

# THE HIVE SAFEGUARDING POLICY

Safeguarding policy to cover all Hive Companies (AHC) including Barnet FC, Barnet FC Academy, London Bees, London Bees Academy, The Hive Foundation, The Hive London

Updated May 2020

## Table of Contents

<b>Introduction .....</b>	<b>4</b>
Safeguarding Legislation & Guidance .....	4
Definitions .....	5
Scope .....	5
Policy Aims & Objectives.....	6
<b>Roles, Responsibilities &amp; Contact Details .....</b>	<b>6</b>
Board Member Responsible for Safeguarding AHC.....	7
Senior Safeguarding Manager.....	7
Designated Safeguarding Officers.....	8
<b>Good Practice Guidelines .....</b>	<b>11</b>
Ethical Work .....	12
Promoting Good Practice.....	12
Practices to be Avoided .....	13
Practices Never to be Sanctioned.....	13
Incidents to be Reported .....	13
<b>Human Resources &amp; Disclosure .....</b>	<b>14</b>
Disclosure & Barring Service (DBS) .....	14
Staff Training & Awareness.....	14
Work Experience .....	15
Contractors .....	15
Scouts .....	15
Service Level Agreements/Partnership Agreements.....	15
New Appointments.....	15
Equal Opportunities .....	16
Disqualification by Association .....	16
Ratios & Supervision of Children.....	16
Gifts & Favoritism .....	16
Disciplinary Procedures.....	17
Disciplinary Investigations & Hearings .....	19
Disciplinary Actions & Appeal .....	20
<b>Use of Photographic/Filming Equipment .....</b>	<b>22</b>

<b>Highlighting Concern</b> .....	<b>23</b>
<b>Recognition (Signs of Abuse)</b> .....	<b>23</b>
<b>Whistleblowing</b> .....	<b>24</b>
Safeguarding .....	25
Confidentiality.....	25
Raising a Concern or Making an Allegation .....	25
Anonymous Allegations .....	26
Untrue or Unproven Allegations .....	26
Investigation Process .....	26
Responding to Allegations or Suspicions .....	26
Actions if a Concern is Raised .....	27
Complaints & Appeals .....	27
<b>Information Sharing</b> .....	<b>28</b>
<b>Seeking Advice/Referral Flow Chat</b> .....	<b>31</b>
<b>Confidentiality</b> .....	<b>32</b>
Principles .....	32
Statistical Recording.....	32
Records.....	32
Breaches of Confidentiality .....	33
Legislative Framework .....	33
Non-Adherence .....	33
<b>Allegations of Historic Abuse</b> .....	<b>34</b>
<b>Anti-Bullying</b> .....	<b>34</b>
What is Bullying?.....	34
Cyberbullying .....	35
Peer on Peer Bullying.....	35
Why is it Important to Respond to Bullying? .....	35
Signs & Indicators.....	36
Procedures .....	37
Recommended Procedure for Reconciliation .....	38
In the Case of Adults Reported to be Bullying Anyone under 18 .....	38
<b>FGM</b> .....	<b>39</b>
<b>Radicalisation &amp; Extremism</b> .....	<b>39</b>
<b>Domestic Violence &amp; Abuse</b> .....	<b>40</b>
<b>Forced Marriage</b> .....	<b>41</b>



<b>Vulnerable Adults</b> .....	<b>41</b>
Four Additional Types of Harm .....	43
Who Might Abuse Adults? .....	43
Six Principles of Adult Safeguarding .....	44
<b>Barnet FC Academy</b> .....	<b>45</b>
Recruitment .....	45
Training .....	45
Transport.....	46
Gym Usage .....	47
Medical .....	47
Youth Loans, Trials & Work Experience .....	47
<b>The Hive Foundation (Bees in the Community)</b> .....	<b>49</b>
Code of Conduct (Staff).....	49
Code of Conduct (Participant/Player) .....	50
Code of Conduct (Parent/Carer/Spectator) .....	51
Respect .....	52
Abuse of Position of Trust.....	52
Children who may be Vulnerable .....	52
Parental Consent.....	53
Safer Recruitment (Staff) .....	54
Training (Staff).....	54
Safer Recruitment (Volunteers) .....	55
Training (Volunteers) .....	55
Risk Assessment .....	56
Activities of Disabled Persons & Adults at Risk .....	56
<b>Matchday</b> .....	<b>57</b>
Unaccompanied Children .....	57
Mascots & Ball Persons .....	57
<b>Other Useful Documents</b> .....	<b>58</b>

## Introduction

Barnet Football Club, Barnet Academy, London Bees, The Hive London and all its associated companies (from now on to be referred to as **AHC**) acknowledges and accepts it has a responsibility for the wellbeing and safety of all children, young people and vulnerable adults who are under the club's care or utilising the club's facilities. It is the duty of all staff working at the club to safeguard the welfare of children, young people and vulnerable adults by creating an environment that protects them from harm and by being aware and alert to safeguarding at all times.

The wellbeing of children, young people and vulnerable adults is paramount for all staff and accordingly, they must make themselves aware of the club's Safeguarding Policy. Where appropriate, the following guidelines will be supplemented by in-service training and additional guidance. **AHC** must ensure:

- The welfare of the child, young person and vulnerable adult is paramount, including and not limited to visitors, any player on trial or spectators, and the needs of disabled children, young person and adults who may be particularly vulnerable must be taken into account.
- All children, young people and vulnerable adults, whatever their age, culture, disability, gender, language, racial origin, religious beliefs and/or sexual identity have the right to protection from abuse.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- All **AHC** staff/volunteers have a responsibility to report concerns to their relevant Designated Safeguarding Officer(DSO).
- Staff/volunteers are not trained to deal with situations of abuse or to decide if abuse has occurred. However, they should be aware of their responsibility to report concerns if they arise.
- **AHC** staff/volunteers understand that **safeguarding is everyone's responsibility**.

## Safeguarding Legislation & Guidance

The following safeguarding legislation and guidance has been considered when drafting this policy:

- The Children Act 1989 and 2004
- The Safeguarding Vulnerable Groups Act 2006
- Working Together to Safeguarding Children 2015
- Keeping Children Safe in Education 2016
- What to do if you're worried a child is being abused 2015
- Safeguarding our Children – 4LSCB Safeguarding Procedures (2007)
- Harrow Council – Safeguarding Children Policy (2014)
- The Prevent Duty – Departmental for Education advice for schools and childcare providers (June 2015)
- Safeguarding Children Who May Have Been Trafficked Guidance (2011)

## Definitions

- A child is anyone who has not yet reached their 18th birthday. 'Children' therefore means 'children and young people' throughout. The fact that a child has reached 16 years of age, is living independently or is in further education, is a member of the armed forces, is in hospital or in custody in a secure estate for children and young people, does not change his or her status or entitlement to services or protection (Working Together to Safeguard Children 2013).
- This document uses the term 'young person' to refer to participants aged between fourteen and eighteen years old.
- The term 'vulnerable adult' is not based on age or disability. For example, there is no age when a person should be classified as a vulnerable adult, nor should all those with a physical or other disability be classed as vulnerable. Moreover, some other people might go through periods of being vulnerable when they are emotionally low or distressed. It is essential that those working with such people recognise this vulnerability and ensure that it is not exploited.
- An "Activity" means any activity or series of activities arranged for a child or children by or in the name of a club. These are deemed to be regulated and therefore activate the required levels of Criminal Record Check that are associated.
- The Term "Abuse" A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults, or another child or children.

## Scope

This policy is for use across the **AHC** and has been adopted by senior executives and management of the club including its trustees. **AHC** are committed to prioritising safeguarding at a strategic level to ensure best practice in safeguarding is promoted and adhered to.

All safeguarding information is stored and retained in line with the Club's Data Protection Policy. This includes guidance for data storage under the General Data Protection Regulation.

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

- The Hive Foundation including all activities on external and The Hive sites
- Barnet FC First Team and Academy;
- London Bees;
- The Hive London;
- Barnet FC Academy Scholars and Pre-Academy;
- The Hive London Club Shop;
- Stadium Tours, Match Day, Stewarding and all other activities on match days and roles that come in to contact with children and young people;
- Travel, Events and Support Liaison;
- Other Club related entities/activities undertaken outside of the UK.

**AHC** recognises that all children, young people and vulnerable adults have a right to feel secure and cannot learn effectively unless they do so. Parents, carers and other people can harm children either by direct acts or failure to provide proper care or both. Children may suffer neglect; emotional, physical or sexual abuse or a combination of such types of abuse. All children, young people and vulnerable adults have a right to be protected from abuse. Whilst the **AHC** will work openly with parents as far as possible, **AHC** reserves the right to contact Local Authority Social Care or the Police, without notifying parents/ carers, if this is in the child's, young person or vulnerable adult's best interests.

**AHC** does not operate in isolation. The welfare of children, young people and vulnerable adults is a corporate responsibility of the entire local authority, Local FA and Football League working in partnership with other public agencies, the voluntary sector and service users and carers. Our Policy will be shared with all partners and external organisations that we make work with or in conjunction with.

This policy which is available on Barnet FC website and is available to staff on the **AHC** joint network.

### **Policy Aims & Objectives**

The aims of **AHC's** Safeguarding policy is to promote good practice and;

- Provide children, young people and vulnerable adults with appropriate safety and protection whilst in the care of **AHC**.
- Allow all staff, trustees, board members and volunteers to make informed and confident responses to specific safeguarding issues.
- Provide all staff, trustees, board members and volunteers a clear understanding that Safeguarding is our responsibility.

The objective of this policy is to ensure that all children, young people and vulnerable adults, are protected from any harm, abuse or exploitation. We will achieve this by following the guidance within this policy and core legislation this policy has been based upon.

### **Roles, Responsibilities & Contact Details**

All staff and volunteers within the **AHC** have a safeguarding responsibility, and need to understand their role within the organisation.

### **Board Member Responsible of Safeguarding AHC**

The Board member responsible for safeguarding is the strategic lead and will work closely alongside the DSO to support them in safeguarding and child protection matters within the organisation.

Our Board member is:

- Graham Slyper
- [gslyper@barnetfc.com](mailto:gslyper@barnetfc.com)

The board member's role includes:

- Overseeing the preparation and implementation of the safeguarding policy and ensuring that it is reviewed on an annual basis, and that the policies and procedures are followed.
- Identifying a budget to ensure continual staff development is possible.
- Reviewing safeguarding incidents post resolution to review staff responses and implement any changes or extra training that may be required.
- Meeting regularly with all the club safeguarding leads to offer support and advice with all safeguarding matters.
- If required, reporting any concerns to Children's Services or the police(urgent concerns must be reported immediately even if the DSO is not available).
- The designated safeguarding officer(DSO) has a specific responsibility for safeguarding and child protection matters within the organisation

### **Senior Safeguarding Manger**

Our senior safeguarding manager is:

- Matthew Dixon
- 020-8381-3800 (Ext. 1040) / [mdixon@thehivelondon.com](mailto:mdixon@thehivelondon.com)

The senior safeguarding manager duties include:

- Directly supervising the club DSO's day to day activity and providing support in all matters.
- Overseeing the preparation and implementation of the safeguarding policy and ensuring that it is reviewed annually, and that the policies and procedures are followed.
- Keeping up to date on own CPD in relation to safeguarding issues.
- Acting as a source of advice on all child protection matters within their organisation and seeking further advice and guidance from other agencies as needed e.g. The FA or Local Authority.
- Speaking to parents about concerns if and when appropriate.
- Ensuring that confidential records are kept of any concerns about a child or young person, and recording any conversations, referrals to statutory agencies or actions taken.
- Ensuring that any such records are kept safely and securely and only shared with people on a need to know basis.



- Making sure that staff/volunteers receive adequate child protection induction and ongoing training.
- Ensuring that all staff and volunteers have up to date DBS checks.
- Promoting the needs of children and young people in the workplace and keeping the staff and volunteers informed on good practice, through staff meetings, 1-1 meetings and yearly appraisals.
- Liaising with the Council and other Child Protection agencies (i.e. Police) and making referrals when safeguarding thresholds have been met.
- Reporting any concerns to Children's Services or the police (urgent concerns must be reported immediately even if the DSO is not available).
- Acting as the lead person in circumstances where an allegation has been made against a member of staff/volunteer within **AHC**, and meet statutory requirements as laid out in Working Together to Safeguard Children 2015 to report such allegations to the Designated Officer for the Local Authority within 48 hrs.
- Attending meetings following disclosures or investigations, including case conferences, and producing reports if required.

