

# Blackburn Rovers

## Safeguarding Children Policy



***Keep yourself safe,  
keep others safe***

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## **Blackburn Rovers Football Club and Blackburn Rovers Community Trust Statement of Commitment**

*“Blackburn Rovers has an ongoing commitment to ensuring that the safety and welfare of children and young people is paramount. The commitment is the basis for all activities, initiatives and development opportunities involving children and young people associated with the Club, whether they are scholars, players, students, fans, volunteers or staff. We have a robust safeguarding system in place across all departments and sites, which incorporates recruiting to high standards and providing induction training for all associated with the Club whatever their role to ensure all staff are aware of the standards and their responsibilities. All concerns are treated seriously and managed by the Safeguarding Team and reported to the external bodies as appropriate and the Board of BRFC. All associated with the Club can be assured the commitment is ongoing and that good practice is continually reviewed with the assistance of local partners, including child safeguarding assurance partnerships and applied so children, young people, parents, staff, clients, customers and fans can be assured we take our responsibilities seriously.”*

**Mike Cheston BRFC Director, BRFC Trustee and Senior Safeguarding Manager**

### **Safeguarding means:**

- Keeping yourself and others (children, adults, fans, colleagues, customers, safe
- Recognising when something is of concern
- Knowing what to do
- Following procedures

### **Safeguarding Matters!**

**Safeguarding is everyone's concern**

## **1. Introduction, background and purpose**

This policy is the overarching policy for the safeguarding of children and young people who are associated with Blackburn Rovers Football Club and Blackburn Rovers Community Trust. The Safeguarding Portfolio incorporates several other safeguarding-related policies and procedures specific to particular areas of the activities of the Club and Trust (the organisations) all of which adopt the principles and procedures underpinning this document. A full list of safeguarding-related policies is incorporated in the appendices at Appendix 1.

The purpose of this policy is to:

- Protect children and young people under the age of 18 from harm and abuse;
- Provide an overview of safeguarding and guidance;
- Increase understanding of why certain people are at risk and the circumstances they may experience;
- Outline the procedures in place for the management of safeguarding all children and young people who come into contact with Blackburn Rovers Football Club and Blackburn Rovers Community Trust;
- Provide staff with the information they need to assist them in meeting safeguarding responsibilities;
- Support staff working with or in contact with children and young people;
- Provide direction about expected standards of behaviour; and
- Ensure appropriate action is taken should a concern or allegation arise.

## **2. Statutory and other guidance**

The Club/Trust is governed by the following legislation and other guidance:

- Sections 10 of the Children Act 2004 and section 16 of the same legislation as outlined in the Children and Social Work Act 2017 requires all agencies working with children and young people to work together to identify and respond to the needs of children and young people to safeguard them and promote their welfare.
- Working Together to Safeguard Children 2018 is the statutory guidance which helps all agencies to know what the law says they and others must do in order to provide a co-ordinated approach to safeguarding and promoting the welfare of children.
- Keeping Children Safe in Education (2019) is statutory guidance from the Department of Education issued under section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014 and the Non-Maintained Special Schools (England) Regulations 2015.
- Football Authorities Safeguarding Standards including the Football Association (FA), Premier League (PL) and English Football League (EFL)
- Local Child Safeguarding Assurance Partnership guidance.
- BRFC Safer Working Practice Guide (Code of Conduct) for staff and volunteers working with children and young people.

Further details can be found in the appendices at Appendix 2.

### **3. Who is the policy for?**

The policy applies to all employees, casual workers and volunteers of Blackburn Rovers Football Club and Blackburn Rovers Community Trust. It applies to all staff working on other sites and where partnerships are in place with the organisations. It also applies to all third parties working with or subcontracted to the organisations who as part of their contractual obligations are required to adopt the same standards and principles.

### **4. Club and Trust commitment and principles**

A clear statement of the organisations' commitment and responsibilities towards safeguarding children and young people is communicated to all staff and volunteers via posters across the sites and features in key policy documents, the Club Customer Charter, and is on the intranet and the website.

Everyone has the right to live without fear of harm or abuse. Blackburn Rovers Football Club and Blackburn Rovers Community Trust recognise they have an active role to play in ensuring that everyone involved has a responsibility for the safety and well-being of children young people and adults at risk. Through creating an environment of trust and inclusion as defined by the club's Equality Policy in conjunction with The Equality Act 2010, the organisations are committed to:

- Preventing and reducing the risk of significant harm, abuse or exploitation of children and young people;
- Responding effectively and appropriately to any incidents and concerns that arise; and
- Raising awareness of key messages and procedures to those who may be abused and to potential abusers that abuse in any form will not be tolerated.

The organisations embrace the following principles:

- The welfare and safety of children and young people is paramount;
- Everyone has the right to live without fear of harm or abuse;
- Creating an environment of trust, inclusion and vigilance and a culture in which people feel comfortable to raise concerns;
- Everyone has the right to protection from abuse;
- Safeguarding practices are incorporated throughout the recruitment process;
- All staff working with children and young people in regulated activity will undertake a Criminal Records Check in keeping with the Club's Safer Recruitment Guide;
- All staff will receive appropriate training and awareness, be effectively supervised where appropriate and will be required to adhere to safer working practices and professional boundaries;
- All people connected to the organisations will be made aware there is a Safeguarding Team comprising a Senior Safeguarding Manager, a Club Safeguarding Officer and Designated Safeguarding Officers throughout the organisations;

- Safeguarding is everyone's concern;
- All suspicions, concerns and allegations of abuse will be treated seriously according to the standards and principles of the organisations and responded to swiftly and appropriately, sharing information with other parties lawfully; and
- The views of children and young people must be heard.

