

Port Vale Football Club

Safeguarding Policy

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Version history

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1. Introduction

Port Vale Football Club (PVFC) is committed to ensuring that we create a safe environment for everyone visiting or taking part in activities at the club. Port Vale Football Club take our responsibility to safeguard and promote the welfare of all children, young people, and adults at risk very seriously. Our approach to any concerns will always be child/young person/adult at risk centred. We and our staff will always, consider what is in the best interests of the child/young person or adult at risk.

This policy sets out our commitment to safeguarding and provides a framework for what to do if concerns arise about their welfare or protection whilst at Port Vale Football Club.

Carol Shanahan
Chair.

2. Scope

This Policy is for use across the club and is to be observed by all those working/volunteering and coming into contact with adults at risk to ensure best practice in safeguarding is promoted and adhered to.

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

- Port Vale Football club and the Vale Park Stadium
- Port Vale Foundation Trust
- Port Vale First Team
- Port Vale Academy and Youth Development
- Port Vale Women
- Port Vale Retail Store
- HUBB Foundation
- Bescura

3. Policy Statement

This policy is written in accordance with the requirements of Working Together 2018, Keeping Children Safe in Education (1st September 2020) and the Standards for Safeguarding and Protecting Children in Sport produced by the NSPCC and Sport England and the Protection of Freedom Act 2012.

These procedures apply to all children/young people under the age of 18 years and adults at risk aged 18 years or over. They all have equal rights to protection regardless of age, gender, ability, culture, race, language, religion or sexual identity. All staff and

volunteers will treat them with respect and dignity throughout their time at the club and will support their needs sensitively.

Working Together to Safeguard Children (WT, 2018) sets out the legislative requirements and expectations on individual organisations to safeguard and promote the welfare of children and should be read in conjunction with this policy. A key principle of effective safeguarding arrangements is that **safeguarding is everyone's responsibility**. Working Together to Safeguard Children 2018 states:

“Everyone who works with children has a responsibility for keeping them safe. No single practitioner can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information, and taking prompt action.

In order that organisations, agencies, and practitioners collaborate effectively, it is vital that everyone working with children and families, including those who work with parents/carers, understands the role they should play and the role of other practitioners. They should be aware of, and comply with, the published arrangements set out by the local safeguarding partners. (Para 16,17 P, 11)”.

The Care Act 2014 sets out the legislative requirements and expectations for how local authorities should protect adults at risk of abuse. There are six key principles which underpin adult safeguarding:

- Empowerment
- Prevention
- Proportionality
- Protection
- Partnership
- Accountability

(This link will detail current procedures for Staffordshire Safeguarding Board [Procedures - Staffordshire Safeguarding Children Board \(staffscb.org.uk\)](https://www.staffscb.org.uk))

Port Vale Football Club is committed to ensuring the welfare and safety of all children, young people and adults at risk involved in or visiting the club will be paramount. Any safeguarding concerns that may arise will be dealt with efficiently and effectively. Our approach will always be child centred and we will always do what is in the best interests of the child/ young person or adult at risk.

***All staff and volunteers at Port Vale Football Club must adhere to this policy.**

4. Indicators of Abuse and Neglect

Abuse is defined in the Working Together 2018 Act as:

“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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms

of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults, or another child or children" (WT 2018 Glossary p106).

It is important to acknowledge that some children and young people are more vulnerable to abuse. For example, children with disabilities and high performing/elite young athletes.

There are varying types of abuse which can range from physical abuse, emotional abuse, sexual abuse and neglect.

- **Physical Abuse** – A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child.
- **Emotional Abuse** – 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.
- **Sexual Abuse** – Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- **Neglect** – The persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance misuse. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs (WT2018).
- **Child Sexual Exploitation** - commonly referred to as 'CSE' is a form of sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology.
- **Contextualised Safeguarding** – as well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation from outside of their families. These extra-familial threats might arise at school and other educational establishments, from within peer groups, or more widely from within the wider community and/or online. These threats can take a variety of different forms and children can be vulnerable to multiple threats, including exploitation by criminal gangs and organised crime groups such as county

lines; trafficking, on line abuse; sexual exploitation and the influences of extremism leading to radicalisation. The football club is aware of these threats which may appear within the local community and has a network of local organisations which it can refer to in case of being made aware of extra-familial threats.

The child or young person may also be a young carer and local authorities also known as children's social care have a statutory duty to identify and assess those children.

The Care Act 2014 provides additional categories of abuse which include:

- **Psychological abuse** – includes emotional abuse which has a harmful effect on the adult's emotional health and wellbeing. It also includes threats of harm or abandonment; deprivation of contact; humiliation; blaming; controlling; intimidation; coercion; harassment; verbal abuse; isolation or withdrawal from services or supportive networks.
- **Modern Slavery** – and trafficking involves men, women and children being exploited through violence, control, coercion and forced work against their will. There are varying forms of exploitation which can include forced marriage, forced labour, domestic servitude.
- **Self-Neglect** – is the inability to maintain a socially and culturally accepted standard of self-care with the potential for serious consequences for the wellbeing and health of the individual.
- **Domestic Abuse** – an incident or pattern of incidents of controlling, coercive, threatening, degrading and violent behaviour, including sexual violence. It can also include financial or economic abuse, harassment and stalking and it can be online and digital.
- **Discriminatory Abuse** – this includes discrimination based upon an individual's age, gender, culture, sexual orientation, disability.
- **Institutional Abuse** – the mistreatment, abuse or neglect of an adult at risk by a regime or agency within the setting the adult lives in or uses.
- **Peer-on-peer abuse** - All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse). This is most likely to include, but may not be limited to:
 - bullying (including cyberbullying);
 - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
 - sexual violence, such as rape, assault by penetration and sexual assault;
 - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
 - upskirting, typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
 - sexting (also known as youth produced sexual imagery); and
 - initiation/hazing type violence and rituals.

