

<b>Section:</b> Human Resources
<b>Policy:</b> Safeguarding Children
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<b>Date of review:</b> 31/07/2024

The Policy will also be reviewed following a major incident, organisational or key legislative change ahead of this date. Please note in line with EFL and LA recommendations this policy was further updated on 14<sup>th</sup> May 2019.

The policy will reference 'Keeping children safe in education (KCSIE) for 2023, replacing KCSIE 2022 that went live in September 2023.

**Statement of Intent**

Club Doncaster believes that every child or young person, defined as any person under the age of 18, who plays or participates in any activity through Club Doncaster should be able to be part of an enjoyable and safe environment and be protected from abuse. This is the responsibility of anyone engaged and working with Club Doncaster and its associated activities.

Club Doncaster recognises its responsibility to safeguard the welfare of all children and young people by seeking to protect them from physical, sexual or emotional harm and from neglect or bullying. We are committed to reviewing our policy and good practice annually.

This policy outlines a strong commitment from the board to the safeguarding agenda and the promotion of wellbeing.

Club Doncaster policies and processes are compiled on the basis of law and guidance that seeks to protect children and young people. Club Doncaster recognises its obligations on voluntary and private sector organisations under section 11 of the Children Act 2004, and Working together to Safeguard Children 2019, Care Act 2014. Our policies are reviewed annually to incorporate any new changes in law, and in consultation with Local Authority.

Club Doncaster acknowledges under a separate policy its obligations of the Health & Safety Act 1974 and acknowledges that children and young people may be especially vulnerable to protection when in the workplace.

Club Doncaster acknowledges its statutory duty to immediately report all issues of concern to the strategic lead of safeguarding under the modern slavery Act 2015, Female Genital Mutilation Act 2003, and the Counter Terrorism and Security Act 2015.

Club Doncaster also works with Doncaster Children's Services and the Local Authority Designated Officer.

### **Safeguarding of Children Policy Statement**

Club Doncaster acknowledges the duty of care to safeguard and promote the welfare of children and is committed to ensuring safeguarding practice reflects statutory responsibilities, government guidance and complies with best practice and FA requirements. As per the Club Doncaster persons handbook this policy applies to all persons who are associated with Club Doncaster, or maybe representing the Club Doncaster brand at any time, including volunteers.

This policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that regardless of age, gender, religion or beliefs, ethnicity, disability, sexual orientation or socio-economic background, all children have a positive and enjoyable experience of Club Doncaster in a safe and child-centred environment and are protected from abuse whilst participating in sport or outside of the activity.

Club Doncaster defines a child or young person as anyone who has not yet reached the age of 18. This is enshrined within UK law and the UN convention of Human Rights. Within this policy the terms young person and child may be interchanged.

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

Safeguarding children is defined within the "working together to safeguard children" legislation as:

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

### **As part of our safeguarding policy Club Doncaster will:**

Promote and prioritise the safety and well-being of children and young people, we will do this by educating all persons associated with Club Doncaster to ensure they place best practice at the centre of everything they do, and are clear in the standards of Club Doncaster via induction, this policy, liaison with the departmental Welfare Officers, and appropriate training.

We will also consult with as many children and young people under the age of 18 that come into contact with all areas of Club Doncaster. Via our young person's fan panel, life skills sessions for academy & RTC players, and life skills sessions as a part of Kicks programmes, and Club Doncaster Foundation, we aim to consult and spread age-appropriate messages, of who young people can talk to when they have a problem, and how their views help to shape our service provision.

Before undertaking consultation and planning events involving young people, the activity leader will consult with their designated department welfare officer/senior welfare officer, who will authorise a completed safeguarding risk assessment. This will be shared with all members of staff related to the activity and stored in line with the Club Doncaster GDPR policy.

Any significant risk will be referred by the Senior Welfare Officer to the Welfare Steering group. A quick guide to all persons with Welfare Officer responsibility can be found on the club website, cloud and within the Safeguarding structure document.

Club Doncaster will ensure everyone understands their role and responsibilities in respect of safeguarding and is provided with appropriate learning opportunities to recognise, identify and respond to signs of abuse, neglect and other safeguarding concerns relating to children and young people. We will do this not only in recognising the above statement through the continuation of training and standards, but also in expecting all persons to carry out their association with the Club in line with specific codes of conduct within the Club Doncaster handbook, EFL issued guidance, and Academy specific codes of conduct.

