

**HTAFC will review this E-Safety Policy and good practice at least annually.**

## **(34) Prevent Duty Policy**

**Background:** The Prevent Duty requires specified authorities to have due regard to the need to prevent people from being drawn into terrorism. The Prevent Duty is part of the Counter-Terrorism & Security Act 2015 and commenced with effect on 1<sup>st</sup> July 2015. **The Prevent Strategy is seeking to:**

- Respond to the ideological challenge of terrorism and aspects of extremism, and the threat that is faced from those who promote these views
- Provide practical help to prevent people from being drawn into terrorism and ensure they are given appropriate advice and support
- Work with a wide range of sectors where there are risks of radicalisation which needs to be addressed, including education, criminal justice, faith, charities, the internet and health

Under the Prevent Duty, all schools and childcare providers are considered specified authorities and therefore must have due regard to the need to prevent people being drawn into terrorism.

**N.B :** Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. The definition of extremism for the purposes of HTAFC's interpretation of its responsibilities under the Prevent Duty also includes calls for the death of members of our armed forces, whether in this country or overseas.

**Policy statement:** HTAFC is committed to the protection and safeguarding of all children that utilise the services it offers. As such, HTAFC will have due regard to the Prevent Duty and will take the steps outlined in this **Prevent Duty Policy** as part of its commitment to child protection and safeguarding. Therefore, this policy demonstrates HTAFC's intention to:

- Make every effort to identify children that may be vulnerable to radicalisation and take the appropriate actions to protect them.
- Promote fundamental British Values (where our interactions permit) to help build a child's resilience to radicalisation and enable them to challenge extremist views.

**HTAFC's approach to its responsibilities will focus on four key themes as follows:**

### **1. Risk assessment; 2. Working in partnership; 3. Staff training & 4. IT policies Each of the**

**above core four themes are explained in greater detail below:**

- 1. Risk Assessment:** As part of its risk assessment processes, HTAFC will undertake a risk assessment of the children that attend and utilise its services to identify any risk of individuals being drawn into terrorism - including support for extremist ideas that are part of terrorist ideology.

Whilst HTAFC realises that there is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology, as with managing our other safeguarding risks and responsibilities, HTAFC's staff members and volunteers will be alert to changes in a child's behaviour which could indicate that they may be in need of help or protection. HTAFC accepts that children at risk of radicalisation may display different signs or seek to hide their views. HTAFC's staff members and volunteers will use their professional judgement in identifying children who might be at risk of radicalisation and bring any concerns they have to HTAFC's Designated Safeguarding Officer - who will ensure that any action taken is proportionate.

HTAFC accepts that even very young children may be vulnerable to radicalisation by others - whether in the family or outside - and consequently display concerning behaviour. The Prevent Duty does not require HTAFC's staff members or volunteers to carry out unnecessary intrusion into family life, but as with any other safeguarding risk, HTAFC must take action if there is any behaviour that raises concerns. **Possible signs of radicalisation include:**

- a) The individual's views become increasingly extreme regarding another section of society or government policy
- b) The individual becomes increasingly intolerant of more moderate views
- c) The individual expresses a desire/intent to take part in or support extremist activity
- d) They are observed downloading, viewing or sharing extremist propaganda from the web
- e) They become withdrawn and focused on one ideology
- f) The individual may change their appearance, their health may suffer (including mental health) and they may become isolated from family, friends, peers or social groups.

HTAFC staff members and volunteers should refer to HTAFC's **Child Protection & Safeguarding Policies and Procedures** relating to the **Procedure for Responding to Signs or Suspicions of Abuse** if they have any concerns relating to children at risk of radicalisation. Where it is felt that there is a concern with regard to radicalisation, then HTAFC's Designated Safeguarding Officer will make the referral to the **Channel Programme**.

**What is the Channel Programme:** The Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for organisations to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages. **Further information relating to the Channel Programme is available at the end of this policy.**

2. **Working in partnership:** HTAFC will continue to work with and build upon its existing local partnership arrangements with the Local Safeguarding Children Boards (LSCBs) - who are responsible for co-ordinating what is done by local agencies for the purposes of safeguarding and promoting the welfare of children. HTAFC already takes in to account the relevant policies and procedures of the LSCB - which includes following the threshold guidance indicating when a child might be referred for support.

Where HTAFC's local authority provides Home Office funded dedicated Prevent co-ordinators, the organisation will work in partnership with them. In addition, HTAFC will work with local Police and any other civil society organisations that may be able to provide advice and support to the organisation with regard to implementing the duty.

Finally, HTAFC will continue to work closely with parents, carers and families who are in a key position to spot signs of radicalisation. Where concerns are raised, HTAFC will assist and advise families and point them to the right support mechanisms.