### **Designated Safeguarding Officers**

Our Designated Safeguarding Officers are:

- Sian Osmond(The Hive Foundation/London Bees)
- 020-8381-3800 (Ext. 1042)
- [sosmond@thehivefoundation.com](mailto:sosmond@thehivefoundation.com)
- James O'Dowd(Barnet FC Academy)
- 07946534294
- [jodowd@canons.harrow.sch.uk](mailto:jodowd@canons.harrow.sch.uk)
- Andrew Wigley(Barnet FC/Matchday)
- 020-8381-3800 (Ext. 1800)
- [awigley@thehivelondon.com](mailto:awigley@thehivelondon.com)
- Andreas Georgiou(The Hive London)
- 020-8381-3800 (Ext. 1011)
- [ageorgiou@thehivelondon.com](mailto:ageorgiou@thehivelondon.com)
- Judith Bruni(London Bees Academy)
- 07912435256
- [judith\\_bruni88@yahoo.co.uk](mailto:judith_bruni88@yahoo.co.uk)

The Designated Safeguarding Officers roles include:

- Overseeing the preparation and implementation of the safeguarding policy and ensuring that it is reviewed annually, and that the policies and procedures are followed.
- Keeping up to date on own CPD in relation to safeguarding issues.

- Acting as a source of advice on all child protection matters within their organisation and seeking further advice and guidance from other agencies as needed e.g. The FA or Local Authority.
- Speaking to parents about concerns if and when appropriate.
- Ensuring that confidential records are kept of any concerns about a child or young person, and recording any conversations, referrals to statutory agencies or actions taken.
- Ensuring that any such records are kept safely and securely and only shared with people on a need to know basis.
- Making sure that staff/volunteers receive adequate child protection induction and ongoing training.
- Ensuring that all staff and volunteers have up to date DBS checks.
- Promoting the needs of children and young people in the workplace and keeping the staff and volunteers informed on good practice, through staff meetings, 1-1 meetings and yearly appraisals.
- Liaising with the Council and other Child Protection agencies (i.e. Police) and making referrals when safeguarding thresholds have been met.
- Reporting any concerns to Children’s Services or the police (urgent concerns must be reported immediately even if the DSO is not available).
- Acting as the lead person in circumstances where an allegation has been made against a member of staff/volunteer within **AHC**, and meet statutory requirements as laid out in Working Together to Safeguard Children 2015 to report such allegations to the Designated Officer for the Local Authority within 48 hrs.
- Attending meetings following disclosures or investigations, including case conferences, and producing reports if required.
- Being available!

Graham Slyper - Board Member Responsible of Safeguarding

Matthew Dixon – Senior Safeguarding Manager

Designated Safeguarding Officers

Sian Osmond  
Foundation/London  
Bees

James O’Dowd  
Barnet FC  
Academy

Andrew Wigley  
Barnet  
FC/Matchday

Andreas Georgiou  
The Hive London

Judith Bruni  
London Bees  
Academy

All staff/volunteers – report to the relevant  
department’s DSO



If you have any other concerns about a child, young person or vulnerable adult and are unable to contact your club officers. Or if you are unhappy with the action taken by them, you can report your concern to:

Middlesex FA County Welfare Officer (CWO)

- Sharon Porter
- 020-8515-6909 / [sharon.porter@middlesexfa.com](mailto:sharon.porter@middlesexfa.com)

Premier League Head of Safeguarding

- Jess Addicott
- [safeguarding@premierleague.com](mailto:safeguarding@premierleague.com)

The Football Association Head of Safeguarding

- Sue Law
- [Sue.law@thefa.com](mailto:Sue.law@thefa.com) / [safeguarding@thefa.com](mailto:safeguarding@thefa.com)

The Football League Child Protection Advisor

- Debbie Treadell
- 01772-325800 / [dtreadell@efl.com](mailto:dtreadell@efl.com)

Harrow Council's Children's Access Team (Safeguarding & Child Protection Unit)

- Golden Number: 020-8901-2690
- Out of Hours: 020-8424-0999

Harrow Council (LADO)

- Janice Miller
- 020-8736-6435 (Monday, Tuesday & Friday) / [Janice.Miller@harrow.gov.uk](mailto:Janice.Miller@harrow.gov.uk)

Harrow Council Safeguarding Adults Services

- Civic Centre, Harrow, HA1 2XY
- 020-8420-9453 / 020-8416-8269 / [safeguardingadults@harrow.gov.uk](mailto:safeguardingadults@harrow.gov.uk)

Barnet Council's Multi-Agency Safeguarding Hub (Safeguarding & Child Protection Unit)

- MASH London Borough of Barnet, North London Business Park, Oakleigh Road South, London, N11 1NP
- 020-8359-4066 / 0871-594-8766(Fax) / [mash@barnet.gov.uk](mailto:mash@barnet.gov.uk)
- Emergency Contact: 020-8359-2000

### Barnet Safeguarding Adults Lead

- Sue Smith
- 020-8359-6015 / [sue.smith@barnet.gov.uk](mailto:sue.smith@barnet.gov.uk)

### Additional Contacts

- The NSPCC Helpline: 0808-800-5000
- Childline: 0800-1111
- Police (Emergency): 999
- Police (Non-Emergency): 101

### Good Practice Guidelines

All personnel should be encouraged to demonstrate exemplary behavior in order to protect themselves from false allegations. The following are examples of how to create a positive culture and climate. Good practice means:

- Always working in an open environment (e.g. avoiding private or unobserved situations and encouraging open communication with no secrets).
- Treating everyone equally, and with respect and dignity.
- Always putting the welfare of everyone first, before winning or achieving goals.
- Maintaining a safe and appropriate distance with players (e.g. it is not appropriate for coaches or other volunteers to have an intimate relationship with a player (or to share a room with them)).
- Building balanced relationships based on mutual trust which empowers children, young people and vulnerable adults to share in the decision-making process.
- Making sport fun, enjoyable and promoting fair play.
- Ensuring that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the Coach Education Programme. Care is needed, as it is difficult to maintain hand positions when the child is constantly moving. Young people should always be consulted and their agreement gained. Some parents are becoming increasingly sensitive about manual support and their views should always be carefully considered.
- Keeping up to date with technical skills and qualifications in sport.
- Involving parents/carers wherever possible. If groups have to be supervised in the changing rooms, always ensure coaches or officials work in pairs or on a one to one basis.
- Ensuring that at tournaments or residential events, adults should not enter children's, young people and vulnerable adults' rooms, on a one to one basis, or invite children, young people and vulnerable adults into their rooms.
- Being an excellent role model in the company of young people.
- Giving enthusiastic and constructive feedback rather than negative criticism.

- Recognising the developmental needs and capacity of young people avoiding excessive training or competition and not pushing them against their will.
- Securing parental consent in writing to act in loco parentis, if the need arises to administer emergency first aid and/or other medical treatment.
- Appointed medical personnel keep a written record of any injury that occurs, along with the details of any treatment given.
- Requesting written parental consent if club officials or volunteers are required to transport young people in cars.

### **Ethical Work**

**AHC** actively promotes and supports ethics in sport, where ethics can be defined as the application of moral rules, principles, values and norms. In line with the policy of the Football Association Club practices the following core values within delivering football opportunities:

- Fairness
- Integrity
- Respect
- Equality

Every member within AHC, whether as players, staff, officials, coaches, trustees, volunteers or supporters must take personal responsibility for ensuring that football activities are fun and fair for all. If we fail to do so, we will all suffer. To help you to tackle these problems in a coordinated and proactive way, the safeguarding policy addresses the most important ethical issues. Please take the time to read it carefully and consider what it means.

### **Promoting Good Practice**

Abuse can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgment about the appropriate action to take.

Abuse can occur within many situations including the home, school and the sporting environment. Some individuals will actively seek employment or voluntary work with children, young people or vulnerable adults in order to harm them. A coach, instructor, teacher, official or volunteer will have regular contact with young people and be an important link in identifying cases where they need protection.

All suspicious cases of poor practice should be reported following the guidelines in this document. When an individual enters the club having been subjected to abuse outside the sporting environment, sport can play a crucial role in improving the child's self-esteem. In such instances the club must work with the appropriate agencies to ensure the child receives the required support.

### **Practices to be Avoided**

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable, it should be with the full knowledge and consent of someone in charge at the club or the child's parents. For example, a child sustains an injury and needs to go to hospital, or a parent fails to arrive to pick a child up at the end of a session:

- Avoid spending time alone with children, young people and vulnerable adults away from others.
- Avoid taking or dropping off a child, young person or vulnerable adult to an event.

### **Practices Never to be Sanctioned**

The following should never be sanctioned. You should never:

- Engage in rough, physical or sexually provocative games, including horseplay.
- Share a room with a child, young person or vulnerable adult for example when on a touring trip.
- Allow or engage in any form of inappropriate touching.
- Allow children, young people and vulnerable adults to use inappropriate language unchallenged.
- Make sexually suggestive comments to a child, young people and vulnerable adults, even in fun.
- Reduce a child, young person or vulnerable adult to tears as a form of control.
- Allow allegations made by a child, young person or vulnerable adult to go unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for children, young people and vulnerable adults, which they can do for themselves.
- Invite or allow children, young people and vulnerable adults to stay with you at your home unsupervised.

### **Incidents to be Reported**

If any of the following occur, you should report this immediately to the relevant DSO. You should also ensure the parents/career of the child, young people and vulnerable adults are informed:

- If you accidentally hurt a child, young people or vulnerable adult.
- If the child, young people or vulnerable adult seems unduly distressed in any manner.
- If a child, young people or vulnerable adult appears to be sexually aroused by your actions.
- If a child, young people or vulnerable adult misunderstands or misinterprets something you have done.
- Use of photographic/filming equipment at training and games by any other persons than those appointed and approved by **AHC**.
- The Football Association has issued detailed guidance on this issue and reference should be made to the FA web site for more information.



## **Human Resources & Disclosure**

### **Disclosure & Barring Service (DBS)**

The Disclosure and Barring Service (DBS) helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaced the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA) in December 2012.

The DBS is responsible for:

- Processing requests for criminal records checks (DBS checks, formerly CRB checks)
- Deciding whether it is appropriate for a person to be placed on or removed from a barred list (that is a list of people who are barred from working with children or/and vulnerable adults because they pose too great a risk to them)
- Placing or removing people from the DBS children's barred list and adults' barred list for England, Wales and Northern Ireland Criminal Record Checking:

Under the Rehabilitation of Offenders Act 1974, a person with a criminal record is not required to disclose any spent convictions unless the position they are applying for, or are currently undertaking, is listed as an exception under the act (Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975).

Where an exception to the Rehabilitation of Offenders Act exists, the post/role is eligible for Disclosure and Barring Service (DBS) checks containing individual's full criminal record, including spent cautions and convictions.

The minimum age at which someone can be asked to apply for a DBS check is 16 years old.

As part of **AHC's** recruitment and selection process, offers of work for positions which involve working with Children are subject to a satisfactory Disclosure & Barring Service (DBS) Criminal Records Check (CRC) at the level deemed suitable for the position offered and subject to appropriate references.

### **Staff Training & Awareness**

A staff briefing note giving guidance to Club employees and casual workers who come into contact with Children is provided at induction and also available on the Clubs Company Hard Drive. The SSM holds a specific Safeguarding & Safer Working Practice Induction with all new fixed-term, permanent starters and volunteers during which the staff briefing note and key elements of the Club's Safeguarding Children Policy are discussed in more detail and specifically to the individuals' role.

All staff working in direct contact with Children are required to complete the FA's 3 hour Safeguarding Children Awareness workshop and undertake a refresher course, as advised by the FA, at least once every 3 years. Details of those satisfactorily completing this course are retained by the Human Resources Department.

A continual Programme of Safeguarding Awareness courses are also provided by the Club to develop knowledge which are department specific.

## **Work Experience**

**AHC** may from time to time offer work experience placements to young people. The Club has a work experience scheme which provides forwardly planned and structured work experience placements. Whilst undertaking work for the Club, those on work experience will not have unsupervised access to Children.

## **Contractors**

All external contractors engaged by **AHC** undergo a suitability test prior to commencing work. This will include evidencing the contractor's Safety Record, Safety Policy, Liability Insurance, Risk Assessment/Method Statement and details of Competent Person. On arrival at the Club the contractor will receive a site induction from a member of the Maintenance team which covers Safeguarding Children and give details of the Club's expected code of behavior. Contractors are subject to regular inspection from Club personnel. In the event of a Contractor carrying out work on an area that is usually occupied by Children, this work, where possible, will be undertaken when Children are not present.

## **Scouts**

All Scouts undertaking work for the Club are registered with the Football League. Those scouts who are engaged in identifying players under the age of 18 also undergo a DBS check and are required to undertake the FA 3 hour Safeguarding Children Workshop.