## **KEEPING YOURSELF AND OTHERS SAFE**

### **5. Safeguarding structure**

There is a clear line of accountability within the Club and Trust for work on safeguarding and promoting the welfare of children. The Blackburn Rovers Safeguarding Team comprises:

- Senior Safeguarding Manager (SSM) who is a Director of the Club and Board Member and BRCT Trustee;
- Club Safeguarding Officer who oversees the safeguarding element across all departments of the Club and Trust including Ewood Park operations and administration and reports to the SSM;
- Designated Safeguarding Officers (DSOs) for the following departments: (in larger departments DSOs will have support staff).
  - Blackburn Rovers Academy;
  - Blackburn Rovers Regional Talent Club and Ladies Football;
  - Blackburn Rovers Community Trust;
  - Human Resources;
  - Health and Safety;
  - Safety Officer for Match days and events;
  - Retail / Ticketing;
  - Commercial and Marketing;
  - BRFC/Sodexo Catering;
  - IT;
  - Media; and the
  - Senior Training Centre.

On a quarterly basis:

- The DSOs and their manager meet individually with the Senior Safeguarding Manager and Club Safeguarding Officer;
- A Working Group meets comprising all DSOs and Club Safeguarding Officer; and
- The SSM/ Board meet with the Club Safeguarding Officer and discuss a safeguarding update report.

## **6. Roles and responsibilities**

The SSM is a Director of the Club and has overall responsibility for safeguarding and promoting the welfare of children within the organisation.

The Club Safeguarding Officer works across the organisation ensuring that the policies and procedures are in place, that appropriate training and awareness requirements are met, that all concerns, incidents etc. are recorded and managed and that the Club/Trust works in line with local safeguarding partnership expectations.

The DSOs are the day-to-day contacts for safeguarding in their area/department. Wherever possible the DSO will be the first point of contact for enquiries/concerns, reporting and managing concerns and allegations. All DSOs have deputies. In larger departments the DSOs will be supported by other staff members with specific responsibilities e.g. in the Community Trust, additional staff provide support with safeguarding responsibilities including NCS Co-ordinator, Head of Education, deputy CEO, and in the Football Club, the Safety Team includes a Match Day Safeguarding Officer.

All managers within BRFC, BRFC Ladies and Regional Talent Club and BRFC Community Trust are responsible for managing safeguarding in their area with the support of their DSO and the Safeguarding Team.

Job descriptions can be found in the appendices at Appendix 3.

## **7. Safer recruitment**

The organisations practice safer recruitment which ensures that all who apply to work for the organisations or who are offered employment / volunteer opportunity and become employees/volunteers are subject to a strict recruitment procedure which continues throughout employment/period of voluntary work.

All job offers which involve regulated activities with children and young people and adults at risk, will be subject to a satisfactory self-declaration, a satisfactory Criminal Records Check (CRC) at an enhanced level via The Disclosure and Barring Service (DBS) and satisfactory references.

In line with FA requirements staff with specific roles are obliged to affiliate to the FA and notify details of CRCs.

For further detailed information, please refer to the organisations' Recruitment Policy, Safer Recruitment Guidance and Policy and Procedures for the Management of DBS Disclosures.

## **8. Induction training and raising awareness**

Training and raising awareness of safeguarding and the welfare of children and young people is delivered in many forms to all those working with or in contact with children, appropriate to the audience. Induction training includes a requirement to have read and understood this policy and other relevant documents appropriate to their role in the organisations. Additionally, they should

be familiar with Part One of Keeping Children Safe in Education 2019, the Club Staff Handbook and relevant codes of practice/conduct.

- All current staff across the organisations received brand new Induction training from February 2017 to January 2018;
- From January 2018, as part of a new process of induction into the organisation, all new recruits receive Safeguarding Induction in one form or another dependent on their role and working practices;
- From March 2019, Safeguarding Induction became the responsibility of Line Managers who ensure the Safeguarding Induction Pack is given to all new staff/ volunteers as part of the induction process on Day One and a certificate of assurance is completed by both parties and returned to HR;
- Bespoke sessions are delivered to specific areas including players under 18 and parents throughout the year/season;
- FA Safeguarding Children course is available for all who are working with children in regulated activity and is renewable every three years;
- All match day staff receive refresher training prior to the new season;
- All casual staff and volunteers receive awareness as appropriate;
- Children and young people receive safeguarding awareness appropriate to their age and role;
- FA/EFL facilitate training days on an annual basis for SSM and DSOs; and
- Opportunities for CPD relating to safeguarding including CPD opportunities though local safeguarding partnerships are notified to DSOs.

## **9. Shared working**

The organisations practice effective inter-agency working and follow processes set out for making referrals to and sharing information with the Local Authority Designated Officers (LADOs), the Local Authorities Children's Services, the Police and Football Authorities. See paragraph 34 for contact details and appendix 8 referral chart.

Working with partners and stakeholders using Service Level Agreements, Partnership Agreements, Events Management Plans and the use of Risk Assessments are examples of good practice when managing safeguarding with other organisations outside of statutory and football authorities.

The organisation will be a 'relevant agency' as defined by section 16E of the Children Act. The organisation will work to the relevant safeguarding arrangements of the relevant local safeguarding partnerships.

## **10. Working on off-site premises**

All staff/volunteers working off-site should be familiar with safeguarding arrangements set down by the organisation on whose premises they are working. These should be set out in service level agreements or partnership agreements. Any incidents occurring off-site should be reported to that organisation as per its safeguarding procedures and also to your DSO / Club Safeguarding Officer at



BRFC. If there is any doubt you should follow your organisation's procedure if the safeguarding standards are higher.

## **11. Duty of care**

The Club owes a duty of care to all people who come into contact with the Club / Trust including employees, volunteers and casual workers and will seek to discharge that duty including a situation where an employee may have been suspended following an allegation.

Employers also have a duty of care towards employees paid and unpaid under the Health and Safety at Work Act 1974 and the management of Health and Safety at Work Regulations 1999 (Regulation 19). As such we must provide a safe working environment for adults and young people and provide guidance about safe working practices. Employees should be treated fairly and reasonably in all circumstances. The Human Rights Act 1998, sets out principles regarding protection of individuals from abuse by state organisations or people working for those institutions. Adults who are subject to an allegation should be supported and the principles of natural justice applied.