We will ensure all of our activities take into consideration children and young people that are identified with additional needs and disabilities are supported within our facilities. This includes consultation with parents, and schools, and relevant staff awareness of the SEN code of practice 2015.

We will ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individuals who raise or disclose the concern. We will do this via formal and informal meetings with the Safeguarding Steering group. We will ensure that all Safeguarding incidents are recorded and reviewed when they occur.

We will ensure that confidential, detailed and accurate records of all safeguarding concerns are maintained and securely stored. We will record all incidents in line with GDPR requirements, and ensure that we will only make this information available to appropriate statutory services. This is in addition to our GDPR internal policy and the GDPR regulations 2015.

Whilst we will always follow GDPR regulations, we recognise that safeguarding incidents and documentation relating to allegations will be kept securely and not destroyed in line with Club Doncaster policies. This is to ensure that in the case of non-recent concerns we are able to support statutory agencies with their enquiries.

Prevent the employment/deployment of unsuitable individuals. We will do this through consistent and safe recruitment services and Safer Recruitment Policy, and in line with Club Doncaster disciplinary policies share information of unsuitable individuals where needed.

Ensure robust safeguarding arrangements and procedures are in operation. We will do this through the regular review of safe and best practice via the steering group and seek advice from the English Football League, Football Association, Rugby Football League, and OFSTED when required.

This policy applies to all staff, including senior managers and board of trustees, paid staff, volunteers and sessional workers, agency staff, students or anybody working on behalf of Club Doncaster. Failure to comply with the policy and procedures will be addressed without delay and may result in dismissal/exclusion from all areas of the organisation.

Club Doncaster will ensure that groups of children are at the minimum ratio of 1/16, and a minimum of two Club Doncaster representatives will be responsible for children during this session. Where there is more than 32 persons, further persons will be added at the ratio appropriate.

Through the dissemination of the policy at induction and annual communication, all persons associated with Club Doncaster will be provided with information and expectations on how to work safely with children and young people.

This policy should be read alongside our policies and procedures on:

- Recruitment Policy
- Managing allegations against persons
- Code of conduct (Ethics)
- Equal Opportunities Policy (Equity)
- Anti-bullying policy
- Confidentiality Statement
- Whistle-blowing Policy
- Complaints Procedure and Appeals Process
- Information Sharing Policy
- Health and Safety Policy
- Late collection of Children Policy
- Policy for Trips, Tours and Tournaments
- Parental Consent Form
- Social Media Policy
- Accommodation Providers Guidance
- NCS FAROS Guidance (Reviewed annually)
- Sexting Policy
- The government latest guidance in relation to the COVID 19 response

In addition to Club Doncaster internal policies and in addition to this policy, we acknowledge and ensure that throughout our culture and expectations of staff we place the needs of children at the centre of everything we do.

### **Key Principles:**

The child's welfare is, and must always be, the paramount consideration.

All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation.

All suspicions and allegations of abuse will be taken seriously by the Designated Safeguarding Officer and responded to swiftly and appropriately. Working in partnership with other organisations, children and young people and their parents and carers is essential. The Designated Safeguarding Officer will take the lead on liaising with Statutory Authorities and will gate keep all information in relation to any allegations or concerns voiced within Club Doncaster.

Club Doncaster is committed to working in partnership with the Police, Social Care Departments, and Local Safeguarding Children's Boards (LSCB) in accordance with their procedures, we are aware within the geography and location of our children and young people this will often stretch outside of the borough, and we will liaise and ensure we consult with appropriate LSCB's across the area. This is essential to enable these organisations to carry out their statutory duties to investigate concerns and protect all children and young people.

Club Doncaster holds with the principle that there are some roles within sport where adults have responsibility for, authority and influence over young people and therefore have an ethical obligation to safeguard and protect young people from exploitation. In the spirit of this legislation whilst legally young people aged 16 and 17 have reached the age of consent for sexual activity, any inappropriate sexual relations with young people aged 16 or 17 will be considered a breach of a 'Position of Trust' within Club Doncaster and will be referred to the appropriate regulatory authorities and statutory agencies.