- **Grooming** - Grooming is defined as developing the trust of an individual and/or their family for the purposes of sexual abuse, sexual exploitation, or trafficking. Grooming can happen both online and in person. It is important to remember that someone can groom an organisation for the purpose of sexual abuse. This has been evidenced in recent high-profile cases and appropriate awareness of grooming behaviour patterns presents a significant opportunity to prevent abuse.
- **Radicalisation** - The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of children and/or adults at risk for the purposes of involvement in extremist activity is a serious safeguarding issue.
- **Female genital mutilation (FGM)** - Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practice FGM or 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.
- **Bullying** - Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone, or damaging their possessions.
- **Cyberbullying** - The use of technology to harass, threaten, embarrass, humiliate, spread rumours, or target another person. By definition, it occurs among Children. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking. Bullying as a result of any form of discrimination: Bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation, or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults, and 'banter'.
- **Poor practice** - This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of the child and/or adult at risk are not afforded the necessary priority compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing them in potentially compromising and uncomfortable situations, failing to ensure their safety, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals.

- **Hazing** - Any rituals, initiation activities, action, or situation, with or without consent, which recklessly, intentionally, or unintentionally endangers the physical or emotional well-being of Vulnerable Groups.
- **Infatuations** - Vulnerable Groups may develop an infatuation with a member of Staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware, that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. Staff should therefore ensure that their own behaviour is above reproach. A member of Staff who becomes aware that a Child or Adult at Risk may be infatuated with him/ her, or with a colleague, should discuss this at the earliest opportunity with the Club Designated Safeguarding Officer (or the Club Senior Safeguarding Manager in his/her absence).
- **Fabricate or induced illness** - Fabricated or Induced Illness is easiest understood as illness in a child which is fabricated by a parent or person in loco parentis. The child is often presented for medical assessment and care, usually persistently, often resulting in multiple medical procedures. Acute symptoms and signs of illness cease when the child is separated from the perpetrator.
- **Forced Marriage** - A marriage in which one or both spouses do not (or in the case of some adults with learning or physical disabilities or children, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial and sexual pressure. A Forced Marriage is different from an arranged marriage, which is a marriage entered into freely by both parties, although their families take a leading role in the choice of partner. The Anti-social Behaviour, Crime and Policing Act 2014 made it a criminal offence (which can result in a sentence of up to 7 years in prison) to force someone to marry.
- **Private fostering** - A privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent or close relative where the child is to be cared for in that home for 28 days or more. Close relative is defined as "a grandparent, brother, sister, uncle or aunt (whether of the full blood or half blood or by marriage or civil partnership) or step-parent". A child who is Looked After by a local authority or placed in a children's home, hospital or school is excluded from the definition. In a private fostering arrangement, the parent still holds Parental Responsibility and agrees the arrangement with the private foster carer. A child (as per definition above) placed with a host family for 28 days or more is in a private fostering arrangement and therefore Clubs with host families should inform and work with their local authority ensuring that they meet legislative and local procedural requirements.
- **County Lines** - County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and adults at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Child Criminal Exploitation is common in county lines and occurs where an individual or group takes

advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines and includes for instance children forced to work on cannabis farms or to commit theft.

ABUSE SPECIFIC TO ADULTS AT RISK

The Care Act defines additional types of abuse related specifically to safeguarding Adults at Risk which are described below:-

- **Financial or material abuse** - Stealing from an adult at risk, using them for financial gain, putting pressure on them about wills, property, inheritance or financial transactions, misusing or stealing their property, possessions or benefits. It may include depriving a person access to their money, property or assets. Financial abuse is something more usually related to adults but where professional (and future professional) footballers are concerned, this is a significant area of risk.
- **Coercive control** - Coercive or controlling behaviour does not relate to a single incident, it is a purposeful pattern of incidents that occur over time in order for one individual to exert power, control or coercion over another. For example, restricting access to money, restricting movements, isolating the victim from family and friends, intercepting messages or phone calls.
- **Modern slavery** - Encompasses slavery, human trafficking, and forced labour and domestic servitude. Traffickers and slave masters use whatever means they have at their disposal to coerce, deceive and force individuals into a life of abuse, servitude and inhumane treatment.
- **Trafficking** - The United Nations (UN) defines Trafficking in people as: the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, or abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purposes of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs. The recruitment, transportation, transfer, harbouring or receipt of a child for the purpose of exploitation shall be considered 'trafficking in persons' even if this does not involve any of the means as set out above.
- **Organisational** - Neglect and poor care practice within an institution or specific care setting such as a hospital, care home or where care is provided within an Adult at Risk's own home. This may range from one off incidents to on-going ill treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes or practices within an organisation.

- **Neglect/acts of omission** - Ignoring medical, emotional or physical care needs, failure to provide access to appropriate health, care and support or educational services or the withholding of the necessities of life, such as medication, adequate nutrition and heating.
- **Self-neglect** - Neglecting to care for one's personal hygiene, health or surroundings, and includes behaviour such as hoarding.
- **Discriminatory Abuse** - Unequal treatment based on the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex or sexual orientation. This can be in the form of verbal abuse, derogatory remarks or inappropriate use of language, denying access to communication aids, not allowing access to an interpreter, signer or lip-reader, harassment or deliberate exclusion, denying basic rights to healthcare, education, employment and criminal justice and substandard service provision.

The above list is not exhaustive in terms of risk posed to children, young people and adults at risk. Additional risks include, drug taking, alcohol abuse, missing from education and care and sexting (also known as youth produced visual imagery). Further information can be found in the appendix.

It is important that all staff and volunteers must be aware of the indicators of abuse and neglect for children, young people, and adults at risk to be able to identify those who may need help and protection. Staff and volunteers must seek the advice and support immediately from the Designated Safeguarding Officer (DSO) if they have any concerns or uncertainties in this regard.

It is also important to acknowledge that safeguarding concerns do not always arise from a disclosure from the child/young person or adult at risk. Concerns can emerge from worrying behaviours or changes in patterns of behaviour displayed by the child/young person or adult at risk. Or they can come directly from another individual (child or adult).

5. The Designated Safeguarding Officer (DSO)

1. The Designated Safeguarding Officer (DSO) is responsible for:
 - Being the first point of contact for all staff and volunteers for advice and support if they are concerned about a child, young person, or adult at risk.
 - The DSO must have a higher level of safeguarding training and knowledge than the rest of the staff and attend regular updates organised by the Football League.