3. **Staff training:** Where HTAFC's risk assessment identifies that there is a **high risk** of children who use its services being at risk of radicalisation, it will ensure that the appropriate employees participate in the Home Office's **Workshop to Raise Awareness of Prevent (WRAP)**. As a minimum, HTAFC's Designated Safeguarding Officer will undertake the **WRAP** training to ensure that they are able to provide advice and support to other members of HTAFC's staff and volunteers on protecting children from the risk of radicalisation.

However, as part of HTAFC's commitment to raise awareness generally about the Prevent Duty and the associated responsibilities, all employees and volunteers will be required to complete the **Channel General Awareness Training** on-line module and print out their **Certificate of Completion**. The **Channel General Awareness Training Module** can be found here:

[http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html)

The **Channel General Awareness Training Module** is a free resource and takes just 25 minutes to complete. This on-line module provides an introduction to how to identify factors that can make people vulnerable to radicalisation, as well as case studies illustrating the types of intervention that may be appropriate, in addition to Channel.

- 4. IT policies:** HTAFC acknowledges its duty to ensure that children are safe from terrorist and extremist material when using the internet whilst accessing the organisations services. To this end, HTAFC has in place suitable internet filtering which it will ensure is regularly updated. HTAFC will require every child who accesses the internet via its computers (and other IT equipment that can access the internet) to sign its **E-Safety Agreement** which is available from HTAFC Designated Safeguarding Officer.

All of HTAFC's staff members and volunteers will need to be aware of the risks posed by the online activity of extremist and terrorist groups and further guidance and advice will be provided by HTAFC's Designated Safeguarding Officer.

**Reviewed & Updated: September 2019**

HTAFC will review this **Prevent Duty Policy** and good practice at least annually.

### **(35) Building Resilience Against the Radicalisation of Children & Young People Policy**

HTAFC acknowledges its responsibilities in helping to build the resilience - of the children who use its services - to radicalisation. This will be achieved through providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. HTAFC will use its notice boards and appropriate delivery opportunities to promote fundamental British values. **The British values as far as the Prevent Duty is concerned are:**

- **Democracy:** Respect for democracy and support for participation in the democratic process
- **The rule of law:** Respect for the basis on which the law is made and applies in England
- **Individual liberty:** Support and respect for the liberties of all within the law
- **Mutual respect and tolerance of different faiths and beliefs:** Support for equality of opportunity for all and respect and tolerance of different faiths and religious and other beliefs

These fundamental British values will be integrated into the work of HTAFC with the children it works with as appropriate. This will include - but is not be limited to - personal, social and health education to explore sensitive or controversial issues and equipping them with the knowledge and skills to understand and manage difficult situations. HTAFC will help children to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. This approach can help them develop effective ways of resisting pressures, including knowing when, where and how to get help. HTAFC will help the children it works with to develop positive character traits such as resilience, determination, self-esteem, and confidence.

In addition - and always where appropriate to the specific interaction - HTAFC will seek to incorporate opportunities to provide the knowledge, skills and understanding to prepare children to play a full and active part in society. Specifically, this will be to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. Ultimately, the way that HTAFC approaches its work with children will always underpin the principles of democracy and give them opportunities to understand how laws are made and upheld.

As a consequence of the diverse backgrounds that the children that access our services come from, HTAFC has an excellent opportunity to reinforce the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect and understanding.

**What to do if an HTAFC staff member or volunteer has a concern:** As detailed in the **Prevent Duty Policy**, if an HTAFC staff member or volunteer has a concern that a particular child is at risk of radicalisation, then in the first instance they should refer to HTAFC's **Child Protection & Safeguarding Policies and Procedures**. In particular, this means following the **Procedure for Responding to Signs or Suspicions of Abuse**. However, in all cases, please discuss your concerns with HTAFC's Designated Safeguarding Officer.

**Reviewed & Updated: September 2019**

**HTAFC will review this Building Resilience Against the Radicalisation of Children & Young People Policy and good practice at least annually.**