The Health and Safety Act 1974 and the management of Health and Safety at Work Regulations 1999 (Regulation 19) also imposes a duty on employees to take care of themselves and anyone else who may be affected by their actions or failings.

## **12. Position of trust**

Staff who have responsibility for and authority or influence over children and young people are in a position of trust. A position of trust can be described as one in which one party has power and influence over the other by virtue of their work or the nature of the activity. Those in such a position need to understand the power they may have over those in their care and the responsibility they have as a consequence. They should not:

- Use their position to gain access to information relating to children or young people for their own or others' advantage
- Use their power to intimidate, threaten, coerce or undermine children or young people; or
- Use their status and standing to form or promote inappropriate relationships; professional boundaries must be maintained at all times.

## **13. Additional responsibilities for children/young people under the age of 18**

It can be confusing for young people to understand when they become an adult. Various stages in a young person's life are treated with adult status – for example the age of consent, driving test, but in law, anyone under the age of 18 is a child. Therefore, a person becomes an adult when they attain the age of 18. Staff need to be aware that additional responsibilities are placed on them when they are responsible for someone under the age of 18. This is especially important in forming, developing and maintaining relationships.

#### **14. Relationships with children and young people under 18**

Anyone under the age of 18 is a child/young person in the eyes of the law. Any person working for the company who in the eyes of the company is in a position of trust should not enter into any intimate relationship with anyone under the age of 18. The age is 21 if the person is in education. Failure to follow this advice could lead to referral to the relevant statutory agencies, disciplinary action and dismissal. Further details can be found in the BRFC Relationships Policy.

#### **15. Professional boundaries**

Professional boundaries in person and through social media are an essential part of good working relationships and it is important that staff have the capability to build and maintain professional boundaries adopting high standards of personal behaviour in their relationships with children, young people and parents.

#### **16. Self-referral**

Professional boundaries must be upheld as part of the Club's culture and practices but there may be occasions when staff and volunteers become aware of their own poor practice or cross professional boundaries or form a particular attachment which could lead to their integrity being questioned and so they have a duty to self-refer themselves to their manager or the Safeguarding Team.

#### **17. Poor practice**

This happens whenever staff/ volunteers fail to fulfil the high standards of care and support in their work with children and young people. It might occur if there is a lack of training but persistent poor practice can lead to lower standards and result in harm or abuse if not dealt with. It should be remembered that procedures to be followed are Club/Trust procedures rather than how the individual may view the situation as being acceptable, trivial or unimportant. Poor practice is unacceptable and may lead to disciplinary action being taken.

#### **18. Casual disregard of safeguarding practices**

This can happen when staff/volunteers are aware of all safeguarding requirements and choose to disregard procedures/guidance. This is unacceptable and will lead to disciplinary action being taken.

### **RECOGNISING WHEN SOMETHING IS OF CONCERN**

#### **19. Concerns**

A concern is anything which doesn't seem quite right, it preys on your mind, or it may be something you or others have seen or heard that needs further consideration. A concern can be related to abuse. An incident is when something has taken place that may or may not involve abuse.

If you have a concern about a child/young person, or if an allegation or disclosure has been made, you must pass the information on to your DSO or Club Safeguarding Officer immediately. Don't ignore it even if it seems to be 'something and nothing'. There are some instances where concerns / allegations can be reported to the police and or Local Children Services immediately for example if you think the child is in danger and you cannot make contact with your DSO.

Working Together to Safeguard Children 2018 defines safeguarding as:

- 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; and
- Taking action to enable all children to have the best outcomes.

## **20. Abuse and types of abuse**

Child abuse can be described as harm to a child or failure by a person with responsibility for a child to take reasonable care or a combination of both. Abuse can take many forms and may be caused by anyone - adults, other children and strangers. It can occur in a family or institutional or community setting. The perpetrator may or may not be known to the child. Children with disabilities and additional needs can face additional safeguarding challenges.

There are four main types of abuse:

- Physical
- Sexual
- Emotional
- Neglect

More details can be found at appendix 4 and further circumstances where abuse may be prevalent are listed at appendix 5.

## **21. How do you know? What are the signs of abuse / cause for concern?**

All staff/volunteers should be aware of the signs of abuse. Further details of specific indicators are included at appendix 4 but there are four signs that something may be a cause for concern. Here are some examples but the list is not exhaustive:

**Behavioural** - where it may be noticed that someone's behaviour is different - this could be a change in temperament, appearance, performance, attendance or habits. We all notice when someone near to us is 'not their usual self'.

**Medical** – persistent poor health, repeated fractures, bruising, listlessness.

**Disclosure** – when someone tells you about a concern affecting them or someone else.

**Circumstantial** – where a safeguarding concern arises out of another issue / incident / complaint.

## **KNOWING WHAT TO DO AND FOLLOWING PROCEDURES**

### **22. Reporting a concern**

It is not the responsibility of an individual to decide whether a concern should be reported or whether an allegation is true or whether abuse has taken place but it is the responsibility of everyone to follow safeguarding procedures to ensure that all concerns, incidents and allegations are treated seriously and reported immediately. Through appropriate training staff will become more confident in recognising, reporting and dealing with concerns. It will take a great deal of trust and courage for a child to disclose something to someone.

A situation may arise whereby you need to respond immediately and a DSO may not be available. If you have a concern about the immediate safety of a child you must contact the police on 999 or Blackburn with Darwen Children's Services, otherwise follow the procedures below.

### **23. Responding to a disclosure or concern**

- Keep calm and reassure the child/young person they were right to tell you;
- Take the allegation / concern seriously - don't dismiss it – listen carefully;
- Make sure the child is safe – and removed from harm, if at immediate risk keep the child with you until advised by Children's Services / Police;
- Document any evidence or disclosure accurately and fully, ask for details but do not ask leading questions or cast doubt on what the child has told you, ask basic questions (see referral form at appendix 7) and write up a factual record;
- Report the incident to the Designated Safeguarding Officer and / or Club Safeguarding Office as soon as possible, who will advise / take the next steps;
- Don't make promises you can't keep;
- Don't interfere with evidence; and
- Complete a referral sheet (appendix 7) or provide the same information in an e-mail to the DSO/Club Safeguarding Officer.