- They are responsible for all DBS (Disclosure and Barring Service) checks for relevant staff in the club and all full and part-time staff in the Academy.
- They are responsible for ensuring the safeguarding policy is kept up-to-date and reviewed on an annual basis.
- The DSO will always provide advice and support to all staff and volunteers where concerns have arisen and will support the decision making about whether staff concerns are enough to notify children's services/police or whether other courses of action are more appropriate.
- The DSO will always ensure all concerns are logged and stored securely.
- They are responsible for promoting a safe environment for children, young people, and adults at risk throughout the stadium during the week and on matchdays.
- They know the contact numbers of the various groups/organisations which are involved in keeping children/young people and adults at risk safe. They may have to contact an outside agency who work in partnership e.g., allegations against staff which could be overseen by the Local Authority Designated Officer (LADO).
- Ensure the safeguarding policy is available publicly, on the club's website or by other means
- The DSO creates and updates the Academy's Register which includes boys who may need extra support from staff and coaches. The academy compiles and updates a support register which includes input from schools and parents/carers. Children appear on the register because of learning issues/challenging behaviour or are aged 16-18 are with host families away from their parents.
- Coordinate concerns about children, young people, and adults at risk
- Ensure safeguards and support are in place for everyone
- Where a referral is made to the Local Authority / Children's Services the DSO will always ensure the Club Chair is notified immediately.
- The DSO is responsible for contacting all referees for applicants who have applied for a role at the club if they are shortlisted and before they are interviewed.

6. Responding to and Reporting Concerns

Where safeguarding is concerned, staff and volunteers are advised to maintain an attitude that **it could happen here** and must not therefore, become complacent that a safeguarding concern may never occur at the club. Section 11 of the Children's Act 2004 (referenced on P59 of Working Together 2018) states, "*employers are responsible for ensuring that their staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children; creating an environment where staff feel able to raise concerns and feel supported in their safeguarding role*".

It is not the responsibility of staff and volunteers at Port Vale Football Club to decide if abuse has occurred; however, it is our responsibility to act on any concerns by reporting these to the Designated Safeguarding Officer immediately who will determine the course of action to be taken. ***Remember if something doesn't look or feel right then it generally isn't – Report It!**

All concerns must be recorded without delay and no later than 24 hours of the issue being identified by the staff member/volunteer or other person on the 'MyConcern' online recording system. If you do not have access to this system, then the DSO will record this on your behalf.

Once recorded this will issue an alert to the DSO and any relevant departmental safeguard leads. If in exceptional circumstances, the DSO is not available, then this should not delay appropriate action being taken to safeguarding the welfare of the child/young person or adult at risk. The staff member or volunteer must contact the DSO or his/her deputy or seek advice from the Local Authority / Children's Social Care. Any action taken must be shared with the DSO as soon as is practically possible.

All issues, concerns, discussions that have taken place and the decisions that have been made must be recorded on 'MyConcern'. This would also include a Safeguarding "near miss". It is essential that the child/young person or adult at risk receives the right help at the right time. It is poor practice not to have robust recording systems in place when concerns/issues have been raised. Poor practice can potentially lead to:

- The Club failing to act on and refer the early signs of abuse and neglect.
- Not sharing information.
- Sharing information too slowly.

Other examples of poor practice can include:

- Failing to listen to the views of the child, young person, or adult at risk
- Failing to re-assess concerns when situations do not improve
- Failing to challenge those who do not appear to be acting accordingly
- Taking an incident focused approach to concerns / issues that have arisen rather than looking back at the whole series of events

Where concerns of poor practice are identified they will be addressed immediately with the individual staff member or volunteers and may lead to disciplinary proceedings being initiated by the Head of Academy/Chief Executive.

It is the responsibility of the DSO to ensure that when safeguarding concerns are raised, sensitive issues are managed effectively, confidentiality is maintained, any potential statutory investigation is not compromised, and the child/young person or adult at risk's voice is heard.

Where a child is suffering, or is likely to suffer harm, it is important that a referral to the Local Authority/ Children's Social Care, formally known as 'Social Services' (and if appropriate the police) is made immediately. A Referral is made via the Children's

advice and duty service (CHADS) on 01782 235100 (Monday to Friday 8.30am to 6pm). Or out of ours via the emergency duty team on 01782 234234. This Referral is a conversation-based assessment with a trained social worker who will decide on the appropriate response. Details of the email and contact numbers are repeated in the Appendix. Where a child/young person or vulnerable adult is at immediate risk of harm then the Police must be contacted by calling 999.

Children's Social Care, with the help of other organisations as appropriate, have a duty in law to make enquires under Section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer significant harm.

The purpose of a Section 47 enquiry is to decide whether and what type of action is required to safeguard and promote the welfare of a child who is suspected of, or likely to be, suffering significant harm. The enquiry is carried out by undertaking or continuing with an assessment in accordance with the requirements set out in WT 2018. Local Authority social workers have a statutory duty to lead assessments under section 47 of the Children Act 1989 ("Section 47 - A local authority must *investigate* if they are informed that a child in their area is subject of an emergency protection order, is in police protection or is suffering or likely to be suffering significant harm. They must then take any steps, as reasonably practicable, to ensure that the child is safeguarded"). The police, health practitioners, teachers and school staff and other relevant practitioners should help the local authority in undertaking its enquiries (Section 47 is further described on Page 45, Working Together, 2018).

Where a referral is made the Children's Social Care, the DSO must inform the Co-Chair/Chief Executive without delay. All other issues that are raised with the DSO will be routinely shared with the Co-Chair/Chief Executive when appropriate.

For adults at risk the Local Authority has a duty to assess the situation and ensure the safety and wellbeing of the person. Where the Football Club has concerns about the welfare of an adult at risk the DSO will make a Safeguarding Adult Referral to the Local Authority without delay. The referral will consider a holistic assessment of the adult at risk's current circumstances including their emotional, physical, social, and psychological presentation. (any issues that may affect an adult at risk should be referred to the Adult Safeguarding Team on 01782 235353 adult.protection@stoke.gov.uk or the current Designated adult Safeguarding Manager Jackie Bloxham DASM@stoke.gov.uk).