References are sought for all Scouts and, on registration, Scouts identifying players under the age of 18 are issued with a copy of the Premier League's Premier Practice booklet on Player Recruitment, a Club Code of Conduct and the Club's Safeguarding Children Policy.

## **Service Level Agreements/Partnership Agreements**

**AHC** commitment to Safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any service provider or for commissioned services insofar as those services relate to Children.

## **New Appointments**

All staff who are offered a position which involves working with Children will be required to complete a Self-Declaration Form and also undertake an Enhanced DBS check with a barred list check where appropriate. All offers of work are subject to the outcome of the screening process and where applicable, this is set out in the initial job advertisement and the applicant's offer of work. Until such time as a satisfactory DBS check has been received, the member of staff will not be permitted to work with Children.

**AHC** are committed to providing equal opportunities to staff and therefore a positive DBS check will not necessarily result in a bar from work.



Should a positive DBS check be received, a risk assessment will be carried out by the Senior Safeguarding Manager and, where applicable the department Safeguarding Officer, to assess the information contained within the DBS check. The member of staff may also be asked to attend an interview prior to a recruitment decision being made. The rehabilitation of offender's act and protection of freedoms Act should be considered in all cases before a final decision is made.

### **Equal Opportunities**

**AHC** is committed to providing equal opportunities for all staff, players and supporters. A copy of the Club's policy on equal opportunities can be obtained from the Human Resources department.

### **Disqualification by Association**

**AHC** works in accordance to guidance set out by The Childcare (Disqualification) Regulations 2009 ("the 2009 Regulations") are made under section 75 of the Childcare Act 2006 ("the 2006 Act") and set out the circumstances in which an individual will be disqualified for the purposes of section 75 of the Act. Disqualification by Association dictates that **AHC** as an employer would be unable to offer employment to those living in the same household where another person who is disqualified lives or is employed (disqualification 'by association') as specified in regulation 9 of the 2009 Regulations. Also failure to disclose this information can result in employment being withdrawn or terminated.

### **Ratios & Supervision of Children**

Any activity undertaken by the Club will always give full consideration to the appropriate number of staff members available depending on the age of the Children involved, the degree of risk the activity involves, and whether there are any additional disability needs. The lower the age of the participants, the greater the need for supervision:

- Children under 5, the recommended ratio should be no more than 1:6.
- Children under 8, the recommended ratio should be no more than 1:12.
- Children over 8, the recommend ratio should be no more than 1:16, but this can vary dependent upon the activity.

Where the Club is taking responsibility for the care of the Children, parents/carers should not be included in supervision calculations.

### **Gifts & Favoritism**

Staff should take care that they do not accept any gift that might be construed as a bribe by others, or lead the giver to expect preferential treatment. **AHC** recognises that there are occasions when Children or parents wish to pass small tokens of appreciation to staff, for example at Christmas or as a "thank you", and this is acceptable. However, it is unacceptable to receive gifts on a regular basis or of any significant value as this may be misinterpreted by others. Staff should report any gifts received to their line manager.

Similarly, it is not permitted for staff to give personal gifts to Children. This could be misinterpreted as a gesture either to bribe, or to single out the Child. It might also be perceived that a “favour” of some kind is expected in return. Any reward given to a Child must first be agreed with the staff member’s line manager as part of a structured reward system in line with the departmental policy and not based on favoritism. It should be noted that these guidelines are in addition to employees’ obligations under the Club’s Ethics in Business Policy.

### **Disciplinary Procedures**

All organisations need a minimum number of rules and procedures in order to protect the interests of both the employer and the employee and also the interests of others who come into contact with our organisation.

The rules that we have set out specify standards of performance and behaviour and the procedures referred to in this section are intended to promote consistency and fairness. The purpose of our rules and procedures is to emphasise and encourage improvement in conduct and performance and is not necessarily to be construed as punitive action. Accordingly, every effort is made to ensure that when action is taken under the disciplinary procedure that action is fair and reasonable and that you are given every opportunity to present your case and that there is a right of appeal against any disciplinary decision which is considered to be either unfair or unjust.

The following rules and procedures that are set out are intended to ensure:-

that disciplinary action when taken is taken quickly, fairly and in a uniform and consistent manner;

that you will only be subjected to disciplinary action once there has been a full investigation of all of the facts and you have had an opportunity to present your side of the case. If you are disciplined, you will receive a clear explanation of both the decision reached and any penalty imposed and of the right to appeal against the decision and/or penalty.

It is not practical to set out all the instances of conduct or performance which may lead to disciplinary action. However the disciplinary procedure may be invoked as a result of:-

any failure to observe the rules set out in this Handbook or in any other part of your Contract of Employment/Principal Statement of Terms and Conditions of Service.

any other instance of conduct or performance, which we believe could only properly be dealt with under the disciplinary procedure.

It is impossible to produce an exhaustive list of all instances of misconduct or performance giving rise to disciplinary action, and it is also impractical to state which category of discipline will be applied to any given degree of behaviour or performance. Other than for a probationary termination, or a Gross Misconduct issue, it is unlikely that dismissal would be the first course of action taken. However, conduct or performance which proves to be unacceptable will fall into one of the undernoted four categories.

Unsatisfactory Conduct, Misconduct, Serious Misconduct or Gross Misconduct.

## Informal Counselling

Where a breach of conduct or performance is not regarded as being particularly serious and is shown to have been caused by capability, competence or behaviour of an employee, we may deal with this matter informally in the first instance and give an opportunity for improvement, if necessary with training, rather than to revert to the formal disciplinary procedure. Any decision to proceed in this way however is a matter for our discretion and will depend entirely on the circumstances of each case.

## Unsatisfactory Conduct

Any minor breach of the rules and regulations will fall into the category of unsatisfactory conduct. If it is considered sufficiently serious to warrant disciplinary action then it is likely that if this is the first instance of such a minor misdemeanour the disciplinary consequence will be a verbal warning. In dealing with unsatisfactory conduct it is the standard of conduct or indeed performance which is being considered and not necessarily a repetition of an earlier misdemeanour.

## Misconduct

Disciplinary action may be taken where there is continued repetition of action which has resulted in a previous verbal warning for unsatisfactory conduct and there has been no improvement or there has been continued breach. It may well be however that the misconduct in question may be sufficiently serious to warrant an immediate written warning without there having been a previous verbal warning issued.

## Serious Misconduct

Serious misconduct or a serious shortfall in performance may in themselves require a final written warning to be issued irrespective of whether previous warnings have been given. A first and final written warning may be issued where it is considered that conduct or performance is not sufficiently serious to warrant dismissal but nevertheless is considerably more serious than the action which would normally have warranted a written warning for misconduct.

There will be occasions when you have received a combination of either verbal and/or written warnings in respect of your conduct or performance and there has still been no marked improvement or there has been repetition of the action for which the previous warnings have been given. Consequently, if you have previously been given a written warning in relation to your conduct or performance and there has been no improvement or there has been a repetition of the misconduct then the next disciplinary punishment will usually be a final written warning for serious misconduct.

Please note that following the issue of a final written warning any further repetition or further breach in relation to conduct or performance will usually result in dismissal with contractual notice, after a disciplinary hearing.

## Gross Misconduct

Certain aspects of behaviour, conduct and performance, will be construed as gross misconduct and this term as the name implies involves conduct which is particularly serious in itself or in its consequences. In such cases it is considered inappropriate to allow you to continue at work and the only proper penalty would be summary dismissal which means summary dismissal after a disciplinary hearing with the forfeiture of any right to notice of termination, or payment in lieu of notice.

WE DEAL WITH EVERY CASE ENTIRELY ON ITS MERITS AND UNDERTAKE THAT WE WILL ALWAYS SEEK TO CONDUCT THE DISCIPLINARY PROCEDURE REASONABLY, FAIRLY AND CONSISTENTLY.

## Disciplinary Investigations & Hearings

When a matter arises which we consider can be properly dealt with on an informal basis this would be our preferred approach. This is particularly the case where a matter relating to your abilities arises and which we believe can be resolved by discussion, training or counselling. However if there is no improvement after a suitable period of time has been allowed or training undertaken, the matter may have to be dealt with more formally.

In the event of a matter arising where it is considered necessary to invoke the disciplinary procedure, we will first seek to establish the true facts of the case and this will be done before memories and recollections fade. Other employees who may be involved in this investigation will be required to cooperate fully with the procedure.

On certain occasions it may be considered prudent or necessary to suspend you with pay pending the conclusion of any investigation and subsequent hearing. Further clauses within this section will indicate the level of authority vested in management levels within the business. It must be noted that suspension with pay is not in itself disciplinary action, and is only seen as a temporary measure intended to assist in the proper conduct of the disciplinary process and is not a pre-judgement of that process. The authority to suspend with pay is vested in the senior management team.

If, following initial investigation, it is considered that there is a case to answer then a disciplinary hearing will be established as soon as possible and you will be informed in writing of the reasons for the disciplinary hearing and the date and time of the hearing. It should be noted at that hearing you may be accompanied by a fellow employee of your own choice, or a Trade Union representative. We do not consider that legal representation, or representation by an external body, or person, is either appropriate or necessary in what essentially is an internal matter. This restriction would apply to both sides.

The nature of the disciplinary matter will be explained to you in as much detail as is possible and you will have every opportunity to present your case in full, to call any witnesses you would feel appropriate and to present any written evidence. If you require further time to prepare your case we may postpone the hearing until a later date but normally only one

adjournment will be granted. If your version of events so requires we will undertake such further investigations as may be considered appropriate in order to establish the credibility of your explanation and the result of these investigations will be put to you before any final decision is made.

At the conclusion of the hearing if you accept that the matters raised against you are correct or if a decision is made against you, then before any penalty is imposed we will give you an opportunity to put forward any mitigating circumstances you feel may be relevant.

At that time there will be a verbal explanation of the decision and this will then be confirmed in writing to you. Your right to appeal against either the findings and/or the penalty to be imposed will also be explained to you verbally and in writing.

### **Disciplinary Actions & Appeal**

#### **Dismissal**

Contractual dismissal for misconduct will result in the termination of employment with notice or payment in lieu of notice.

Dismissal for gross misconduct offences will result in summary termination without notice, or payment in lieu of notice.

#### **Warnings**

All warnings, including verbal warnings, will be confirmed in writing and will be sent to you and recorded on your file and will contain details of all matters raised during the disciplinary hearing, a summary of all interviews, and your explanations and the final conclusions reached.

Warnings for matters connected with capability or performance will indicate a period of time for improvement and may contain certain recommendations for further training or counselling. Warnings for conduct may require that there is either immediate improvement and/or that there is no repetition of the offence.

Any further disciplinary process which takes place after a previous warning is likely to result in a more serious penalty being imposed, even if the second offence is of a different nature to the previous one, particularly where there is evidence that the first warning has not been heeded.

Warnings will include confirmation of your right of appeal.

#### **Verbal Warnings**

A verbal warning will be disregarded after a 6 month period.

### Written Warnings

A written warning will be disregarded after a 12 month period.

### Final Written Warnings

A final written warning will be disregarded after a 12 month period.

We reserve the right to increase the above periods if the offence committed is particularly serious or if it is an offence which might be repeated periodically.

At the end of a disciplinary hearing, you will be informed both verbally and in writing of your right of appeal, including the name of the person to whom your appeal should be made.

If you decide to appeal, you must give written Notice of Appeal to the nominated person. The notice must be received within 5 working days from the day on which you received the written confirmation of the disciplinary hearing decision.

The Notice of Appeal must state whether you are appealing against the conduct of the disciplinary hearing, its finding, the penalties imposed, or a combination of these factors and the supporting reasons for your appeal.

Our aim in providing an appeal system is to ensure that you have the facility for a complete re-appraisal of the facts and procedures and to reconsider the soundness of the earlier decision.

The Appeal Hearing will be conducted by a person who has previously not been involved in the disciplinary process, so that the original disciplinary hearing can be examined to establish whether the hearing was a full and thorough airing and examination of all the facts/evidence, proper procedures were observed, the findings were fair and reasonable and the penalty imposed properly reflected the gravity of the offence and any mitigating factors were fully considered.

The format of an Appeal Hearing, will be an opportunity for you to present your supporting reasons as to why you believe the disciplinary action taken is either unfair, or too harsh. You may submit any appropriate evidence and call any appropriate witness on your behalf.

At an Appeal Hearing you are again entitled to be accompanied by a work colleague of your choice, or a Trade Union representative. Legal representation will not be recognised.

The findings, decision and outcome of the Appeal Hearing, will be confirmed to you in writing.

## **Use of Photographic/Filming Equipment**

The Club takes its guidance on the use of images from guidelines issued by the FA and Premier League. All images are taken by Club officials who have been briefed by the member of staff (and where possible a Club Safeguarding Officer) responsible for the activity being photographed/filmed.