### **24. Case Management: what happens next?**

The DSO / Club Safeguarding Officer will record the concern, consider what action should be taken and notify the SSM /CEO of proposed action.

This includes whether the information needs to be reported to other authorities e.g. the police, the Children's Services / LADO and football's regulatory bodies (FA, EFL) as appropriate (if this has not already been done) and consideration of suspension if the allegation/concern/disclosure is about an employee or equivalent action if a casual employee/volunteer (see below).

A fact finding exercise / investigation will be undertaken by authorities / Club/Trust as appropriate.

A report of findings and recommendations will be issued to the SSM for approval.

Wherever possible the Club/Trust will wait for an outcome of the authorities' investigation before any decisions are made which may affect the role of the person with the company, however this is dependent on circumstances.

## **25. Receiving an allegation of abuse / concern against a member of staff / volunteer**

All incidents/concerns/allegations about a member of staff/volunteer must be reported to the Club Safeguarding Officer on the same day;

In the event of the Senior Safeguarding Manager being the subject of any concern, it must be reported to the CEO or Trustee as appropriate.

In the event of the Safeguarding Officer being the subject of concern or not available, it must be reported to HR;

On receiving the information, the Safeguarding Officer must report the concerns to Children's Services Department and the LADO, who will refer to the police if appropriate and Safeguarding Teams at the Football Regulatory Authorities as appropriate;

The Local Authority Designated Office (LADO) will advise on the course of action required in respect of the investigation;

If the LADO decides not to take the matter further, it will be dealt with internally;

In conjunction with the LADO, BRFC/ BRCT HR will make a decision as to whether the person needs to be suspended pending investigation;

Where suspension is considered/implemented it will be in accordance with current disciplinary procedures in operation at the Club/Trust. The Club Safeguarding Officer/DSO, will work in partnership with the LADO if involved with the case until the end of the investigation.

The decision regarding the person's future at the Club will be BRFC/BRCT in conjunction with the LADO if they are involved. In some cases, there may be a legal requirement to refer the case to the Disclosure and Barring Service.

## **26. Record keeping**

All safeguarding concerns, disclosures or allegations should be treated as sensitive information and will be recorded, managed and kept securely in accordance with the Club's /Trust's Privacy Policy.

The information should only be shared with relevant parties in the interests of safeguarding a child.

## **27. Whistle-blowing**

The organisations have a Whistle-blowing policy for all employees and is in place to reassure staff that it is safe and acceptable to raise concerns at an early stage. Further details are included in the Whistle-blowing policy which is on the intranet and referenced in the Staff Handbook.

## **28. Voice of the children**

The organisations are building into their procedures and activities opportunities for children to share their views which could help influence the way things are done in the future.

## **29. GDPR and confidentiality**

All staff and volunteers should be aware that in order to safeguard children, there is an obligation to share safeguarding information with other agencies. However, staff should also be reminded reports of concerns and investigations involve sensitive information and that discretion should be maintained and confidentiality protocols followed. Matters are confidential and should not be discussed with any other person unless it is necessary for them to know.

## **30. Dealing with complaints**

The Club's / Trust's Complaints Policy is located on the Safeguarding Matters Webpage. You can access it via this link <https://www.rovers.co.uk/fans/safeguarding-matters/>

The complaints' procedure is also set out in the Customer Charter. Any complaints highlighting a safeguarding concern will be passed to an appropriate DSO/Club Safeguarding Officer and investigated as a safeguarding incident/allegation. If it is found not to be safeguarding - related it can be closed and dealt with in line with the Customer Charter.

## **31. Health and safety**

The organisations' Health and Safety Policy provides guidance to those whose roles involve working with children and young people. Where a child or young person is involved in any activity including e.g. events, performances, trips (including overnight stays) tournaments and work placements, a risk assessment must be undertaken taking account of the Health and Safety Policy and include the safeguarding of children and young people. The risk assessment should set out arrangements in place for their care and supervision.

### **32. Player/Parent participation**

Additional information related specifically to player/parent participation will be covered in the relevant policies specifically written for the circumstances in which they are involved and are listed at Appendix 1.

### **33. Private Fostering Accommodation**

Where Academy children under 16 are accommodated with host families, the organisation has a mandatory duty to inform the Local Authority of the arrangements. In a private fostering arrangement, the parent still holds Parental Responsibility and agrees the arrangement with the private foster carer.

### **34. Photography and video Images**

Additional information relating specifically to photography and video images will be covered in the relevant policies and are listed at Appendix 1.

### **35. Contact details**

<b>Senior Safeguarding Manager</b>	Mike Cheston 01254 508299 <a href="mailto:mcheston@rovers.co.uk">mcheston@rovers.co.uk</a>
<b>Club Safeguarding Officer</b>	Christine Rennard 01254 508205 <a href="mailto:safeguarding@rovers.co.uk">safeguarding@rovers.co.uk</a>
<b>Designated Safeguarding Officer – BRFC Community Trust</b>	David Hayhurst 01254 508133 <a href="mailto:David.Hayhurst@brfctrust.co.uk">David.Hayhurst@brfctrust.co.uk</a>
<b>Designated Safeguarding Officer – BRFC Academy</b>	Chris Pettigrew 01254 508317 <a href="mailto:cpettigrew@rovers.co.uk">cpettigrew@rovers.co.uk</a>
<b>Designated Safeguarding Officer – Safety Officer</b>	Stuart Caley 01253 508286 <a href="mailto:scaley@rovers.co.uk">scaley@rovers.co.uk</a>
<b>Police</b>	101 or 999 if an emergency
<b>LADO Blackburn with Darwen</b>	01254 585184 <a href="mailto:megan.dumpleton@blackburn.gov.uk">megan.dumpleton@blackburn.gov.uk</a>
<b>LADO Blackpool</b>	01253 477541 <a href="mailto:Peter.Charlsworth@blackpool.gov.uk">Peter.Charlsworth@blackpool.gov.uk</a>
<b>LADO Lancashire</b>	01772 536694 <a href="mailto:Tim.booth@lancashire.gov.uk">Tim.booth@lancashire.gov.uk</a>
<b>Blackburn with Darwen Children’s Services Monday to Friday 8.30am. to 5pm</b>	01254 666400