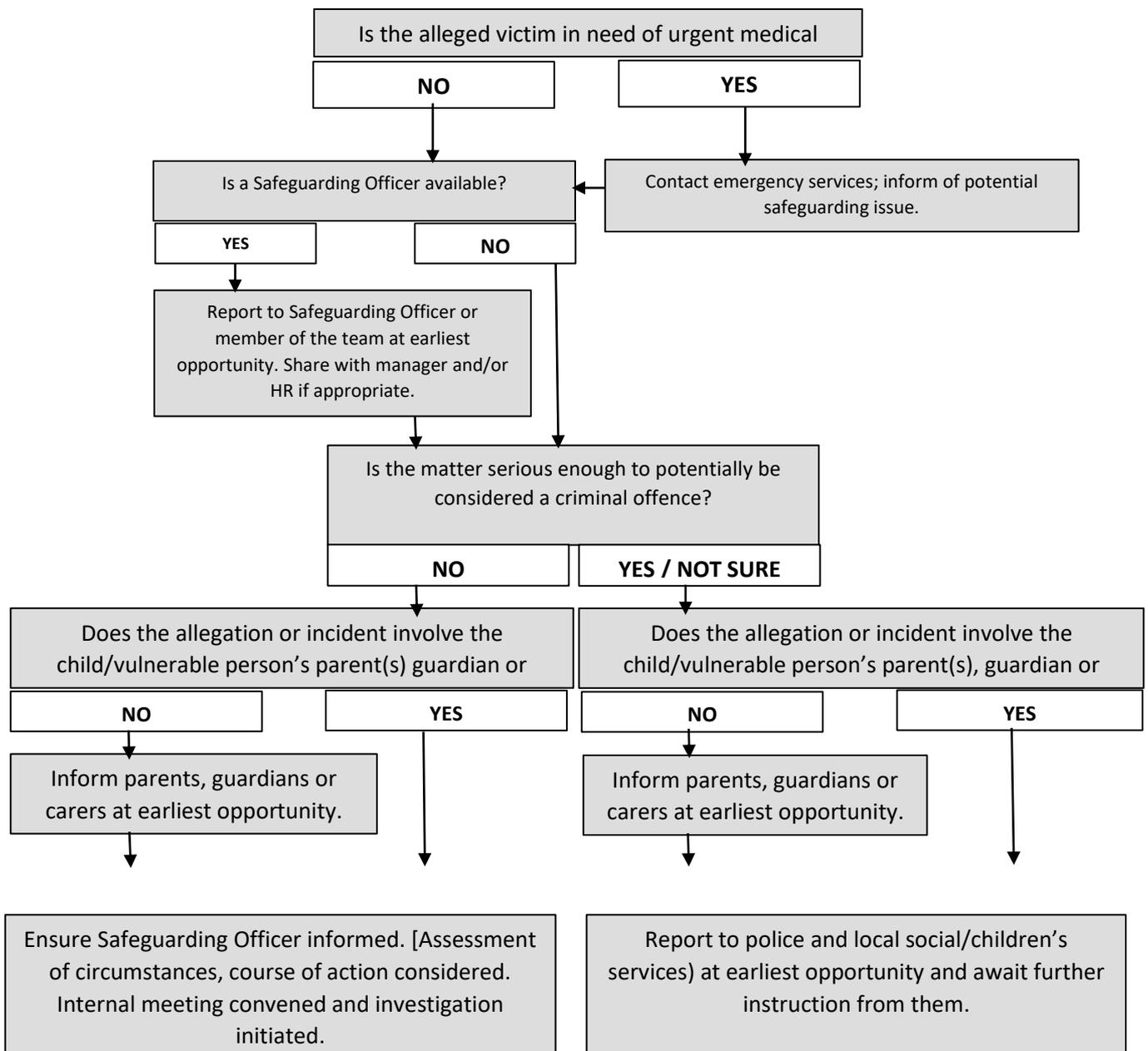
What to do in response to a concern, incident, or allegation.

When a child or other vulnerable person has disclosed concerning information to
you

OR

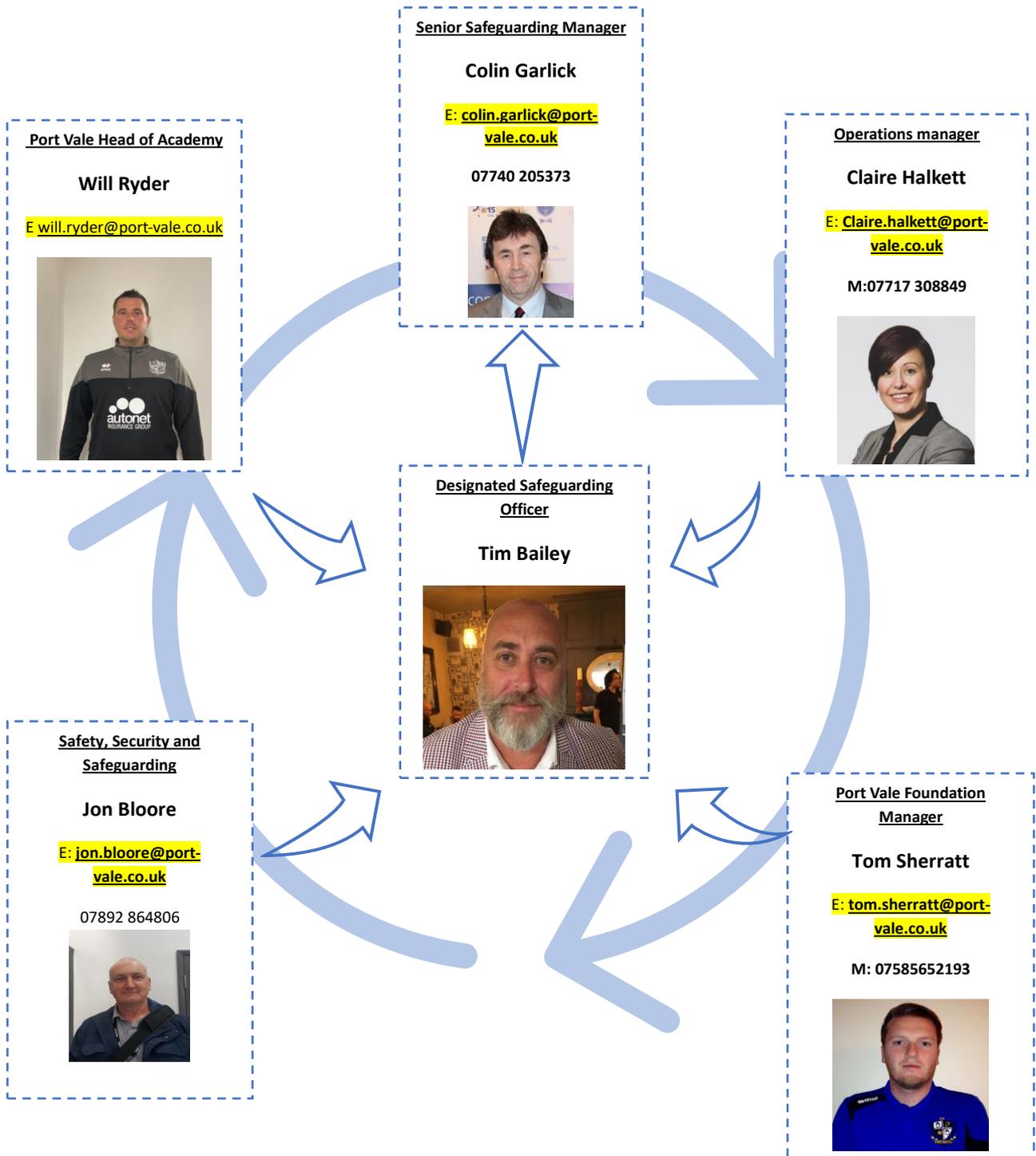
you have witnessed or had reported to you an incident or complaint involving a
child or other vulnerable person*, which may be considered abuse or poor practice.