## Definitions of abuse

### Statutory Definitions of Abuse (Children)

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults or another child or children.

The terms and definitions of abuse below are based on the government guidance 'Working Together to Safeguard Children (March 2015)'

Children	Anyone who has not yet reached their 18th birthday. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in the secure estate, does not change his/her status or entitlements to services or protection.
Safeguarding and promoting the welfare of children	Defined for the purposes of this guidance as: protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children are growing up in circumstances consistent with the provision of safe and effective care; and Taking action to enable all children to have the best life chances.
Child at risk of harm	Part of safeguarding and promoting welfare. A Section 47 enquiry refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.
Child In Need	A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Children in need may be assessed under section 17 of the Children Act 1989, in relation to their special educational needs, disabilities, as a career, or because they have committed a crime. Where an assessment takes place, it will be carried out by <u>a social worker</u> .
Abuse	A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

Physical abuse	<p>A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. In the sports environment, physical abuse might also occur when the nature and intensity of training exceeds the capacity of the child's or young person's immature and growing body (e.g. Overtraining) and also when parents or coaches encourage children/young people to take performance enhancing drugs or alcohol.</p>
Emotional abuse	<p>The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), 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.</p> <p>In a sports environment, emotional abuse might include situations where parents or coaches subject children or young people to constant criticism, bullying or unrealistic pressure to perform to high expectations or to obtain standards they're clearly not able to reach. It may also include situations where children and young people are overprotected preventing them from socialising.</p>
Sexual abuse	<p>Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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. In a sports environment, sexual abuse might occur when inappropriate physical contact takes place e.g. Through inappropriate supporting, treatment or touching of children or young people. It is apparent that abuse is carried out by both males and females and other young people also sexually abuse.</p>

Neglect	<p>The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:</p> <ul style="list-style-type: none"> <li>provide adequate food, clothing and shelter (including exclusion from home or abandonment);</li> <li>protect a child from physical and emotional harm or danger;</li> <li>ensure adequate supervision (including the use of inadequate care-givers); or</li> <li>Ensure access to appropriate medical care or treatment.</li> </ul> <p>It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.</p> <p>In a sports environment neglect may occur if children/young people are consistently left alone and unsupervised. It may also occur if a teacher, coach or manager fails to ensure children are safe, or exposes them to undue extremes of weather or risk of injury e.g. Through unsafe equipment.</p>
Young carers	<p>Are children and young people who assume important caring responsibilities for parents or siblings, who are disabled, have physical or mental ill health problems, or misuse drugs or alcohol.</p>
Child sexual exploitation	<p>A form of child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce or manipulate. The victim may be sexually exploited even if the sexual activity appears consensual. <u>CSE can also take place through the use of technology.</u></p>
Private Fostering	<p>A form of care where a child under the age of 16, or 18 if disabled, who is cared for by an adult who is not a parent but is defined as a relative for over 28 days. Club Doncaster has a duty to refer all scenarios they become aware of to the child’s local authority.</p>

## **Promoting Clear Systems**

Club Doncaster is committed to working together to ensure that robust and consistent safeguarding Systems exist through a collaborative approach to safe recruitment, accessible education programmes and a coordinated approach to the sharing of information.

Whilst we believe that the responsibility for safeguarding is shared by everyone associated with Club Doncaster and its organisations, there is a clear leadership structure running through the organisation.

Club Doncaster requires that each strand of the organisations have a Senior & Welfare Officer (WO) responsible for Safeguarding.

All persons should be aware of who their departmental representative is:

- Board Member Responsible for Safeguarding - Gavin Baldwin & Natalie Shaw
- Strategic Lead of Safeguarding - Chris Wood
- Doncaster Rovers FC - Gavin Baldwin
- Doncaster Rovers Academy - Stuart Swift
- Club Doncaster Foundation - John Davis
- Club Doncaster Sports College - Adi Turnpenny - Emma Harrison
- Stadium Match Day – Chris Wood
- Doncaster Rugby League Club - Carl Hall

The persons listed above are the initial departmental contacts for persons that are concerned about any areas of practice or have some information in relation to the safeguarding of a child or young person that they wish to pass on.