<b>Blackburn with Darwen Children's Services Out of Hours Emergency Duty Team</b>	01254 587547
<b>Club Chaplain</b>	Ken Howles 07985 671742 <a href="mailto:kenhowles@me.com">kenhowles@me.com</a>
<b>24 hour NSPCC / FA Helpline</b>	0800 023 2642
<b>FA Safeguarding Team(urgent matters)</b>	0800 0835 902
<b>FA Safeguarding Team (non-urgent enquiries)</b>	<a href="mailto:Safeguarding@TheFA.com">Safeguarding@TheFA.com</a>
<b>Childline</b>	0800 1111
<b>Police trafficking helpline</b>	0800 783 2589
<b>Prevent Counter Terrorism</b>	concern@lancashire.pnn.police.uk

### **36. List of appendices**

Appendix 1	Safeguarding-related policies
Appendix 2	Legislation and statutory guidance
Appendix 3	Roles and responsibilities of the Safeguarding Team
Appendix 4	Types and indicators of abuse
Appendix 5	Further circumstances where abuse may be prevalent
Appendix 6	Good practice guide for safeguarding children
Appendix 7	Cause for concern referral form
Appendix 8	Safeguarding flow chart for reporting a concern.



## **Appendices**

### **Appendix 1 - Safeguarding – related policies**

To help create a safer environment of trust, inclusion and vigilance, and a culture in which people feel comfortable to raise concerns, the following policies and procedures are available for staff, young people, parents and all who have an association with the organisations:

- Recruitment Policy
- Safer Recruitment Guidance
- Health and Safety Policy
- Whistleblowing Policy
- Equality Policy
- Safer Working Practice Guide for those working with children and Young People
- Match day Safeguarding Policy
- Match day Ball Team Safeguarding Policy
- Code of Practice Regional Talent Club Players
- Code of Practice Academy Players
- Code of Practice Regional Talent Club Parents
- Code of Practice Academy Parents
- Code of Practice Scouts
- Anti- bullying Policy
- Late Collection Policy
- Transport Policy
- BRCT Photography / Images Policy
- BRCT Trips, residential and tournaments Policy
- Use of internet/social media policy
- Inappropriate material (images/sexting)
- BRFC/BRCT Privacy Policy

### **Other policies and guidance for reference**

- Blackburn with Darwen Safeguarding and Child Protection Policy
- National Citizen Service (NCS) Safeguarding and Work with Young People Guidance to Local Delivery Partners
- Affiliated Football Safeguarding Children Policy and Procedures
- EFL Guide to member Clubs
- UKCCIS Guidance: Sexting in schools and colleges

### **Appendix 2 - Legislation and statutory guidance**

Working Together to Safeguard Children 2018

The Children Act 1989 and 2004

Keeping Children Safe in Education 2019

Health and Safety at Work Act 1974

Management of Health and Safety at Work Regulations 1999

Modern Slavery Act 2015  
 Counter Terrorism and Security Act 2015  
 Private Fostering Regulations 2005  
 Female Genital Mutilation Act 2003  
 Protection of Freedoms Act 2012  
 General Data Protection Regulations & Data Protection Act 2018

### **Appendix 3 - Roles and Responsibilities of the Safeguarding Team**

#### **Senior Safeguarding Manager**

##### **Overall Purpose of the Job**

- The overall purpose of this role is to have senior management responsibility for the safeguarding of children and young people involved in any activities organised by the Club.
- Have an up-to-date knowledge of relevant requirements for safeguarding children.
- Ensure the club has in place appropriate policies and procedures in respect of identifying and reporting concerns or disclosures related to the protection of children.
- Work together with, and support the club/department DSO (s) in respect of any concern, disclosure or investigation.
- Ensure complaints of poor practice or disclosures are dealt with or escalated to the appropriate investigating agency.
- Ensure the footballing authorities are informed as appropriate.
- Ensure issues are reported to the Disclosure and Barring Service (DBS) as required by legislation.
- Ensure any records in relation child protection are stored safely in line with the General Data Protection Regulations 2018.
- Together with the club/department DSO (s) identify safeguarding training needs and identify resources to support training needs.
- Together with the DSO (s) monitor staff/volunteer training records in respect of safeguarding children.
- Together with the DSO (s) ensure all staff/volunteers working with children have the appropriate level of Criminal Records Check (CRC) for the role. That the CRC is regularly updated in line with FA and FL guidance, every 3 years.
- Report regularly to the Board on Safeguarding matters.

#### **Club Safeguarding Officer**

##### **Overall Purpose of the Job**

- To safeguard and promote the welfare of children and young people adults at risk and ensure all club staff and volunteers, parents and players/children understand their role;
- Promote and raise awareness of safeguarding principles and how it is structured and managed within the Club;
- Report and refer poor practice complaints in line with policy guidance advised by The EFL Football and The FA;

- Deal with any complaints about poor practice in line with the Club's Safeguarding Complaints Procedure;
- To keep records of any incidents / concerns/ allegations;
- Ensure all staff/volunteers working with children (appropriate to their role) have an enhanced DBS / CRC clearance for work in football (Renewed every 3 years in line with FA and EFL guidance);
- Disseminate to all staff working with children, up-to-date legislative and good practice requirements in relation to safeguarding children;
- Ensure all staff receive safeguarding awareness and that staff working with children and adults at risk receive appropriate CPD opportunities;
- To liaise with all parents and authorities in respect of any Safeguarding complaints;
- Ensure effective inter-agency working to safeguard and promote the welfare of children and adults at risk; and
- Report regularly to the Safeguarding Senior Manager / Board on Safeguarding matters.