**It is essential when considering an incident or concerns involving an adult who may be vulnerable to obtain the consent of that adult before referring the matter to a statutory agency, unless there is an immediate risk of harm.*



Whatever the circumstances the person receiving and then reporting the complaint or incident must record a written statement preferably using Incident Report Form or online reporting system. This will be submitted to the Designated Safeguarding Officer at the earliest opportunity.

Port Vale Safeguarding Network



7. Information Sharing and Safeguarding Concerns

The NSPCC's Child Protection in Sport Unit provide the following advice for sharing information:

“Why is information sharing guidance important? Because child protection and safeguarding involves sensitive information that directly affects the welfare of children and young people. To keep these children safe, information needs to be shared appropriately so that decisions can be made to protect them. However, clear boundaries around information sharing are important to maintain confidentiality where appropriate and to ensure that only those who need the information are made aware of it.

What information to share

Whenever a sports organisation receives information that raises concerns about a child or children, decisions need to be made about information sharing. This could include:

- concerns about a child received within or outside the sport
- concerns about a person in a position of trust, such as a coach – this could include information on a [Disclosure & Barring Service \(DBS\) check](#)
- concerns about a member of a sports club
- concerns about a sports environment, such as an event location or hosting arrangements

Key principles for deciding what to share

The Government guidance, [Information sharing advice for safeguarding practitioners](#), describes the '7 Golden Rules' of information sharing:

1. Remember that the Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You

may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk.

5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up to date, is shared in a timely fashion, and is shared securely.
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Who to share information with

Part of the decision-making process will include consideration about who to share information with. This could include:

- **Statutory organisations** – the Police and/or Children's Services must be informed about safeguarding concerns; Designated Officers should be consulted where there are concerns about someone in a position of trust.
- **Disclosure & Barring Service** – must be informed of any concerns about someone in regulated activity who is suspended or expelled from the organisation.
- **Other clubs and other sports organisations** – informing other organisations need to be considered according to the principles below in order that they can safeguard children in their care who may be at risk of harm.
- **Individuals within the organisation** – this will be decided on the basis of who needs to know what information in order to keep children safe according to the principles below".

Sensitive and confidential information/data is stored in a lockable cupboard in the academy office/chief executive's office and all information electronically is password protected.

All staff and volunteers must fully comply with the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

The Chairperson must be informed all safeguarding concerns identified by the DSO within 24 hours of the referral being made.

8. Safer Recruitment

Port Vale Football Club is committed to ensuring that anyone appointed by the club either as a paid employee or volunteer is suitable to work with children/ young people and adults at risk.

The whole recruitment process will be under the direction of Human Resources Department who will ensure that all applicants for either paid or volunteer roles must complete an application form. Any gaps in the applicant's employment / background history must be addressed during the interview. The applicant must provide two references which must include the applicants last paid employer. One referee should also be from someone who can comment on the applicant's ability to work with children, young people and adults at risk.

References will be sought for applicants who have been offered a post and contact will be made with the referees. Any final offer will be made subject to these suitable references being obtained.

Any information obtained from all sources will be shared with those responsible for deciding on the applicant's suitability for the role. In the event that concerns are raised following any information obtained from the referees then the applicant must not be appointed until a satisfactory resolution has been achieved and the applicant is deemed not to pose a safeguarding risk. A DBS referral should be made when someone who is engaged in regulated activity has permission withdrawn from engaging in that activity, including where a person has resigned in circumstances where they would otherwise have been dismissed. (Advice about DBS referrals should be discussed with the DSO and HR).

It is the responsibility of the applicant to disclose details in respect of relevant convictions and give their consent to criminal record checks being requested in respect of them. Failure to disclose such information either before being appointed to the role or afterwards may result in the individual being dismissed from the club. Further details of what posts require a DBS check can be found in the latest EFL Guidance a snap shot of which is contained on Appendix B; however, all posts requiring direct access to children, young people and adults at risk must require a DBS check before any work with children/adults at risk is undertaken.

All posts will be subject to a sixth month probationary period and after six months the individual's performance will be reviewed against the requirements of the job description which will be discussed at interview.

Academy Players are asked at the end of the season to comment on procedures and are invited to make suggestions relevant to improvements in how the academy operates. Parents of players have opportunities to comment on current procedures and make suggestions on improvements at the assessment evenings in December and May. Parents are requested to attend "the introduction to the new season" meeting in July when safeguarding policies and good practice are discussed. At the discretion of the

academy manager there may be occasions when children are involved in the selection process of choosing new members of staff.

All new staff and volunteers appointed will receive an induction. During this period, all new recruits must meet with the DSO who will discuss the requirements of the safeguarding policy. Each term all academy staff are required to attend training and updates when safeguarding is included on the agendas. Safeguarding always appears on the agenda of the club's operations meetings.

The academy's head of coaching meets all new recruits on a regular basis to check on progress and includes safeguarding items and updates on this training agenda. The head of coaching will use 1:1 meeting's as a process of helping new staff to settle in and review progress, there is facility to record this meeting as a welfare meeting on TOPICS through the Academy link.