- Before taking images of Children, parental consent is sought in writing at the start of each football season, session or prior to the event. Parents/Legal Guardians are responsible for informing the Club of any change of circumstances within the season which may affect consent.
- Parents/Legal Guardians will be informed of how the image will be used. The Club will not allow an image to be used for something other than that for which it was initially agreed.
- All Children featured in Club publications will be appropriately dressed.
- Where possible, the image will focus on the activity taking place and not a specific Child.
- Where appropriate, images represent the broad range of people participating safely in the event.
- Designated Club photographers will, where applicable, undertake a DBS and attend a Safeguarding Children workshop and in any case will be personally responsible for keeping up to date with the latest guidelines on the Use of Images policies issued by the Club and by the Premier League from time to time. Club Identification will be worn at all times.
- Children who are subject to family, care or legal proceedings, or who are under a court order will not have their images published in any Club document.
- No images of Children featured in Club publications will be accompanied by personal details such as their school or home address.
- Recordings of Children for the purposes of legitimate coaching aids are only filmed by Club officials and are stored safely and securely at the Club's premises.
- Any instances of inappropriate images in football should be reported to the Club's Safeguarding Manager immediately.
- The Club does not put young player profiles with images and personal information on its website.

There is evidence that some people have used sporting events as an opportunity to take inappropriate photographs or film footage of young or disabled sportspeople in vulnerable positions. All clubs should be vigilant and any concerns should be reported to the club child protection officer.

Videoing as a coaching aid: there is no intention to prevent club coaches and teachers using video equipment as a legitimate coaching aid. However, performers and their parents/carers should be made aware that this is part of the coaching programme and give their permission, and such films should be stored securely.

The Football Association has issued detailed guidance on this issue and reference should be made to the FA web site for more information.

### **Highlighting Concern**

Although **AHC** is committed to doing the utmost to safeguard Children, young people and vulnerable adults from harm there may be occasions when concern is raised over the treatment of a Child young person or vulnerable adult.

“Abuse” and “neglect” are generic terms encompassing all ill treatment of Children, young people and vulnerable adults as well as cases where the standard of care does not adequately support the Child, young person or vulnerable adult health or development. Children, young people and vulnerable adults may be abused or suffer neglect through the infliction of harm, or through the failure to act to prevent harm. Abuse can occur in a family or an institutional or community setting. The perpetrator may or may not be known to the Child, young person or vulnerable adult and may be of the same or opposite sex. There is often a common misconception that only a certain type of person can abuse Children but this is simply not the case – abuse can take place in any setting, by someone of either sex, of any sexual orientation and of any age.

### **Recognition (Signs of Abuse)**

There are five main forms of abuse identified as follows, should you have any concern that abuse is occurring you should contact the SM or a Safeguarding Officer immediately.

**Physical Abuse:** Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a Child, young person or vulnerable adult. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a Child, young person or vulnerable adult. A person might do this because they enjoy or need the attention, they get through having a sick Child, young person or vulnerable adult. Physical abuse can be caused through omission or the failure to act to protect.

**Sexual Abuse:** Sexual abuse involves forcing or enticing a Child, young person or vulnerable adult to take part in sexual activities, not necessarily involving a high level of violence, whether or not the Child, young person or vulnerable adult is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving Children, young people and vulnerable adults in looking at, or in the production of, sexual images, watching sexual activities, encouraging Children, young people and vulnerable adults to behave in sexually inappropriate ways, or grooming a Child, young person or vulnerable adult in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other Children, young people and vulnerable adults.

**Neglect:** Neglect is the persistent failure to meet a Child, young person or vulnerable adult’s basic physical and/or psychological need, likely to result in the serious impairment of the Child, young person or vulnerable adult’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a Child, young person or vulnerable adult is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion



from home or abandonment); protect a Child, young person or vulnerable adult from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a Child, young person or vulnerable adult's basic emotional need.

**Emotional Abuse:** Emotional abuse is the persistent emotional maltreatment of a Child, young person or vulnerable adult such as to cause severe and persistent adverse effects on the Child, young person or vulnerable adult's emotional development. It may involve conveying to Children, young people and vulnerable adults that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the Child, young person or vulnerable adult 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, young people and vulnerable adults. These may include interactions that are beyond the Child, young person or vulnerable adult's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the Child, young person or vulnerable adult participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing Children, young people and vulnerable adults frequently to feel frightened or in danger, or the exploitation or corruption of Children, young people and vulnerable adults. Some level of emotional abuse is involved in all types of maltreatment of a Child, young person or vulnerable adult, though it may occur alone.

**Bullying:** Bullying is not always easy to define and can occur in many forms. The three main types are: physical, verbal and emotional.

**AHC** has a zero-tolerance approach to bullying and any reported incidents of bullying by a staff member to a Child, young person or vulnerable adult, Child, young person or vulnerable adult to staff member or Child, young person or vulnerable adult to Child, young person or vulnerable adult will be taken seriously and investigated by a DSO. Refer to the below for separate Anti-Bullying policy which is issued to parents, players and coaches.

All staff members who undergo the FA's 3-hour Safeguarding Children Workshop receive bullying awareness training as part of the workshop as well as attending a Safer Working Practice workshop facilitated by the Safeguarding Manager.

For more detailed information on the five main forms of abuse, reference should be made to the Football Association's Safeguarding Children Policy and Procedures, which can be found on [www.thefa.com](http://www.thefa.com).

### **Whistleblowing**

It is often the case that players, coaches, officials, parents or team followers are the first to realise that a child's safety and welfare are under threat. However, they may not express their concerns because they feel that speaking up would be too difficult to handle. It may also be that they fear harassment or victimisation.

In these circumstances, it may be easier for them to ignore the concern rather than report what may just be a suspicion of poor practice. **AHC** urges anyone to come forward and voice those concerns,

and commits to matters of concern being raised without fear of victimisation, subsequent discrimination or disadvantage.

The following is intended to encourage and enable individuals to raise serious concerns within **AHC** rather than overlooking a problem or blowing the whistle outside. It is in the interest of all concerned that disclosure of potential abuse or irregularities are dealt with properly, quickly and discreetly. This includes the interests of all persons involved with **AHC**, the person making the complaint and the person who is the subject of the complaint.

### **Safeguarding**

**AHC** recognises that raising a concern and reporting an allegation can be a difficult decision to make through fear of reprisals from those responsible for the alleged poor practice. If an individual believes what they say is or may be true, they should have no reason to fear reporting their concern as a duty of care to the child, young person or vulnerable adult concerned.

Where concerns are raised in good faith, **AHC** will offer full support to the whistle-blower and will not tolerate any resulting bullying, harassment or victimisation whatsoever. If this does occur, any perpetrators will be dealt with under Club disciplinary policy/procedures, which may result in possible expulsion from the club.

### **Confidentiality**

**AHC** will do its utmost to protect the confidentiality of a whistle-blower if they do not want their identity to be disclosed. It must be acknowledged that any subsequent investigation into an allegation, the whistle-blower may be needed provide a statement to form part of the evidence.

If the investigation process requires the whistle-blower to be identified, or it becomes apparent that the whistle-blower will be identified, notice will be given to them by the Designated Safeguarding Officer (DSO), to which person the identity disclosure will be made. They will then be given the opportunity to discuss any likely consequences.

### **Raising a Concern or Making an Allegation**

In the first instance, concerns should be brought to the attention of the relevant department DSO or SSM in writing. The SSM is Matthew Dixon who can be contacted via email at [mdixon@thehivelondon.com](mailto:mdixon@thehivelondon.com). The concern needs to be as specific as possible including the reason for the concern, an outline of the issue, the history or background, any names, dates and locations where possible.

The earlier an individual expresses a concern, the easier it is for someone to take prompt and efficient action. Although the whistle-blower is not expected to prove the truth of an allegation, they will need to demonstrate to the department's DSO that there are sufficient grounds for their concern.

### **Anonymous Allegations**

**AHC** encourages the whistle-blower to put their name to a concern or allegation. Anonymous concerns or allegations are much less powerful and are therefore much harder to prove. Any concern or allegation received anonymously will still be considered and an investigation will be undertaken at the discretion of the DSO who will assess the seriousness of the concern, the credibility of the concern, and the likelihood of confirming the allegation from attributable sources or factual records.

### **Untrue or Unproven Allegations**

If an investigation finds that the concerns or allegations made by a whistle-blower are untrue or have not been substantiated but were reported in good faith, then no action will be taken against the whistle-blower. However, if it is established a concern or allegation was made with malicious or frivolous intent or for personal gain, disciplinary action may be taken against them. In such cases, the **AHC** disciplinary policy/procedure will apply.

### **Investigation Process**

All investigations will be undertaken by the DSO who may be supported by an appropriate member of **AHC** Senior leadership team. However, should you feel that you have not received a satisfactory response or conclusion to your concern you can approach the following people/organisations:

- Club Safeguarding Committee Member
- Middlesex FA County Welfare Officer
- The FA/NSPCC Child Protection 24-Hour Helpline 0808-800-5000
- Or by going direct to the Police (999) and/or Harrow councils' golden number 020-8901-2690 (out of hours 020-8424-0999)

### **Responding to Allegations or Suspicions**

It is not the responsibility of anyone operating in **AHC** to decide whether or not child abuse has taken place. However, there is a responsibility to act on any concerns through contact with the appropriate authorities.

**AHC** will assure all staff and volunteers that it will fully support and protect anyone who in good faith reports his or her concern that colleague is or may be abusing a child, young person or vulnerable adult. Where there is a complaint against an adult there may be three types of investigation:

1. A criminal investigation.
2. A child protection investigation.
3. A disciplinary or misconduct investigation.

The result of the police and child protection investigation may well influence the disciplinary investigation but not necessarily.

### **Actions if a Concern is Raised**

1. Concerns about poor practice
  - a. If following consideration the allegation is clearly about poor practice; **AHC** DSO will deal with it as a misconduct issue. If the allegation is about poor practice by **AHC** DSO or the matter has been handled inadequately and concerns remain it should be reported to The Middlesex FA or the Harrow safeguarding team (the golden number) who will decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.
2. Concerns about suspected abuse
  - a. Any suspicion that a child, young people and vulnerable adults has been abused by an adult should be reported to **AHC** safeguarding officer who will take such steps as considered necessary to ensure the safety of the child, young people and vulnerable adults' question and any other child, young people and vulnerable adults who may be at risk. **AHC** safeguarding officer will refer the allegation to the Harrow safeguarding team who may involve the police, or will go directly to the police in an emergency.
  - b. The parents or carers of the child, young person or vulnerable adults will be contacts as soon as possible following advice from the social services department.
  - c. If **AHC** DSO is the subject of the suspicion/allegation. The report must be made to the committee representative for Safeguarding Graham Slyper ([gslyper@thehivelondon.com](mailto:gslyper@thehivelondon.com)) club chairman or in his/her absence the Middlesex FA Welfare Officer who will refer the allegation to the local authorities safeguarding team.

### **Complaints & Appeals**

A complaint may be made by an individual who has been the subject of a poor practice or child protection concern that has been dealt with by **AHC** Safeguarding team.

In the first instance the complainant is required to contact The Senior Safeguarding Manager (Matthew Dixon: [mdixon@thehivelondon.com](mailto:mdixon@thehivelondon.com)).

The SSM will make contact with the complainant within 72 hours to establish more information. It is however hoped that the SSM will be able to resolve the complainants concerns and give appropriate assurances regarding the management of the case in question. A record of this resolution will be made and copied to the complainant.

If the complainant is dissatisfied with the response and wishes to take the matter further, they are required to put the matter in writing to Graham Slyper (Board member in charge of safeguarding) to

The Hive London, Camrose Avenue, HA8 6AG, within 28 days of the known outcome of the informal communication with The SSM.

Please note, any matters relating to appeals with regard to FA Disciplinary Hearings and Suspensions will be separately dealt with by The FA.

### **Information Sharing**

With regards to the welfare of children/young people, information sharing is key to enabling early intervention and preventative work. By sharing genuine concerns about a child or family, professionals can construct a more accurate picture about a child/young person's safety and well-being.

#### **Seven golden rules for information sharing**

1. Remember that the Data Protection Act is not a barrier to sharing information but provides a framework to ensure that personal information about living persons is shared appropriately.
2. Be open and honest with the person (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 if you are in any doubt, without disclosing the identity of the person where possible.
4. Share with 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, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.
5. Consider safety and well-being: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
6. Necessary, proportionate, relevant, 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 people 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.

Remember, data protection should never be used as an excuse for failure to protect a child/young person from a real risk of harm. Seek advice if you are not sure what to do at any stage and ensure that the outcome of the discussion is recorded.