### **Main tasks**

- To play a key role in liaising with The EFL and the FA to safeguard children involved with the Football Club.
- To assist /advise in the development of safer recruitment practices in the Club;
- Ensure the club has in place appropriate policies and procedures for identifying, responding to and reporting concerns or disclosures of abuse;
- Meet regularly with Departmental DSOs and appropriate staff;
- To ensure any appropriate data-base systems related to safeguarding are compliant with requirements;
- To respond to requests from The EFL or FA in relation to information or enquiries regarding safeguarding children involved with the Club.
- To facilitate or deliver safeguarding induction and training for club staff appropriate to their work with children and young people and ensure managers keep a record of staff development.
- To deal with manage and monitor instances of poor practice and/or safeguarding procedures and report through club reporting procedures, keeping appropriate records.
- To represent the Football Club at Safeguarding workshops or training delivered by The FA and EFL or other specified training agencies;
- To take a lead role in raising the profile of safeguarding children, both within the club and with external or partner agencies. Including Safeguarding Partnerships as required.
- To ensure compliance with the EFL Safeguarding standards.

- To attend training and demonstrate continued professional development.

### **Designated Safeguarding Officers**

- Ensure familiarity with and adherence to the Club Safeguarding Structure and Compliance Plan;
- Ensure familiarity and compliance with and commitment to Policies and Procedures and other safeguarding documentation as appropriate;
- Manage and report incidents, disclosures etc. in accordance with Policies and Procedures;
- Raise awareness of safeguarding practices in your area of responsibility and create a culture of trust and inclusion;
- Deliver or arrange delivery of awareness training and key messages for your staff and ensure you and your deputy have received adequate training to fulfil your role;
- Appoint a Deputy to cover absences;
- Be responsible for providing support to staff involved in an allegation;
- Recognise the importance of professional boundaries in working relationships; and
- Must be supported in their role by their manager.

### **Appendix 4 – Types and Indicators of abuse**

The presence of any one of the indicators in isolation does not necessarily mean a child has been abused but may indicate a need to raise a concern.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning and scalding, drowning, suffocating or otherwise causing physical harm to a child. This could result in repeated or multiple bruising, fractures, burns, scalds and bite marks. Indicators can include explanations inconsistent with injuries, different explanations for an injury or reluctance to discuss or give information. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child.

**Sexual abuse** is when adults of either sex or other children use children to meet their own sexual gratification. It involves forcing or enticing a child or young person to take part in sexual activities including prostitution, whether or not the child is aware of what is happening. The activities may involve physical contact, including penetrative or non-penetrative acts. They may include non-contact activities, such as involving children in looking at or in the production of pornographic material or watching sexual activities or encouraging children to behave in sexually inappropriate ways.

Recognition can be difficult unless the child discloses. There may be no physical signs and indicators are likely to be emotional or behavioural.

**Emotional** is 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 and valued only so far as they meet the needs of the other 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 over protection and limitation of exploring and learning, or preventing the child participating in normal social interaction. It may involve the seeing or hearing of ill treatment of another. Some level of emotional abuse is involved in all types of maltreatment of a child, but it may also occur alone.

**Neglect** is the persistent failure to meet a child's basic physical or psychological needs likely to result in the serious impairment of the child's health or development. This can start during pregnancy as a result of maternal substance abuse. Neglect may involve a parent / carer failing to provide adequate food, clothing, shelter (including exclusion and abandonment), failing to protect a child from physical or emotional harm or danger, failing to ensure adequate supervision including the use of inadequate care-takers or the failure to ensure access to appropriate medical care or treatment.

### **Appendix 5 - Further circumstances where abuse may be prevalent**

There are many additional categories linked with abuse. The list is not exhaustive. Further information will be found in Local Safeguarding Partnership Guidelines and Keeping Children Safe in Education 2019, but below is an outline of some of the specific categories.

**Child Sexual Exploitation** involves exploitative situations, contexts and relationships where young people may receive something such as gifts, food, accommodation, drugs, alcohol, even affection in return for engaging in sexual activities. The perpetrator will groom the victim over a pro-longed period and exert power which increases as the relationship develops. Sexual exploitation involves a degree of coercion, intimidation, enticement, cyberbullying and grooming. Young people may be tricked into believing they are in a loving consensual relationship and do not necessarily see themselves as a victim and so don't always exhibit external signs of abuse.

**Bullying** is behaviour that is intended to hurt someone physically or emotionally. It is often persistent or repeated over a long period of time, and is hostile and intimidating. It can be name-calling, isolation and exclusion, pushing, spreading rumours, threatening behaviour, constant criticism and undermining. Indicators may include, physical injuries such as unexplained bruises, being afraid to go school, training sessions, matches, mysterious illnesses, a dip in performance, problems eating or sleeping, loss of confidence, withdrawal.

**Grooming** is when someone builds an emotional or transactional connection with a child to gain their trust for the purpose of sexual abuse or criminal exploitation. Children can be groomed on-line or in reality by a stranger or someone they know,

for example a family member friend or professional. Groomers can 'groom' family members in order to gain access to a child. They can be male or female or any age. Many children, young people do not understand they have been groomed or that it is abuse and so don't recognise themselves as being a victim.

**Radicalisation** is a form of grooming or exploitation whereby people come to support forms of extremism and extremist ideology which in some cases leads to participation in terrorist groups and activities. There is no clear profile of who is likely to become radicalised however staff should be aware of changes in behaviours which may indicate help or protection is needed and have a general understanding of some key indicators which may make an individual more susceptible to exploitation and which for example may include:

- Identity or personal crisis
- Unemployment/ underemployment
- Underachievement
- Isolation / exclusion

These factors would be considered in conjunction with the circumstances of an individual rather than individually. Many of our staff have completed the Channel Training module which is part of the Government's PREVENT strategy.

**Modern Slavery and Trafficking** encompasses human trafficking, slavery, forced labour and domestic servitude. Victims can be coerced, deceived, forced into a life of abuse and inhumane treatment. Section 52 of the Modern Slavery Act 2015 places a duty on public authorities to notify the National Crime Agency if there are signs or intelligence has been received or there are reasonable grounds to believe there is an indication that a person may be a victim of slavery or human trafficking.