## **(36) Guidance on Prevent and the Channel Programme**

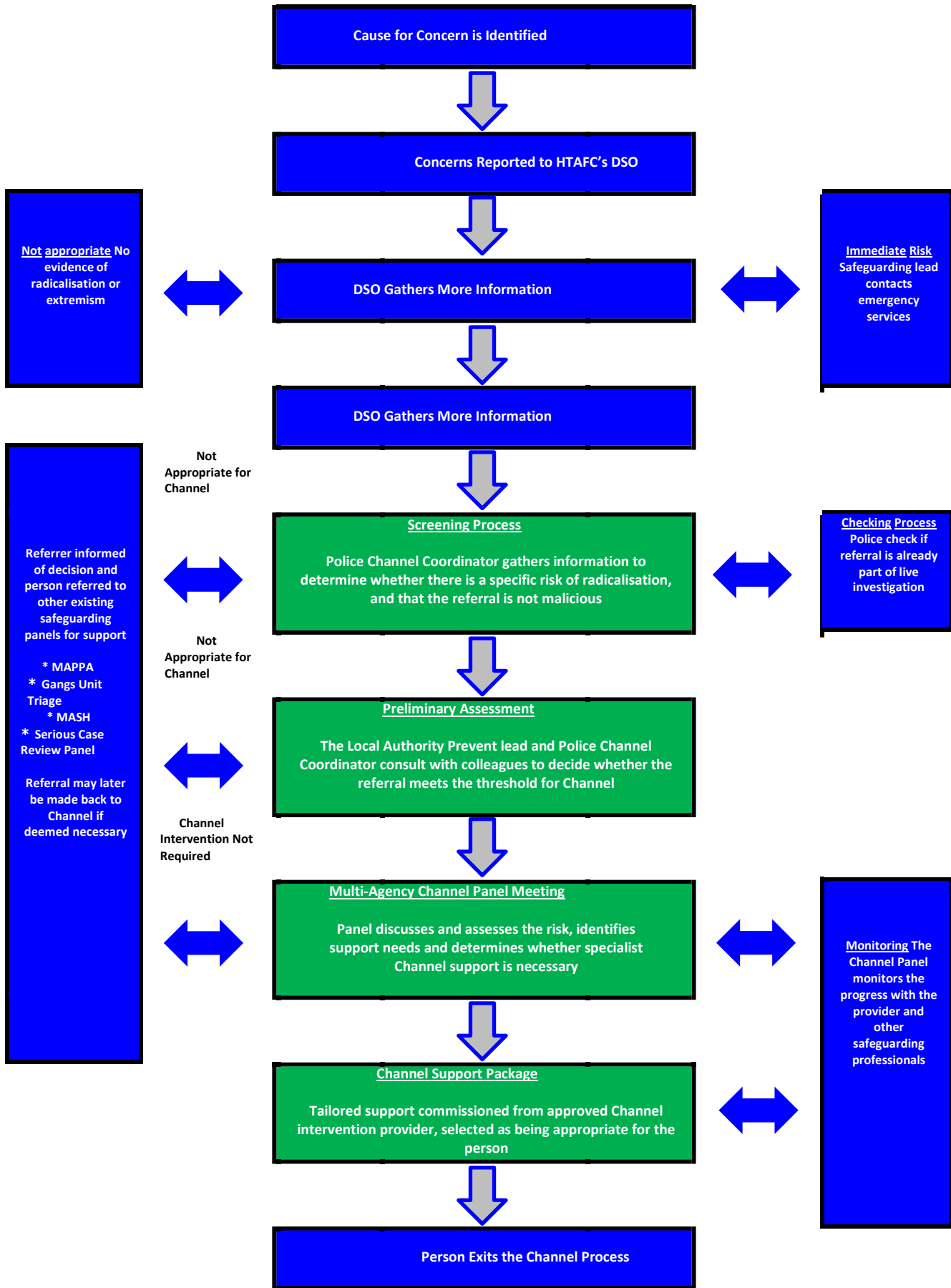
- **What is Prevent?** Prevent is the Government's strategy to stop people becoming involved in violent extremism or supporting terrorism, in all its forms. Prevent works within the non-criminal space, using early engagement to encourage individuals and communities to challenge violent extremist ideologies and behaviours.
- **What is Channel?** Channel is an early intervention multi-agency process designed to safeguard vulnerable people from being drawn into violent extremist or terrorist behaviour. Channel works in a similar way to existing safeguarding partnerships aimed at protecting vulnerable people.
- **Who does Channel work with?** Channel is designed to work with individuals of any age who are at risk of being exploited by extremist or terrorist ideologues. The process is shaped around the circumstances of each person and can provide support for any form of radicalisation or personal vulnerabilities.
- **How does Channel work?** Each Channel Panel is chaired by a local authority and brings together a range of multi-agency partners to collectively assess the risk and can decide whether a support package is needed. The group may include statutory and non-statutory partners, as well as lead safeguarding professionals. If the group feels the person would be suitable for Channel, it will look to develop a package of support that is bespoke to the person. The partnership approach ensures those with specific knowledge and expertise around the vulnerabilities of those at risk are able to work together to provide the best support.
- **What does Channel support look like?** Channel interventions are delivered through local partners and specialist agencies. The support may focus on a person's vulnerabilities around health, education, employment or housing, as well as specialist mentoring or faith guidance and broader diversionary activities such as sport. Each support package is tailored to the person and their particular circumstances.
- **How will the person be involved in this process?** A person will always be informed first if it's felt that they would benefit from Channel support. The process is voluntary and their consent would be needed before taking part in the process. This process is managed carefully by the Channel Panel.
- **Who can make a referral?** Anyone can make a referral. Referrals come from a wide range of partners including education, health, youth offending teams, Police and social services.
- **What happens with the referral?** Referrals are first screened for suitability through a preliminary assessment by the Channel Coordinator and the local authority. If suitable, the case is then discussed at a Channel panel of relevant partners to decide if support is necessary.
- **Raising a concern:** If you believe that someone is vulnerable to being exploited or radicalised, please follow HTAFC's **Child Protection & Safeguarding Policies and Procedures** and raise your concerns in confidence to HTAFC's Designated Safeguarding Officer, who will be responsible for raising concerns to Channel if appropriate.