The Officers are supervised by the Strategic Lead of Safeguarding who will receive information and ensure that this is dealt with in line with this and statutory procedure.

All persons listed above are available across the organisation to be able to receive and pass information onto the Designated Safeguarding Officer if required. If appropriate the Designated Safeguarding Officer can be contacted directly with any information, and this will be dealt with in the same way as the listed procedure.

Club Doncaster also supports any concerns been communicated into its affiliated governing bodies via the NSPCC FA Helpline 0808 800 500, the FA Case Management Team 0800 1691863, The Rugby Football League Safeguarding line 01132375046, or Doncaster Local Safeguarding Board on 01302 737777.

The Safeguarding Steering group meet at appropriate intervals to ensure that they are all up to date with appropriate legislative changes, and to share information and incidents for the purpose of review

and any further appropriate action. The steering group will also make decisions in relation to risk assessments required for roles at Club Doncaster.

The Club also has a safeguarding section on Rugby, Football and Foundation websites that is able to be accessed by all persons outside of the organisation requiring support and understanding of the Club Doncaster procedures.

All associated partners who are involved with Club Doncaster will be aware within respective agreements that they are expected to abide by best practice and agree to the legislative principles of safeguarding children and young people.

It is essential that everyone involved in Club Doncaster recognises that taking no action when there is a concern regarding the welfare of a child is not an option.



## **DBS and Safer Recruitment**

Club Doncaster will work with the legislation provided by the Government, Football Association and Football League to identify roles that are carried out by persons that may meet the “regulated activity” guidance provided. Club Doncaster will ensure that enhanced DBS checks are carried out for relevant persons working within roles at a minimum frequency of three years.

Club Doncaster has a recruitment policy and procedure which identifies the steps and checks that will need to be carried out prior to the commencement of employment. Working in line with this policy and the recruitment policy, the people and culture department will lead on ensuring that practices are followed. All shortlisting and interview panels for casual and permanent staff will be represented by the People & Culture or Senior Executive Committee. We check via passport the identity of candidates, and ensure that within each stage of the recruitment process safeguarding is at the centre of policy & procedure.

For all roles it is a requirement of all agreements and employment contracts that persons declare any relevant convictions on an annual basis on the self-declaration form issued and collated by the People & Culture department, this will ensure that accurate and up to date risk assessments are in place in line with both Safer Working Practices and the Rehabilitation of Offenders Act.

Within service level agreements we ensure that safeguarding and appropriate levels of checking are highlighted as the responsibility of the service provider.

All identity checking, prior, during and after being associated with Club Doncaster will be made in line with the Keeping Children Safe in Education 2016 document.

## **CPD and Safeguarding updates**

On an annual basis, briefings to all persons will be undertaken via the Welfare Officer / Strategic Lead for Safeguarding, where policies and procedures are refreshed, and statutory and policy updates shared.

All new persons will be given an induction that includes e-training on safeguarding matters, in addition to radicalisation / WRAP online training, policies and procedures, contractual, and policy and procedure familiarisation. Further induction and training proportionate to the role will be identified via appraisal 121 and recruitment discussions.

All persons associated with working with Club Doncaster will undertake the FA Safeguarding Children Workshop, with Welfare Officers also completing the Welfare Officers workshop at the frequency of once every three years.

Where appropriate in line with the Rugby Football League, the NSPCC Time to Listen Training will be completed by relevant personnel.

The Strategic lead for safeguarding will ensure or delegate attendance at all EFL and RFL safeguarding events and workshops where attendance is required.

## **E Safety**

We are committed to ensuring the safety of children who access Club Doncaster related activities. We have an email and internet usage policy for persons who have registered Club Doncaster computer access.

Any concerns in relation to a child or young person and their safety on the internet or via an electronic device should be reported via the safeguarding procedures.

## **Safer working practices**

Guidance for safer working practices is issued via the person's handbook, and departmental specific codes of conduct. Whenever possible staff should avoid situations where they are in prolonged 1v1 contact with children and young people, in the event of this happening a further adult / welfare officer should be aware of the reasoning, and appropriate steps such as windows / doors being open, CCTV placement, and telephone check ins should occur.

## **Photography & Images**

We are aware that many people who take or view photographs do so for entirely innocent and acceptable reasons. Sadly, we must also ensure that we have safeguards in place to protect children who engage with our programmes.