**Female Genital Mutilation (FGM)** is a form of child abuse which involves intentionally altering or injuring female genital organs for non-medical reasons and is illegal in this country (Female Genital Mutilation Act 2003). It is also illegal to take girls who are British Nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country. Staff need to be alert to the possibility of when a female may be at risk of FGM or if it has happened. There is a statutory duty to report these cases to the police. It is for the police to investigate the circumstances and to conduct enquiries into any alleged offence.

**Forced Marriage -** There is a clear difference between a forced marriage and an arranged marriage. In arranged marriages the families of both spouses take a leading role in arranging the marriage but the choice of whether to accept the arrangement remains with the two people.

In a forced marriage, one or both spouses do not consent to the arrangement of the marriage and some elements of duress are involved. This can involve physical, psychological, financial, sexual and emotional pressure. Forced marriage is an abuse of human rights, and where a child is involved, an abuse of the rights of the child. Further information can be found at <https://www.gov.uk/stop-forced-marriage>

**Hate Crime** is an incident of crime that is motivated by hostility or prejudice based on a victim's disability, race, religion or belief, sexual orientation or transgender identity.

**Peer on peer abuse** - Children can abuse other children – generally referred to as peer on peer abuse. All staff should be aware that safeguarding issues can manifest themselves via peer on peer abuse. This can include, but is not limited to bullying (including cyberbullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm, sexual violence and sexual harassment, sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals. Responses to incidents of sexting will be dealt with in accordance with the UKCCIS Guidance: Sexting in Schools and Colleges.

**Hazing** is any action or situation, with or without the consent of participants which recklessly intentionally or unintentionally endangers the mental, physical or emotional wellbeing of a child or young person. It will not be tolerated. An example would be a group initiation ceremony where a child is forcibly encouraged to consume alcohol.

**Domestic Violence** is an important indication of risk at harm to children who may be affected directly or indirectly if they are connected to a household where there is domestic violence. It can have a damaging effect on health and development. Many of the signs will be those related to physical and emotional abuse.

**Child Criminal Exploitation: county lines-** criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- Can affect any child or young person (male or female) under the age of 18 years;
- Can affect any adult at risk over the age of 18 years;
- Can still be exploitation even if the activity appears consensual;
- Can involve force and / or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- Can be perpetrated by individuals or groups, males or females, and young people or adults; and
- Is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources.

**Honour-based violence** is an internationally recognised term used to describe cultural justifications for violence and abuse. It justifies the use of certain types of violence against children, women and men and crosses all communities, cultures, faith groups, nationalities transcending national and international boundaries. It is domestic abuse, child abuse and a crime. It encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the

community including female genital mutilation (FGM) forced marriage and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this and the additional risk factors when deciding what form of safeguarding action to take.

## **Appendix 6**

### **Good practice guide for safeguarding children**

#### **Keeping Records**

Always make an accurate record of the things you have observed or been told. This should include a note of the date and time of a particular incident, or when a particular concern came to your attention. If the young person has told you something, it is essential that you write this down in the young person's own words. The written record should include a note about the size and appearance of any injury (a sketch is helpful). Injuries a young person arrives with at the start of any session should be noted; any injuries received during a session should always be recorded in the Accident Book. This information will be useful when making a referral about suspected abuse. Your Safeguarding Officer may ask to see these records should there be a referral to Social Services.

#### **Confidentiality**

The purpose of confidentiality is to protect young people, by providing appropriate privacy to young people and their families and by ensuring that Blackburn Rovers Football Club is not assisting abusers through access to information. Information (written or verbal) should be shared only on a need to know basis. All Safeguarding Children records should be kept separately from a young person's open records. They should be kept in a **secure place** and be assessed only by designated persons. Parents and Club officials have no right of access to separate Safeguarding Children Records, which remain confidential at all times.

#### **Listening and Reassuring**

Young people need to be listened to and allowed time and space to talk about their experiences, even if they have chosen an inconvenient time. They need to know that they are being taken seriously and be reassured that they have done the right thing in telling you about their concern.

#### **Appropriate Questioning**

It is important to know that interviewing young people in cases of abuse is a specialist role, which should be done only by trained social workers and police officers. If you have been asked to hear a young person's concerns however, it is acceptable to ask a brief, open-ended question e.g. 'can you tell me a bit more about... ' to clarify what is meant. Remember that the young person may be asked to talk to someone else at



a later stage. Try to avoid interrupting or questioning the young person and instead allow them to talk at their own pace and in their own words.

### **Your Own Feelings**

Try not to make assumptions about what you are told and avoid using emotive words such as 'rape', 'assault' or 'beating' which might make the experience of telling even more difficult. It is important not to criticise the abuser e.g. 'X is a bad person'. Try not to project your own feelings onto the young person. It might help you to sort out your own feelings if you talk to the Designated Person or Safeguarding Children's Officer.

Your own suspicions are important and need to be reported to your relevant managers or safeguarding leads rather than the child or family.

### **Never Make Promises**

Be honest and realistic: you should never promise not to tell or say you can do something you are unable to do. You have a **duty** to pass on any allegations or suspicions about abuse to the appropriate person. If you are going to pass information on, it is right to let the young person know why you are doing this and who you will be contacting (as required by GDPR and Data Protection Act 2018 guidance). Older children will naturally be able to understand more fully what is to happen.