Code of conduct

The club's codes of conduct are applicable to all employees of the club, volunteers, parents, guardians, supporters on match day, children, young people, and adults at risk and must be adhered to. Details can be found on the attached Appendix B.

Whistleblowing

Whistleblowing occurs when a person raises a concern about dangerous or illegal activity, or any wrongdoing in their organisation. As a whistle-blower you are protected in law because you should not be treated unfairly or lose your job because you raise concerns. You can raise your concern at any time about an incident that happened in the past, is happening now, or you believe will happen in the near future. Whistleblowing law derives from the Employment Rights Act 1996 (as amended by the Public Interest Disclosure Act 1998). It provides the right for a worker to take a case to an employment tribunal if they have been victimised at work or they have lost their job because they had 'blown the whistle'.

**Please note that Port Vale Football Club have a separate Safeguarding Whistleblowing Policy.*

Port Vale Football Club want to ensure there is a healthy and supportive culture across the organisation whereby people have the confidence to come forward to speak out or act if they are unhappy with anything. At the first instance it may be appropriate to speak to their line manager but if this opportunity is not available the Chief Executive or Co-Chair would be the most appropriate.

In the first instance you may wish to report any concerns directly with your line manager or with the DSO at the club; however, you may wish to contact the F.A for advice by contacting the FA Case Management Team on 0844 980 8200 Ext 4787. Alternatively, you can contact the NSPCC Whistleblowing Advice Line on 0800 028 0285 or via email: help@nspcc.org.uk or contact the Police or Children's Social Care.

The FA will treat your disclosure in confidence and will only reveal your identity if absolutely necessary. For example, in connection with legal action unions and professional associations can also support and assist their members.

If in the event you make a disclosure to the club, the F.A or partner agencies such as the Police and Children's Social Care and they are found to be malicious or made for personal gain then disciplinary action will be taken against you.

Anyone found to be harassing or victimising an individual who makes a protected disclosure will be subject to disciplinary action.

Compliments & Complaints

Port Vale Football Club welcome all compliments and complaints and consider they are an opportunity to continually reflect and learn from. The football club has a supporter's liaison officer and a disability support officer who address any concerns fans have and the chief executive will respond to additional complaints. The academy has similar opportunities for parents/boys to raise concerns and has a process for dealing with them. Further opportunities to engage with the club's community are being discussed and fan's forums are held on a regular basis. The club will respond to any concerns and ideas as soon as it is possible to do so and certainly within 7 days.

**Port Vale Football Club have a separate policy for Safeguarding Allegations of Abuse Against Staff.*

Other Policies linked directly or indirectly to Safeguarding at Port Vale FC.

- Health and Safety policy
- Child friendly safeguarding children policy
- Adults at Risk Policy
- Photography and videography Policy
- Anti-Bullying Policy
- Whistleblowing policy
- Anti-Racism policy
- Equality, Diversity and Inclusion Policy
- Youth Players playing in the First Team Policy
- Furry Mascot Policy
- Ball Crew Policy
- Accident reporting Policy
- Transport policy/plan
- Mental Wellbeing Policy
- Guidance to bring a child to a match policy.
- Allegations against staff Policy
- Late Collection of Children Policy
- Safe IT use Policy
- Mentoring Policy
- Accessibility Policy

Appendix A

List of Contacts and resources

The Designated Safeguarding Officer

The Designated Safeguarding Officer (DSO) is Tim Bailey

Email: tim.bailey@port-vale.co.uk Tel: 07966 935817

The Senior Safeguarding Manager

Chief Executive: Colin Garlick. (SSM) Tel: 07740205373

Staffordshire Football Association.

Safeguarding & Education Officer is Jan Scott

(E): Support@StaffordshireFA.com

(T): 01785 256994 (ext. 205)

(M): 07969 294023

Making a referral to the Local Authority / Children's Social Care

If you think a child or young person is at risk of significant harm contact the Children's Advice and Duty Team on: 01782 235100

www.safeguardingchildren.stoke.gov.uk - Local Authority Designated Officer (LADO)

Advice and Access Team: 01782 232200

Email: CW@stoke.gov.uk

Emergency Duty Team – 01782 234234 (After 5pm Monday to Friday and weekends)

www.stoke.gov.uk – Worried about an adult?

Telephone: 08005610015

Codes of Conduct (Appendix B 1-4)

DBS Eligibility Guidance (Appendix C)

Legislation and Statutory Guidance

<https://www.gov.uk/government/publications/care-act-statutory-guidance>

www.gov.uk – Keeping children safe in education (2020)

www.gov.uk – Working Together to Safeguard Children (2020) – a full list of Department for Education guidance can be found on page 108 & 109 of this statutory guidance.

Topics Online reporting system Guidance (Appendix D)

Useful Sources of Information

<https://www.gov.uk/government/publications/care-act-2014-part-1-factsheets>

[https://www.cqc.org.uk/sites/default/files/20140416_safeguarding_adults_-_roles_and_responsibilities_-_revised_draf....pdf](https://www.cqc.org.uk/sites/default/files/20140416_safeguarding_adults_-_roles_and_responsibilities_-_revised_draft....pdf)

<https://www.gov.uk/government/collections/mental-capacity-act-making-decisions>

<https://www.gov.uk/government/publications/prevent-duty-guidance>

<https://www.gov.uk/government/publications/a-public-health-approach-to-violence-prevention-in-england>

www.gov.uk – Safeguarding Adults

www.gov.uk – Whistleblowing

www.gov.uk - Human Trafficking and Slavery

<https://thecpsu.org.uk>

<https://www.gov.uk/government/publications/safeguarding-women-and-girls-at-risk-of-fgm>

www.gov.uk – Child exploitation disruption toolkit

www.gov.uk – Disclosure and Barring Service

<http://webapps.stoke.gov.uk> – Staffordshire and Stoke on Trent Safeguarding Adults Partnership Inter- Agency Adult Protection Procedures – stoke.gov.uk

<https://www.childline.org.uk>

<https://www.stonewall.org.uk>

<https://www.disabilityrightsuk.org>

<https://womensaid.org.uk>

www.beds.ac.uk – Contextualised Safeguarding

Stoke-on-Trent PREVENT programme

The Prevent programme is the city's response to the Government's national counter-terrorism strategy which aims to stop people being drawn into or supporting terrorism. The city's Prevent programme which staff at the club and the academy are aware of is designed to:

- Divert vulnerable individuals away from the radicalisation process and ensure that they are given appropriate advice and support through local safeguarding structures
- Deter extremist groups from creating division and disharmony and spreading hate
- Keep the majority safe from the few who seek to harm others
- Ensure that clubs understand how to recognise extremism

Channel Panel-Stoke-on-Trent

This panel supports people at risk of being radicalised recognising that the radicalisation of vulnerable children and adults is a safeguarding issue. All club employees and academy staff know that if they are concerned that someone is at risk of getting involved in extremism, they should discuss this with the DSO.