## Safeguarding Children - The 5 R's

### Recognise:

- Be vigilant.
- Know the children you work with.
- Be familiar with the types and indicators of abuse.

### Respond:

- Never ignore concerns, signs or reports related to children's wellbeing and safety.
- Do not delay your response.

### Report:

- Always report your concerns to the Designated Safeguarding Officer (DSO) or their Deputy.
- Ensure every member of staff/volunteer is aware of who the DSO and Deputy DSO is.

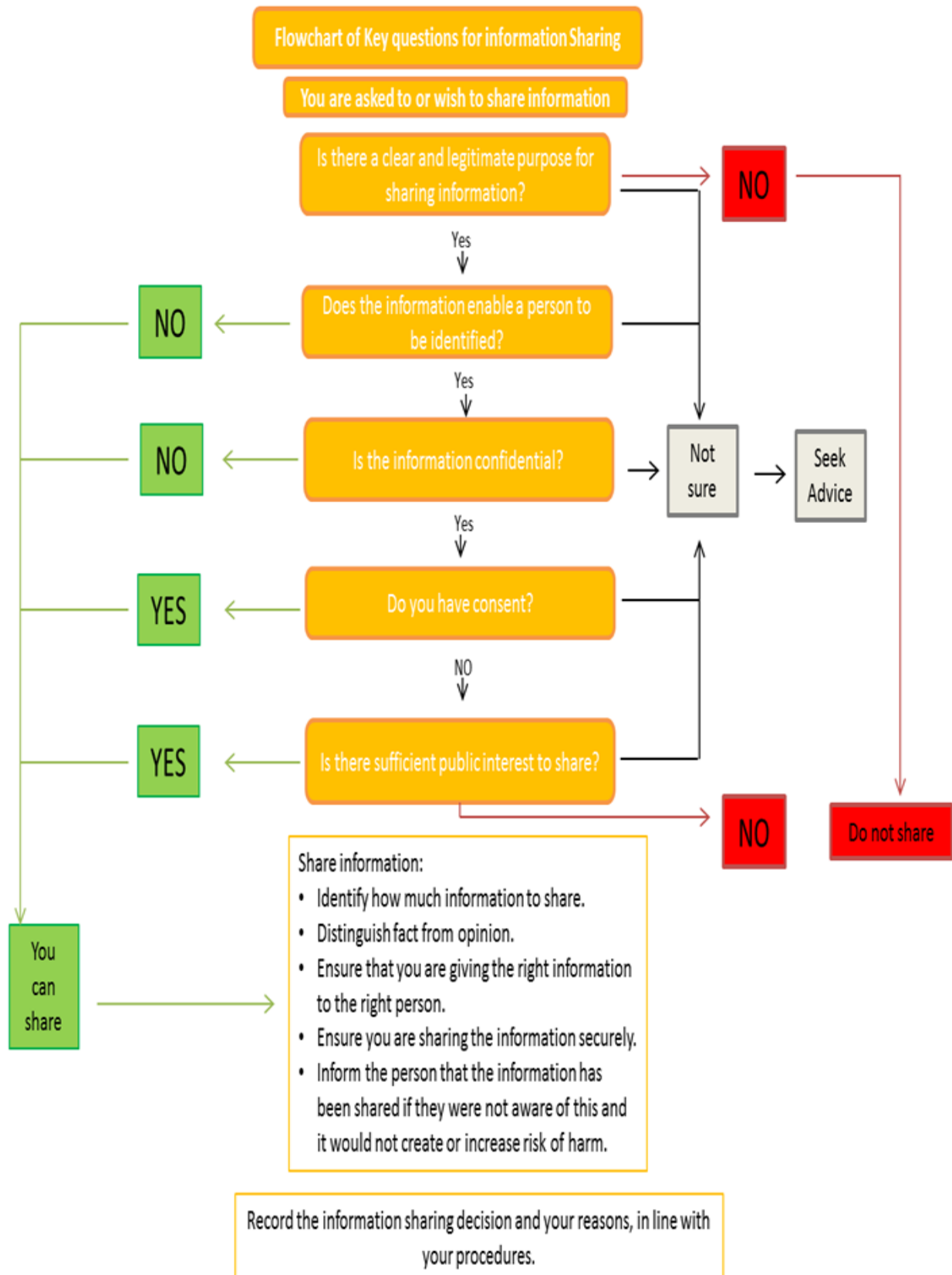
### Record:

- Always make a record of what happened – the incident or concern, the exact words of the child where possible (if they disclosed) and any immediate actions taken.
- Use your organisation's standard recording log.
- Don't delay it – record information as soon as possible.

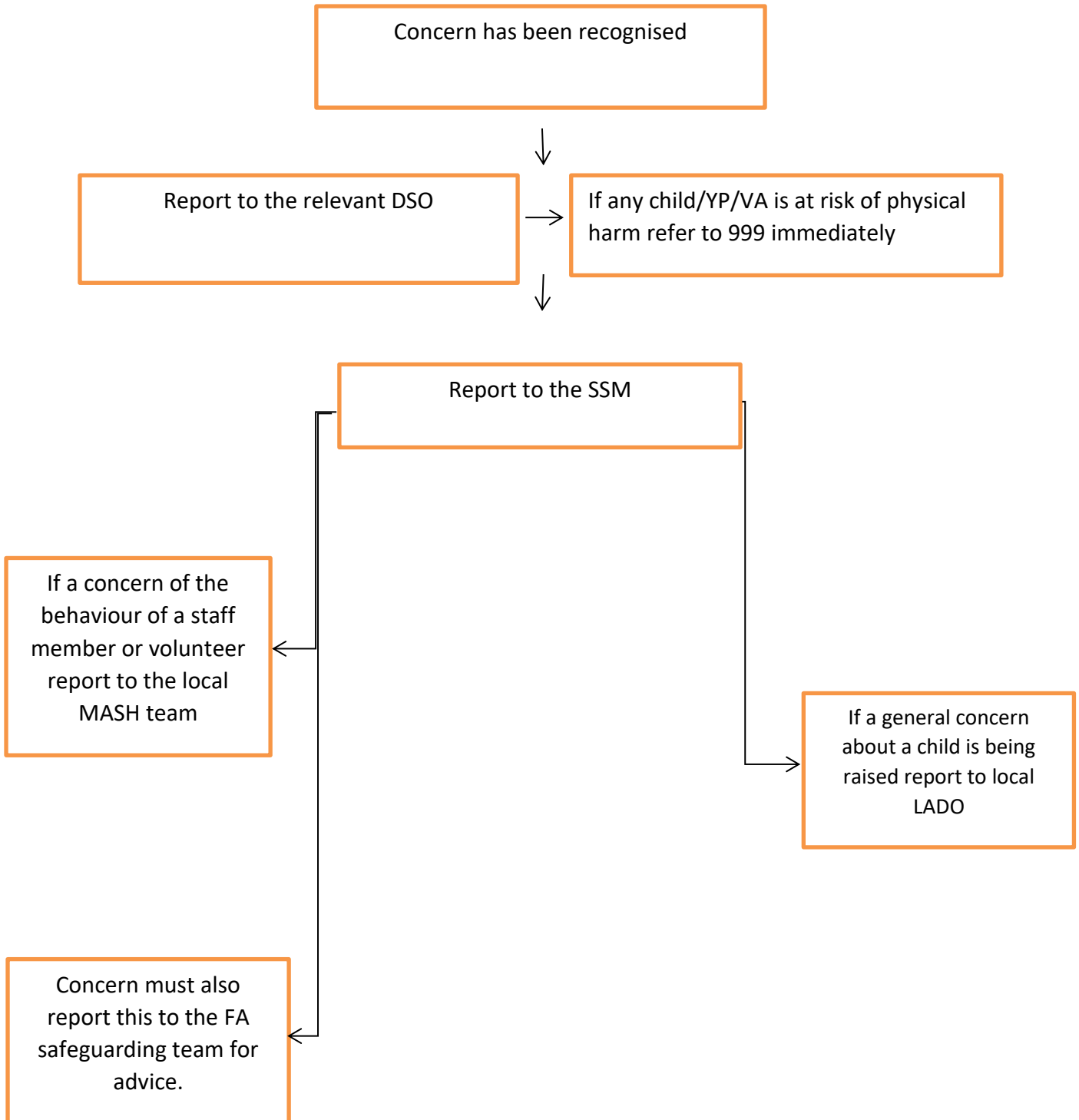
### Refer:

- All cases where there is a concern about significant harm of risk thereof must be referred to Harrow Children's Social Care via the Golden Number.
- This will be done by the DSO but you should be familiar with the process too.

Use this flowchart to help you determine whether or not to share information about a child and/or family you are working with.



### Seeking Advice/Referral Flow Chart





## **Confidentiality**

Every effort should be made to ensure that confidentiality is maintained for all concerned.

Information should be handled and disseminated on a need to know basis only. This includes the following people:

- The Designated Safeguarding Officers
- The parent/guardian of the person who is alleged to have been abused (if this is safe to do so ask your SSM)
- The person making the allegation
- The local authorities Safeguarding team
- The Middlesex FA Welfare Officer
- The alleged abuser (and parent/guardian if the alleged abuser is a child, young person or vulnerable adult)

The relevant DSO will seek advice on who should approach the alleged abuser and information should be stored in a secure place with access limited to designated people, in line with data protection laws (e.g. that information is accurate, regularly updated, relevant and secure).

## **Principles**

- All personal paper-based and electronic data must be stored in accordance with the Data Protection Act 1998 and must be secured against unauthorised access, accidental disclosure, loss or destruction.
- All personal paper-based and electronic data must only be accessible to those individuals authorised to have access.

## **Statistical Recording**

**AHC** is committed to effective statistical recording of the use of its services in order to monitor usage and performance.

All statistical records given to third parties, such as to support funding applications or monitoring reports for the funding bodies shall be produced in anonymous form, so individuals cannot be recognised, unless participants have agreed to share their information.

## **Records**

All records are kept in locked filing cabinets. All information relating to service users will be left in locked drawers. This includes notebooks, copies of correspondence and any other sources of information.

## **Breaches of Confidentiality**

**AHC** recognises that occasions may arise where individual workers feel they need to breach confidentiality. Confidential or sensitive information relating to an individual may be divulged where there is risk of danger to the individual, a volunteer or employee, or the public at large, or where it is against the law to withhold it. In these circumstances, information may be divulged to external agencies e.g. police or social services on a need to know basis.

Where a worker feels confidentiality should be breached the following steps will be taken:

- The worker should raise the matter immediately with their Line Manager.
- The worker must discuss with the Line Manager the issues involved in the case and explain why they feel confidentiality should be breached and what would be achieved by breaching confidentiality. The Line Manager should take a written note of this discussion.
- The Line Manager is responsible for discussing with the worker what options are available in each set of circumstances.
- The Line Manager is responsible for making a decision on whether confidentiality should be breached. If the Line Manager decides that confidentiality is to be breached then they should take the following steps:
  - The Line Manager should contact the Chair in the first instance, or Vice Chair of the Committee. The Manager should brief the Chair/Vice Chair on the full facts of the case, ensuring they do not breach confidentiality in doing so. The Line Manager should seek authorisation to breach confidentiality from the Chair/Vice Chair.
  - If the Chair/Vice Chair agrees to breach confidentiality, a full written report on the case should be made and any action agreed undertaken. The Line Manager is responsible for ensuring all activities are actioned.
  - If the Chair/Vice Chair does not agree to breach confidentiality then this is the final decision.

## **Legislative Framework**

**AHC** will monitor this policy to ensure it meets statutory and legal requirements including the Data Protection Act, Children's Act, Rehabilitation of Offenders Act and Prevention of Terrorism Act. Training on the policy will include these aspects.

## **Non-Adherence**

Breaches of this policy will be dealt with under the Grievance and/or Disciplinary procedures as appropriate.

### **Allegations of Historic Abuse**

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child). Where such an allegation is made the club should follow the procedures in place and report the matter to the local authority or the police. This is because other children, young people and vulnerable adults, whether within or outside sport, may be at risk from this person.

Anyone who has previous criminal convictions for offences relating to abuse is automatically excluded from working with children. This is reinforced by the details of the protection of children act 1999.

### **Anti-Bullying**

We are committed to providing a caring, friendly and safe environment for all of our members so they can participate in football in a relaxed and secure atmosphere. Bullying of any kind is unacceptable at **AHC**. If bullying does occur, all children or parents should be able to tell and know that incidents will be dealt with promptly and effectively. We are a TELLING company. This means that anyone who knows that bullying is happening is expected to tell the Designated Safeguarding Officer or Deputy. This company is committed to playing its part to teach children to treat each other with respect.

### **What is Bullying?**

Bullying is the use of aggression with the intention of hurting another person. Bullying results in pain and distress to the victim.