Please refer to the flowchart on the next page which identifies the Channel process for HTAFC...

**Reviewed & Updated: September 2019**

HTAFC will review this Guidance on Prevent and the Channel Programme at least annually.

**(37) The Channel Process within HTAFC**



### **(38) Ongoing Safeguarding Training, Professional Development & Support Policy**

**Policy statement:** The only way that HTAFC can be certain that its strategy for implementing safeguarding is effective, is through the induction; the training (and regular refresher training); as well as the on-going professional development of all its staff and volunteers. It is for this reason that HTAFC have developed a **Training Policy** which identifies the distinct steps that the organisation will take to ensure the competence of its key safeguarding personnel; as well as all its remaining staff and volunteers.

**Induction training:** Upon appointment, all staff and volunteers will undertake a structured induction programme during their probationary period. While induction training will cover many elements related to a new recruit becoming familiar with the organisation and the role they have been recruited for, every new staff member and volunteer will receive specific induction training relating to safeguarding and promoting the welfare of children.

Further details relating to induction training can be found in the **Safer Induction Policy** detailed in this Handbook.

**Training & refresher training:** Following induction, it is the policy of HTAFC that all staff and volunteers will undertake further training (and refresher training) as necessary to provide them with relevant skills and knowledge to safeguard effectively. To ensure this policy is effective, HTAFC will budget the necessary resources (including time and travel opportunities) for both training and training events. While this will naturally include the training necessary for effective role performance, it will also include - as a matter of course - further safeguarding training linked to maintaining the best standards of child protection; and as appropriate to their role and level of contact with children. **This will include such subject areas as:**

- Understanding the legislation and any specific regulations regarding safeguarding
- Updates (and refresher training) on recognising indicators and signs of abuse
- HTAFC's procedures for responding to, reporting, recording and referral of concerns, allegations or disclosures of abuse
- The relevant process for reporting and managing allegations against staff and volunteers
- Ongoing anti-bullying support, training and guidance to support staff and volunteer to be effective at preventing and responding to all forms of bullying, including racist homophobic and sexual bullying

In addition, HTAFC line managers are required to ensure that all staff and volunteers receive safeguarding and child protection updates at regular staff meetings between any formal training and refresher training received throughout the year. Where appropriate, HTAFC will put staff and volunteers onto the annual "FA Safeguarding Children Workshop" to help meet the requirements of training and refresher training.

**On-going professional development:** While all staff and volunteers are encouraged generally to undertake Continual Professional Development (CPD) to maintain and keep up to date their skills, certain HTAFC staff members are obligated to undertake CPD as part of their role responsibilities for the organisation. Listed below are the minimum CPD requirements for the following HTAFC safeguarding staff members:

- **Safeguarding Manager (SSM):** This post-holder must attend mandatory Safeguarding SSM Training every two years.
- **Designated Safeguarding Officers (DSOs):** This post-holder must attend mandatory Safeguarding DSO training annually.

**How HTAFC will support employees and volunteers:** HTAFC recognises that employees and volunteers working for the organisation and who have become involved in supporting/working with a child who has suffered harm - or appears to be likely to suffer harm - may find the situation stressful and upsetting. It is HTAFC's paramount concern that all employees and volunteers receive all necessary support in these circumstances.

HTAFC will support all employees and volunteers who find themselves in this situation, by providing an opportunity to

talk through any anxieties, concerns and worries with HTAFC's Designated Safeguarding Officer. In all cases - and where required or considered appropriate - HTAFC and the Designated Safeguarding Officer will seek-out further support. This could be provided by, for example, Occupational Health and/or a teacher/trade union representative as appropriate.

HTAFC will ensure that the Designated Safeguarding Officer has access to support and appropriate workshops, courses or meetings as organised by the Local Authority and/or the FA to enable them to manage such situations.

**Reviewed & Updated: September 2019**

**HTAFC will review this Ongoing Safeguarding Training, Professional Development & Support Policy and good practice at least annually.**