The DSO will liaise with the Channel Co-ordinator at Staffordshire Police Prevent Team to discuss and make a referral if necessary. Their contact is 01785 238239.

Authority from Port Vale Board and acceptance of Policy

Signed by:

_____ **Name Board member** **date:**

_____ **SSM** **date:**

This policy will be reviewed on an annual basis or following learning outcomes as a result of a significant incident or when legislation / statutory guidance changes by the Designated Safeguarding Lead.

Appendix b
(1)



Code of Conduct for Staff & Volunteers

1. This code of conduct is applicable to all employees of the football club and volunteers which must be adhered to. We expect all staff and volunteers to follow the behaviours as set out in this code. If any staff member or volunteer behaves in a way which contradicts any of the points set out below, the club will address them with the individual without delay to resolve the issue. Continued issues and repeated breaches of this code may result in the club taking disciplinary action against the staff member or volunteer with the involvement of governing bodies and ultimately your dismissal from the club.

As a member of staff or volunteer at the club you must:

- Implement our safeguarding policy and procedure.
- Report any concerns about or allegations of abuse or poor practice to the Designated Safeguarding Officer.

- Listen to any concerns that parents, guardians, children, young people, or adults at risk may have.
- Consider your behaviour – do not engage in any behaviour that constitutes any form of abuse
- Respect your position of trust and maintain appropriate boundaries and relationships with children, young people or adults at risk. Engaging in sexual behaviour of any kind with any child under the age of 16 is illegal
- Keep coaching and safeguarding training up to date
- Keep children, young people and/or adults at risk in your sessions safe by supervising appropriately, using safe methods and techniques and by putting their safety first.
- Make sure you have appropriate staffing ratios of adults to participant before the session begins
- Ensure all equipment is fit for purpose, safe to use and accessible
- Respect children, young people and adults at risks trust and rights whilst being open and honest with them
- Champion everyone's right to take part and celebrate difference in our football club or by not discriminating against anyone, regardless of gender, race, sexual orientation or ability
- Stop the activity if an injury occurs with a child, young person or adult at risk. Administer minor first aid and call for help where necessary
- Always use constructive and positive methods of feedback when developing their skills and abilities and never humiliate or harm them in doing so.
- Always behave appropriately on line and in accordance with the club's online safety and acceptable use policy
- Challenge and address instances of poor, negative, aggressive or bullying behaviour either towards or amongst children, young people or adults at risk
- Always lead by example when it comes to good sportsmanship, positive behaviour and commitment to the game
- Make our club a friendly and welcoming place
- Work with the players in accordance with the FA Charter for Quality and the Football Club Scheme of Work always taking into consideration the Four Corner of Development
- Respect the rights, dignity and worth of each individual
- Be concerned with the well-being, health and future of the individual player and will be supportive in his demands on the young player remembering they are children.
- Be aware of the player's educational needs and its impact on his training remembering that in an average week during the season most boys will be involved in training, matches and travelling for over 12 hours per week.
- Act as role models for the players in behaviour and good conduct towards other girls, boys, parents, carers, supporters and match officials.

- Always seek ways in which they can improve the child/ young person's development and exhibit high standards
- Make themselves aware and follow the Academy's Safeguarding Policy and report any concerns immediately to the club's DSO.
- When travelling to away matches in the mini buses enter all required details for each journey in the folder provided. Make sure all passengers are wearing seat belts throughout the journey.
- Never transport children in private cars
- Wear the corporate clothing provided and be punctual at all sessions maintaining 90% attendance throughout the season
- Always wear your ID badge
- Report any missing/damaged equipment immediately to the Academy Manager or senior staff
- Ensure sessions are documented in log books/session plan books/registers-management tool
- Display professional attitude towards other staff supporting them at all times
- Never use social media to question decisions made about child's footballing progress or lack of it.

Name of Staff Member/Volunteer	
Signature of Staff Member / Volunteer	
Date	

Appendix b (2)



Code of Conduct for Parents & Carers

1. This code of conduct is applicable to all parents and carers. We expect all parents and carers to follow the behaviours as set out in this code. If any parent or carer behaves in a way which contradicts any of the points set out below, the club will address them with the parent/carer without delay and aim to resolve the issue. Persistent concerns or breaches may result in parents/carers being asked not to attend games if their attendance is considered a risk to the welfare and enjoyment of young participants. Continued issues and repeated breaches of this code may result in the club regrettably asking your child to leave the activity, even or club permanently, something we never want to do.

As a parent/carer of a child/young person taking part on our club or activity, we've like you to:

- Make sure your child has the right kit for the season as well as enough food and drink
- Try to make sure your child arrives to sessions on time and collected promptly; or let us know if you are running late or if your child is going home with someone else
- Complete all consent, contact and medical forms and update us straight away if anything changes
- Make sure your child wears any protective kit we may provide for them
- Maintain a good relationship with your child's coach/trainer and catch up with them as much as you can about your child's development
- Tell us if you have any worries about your child's development or time at the club/activity
- Lead by example when it comes to positive behaviour on the side-lines
- Accept the official's judgement and do not enter the field of play

- Use social media responsibly when talking about what goes on at our club, by behaving in the same way online as you would in person
- Talk to your child about embracing good sportsmanship and encourage them to play by the rules
- Ensure your child understands their code of conduct
- Report any safeguarding concerns immediately to the Designated Safeguarding Officer.