Bullying can be:

- Emotional being unfriendly, excluding (emotionally and physically) sending hurtful text messages, tormenting, (e.g. hiding football boots/shin guards, threatening gestures)
- Physical pushing, kicking, hitting, punching or any use of violence
- Sexual unwanted physical contact or sexually abusive comments
- Discrimination racial taunts, graffiti, gestures, homophobic comments, jokes about disabled people, sexist comments
- Verbal name-calling, sarcasm, spreading rumours, teasing

## **Cyberbullying**

This is when a person uses technology i.e. mobile phones or the internet (social networking sites, chat rooms, instant messenger, tweets), to deliberately upset someone. Bullies often feel anonymous and 'distanced' from the incident when it takes place online and 'bystanders' can easily become bullies themselves by forwarding the information on. There is a growing trend for bullying to occur online or via texts – bullies no longer rely on being physically near to the child, young person or vulnerable adult.

**AHC** commits to ensure our website, websites and/or social networking pages are being used appropriately and any online bullying will be dealt with swiftly and appropriately in line with procedures detailed in this policy.

There is no clear boundary between incidents that should be regarded as abusive and incidents that are more properly dealt with as bullying, sexual experimentation etc. This is a matter of professional judgement.

## **Peer on Peer Bullying**

If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: bullying, fighting and harassment between children are not generally seen as child protection issues. However, it may be appropriate to regard a young person's behaviour as abusive if:

- There is a large difference in power (for example age, size, ability, development) between the young people concerned; or
- The perpetrator has repeatedly tried to harm one or more other children; or
- There are concerns about the intention of the alleged perpetrator.

If the evidence suggests that there was an intention to cause severe harm to the victim, this should be regarded as abusive whether or not severe harm was actually caused.

## **Why is it Important to Respond to Bullying?**

Bullying hurts. No one deserves to be a victim of bullying. Everybody has the right to be treated with respect. Individuals who are bullying need to learn different ways of behaving.

**AHC** has a responsibility to respond promptly and effectively to issues of bullying.

## Signs & Indicators

A child may indicate by signs or behaviour that he or she is being bullied. All staff and volunteers should be aware of these possible signs and that they should investigate if a child/young person or vulnerable adult:

- says he or she is being bullied
- is unwilling to go to club sessions
- becomes withdrawn, anxious, or lacking in confidence
- feels ill before training sessions
- comes home with clothes torn or training equipment damaged
- has possessions go “missing” asks for money or starts stealing money (to pay the bully)
- has unexplained cuts or bruises
- is frightened to say what’s wrong
- gives improbable excuses for any of the above.

In more extreme cases:

- starts stammering
- cries themselves to sleep at night or has nightmares
- becomes aggressive, disruptive or unreasonable
- is bullying other people or siblings
- stops eating
- attempts or threatens suicide or runs away.

These signs and behaviours may indicate other problems, but bullying should be considered a possibility and should be investigated. Bullying can be a result of discrimination, bullying because of discrimination occurs when bullying is motivated by a prejudice against certain people or groups of people. This may be because of their gender, age, race, nationality, ethnic origin, religion or belief, sexual orientation, gender reassignment, disability or ability.

Generally, these forms of bullying looks like other sorts of bullying, but in particular it can include:

Verbal abuse – derogatory remarks about girls or women, suggesting girls and women are inferior to boys and men, or that black, Asian and ethnic minority people are not as capable as white people;

spreading rumours that someone is gay, suggesting that something or someone is inferior and so they are “gay” – for example, “you’re such a gay boy!” or “those trainers are so gay!” Ridiculing someone because of a disability or mental health related issue, or because they have a physical, mental or emotional developmental delay. Referring to someone by the colour of their skin, rather than their name; using nicknames that have racial connotations; isolating someone because they come from another country or social background etc.

- Physical abuse – including hitting, punching, kicking, sexual assault, and threatening behaviour.
- Cyberbullying – using online spaces to spread rumours about someone or exclude them. It can also include text messaging, including video and picture messaging.

Discrimination is often driven by a lack of understanding which only serves to strengthen stereotypes and can potentially lead to actions that may cause women, ethnic minorities, disabled people, lesbian, gay, bisexual or transgender people, or people who follow specific religions or beliefs, to feel excluded, isolated or undervalued. Ensure that all staff and volunteers know that discriminatory language and behaviour will not be tolerated in **AHC**.

- If an incident occurs, children should be informed that discriminatory language is offensive, and will not be tolerated. If a child continues to make discriminatory remarks, explain in detail the effects that discrimination and bullying has on people. If it is a young person making the remarks their parents should be informed just as in any breach of **AHC** Anti-Bullying policy.
- If a child makes persistent remarks, they should be removed from the setting and the nominated safeguarding officer or official should talk to them in more detail about why their comments are unacceptable.
- If the problem persists, the child should be made to understand the sanctions that will apply if they continue to use discriminatory language or behaviour.
- Consider inviting the parents/carers to the club to discuss the attitudes of the child in line with the procedures detailed in this policy.

### **Procedures**

1. Report bullying incidents to the Designated Safeguarding Officer
2. In cases of serious bullying, the incidents will be referred to the County FA Welfare Officer for advice and possibly to The FA Case Management Team
3. Parents should be informed and will be asked to come in to a meeting to discuss the problem
4. If necessary and appropriate, the police/local authority will be consulted

5. The bullying behaviour or threats of bullying must be investigated and the bullying stopped quickly
6. An attempt will be made to help the bully (bullies) change their behaviour
7. If mediation fails and the bullying is seen to continue, **AHC** will initiate disciplinary action.

### **Recommended Procedure for Reconciliation**

If the **AHC** decides it is appropriate for them to deal with the situation, they should follow the procedure outlined below:

1. Reconciliation by getting the parties together. It may be that a genuine apology solves the problem.
2. If this fails/not appropriate a small panel (made up from safeguarding committee member, designated safeguarding officer, designated safeguarding deputy) should meet with the parent and child alleging bullying to get details of the allegation. Minutes should be taken for clarity, which should be agreed by all as a true account.
3. The same 3 persons should meet with the alleged bully and parent/guardian and put the incident raised to them to answer and give their view of the allegation. Minutes should again be taken and agreed.
4. If bullying has in their view taken place the individual should be warned and put on notice of further action i.e. temporary or permanent suspension if the bullying continues. Consideration should be given as to whether a reconciliation meeting between parties is appropriate at this time.
5. In some cases the parent/guardian of the bully or person bullied can be asked to attend training sessions, if they are able to do so, and if appropriate. The **AHC** committee should monitor the situation for a given period to ensure the bullying is not being repeated.
6. All staff involved with both individuals should be made aware of the concerns and outcome of the process i.e. the warning.

### **In the Case of Adults Reported to be Bullying Anyone under 18**

1. The County Welfare Officer should always be informed and will advise on action to be taken where appropriate; this may include action by The FA Safeguarding Team.
2. It is anticipated that in most cases where the allegation is made regarding a staff member or volunteer, The FA's Safeguarding Children Education Programme maybe recommended.
3. More serious cases may be referred to the Police and/or the local authority.

#### Prevention:

- **AHC** will enforce this anti-bullying policy.
- The Designated Safeguarding Officer will raise awareness about bullying and why it matters, and if issues of bullying arise in **AHC**, will consider meeting with members to discuss the issue openly and constructively.

#### **FGM**

Female Genital Mutilation (FGM) is a collective term for procedures that remove part or all of the external female genitalia for cultural or other non-medical reasons. The age at which girls are subjected to female genital mutilation varies greatly, from shortly after birth to any time up to adulthood, with the average age being 4 to 13 years.

A child for whom FGM is planned is at risk of significant harm through physical abuse and emotional abuse. Health implications can range from severe pain and emotional/psychological trauma to death from blood loss or infection. Depending on the type of FGM carried out, girls and women can also experience urinary problems, difficulty with menstruation, pain, vaginal infections and specific problems during pregnancy and childbirth.

Female Genital Mutilation is a criminal offence in the UK. The Female Genital Mutilation Act (2003) makes it an offence for UK nationals or permanent UK residents to carry out FGM abroad, or to aid, abet, counsel or procure the carrying out of FGM abroad, even in countries where the practice is legal.

#### More information:

Safeguarding Children at Risk of Abuse through Female Genital Mutilation (LSCB 2007):

[http://www.londonscb.gov.uk/procedures/supplementary\\_procedures.html](http://www.londonscb.gov.uk/procedures/supplementary_procedures.html) and FORWARD:

<http://www.forwarduk.org.uk/key-issues/fgm>

#### **Radicalisation & Extremism**

The government defines extremism as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs.

Some children, young people and vulnerable adults are at risk of being radicalised: adopting beliefs and engaging in activities which are harmful, criminal or dangerous. Islamic extremism is the most widely publicised form and all companies should also remain alert to the risk of radicalisation into white supremacy extremism.



**AHC** full time staff receive training to help to identify signs of extremism. From 1 July 2015 companies are subject to a duty under section 26 of the Counterterrorism and Security Act 2015, in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

In order for **AHC** to fulfil the Prevent duty, it is essential that staff are able to identify children, young people of vulnerable adults who may be vulnerable to radicalisation, and know what to do when they are identified. “Radicalisation” refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism. During that process it is possible to intervene to prevent vulnerable people being drawn into terrorist related activity.

Protecting children, young people and vulnerable adults from the risk of radicalisation should be seen as part of **AHC** wider safeguarding duties, and is similar in nature to protecting children & vulnerable adults from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.

The statutory guidance on the Prevent duty summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies. Staff concerned about children vulnerable to radicalisation should inform the DSO or the SSM whereupon local safeguarding procedures will be activated, using existing national and local protocols for multi-agency liaison with police and social care.

### **Domestic Violence & Abuse**

Domestic Violence and Abuse is a significant issue with 7.1% of women and 4.4% of men estimated to have experienced DVA in the last year. This policy recognises that both men and women can be victimised through Domestic Violence and Abuse. Although a greater proportion of women experience all forms of DVA, and are more likely to be seriously injured or killed by their partner, ex-partner.

The effects of DVA can be wide-ranging and people experience it regardless of their social group, gender, age, ethnicity, marital status, disability, sexuality or lifestyle. In particular, DVA has significant cost and health implications including serious injury, exacerbation of other medical conditions, stress and mental illness.

The legal obligations, which underpin this policy, include the duties within the Human Rights Act (1998), the European Convention on Human Rights to protect life and to protect individuals from inhuman and degrading treatment, and The Care Act (2014), introduced in April 2015, which extended the categories of abuse to include ‘domestic violence and abuse’, demonstrating a recognition of the significance of DVA and the impact on children of adults at risk. An Adult at Risk definition under the Care Act 2014 is a person aged 18 or over and at risk of abuse or neglect because of their needs for care and support. The person does not need to be receiving any particular service in order for the safeguarding duties to apply. The Serious Crime Act (2015) has added to legislation and describes the offence of controlling or coercive behaviour in an intimate or family

relationship. Adults at risk may also be subjected to Domestic Violence and Abuse. The principles contained within this policy must be followed to ensure that adults at risk are protected from harm.

It can be distinguished from other forms of violence, as it is often committed with some degree of approval and/or collusion from family and/or community members.

### **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 or not to accept the arrangement remains with the young people.

In a forced marriage, one or both spouses do not consent to the arrangement of the marriage or in the case of some adults with learning or physical disabilities cannot consent to the marriage, and some elements of duress are involved. Duress can include 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.

Forced marriage involving anyone under the age of 18 constitutes a form of child abuse. A child who is forced into marriage is likely to suffer Significant Harm through physical, sexual or emotional abuse. Forced marriage can have a negative impact on a child's health and development, and can also result in sexual violence including rape. If a child is forced to marry, he or she may be taken abroad for an extended period of time which could amount to child abduction. In addition, a child in such a situation would be absent from school resulting in the loss of educational opportunities, and possibly also future employment opportunities. Even if the child is not taken abroad, they are likely to be taken out of school so as to ensure that they do not talk about their situation with their peers.

### **Vulnerable Adults**

**AHC** recognises that there are differences between safeguarding adults and safeguarding children. Adults may choose not to act at all to protect themselves, and it is only in extreme circumstances that the law intervenes. This will often only happen when an adult is assessed to lack capacity in that area, or where the concerns may extend to children, such as when they are living in the same household.

This can make the matter of safeguarding adults even more complex. It is not solely focused on creating an appropriate process and system to safeguard. It also needs to take into account the importance of creating a culture that embraces the adults themselves, informing and consulting them on all decisions affecting them.