When using images for our own purposes we will:

- Seek written parental consent for photographs prior to them being taken and published (for example on our website or marketing material)
- Seek verbal consent from the child or young person to ensure they are happy to be photographed
- Not use specific details which may give full details of the child, such as their schools, surname or age
- Only take fully clothed images of children, and not take them within a changing room or sensitive environment
  - Ensure that adults in charge of children on residential courses take an active role in relation to children and the usage of cameras in private areas such as bedrooms and changing rooms to prevent any safeguarding issues.
- Encourage children and young people to share with a trusted adult if they feel uncomfortable about any images that are taken.

Image consents are obtained for regular participants within Club Doncaster activity, which are signed with all persons with Parental Responsibility.

## **Late Collection of Children**

Club Doncaster has a duty of care to the children and parents to ensure that collection of all Children are made at the agreed time.

Children remaining in our care after the agreed collection time, must be supervised by a minimum of two persons, one of whom must have an accepted Club Doncaster DBS check.

We appreciate that sometimes there may be circumstances beyond parent / carer control Affecting the prompt collection children.

### **10 minutes over the set time:**

Emergency contact will be made with the nominated person on consent form

### **30 minutes**

The appropriate Club Doncaster Welfare Officer (via the procedure below), will attempt to make further contact with the nominated emergency contact, before referring onto the Strategic Safeguarding Lead.

### **60 minutes over the set time:**

The Strategic Safeguarding Lead will contact the local authority's Duty Assessment Team for advice on their next course of action. This will only happen if none of the child's emergency Numbers have contacted.

Unreasonable and / or persistent lateness may result in terminating the young person's involvement with the activity.

## **Prevent**

The Counter terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

The aim of the Prevent strategy under the UK legislation is to reduce the threat from all types of terrorism. In the Act this has been expressed as the "need to have due regard to the need to prevent people from being drawn into terrorism". Prevent covers international and domestic terror threats, and includes the activities of the far-right groups, and animal right groups.

All persons undertake the governments WRAP training upon induction to Club Doncaster, and have a duty to raise concerns under the safeguarding procedures of children and adults, if it is identified that a young person, vulnerable adult or member of staff is expressing vocal or active opposition to values, including democracy, the rule of the law, liberty, or the mutual respect and tolerance of different faiths and beliefs on any of its programmes.

Where a person is concerned that another person may be demonstrating behaviour that requires advice and intervention under the Prevent Strategy, this should be referred to via the same spirit and process as a safeguarding concern. The Strategic Safeguarding lead will work with appropriate Prevent Staff within South Yorkshire, and present if deemed appropriate at the region's channel panel.

## **Responding to Concerns, Allegations and Disclosures**

There is a legal and moral responsibility to report any concerns about a child or young person in any context via the Safeguarding Officers and Designated Safeguarding Officer. Club Doncaster will support anyone who, in good faith, reports his or her concern that a colleague is, or may be, abusing a child or young person, even if that concern is proved to be unfounded.

Concerns may arise because:

- A child or young person informs you directly that he or she is concerned about someone's behaviour towards them
- You become aware, through your own observations or through a third party, of possible abuse occurring.
- Most suspicions of abuse come about from observation of changes in the child or young person's behaviour, appearance, attitude or relationship with others
- Your suspicions may develop over time

What to do if a child or young person discloses to you:

If a child or young person informs you directly that they are concerned about someone's behaviour towards them, this is known as a disclosure. A disclosure may be given slowly over time or all at once and it may seem incomplete, unclear and may sometimes be retracted. Children don't often tell in one simple 'disclosure'.

The person receiving the disclosure should:

- React calmly so as not to frighten the child or young person
- Ensure the immediate safety of the child or young person
- Tell the child or young person that he or she is not to blame and that he or she was right to tell
- Take what the child or young person says seriously
- If the child or young person needs immediate medical treatment, take them to hospital or telephone for an ambulance, inform doctors of concerns and ensure that they are aware that this is a child protection issue as it is their responsibility to refer this on appropriately to the Police or Children's Services
- When speaking with the child or young person, keep any questions to the absolute minimum.
- Ask only what is necessary to ensure a clear understanding of what has been said
- Do not make promises of confidentiality or outcome, which might not be feasible in the light of subsequent developments
- In the event of suspicion of sexual abuse try to avoid the child bathing or showering until given permission to do so. Washing can destroy valuable evidence
- Take a detailed written record of what the child said to you
- As soon as the child or young person completes the disclosure make sure you accurately record what they said using their language and of any actions you may have taken as a result using the template in Appendix 1
- Seek advice from the Safeguarding Officer / Designated Safeguarding Officer on the appropriateness of informing the parents/carers.