As a parent/carer you have the right to:

- Be assured your child is safeguarded during the time they are with us
- See any of our policies and procedures at any time
- Know who the Designated Safeguarding Officer is and how to contact them
- Be involved and contribute towards decisions within the club or activity
- Know what training and qualifications our staff have
- Be informed of problems or worries relating to your child
- Know what happens if there's an accident or injury, be informed if your child is injured and see the records of any incidents
- Have your consent sought for anything outside of our initial consent form, such as permission to go on trips or photography
- Have any concerns about any aspect of your child's welfare listened to and responded to promptly.

Name of Parent/Carer	
Signature of Parent/Carer	
Date	

Appendix b (3)



Code of Conduct for Children & Young People

1. As a child or young person taking part in our club or activity, we've like you to:
 - Keep yourself safe by listening to your coach/trainer, behaving responsibly and speak out if something isn't right
 - If you are worried about absolutely anything, tell us straight away, talk to your coach/trainer or the Designated Safeguarding Officer.
 - When you are with us, stay in places where you are supposed to, don't wander off or leave without telling a member of staff
 - Take care with our equipment and premises and treat them as if they were your own
 - Get to practice and sessions on time and if you are running late, let a member of staff know
 - Bring the right kit to practice and appropriate kit for the weather
 - Do not smoke, take drugs or consume alcohol on our premises or during practices, competitions or when representing us
 - Respect and celebrate difference in our club or activity and do not discriminate against anyone else on the grounds of gender, race, sexual orientation or ability

- Always report any incidents of bullying, including homophobia and transphobia to a member of staff, even if you are just a witness immediately
- Treat other people with respect and appreciate that everyone has different levels of skills and ability
- Make our club or activity a welcoming and friendly place to be
- Support and encourage your team mates. Tell them when they've done well and be there for them when they are struggling
- Respect our staff and the staff and players from other teams
- Be a good sport, celebrate when we win and be gracious when we lose
- Play by the rules and have fun
- Follow our online safety and internet use policies
- Get involved in club or activity decisions, it is your sport too!

As a child/young person taking part, we understand you have the right to:

- Enjoy the time you spend with us
- Be told who you can talk to if something is not right
- Be listened to
- Be involved and contribute to the decisions within the club or activity
- Be respected by us and other team members and be treated fairly
- Feel welcomed, valued and not judged based on your race, gender, sexuality, disability or ability
- Be encouraged to develop your skills with our help
- Be looked after if there's an accident or injury and have your parents informed if needed.

2. We expect all children and young people to follow the above behaviours set out in this code of conduct. If any child or young person behaves in a way which goes against the points above, then we will address this with you and your parents/carers immediately with the aim to resolve the issue. Continued issues and repeated breaches of this code may result in us regrettably asking you to leave the activity, event or club permanently, for the welfare of other children and young people and our staff. This is something we never want to do.

Name of Child / Young Person	
Signature of Child / Young Person	
Date	



Appendix B (4)

Port Vale Football Club

Match day Safeguarding Code of Conduct.

- Anyone under the age of 12 years must be accompanied by an adult, an adult is anyone aged 18 or over.
- Parents or other responsible adults have primary responsibility for the safety of their child/young person who accompanies them and should always keep them close.
- Please be aware of where your child/young person is always during your visit and have a plan to meet somewhere if you get separated.
- Ensure your child/young person knows who to contact should they feel lost or worried.
- Stewards are situated around the stands in high visibility jackets for your safety and confidence.
- Our Stewards are trained in how to deal with lost children, please ensure your child knows not to go off with a spectator they do not know.
- Should you get separated from your child please contact a Steward immediately and listen to announcements over the stadium speakers.
- In an emergency, please ensure your child is aware what to do including how to evacuate the stadium and where to meet up with you.
- On a match day a dedicated safeguarding steward will be available to help.
- Should you see anything that causes you a concern or doesn't look right please report this to a safety steward.

**Remember if something doesn't look or feel right,
it probably isn't,
Report it!**

Appendix C (Direct Lift from EFL Guidance)

DBS Eligibility Guidance

Regulated Activity	Enhanced disclosures	Standard disclosures	Basic disclosures
Roles in football required to have enhanced disclosures with the appropriate barred list checks	Roles in football required to have enhanced disclosures	Roles in football eligible for standard disclosures	Roles in football eligible for basic disclosures
<p>Safeguarding Manager</p> <p>Designated Safeguarding Officer</p> <p>Assistant Safeguarding Officer</p> <p>Childcare Provider</p> <p>Academy Manager/Director/ Head of Youth Development.</p> <p>Football Team Manager U18's.</p> <p>U18 Football Coach.</p> <p>Coach working with Children and Adults at Risk.</p> <p>Sport scientists (Fitness Trainer, Nutritionist, Psychologist, Physiologist).</p> <p>Driver of a vehicle transporting children on behalf of Club/CCO</p> <p>Head of Education</p> <p>Tutors and assessors (FAL, BTEC Tutors, Functional Skills, NVQ assessors).</p> <p>Academy Steward.</p> <p>Staff accompanying U18 trips/tours/ tournaments.</p>	<p>Head of Recruitment/Player Liaison Officer/ Chief Scout.</p> <p>Academy performance/video analyst.</p> <p>Matchday coordinators.</p> <p>Driver of vehicle for transporting adults at risk.</p> <p>Charity Trustee</p> <p>Matchday regular Family area stewards.</p> <p>Club organised matchday away travel stewards.</p> <p>Matchday disabled area/support area stewards.</p> <p>Academy Directors/Board of Governors.</p> <p>Kit person/manager</p> <p>Furry mascot/character mascot</p>	<p>General Steward</p> <p>Steward Supervisors and managers.</p> <p>Matchday Search and Intervention Stewards</p>	<p>Chairman.</p> <p>Club Secretary.</p> <p>Finance Officer/CCO finance officer.</p> <p>Lead disclosure officers/verifiers/ counter signatories.</p> <p>Scout/Recruitment officer (child workforce).</p> <p>Academy/community/foundation administrator /</p> <p>Ticket office staff.</p> <p>Club shop staff/commercial team.</p> <p>Photographer</p> <p>Cleaning staff.</p>

Chaplain. Host family. Club doctor Physiotherapist. Sport psychologist. All other HCPC listed health care professionals. Community Coach (any sport CCO). Youth worker (CCO) NCS Activity Worker (CCO).			Maintenance staff. Video analyst Club/CCO Safeguarding Senior Manager (SSM). CCO NCS Salesforce User
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