The Care Act recognises 10 categories of abuse that may be experienced by adults:

1. **Self-neglect**

This covers a wide range of behaviour, but it can be broadly defined as neglecting to care for one's personal hygiene, health, or surroundings. An example of self-neglect is behaviour such as hoarding.

2. **Modern Slavery**

This encompasses slavery, human trafficking, forced labour, and domestic servitude.

3. **Domestic Abuse**

This includes psychological, physical, sexual, financial, and emotional abuse perpetrated by anyone within a person's family. It also includes so-called "honour" based violence.

4. **Discriminatory**

Discrimination is abuse that centres on a difference or perceived difference, particularly with respect to race, gender, disability, or any of the protected characteristics of the Equality Act.

5. **Organisational**

This includes neglect and poor care practice within an institution or specific care setting, such as a hospital or care home, or in relation to care provided in one's own home. Organisational abuse can range from one off incidents to ongoing ill-treatment. It can be through neglect or poor professional practice as a result of the structure, policies, processes and practices within an organisation.

6. **Physical**

This includes hitting, slapping, pushing, kicking, restraint, and misuse of medication. It can also include inappropriate sanctions.

7. **Sexual**

This includes rape, indecent exposure, sexual harassment, inappropriate looking or touching, sexual teasing or innuendo, sexual photography, subjection to pornography or witnessing sexual acts, indecent exposure and sexual assault, or sexual acts to which the adult has not consented, or was pressured into consenting.

8. **Financial or Material**

This includes theft, fraud, internet scamming, and coercion in relation to an adult's financial affairs or arrangements, including in connection with wills, property, inheritance or financial transactions. It can also include the misuse or misappropriation of property, possessions, or benefits.

9. **Neglect and Acts of Omission**

This includes ignoring medical or physical care needs and failing to provide access to appropriate health social care or educational services. It also includes the withdrawing of the necessities of life, including medication, adequate nutrition, and heating.

10. **Emotional or Psychological**

This 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.

## **Four Additional Types of Harm**

There are four additional types of harm that are not included in The Care Act, but they are also relevant to safeguarding adults.

### **1. Cyberbullying**

Cyberbullying occurs when someone repeatedly makes fun of another person online, or repeatedly picks on another person through emails or text messages. It can also involve using online forums with the intention of harming, damaging, humiliating, or isolating another person. It includes various different types of bullying, including racist bullying, homophobic bullying, or bullying related to special education needs and disabilities. The main difference is that, instead of the perpetrator carrying out the bullying face-to-face, they use technology as a means to do it.

### **2. Forced Marriage**

This is a term used to describe a marriage in which one or both of the parties are married without their consent or against their will. A forced marriage differs from an arranged marriage, in which both parties' consent to the assistance of a third party in identifying a spouse. The Anti-Social Behaviour, Crime and Policing Act 2014 make it a criminal offence to force someone to marry.

### **3. Mate Crime**

A "mate crime" is when "vulnerable people are befriending by members of the community who go on to exploit and take advantage of them" (Safety Network Project, ARC). It may not be an illegal act, but it still has a negative effect on the individual. A mate crime is carried out by someone the adult knows, and it often happens in private. In recent years there have been a number of Serious Care Reviews relating to people with a learning disability who were seriously harmed, or even murdered, by people who purported to be their friend.

### **4. Radicalisation**

The aim of radicalisation is to inspire new recruits, embed extreme views and persuade vulnerable individuals to the legitimacy of a cause. This may be direct through a relationship, or through social media.

## **Who Might Abuse Adults?**

Abuse and neglect might be carried out by anyone in contact with adults, even by people employed to provide care.

There may be indicators that adults are experiencing harm from people within our organisation, such as volunteers, members of staff, or other members of the public. Or they may be experiencing harm from those connected with their life outside our organisation, such as a carer or a spouse.

This may include:

- Spouses, friends, family and neighbours
- People employed to provide care

- Paid staff or professionals
- Volunteers
- Strangers

### **Six Principles of Adult Safeguarding**

Learn the principles set out by The Care Act that underpin the safeguarding of adults. The Care Act sets out the following principles that should underpin the safeguarding of adults.

#### **Empowerment**

People are supported and encouraged to make their own decisions and informed consent. “I am asked what I want as the outcomes from the safeguarding process and this directly inform what happens.”

#### **Prevention**

It is better to take action before harm occurs “I receive clear and simple information about what abuse is. I know how to recognise the signs, and I know what I can do to seek help.”

#### **Proportionality**

The least intrusive response appropriate to the risk presented. “I am sure that the professionals will work in my interest and they will only get involved as much as is necessary.”

#### **Protection**

Support and representation for those in greatest need. “I get help and support to report abuse and neglect. I get help so that I am able to take part in the safeguarding process to the extent to which I want.”

#### **Partnership**

Services offer local solutions through working closely with their communities. Communities have a part to play in preventing, detecting and reporting neglect and abuse. “I know that staff treat any personal and sensitive information in confidence, only sharing what is helpful and necessary. I am confident that professionals will work together and with me to get the best result for me.”

#### **Accountability**

Accountability and transparency in delivering safeguarding. “I understand the role of everyone involved in my life and so do they.”

## **Barnet FC Academy**

Barnet Football Club's Academy is committed to the welfare and safety of all Children, both within the Academy and at the Club as a whole. The Academy also realises the importance of communication and works closely with parents, carers, schools and local authorities to ensure that the wellbeing of all Children is paramount.

## **Recruitment**

Barnet Football Club Academy recognises that anyone may have the potential to abuse children; young people and vulnerable adults in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children.

Pre-selection checks must include the following:

- All employees/volunteers should complete an application form. The application form will elicit information about an applicant's past and a self-disclosure about any criminal record.
- Consent should be obtained from an applicant to seek information from the Criminal Records Bureau.
- Evidence of identity (passport or driving license with photo).
- Interview and Induction. All employees/volunteers will be required to undergo an interview carried out to acceptable protocol and recommendations.

All employees/volunteers should receive formal or informal induction, during which:

- A check should be made that the application form has been completed in full (including sections on criminal records and self-disclosures).
- Their qualifications, if any, should be substantiated.
- The job requirements and responsibilities should be clarified.
- They should sign up to the Clubs Code of Conduct.
- Child protection procedures are explained and training needs are identified.

## **Training**

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:

- Analyse their own practice against established good practice, and to ensure their practice is likely to protect them from false allegations.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- Respond to concerns expressed by a child, young people and vulnerable adults.

- Work safely and effectively with children, young people and vulnerable adults.

#### **Barnet Football Club Academy requires:**

- Coaching staff to have recognised FA Coaching qualification and meet requirements set within the EPP and Football League including up to date safeguarding training.
- Non-coaching staff and volunteers to be encouraged to complete a recognised awareness training course on safeguarding.
- Relevant employees/volunteers to receive advisory information outlining good practice and informing them about what to do if they have concerns about the behavior of an adult towards a young person.
- Relevant employees/volunteers should be encouraged to gain a national first aid training certificate. EPP also requires lead coaches to have recognised BFAS certification.
- Attend update training when necessary.

#### **Sending U18 players on Loan**

- EWO to request loan clubs safeguarding policy.
- Request points of contact at club other than the manager.
- EWO to speak with U18 player at earliest opportunity to review fixture.
- EWO to speak to loan club manager to check players progress at earliest opportunity.
- Some players may be involved with a sister club which is managed by Head of Recruitment.
- HoR will report to EWO and ensure the welfare of all the players on loan.

In addition to players being on loan, these processes also apply to those either training or playing with the first-team squad. An appropriate and specific member of staff should be identified as being responsible for monitoring the welfare of players who are under the age of eighteen.

Those currently responsible for the welfare and safeguarding of players under 18 either on loan or training/playing with the first-team are Ben Ashby and Luigi Cerullo.

#### **Transport**

The Club has an Academy COO who is responsible for overseeing transport arrangements across the Academy, including registered Academy players and players attending the Club on trial. The Academy COO attends bi-monthly meetings with the SM and Academy Safeguarding Officers in order to report on the Academy's transport programme and other relevant matters.

When Children are being transported on behalf of the Club they shall, where possible, be accompanied by their team manager or a coach. In some cases, where Children need to be transported unaccompanied, this will be with a member of Club staff who has a satisfactory DBS and has been issued with (and received training on) the Club's Academy Transport Policy. In either case a

Child will only be transported under these circumstances with the specific prior consent of their parent or guardian. Although outside of the sphere of responsibility for local education authorities, the Club also provides a duty of care for young person's when travelling on behalf of the Club.

When players under 18 are required to stay overnight with the first-team squad, they will be provided with their own room and Luigi Cerullo will be responsible for the wellbeing and safeguarding of the player.

### **Gym Usage**

Players aged 16 and above are allowed to use the gym unsupervised providing they have undertaken a full induction. There will also be occasions where 14 and 15 year old players are able to access the gym. In these circumstances, they must always be supervised by a gym Instructor or club/academy staff.

### **Medical**

There will be occasions where medical treatment is necessary during evening training sessions and weekend fixtures and unfortunately, due to staffing numbers, the Club is unable to guarantee that **two** members of staff are present during treatment sessions.

All members of the medical department have a valid DBS and are required to attend the FA's Safeguarding Children awareness workshop and internal Safer Working Practice training. The Club is fully committed to equal opportunities for all individuals and, as such, the Club employs both male and female staff to work within the medical department.

If required to stay overnight on any Club event, Children will be accompanied by at least **two** nominated staff members who have a valid DBS and have undertaken Safeguarding Children training. Should a parent prefer to accompany and stay overnight with their Child then a request can be made to the Club for consideration. In any event, written parental/guardian consent will be sought before a Child or young person is asked to stay unaccompanied overnight in accommodation.

### **Youth Loans, Trials & Work Experience**

If an Academy Player or young Professional under the age of 18 joins another club on trial, work experience or a Football League Youth Loan the Academy will seek written parental consent (additional to the standard consent sought at the start of every season) prior to the activity taking place. Consideration will also be given to the player's education programme, travel and accommodation arrangements. As good practice the Club should designate a member of Academy Staff to check on the Players on a regular (weekly) basis, not just for game situations but for their general welfare whilst on loan, trial or work experience.

If the loan club is not located within a reasonable travelling distance from the player's current address, Barnet FC will insist that, where possible, players are placed in suitable accommodation during their time away from the Club. If the loan club have a fixture that requires overnight accommodation and travel, any player under the age of 18 must be in their own room and have an emergency contact within the place of stay. For example, if staying in a hotel overnight, the player





must have their own room and the club must provide an appointed member of staff responsible for the safeguarding of that player. This designated member of staff must have a valid DBS check.

If a player is loaned to a part time club, then he will continue to train with Barnet FC alongside training commitments with the loan club. Barnet FC will monitor their game time, weekly load and their physical and mental wellbeing during this period.

The length of the loan is taken on a player by player basis depending on the needs of the players development. These decisions will be carried out by agreement and conversations between: First Team Manager, Academy Manager & PDP Lead Coach.

There is no doubt that going out on loan can be of great benefit to the players for not only game time, but also in becoming more responsible and maturing both physically and mentally in a different environment.

As players progress through the academy system they may have the opportunity to train and play with the adult provisions of the club/loan club. This carries a number of safeguarding concerns as they will be entering an adult provision and be susceptible to adult behaviors and language. The club will support the player(s) during this transition. Parents will be included and consent sought.

For players under the age of 18 who are joining the Club on trial (including Work Experience) parental consent will be sought prior to the trial taking place, along with a full medical history and injury disclaimer.

Finally, we feel we have a duty of care to look after all our young players and give them the best opportunity to showcase their ability both on and off the pitch and continue their development in a good working/learning environment. The head of safeguarding will have an informal discussion with the player every Monday. The Academy Manager will phone the main contact at the loan club every Monday.



## **The Hive Foundation (Bees in the Community)**

### **Code of Conduct (Staff)**

The following code of conduct is to be adhered to by all employees and people associated with the Hive Foundation.

Coaches, Staff, Volunteers and trustees are the key to the establishment of ethics in football. Their concept of ethics and their attitudes directly affects the behaviour of players under their supervision. Coaches, Staff, Volunteers and trustees are therefore, expected to pay particular care to the moral aspect of this conduct.

Coaches, Staff, Volunteers and trustees have to be aware that almost all of their everyday decisions and choices of actions, as well as strategic targets, have ethical implications.

Increased responsibility is requested from coaches involved in coaching young people. The health, welfare and moral education of children and young people are our first priority, before the achievement or the reputation of the club, school, coach or parent.