### **Allegations against staff & position of trust**

Working with all statutory bodies we will ensure that we will do all we can to prevent people who pose risks to children from working with our organisation.

We also understand that issues may arise with persons after they have been checked via DBS and provided with advice and guidance around safer working practices via their specific line manager and staff handbook. Any concerns about a person associated with Club Doncaster should be taken to the Head of People & Culture / Strategic Safeguarding Lead immediately. Any concerns about the Head of People & Culture should go to the Chief Executive or Local Authority Designated Officer on 01302 734444.

This policy identifies that persons working within the organisation are always deemed within the spirit of the law and are defined as within a position of trust. All persons must understand their 12 responsibility within their roles and the power balance this has in any professional relationship with a person under the age of 18 and their families.

Explicitly persons should not:

- Use their position to gain access to information for their own advantage, such as personal details.
- Use their power or their involvement with Club Doncaster to intimidate, threaten or coerce a young person and their family.
- Use the status to form inappropriate social relationships and blur professional boundaries such as linking via social media or socialisation outside of the professional relationship.

Persons who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently. In relation to issues of a safeguarding nature and in line with the Club Doncaster terms of engagement, discipline policies.

Where any person has a concern that a person has caused harm, or poses a future risk of harm to any vulnerable groups including children, they have a duty to immediately report this. The following are included but are not regarded as exclusive:

- Behaviour in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children.

These behaviours should be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect).

Allegations against persons who work in children and young people that may be deemed as inappropriate under the sexual offences act 2003, may also include:

- Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual
- 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence Other 'grooming' behaviour giving rise to concerns of a broader child protection nature (e.g. inappropriate text / e-mail messages or images, gifts, socializing etc.);
- Possession of indecent photographs / pseudo-photographs of children.

If concerns arise about the person's behaviour to her/his own children, Club Doncaster will liaise with the Local Authority to let them assess whether there may be implications for children with whom the person has contact with.

Allegations of historical abuse should be responded to in the same way as contemporary concerns.

### **Poor Practice**

Poor practice occurs when a person fails to fulfil the standards and responsibilities when working with children. If allowed to continue poor practice can cause harm and become abuse. Poor practice is unacceptable within Club Doncaster activity and we need to work with departments to ensure that this risk is minimized by the behaviour and conduct of all persons.

Via the MY concern app, staff and welfare officers should report issues of near miss or poor practice. These will then be discussed and investigated appropriately.

Examples of poor practice, may include:

- Allowing hazing / bullying to go unreported
- Allowing concerning practices to go unreported (eg player punishment/name calling)
- Ignoring health & safety guidelines
- Unauthorised visitors
- Failing to adhere to departmental codes of conduct

### **Low Level Concern Management**

It has been recognised by Club Doncaster that there is a need to manage issues that fall under the umbrella of safeguarding but are of a minor nature or deemed as welfare issues. These matters are classified as low-level concerns. Handling such concerns appropriately and proportionately will strengthen the confidence of staff.

A low-level concern is a piece of information, advice or "nagging doubt" where a person may have acted in a manner inconsistently or a sense of omission or inconsistency with culture and behaviour. This may be the language used or an action.

Where concerns are designated and deemed to be low level, with consultation from the safeguarding lead, and appropriate statutory bodies, these will be recorded via my concern in the same way as referring an issue of safeguarding, and persons as appropriate are protected under the club's whistleblowing and GDPR policies / contracts.

### Significant organisational Change

Any significant organizational change which isn't highlighted which isn't highlighted from the risk assessment process, will form part of a structured decision-making process at the Senior Executive level. No activity will be authorized until this has been approved by the Chief Executive, or appropriate trustee boards.

### Reporting a Concern Allegation or Disclosure – Flow Chart