### **Relationships with Parents/Carers**

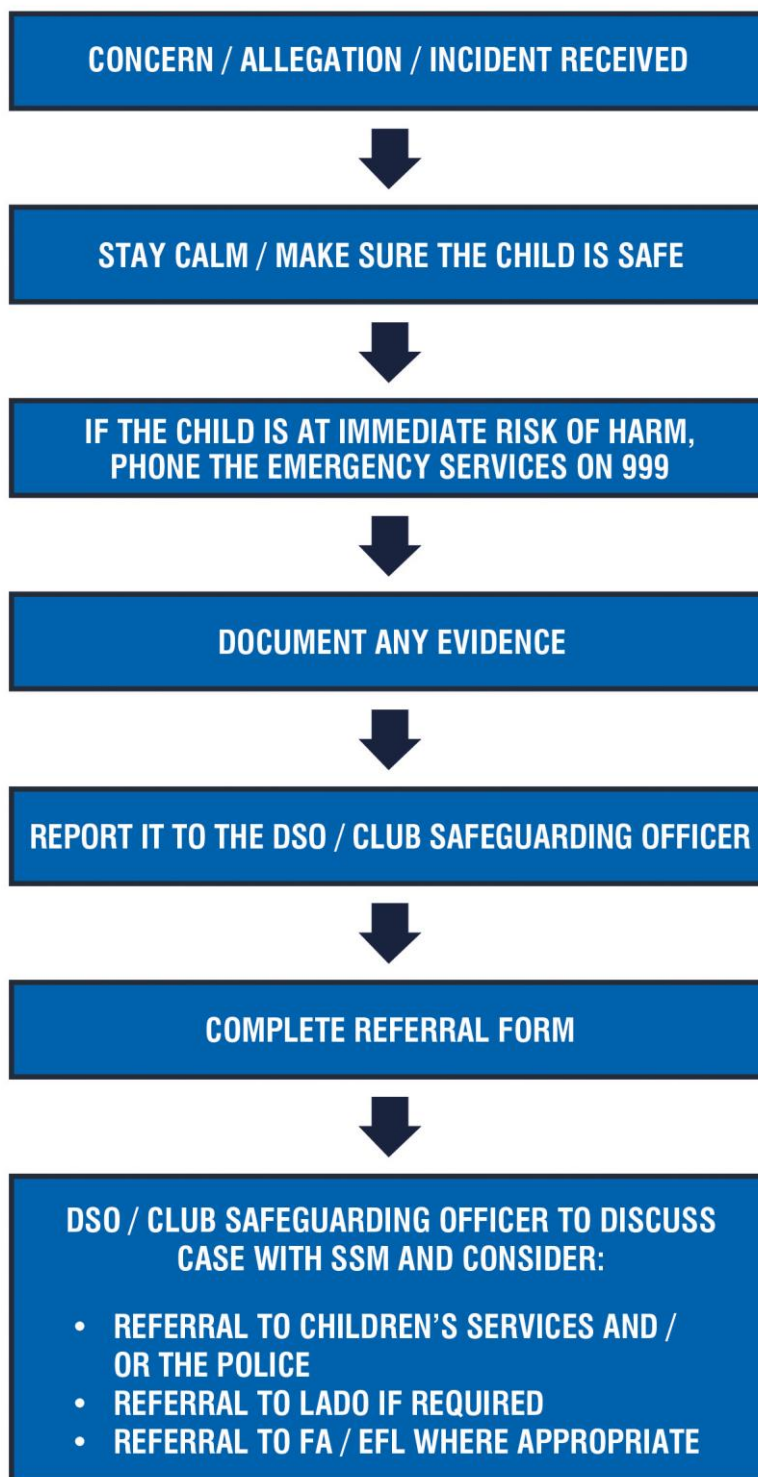
If abuse and neglect is suspected, or there is any reason to believe that alerting the parent might compromise the young person's welfare, you are advised not to discuss this with the parent/carer but you should contact the Designated Person or Safeguarding Children's Officer immediately. Otherwise, if you see an injury about which you have suspicions, or you have concerns about a young person's behaviour or welfare, you should ask the parent/carer for an explanation. If the parent/carer, when asked about the injury is evasive or inappropriately hostile, or will say nothing at all, this **may** support your suspicions that the injury was non-accidental.

### **Urgency**

Prompt action needs to be taken in all instances in which abuse is suspected or discovered but **never** challenge the alleged abuser as you may put yourself and/or the adult at risk or contaminate the evidence.

**Appendix 7 Cause for concern referral form**

<b>BRFC/BRCT Safeguarding Children's referral form</b>	
<b>Concern/allegation /incident raised by:</b>	
<b>Date of incident/allegation:</b>	
<b>Name of child/young person:</b>	
<b>Date of birth/age:</b>	
<b>Address:</b>	
<b>Name of parent/carer/guardian:</b>	
<b>Contact details of parent/carer/guardian including telephone number and address if known:</b>	
<b>Brief description of concern etc. including basic information:</b> <ul style="list-style-type: none"> <li>• On what date?</li> <li>• Where did it happen?</li> <li>• Who was involved?</li> <li>• What happened?</li> <li>• Were there any witnesses? If yes please provide details.</li> </ul>	
<b>Action taken: – including whether this has been reported to the police/LADO/Children's services/FA/EFL</b>	
<b>Your role and contact details:</b>	
<b>Date of referral to DSO:</b>	

**Appendix 8 – Reporting a concern flow chart**

**Policy review**

This policy has been reviewed by:

BRFC Safeguarding Working Group (DSOs and supporting staff as appropriate) and advice and guidance sought from Blackburn with Darwen Children Safeguarding Assurance Partnership (CSAP).

The policy will be reviewed on an annual basis 12 months from Board approval or following any incident which may impact the content and wherever there is a change in safeguarding legislation or the Club/Trust implements a new activity/service which involves contact with children or following significant organisational change.

**Approval route**

Approved on behalf of BRFC Board and BRCT by:

Name: Mike Cheston

Signature:

A handwritten signature in black ink, appearing to read 'M. Cheston', written in a cursive style.

Positions in companies: BRFC Finance Director and BRCT Trustee

Date: 23 December 2019

Document history

The first version of this policy (v1.0) was approved on 24 October 2018

<b>Date of review</b>	<b>Version</b>	<b>Approver</b>	<b>Date approved</b>	<b>Next review</b>
December 2019	2.0	Mike Cheston	23 December 2019	23 December 2020

**Safeguarding is everyone's concern**

**Be vigilant!**