### **All Staff must:**

- Respect the rights, dignity, safety and work of each and every person and treat each equally within the context of the sport.
- Make yourself familiar with the Hive Foundation safeguarding policies.
- Set a positive example for others, especially children and players.
- Place the well-being and safety of each player above all other consideration including the development of performance.
- Adhere to all guidelines laid down by the FA licensed coaches club and the Football Association.
- Do not exert undue influence on children, young people and vulnerable adults on any initiatives to obtain personal benefit or reward. This includes using their influence to attract players to private football teams or initiatives not connected to the Hive Foundation.
- Ensure the activities they direct or advocate are appropriate for the age, maturity, experience and ability of the participants.
- Where possible, work with other coaches or at least in pairs and should never get into a situation where they are alone with a child or young adult.
- Promote the positive aspects of the sport and never condone violations of the laws of the games, behaviour contrary to the spirit of the laws of the game or relevant rules and regulations or the use of prohibited substances or techniques.
- Consistently display the high standards of behaviour and appearance of the Hive Foundation.

- All coaches arrive at each sessions at least 15 minutes before it is due to start and are not to leave until every child has left safety.
- Encourage and guide to accept responsibility for their own behaviour and performance.
- Clarify with the players (and where appropriate, parent) exactly what is expected of them and also what they are entitled to expect from their coach.
- Be responsible for developing the rules governing the conduct of the group and the behaviour of the attendees will be made clear to all concerned such as toilet breaks, remaining in the group at all times, no foul and abusive language will be permitted, no bullying or violence will be permitted etc.
- Ensure that the rules are applied consistently so that the attendees can build up useful habits of behaviour.
- Praise and highlight good behaviour such as kindness, helpfulness and 'fair-play'.
- Not use inappropriate or innuendo at any time.
- Not shout or raise their voice in a threatening way.
- Not undertake private work from the Hive Foundation customers. Any approaches must be redirected to the office, failure to do so will be treated as gross misconduct.
- Give the office a minimum of 2 weeks' notice if they are unable to fulfil their session commitments. Failure to do so will result in a review of allocation of future sessions.
- In the case of illness, a coach must report it to the office as soon as possible. If no one is in the office you must contact your line manager on their mobile.
- Ring the office or head coach if they are going to be late for a session, so the office can inform the school office or the head coach as soon as possible.

### **Code of Conduct (Participant/Player)**

When playing football, I will:

- Always play to the best of my ability and for the benefit of my team
- Play fairly – I won't cheat, dive, complain or waste time
- Respect my team-mates, the other team, the referee or my coach/team manager
- Play by the rules, as directed by the referee
- Be gracious in victory and defeat – I will shake hands with the other team and referee at the end of the game
- Listen and respond to what my coach/team manager tells me
- Understand that a coach/team manager has to do what is best for the team and not one individual player

- Talk to someone I trust or the club welfare officer if I'm unhappy about anything at my club

I understand that if I do not follow the Code, any/all of the following actions may be taken by my club, County FA or The FA: I may:

- Be required to apologise to my team-mates, the other team, referee or team manager or receive a formal warning from the coach/team manager or the club committee
- Be suspended from training
- Be required to leave the club In addition:
- My club, County FA or The FA may make my parent or carer aware of any infringements of the Code of Conduct
- The FA/County FA could impose a fine and suspension against my club

### **Code of Conduct (Parent/Carer/Spectator)**

We all bear a collective responsibility to set a good example and help provide a positive environment in which children/young people can learn and enjoy the game. Play your part and observe The FA's Respect Code of Conduct for spectators at all times I will:

- Remember that children play for FUN
- Applaud effort and good play as well as success
- Respect the Referee's decisions even when you don't agree with them
- Appreciate good play from whatever team it comes from and remain behind the touchline and within the Designated Spectators' Area (where provided)
- Let the coach do their job and not confuse the players by telling them what to do
- Encourage the players to respect the opposition, referee and match officials
- Support positively. When players make a mistake offer them encouragement not criticism and never engage in, or tolerate, offensive, insulting, or abusive language or behaviour

I understand that if I do not follow the Code, any/all of the following actions may be taken by my club, County FA or The FA: I may be:

- Issued with a verbal warning from a club or league official or required to meet with the club, league or CFA Welfare Officer
- Required to meet with the club committee
- Obligated to undertake an FA education course
- Obligated to leave the match venue by the club
- Requested by the club not to attend future games
- Suspended or have my club membership removed
- Required to leave the club along with any dependents



In addition:

- The FA/County FA could impose a fine and/or suspension on the club

### **Respect**

Respect is The FA's response to a clear message from throughout the game that the health of football depends upon high standards of behaviour on and off the pitch. This is a statement and code of conduct that The Hive Foundation follow and expect all staff, volunteers, trustees, participants and parents/carers to abide by.

- Respect is a behavioural code for Football
- Respect is about recognising that the integrity of the game is more important than the result of the match
- Respect is For ALL and plays a key part in uniting the game
- Respect is about creating an understanding of what is acceptable and unacceptable behaviour in Football
- Respect is about those involved taking responsibility for the consequences of their own actions
- Respect is about supporting match officials to do their job
- Respect is not a slogan. It is a collective responsibility of those involved in football to create a safe, fun and inclusive environment in which the game can take place

The following Respect Codes of Conduct outline the types of behaviour that will support a safe, fun and inclusive game in this country. They also identify a range of sanctions which may be taken if these codes are not abided by.

### **Abuse of Position of Trust**

All staff at The Hive Foundation are aware that inappropriate behaviour towards participants is unacceptable and that their conduct towards participants must be beyond reproach.

Staff understands that under the Sexual Offences Act 2003 it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of staff and a participants under 18 may be a criminal offence.

### **Children who may be Vulnerable**

Some children may have an increased risk of abuse. Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur. To ensure that all of our pupils

receive equal protection, we will give special consideration to children, young people or vulnerable who are:

- Disabled or have special educational needs
- Young carers
- Affected by parental substance misuse, domestic violence or parental mental
- Health needs
- Asylum seekers
- Living away from home
- Vulnerable to being bullied, or engaging in bullying
- Living in temporary accommodation
- Live transient lifestyles
- Living in chaotic and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality
- At risk of sexual exploitation
- Do not have English as a first language
- At risk of female genital mutilation (FGM)
- At risk of forced marriage
- At risk of being drawn into extremism

This list provides examples of additionally vulnerable groups and is not exhaustive.

### **Parental Consent**

- When a child is registered for The Hive Foundation, the registration form is used to obtain the child's or vulnerable adults' details. Registration is taken as an understanding that the child will be provided with a service of care and learning that is best suited to him / her.
- The consent form also contains the option to allow consent for the taking of photographs of the child or vulnerable adults which may be used for display purposes within the hive foundation.
- Furthermore, it will contain consent for the giving of medical care to the child or vulnerable adults as and when required.

It is therefore the policy of The Hive Foundation to seek separate written consent, permission or authorisation from the parents/ carers BEFORE undertaking any of the following:

- Administration of prescription medicines
- Trips and outings away from the Hive. In this respect consent may also be required for each outing, according to circumstances
- Consent for named individuals to drop off, and/or collect from The Hive Foundation

It is fully accepted that each issue referenced above is a matter for personal choice or belief, and as such, The Hive Foundation will fully respect and abide by the decision of the parent/carer in each case.

### **Safer Recruitment (Staff)**

Organisations employing staff to work with children/young people should have a consistent and thorough process of recruitment that reduces the risk of selecting those who may pose a risk to children/young people.

In the recruitment of staff, organisations must ensure that:

- Recruitment documentation (application forms and adverts) contains reference to the organisations commitment to safeguarding children and young people.
- DBS checks are undertaken.
- A minimum of two references are obtained, including one from the applicant's current or most recent employer. Where possible, one reference should be from a person who has experience of the applicants work with children/young people.
- Applicants should be asked to bring original or certified copies of documents confirming any necessary or relevant educational and professional qualifications.
- All applicants should bring to interview evidence of their identity, which could include a full birth certificate, passport or photo card driving license and additionally a document such as a utility bill that verifies the candidate's name and address.
- Interviews should be rigorous in addressing safeguarding issues.

The same processes should apply to volunteers who have unsupervised or regular contact with children/young people. However, where volunteering activity is unplanned and does not include unsupervised contact e.g. one-off day trip, a DBS check is not required.

### **Training (Staff)**

It is important that all staff receive training to enable them to recognise the possible signs of abuse, neglect and exploitation and to know what to do if they have a concern. New staff and trustees will receive a briefing during their induction, which includes The Hive Foundations Safeguarding Policy, Staff Code of Conduct, reporting and recording arrangements, and details for the DSO/SSM and all other relevant documentation. All staff, including the DSO/SSM and trustees will receive training that is regularly updated. All staff will also receive safeguarding updates throughout the year, in staff meetings and trustees meetings.

### **Safer Recruitment (Volunteers)**

The Hive Foundation recognises that anyone may have the potential to abuse children, young people and vulnerable adults in some way and that all reasonable steps are taken to ensure unsuitable people are prevented from working with children.

Pre-selection checks must include the following:

- All volunteers should complete an application form. The application form will elicit information about an applicant's past and a self-disclosure about any criminal record.
- Consent should be obtained from an applicant to seek information from the Criminal Records Bureau.
- Evidence of identity (passport or driving licence with photo).
- Interview and inductions.

All volunteers will be required to undergo an interview carried out to acceptable protocol and recommendations.

All volunteers should receive formal or informal induction, during which:

- A check should be made that the application form has been completed in full (including sections on criminal records and self-disclosures.)
- Their qualifications, if any should be substantiated.
- The job requirements and responsibilities should be clarified.
- They should sign up the clubs code of conduct.
- Child protection procedures are explained and training needs are identified.

### **Training (Volunteers)**

In addition to pre-selection checks, the safeguarding process includes training after recruitment to help staff and volunteers to:

- Analyse their own practice against established good practice, and to ensure their practice is likely to protect from false allegations.
- Recognise their responsibilities and report any concerns about suspected poor practice or possible abuse.
- Respond to concerns expressed by a child, young person and vulnerable adults.
- Work safely effectively with children, young people and vulnerable adults.

The Hive Foundation requires:

- Coaching staff to attend a recognised level 1 coaching course which will include a good practice and child protection awareness training workshop, to ensure their practice is



exemplary and to facilitate the development of a positive culture towards good practice and child protection.

- Staff and volunteers to be encouraged to complete a recognised awareness training course on child protection.
- Relevant staff and volunteers to receive advisory information outlining good practice and informing them about what to do if they have concerns about the behaviour of an adult towards a vulnerable person.
- Relevant staff and volunteers should be encouraged to gain a first aid training qualification.
- Attend update training when necessary.

### **Risk Assessments**

The Hive Foundation undertakes a Risk Assessment for each Activity they operate. These Risk Assessments are undertaken on a bi-annual basis and are completed in consultation with the BFC COO and, where necessary, the Senior Safeguarding Manager.

### **Activities for Disabled Persons & Adults at Risk**

The Hive Foundation carries out all activities for disabled persons and adults at risk under the guidelines of the Disability Discrimination Act and Safeguarding Vulnerable Groups Act, and in accordance with this policy.

## **Match Day**

### **Unaccompanied Children**

In accordance with the Club's ticketing terms & conditions, the minimum age that a Child is permitted to attend a match at The Hive Stadium unaccompanied is 14 years old.

### **Mascots & Ball Persons**

The Club will only allow Children to be match day mascots or ball persons once parental consent has been obtained. A signed image consent form is also required before any images are published in the Club's matchday programme.

No photographs of mascots or ball persons featured in Club publications will be accompanied by personal information about the Child, such as their school, home address or local sports team.

Whilst at The Hive, mascots and ball persons are accompanied at all times by at least 2 members of staff who have a valid DBS. Staff who are responsible for mascots and ball persons on a match day are also required to have a good level of understanding and awareness of safeguarding children.

If you have any other concerns or are unsure about specific issues you are having please reference any of the supporting safeguarding documents below.

- Data protection policy
- Early help policy
- E-safety policy
- Health & Safety policy
- Keeping the child at the centre of our work policy
- Lone working policy
- Risk assessment policy
- Safer recruitment policy
- Trips, Transport & Tours Policy
- Internet Usage & Social Media Policy
- Missing Child Procedure
- Left Child Procedure
- Illness & Injury Procedure



**Other Useful Documents**

For further information on safeguarding and best practice please see the FA’s Grassroots safeguarding children policies and procedures (working together to safeguard football).

A copy is available in the Foundation office. Or alternatively see the Harrow council Harrow Safeguarding Children Guidance (The Green Book).

**REMEMBER: NON ACTION IS NOT AN OPTION IN SAFEGUARDING.**

This policy was formally adopted by the committee of **AHC** on:

Graham Slyper (Board Member)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Matthew Dixon (Senior Safeguarding Manager)

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

It will be reviewed on an annual basis, with the next review scheduled for:

**July 2020** unless in the event of a major incident or change in legislation.