ROTHERHAM UNITED COMMUNITY TRUST

POLICY / PROCEDURE

NAME: Safeguarding
VERSION: V4

Written by	Jamie Noble
Creation date	June 2108
Signed by trustee	
Date signed	
Review frequency	Annually
Revision details	Standardised participant code of conduct Addition of complaints procedure and Whistleblowing Addition of What happens next – Investigations Updated version of Keeping Children Safe in Education

Safeguarding Policy

ROTHERHAM UNITED COMMUNITY TRUST
Y:\RUFC Community\0. Policies, Procedures, Risk Assessments\POLICIES & PROCEDURES\1. Policies & Procedures\Safeguarding Policy\RUCT Safeguarding Policy V2.docx

Rotherham United Community Trust

Introduction

The Board of Trustees of Rotherham United Community Trust, Chief Executive and Head of Community acknowledges and accepts it has a statutory obligation and responsibility for the wellbeing and safety of all Children and young people and vulnerable adults who participate in The Organisation's activities (including the NCS programme) or utilise The Organisation's facilities. This policy is reviewed and thus endorsed annually by the board of trustees and signed by the Chair as evidence of approval. We aim to listen to children and adults at risk and take account of their wishes and feelings, both in individual decisions and in the development of services.

The Children Act 1989 states that the child's welfare is paramount and that every child and vulnerable adult has a right to protection from abuse, neglect and exploitation.

Rotherham United Community Trust acknowledges it's responsibility to safeguard the welfare of every child, young person and vulnerable adult who has been entrusted to its care and is committed to working to provide a safe environment for all of its members. A child or young person is anyone under the age of 18 involved in any club or community activity. A vulnerable adult is anyone who may be unable to take care of himself or herself or be unable to protect himself or herself against significant harm or exploitation. Participants with additional needs and/or disabilities can face further safeguarding challenges.

The key principles of the Rotherham United Community Trust Safeguarding Policy are:

- RUCT responsibility to safeguard and promote the welfare of all children, young people and vulnerable adults is of paramount importance.
- All children, young people and vulnerable adults have a right to be protected from abuse regardless of their Age, Disability, Gender reassignment, Sex, Marriage or Civil Partnership, Pregnancy & Maternity, Race, Religion & Belief or Sexual Orientation
- Participants will receive a safeguarding induction when first attending a session. This includes (but is not exclusive) to students attending educational courses. This induction will inform participants of key contacts, procedures and policies in our aim to keep them safe.
- All suspicions and allegations of abuse or poor practice will be taken seriously and responded to swiftly and appropriately
- Policies will be reviewed annually unless an incident or new legislation or guidance suggests the need for an interim review.
- RUCT will work with other agencies and share information appropriately to ensure the safety and wellbeing of all of our staff, learners and participants. We will support sharing information on a case-by-case basis. Where justified in sharing some confidential information in order to make decisions on sharing further information or taking action. The information shared should be proportionate. Decisions in this area need to be made by, or with the advice of the LADO or relevant designated safeguarding officer.
  (See also RUCT Information Sharing Protocol)

RUCT Safeguarding Statement

We acknowledge that every child, young person or vulnerable adult who plays or participates in community activity should be able to take part in an enjoyable and safe environment and be protected from poor practice and abuse. This is the responsibility of every adult involved in our club.

Rotherham United Community Trust has a role to play in safeguarding the welfare of all children, young people and vulnerable adults by protecting them from physical, sexual or emotional harm and from neglect or bullying. It is noted and accepted that the Rotherham United Community Trust Safeguarding Policy and related regulations applies to everybody in community activity whether in a paid or voluntary capacity.

OTHER POLICIES

This policy should be read in conjunction with other RUCT related policies. The full policies can be found in the Employee Handbook, Safeguarding Policy or website.

These include but are not limited to:
RECRUITMENT & SELECTION POLICY
RECRUITMENT OF EXOFFENDERS POLICY
EQUAL OPPORTUNITIES POLICY
HEALTH AND SAFETY POLICY
IMAGES POLICY
SOCIAL MEDIA POLICY
WHISTLEBLOWING POLICY
CONFIDENTIALITY AND INFORMATION SHARING POLICY
DIVERSITY POLICY
ANTI BULLYING POLICY
PREVENT POLICY

All staff members working with participants in an education setting are required to read the Keeping Children Safe in Education 2020 at least once per year, which is recorded on the staff single central record.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/912592/Keeping_children_safe_in_education_Sep_2020.pdf

INDEX

Content

Section

1. Definitions
2. Legal Framework
3. Review
4. Aims and key principles
5. Designated Safeguarding Lead
6. Designated Safeguarding Officers
7. Human Resources and Disclosure
8. Disclosure barring service
9. Equal Opportunities
10. Ratios for supervision of children
11. Lone working guidance
12. Gifts and favouritism
13. Use of images
14. Transport
15. Medical
16. Complaints
17. Guidelines in the event of concern
18. Responding to a report of suspicion
19. Recording allegations or suspicions
20. Specific information regarding allegations against members of staff
21. Confidentiality
22. Unsubstantiated, unfounded, false or malicious reports
23. Key contacts
23. Appendix One – Signs and Indicators of Abuse
24. Complaints
25. What happens next: Investigations

1 Definitions

1.1 A “Child” (collectively referred to as “Children”) is defined as anyone under the age of 18.

1.2 An “Activity” means any activity or series of activities arranged for a Child or Children by or in the name of The Organisation. These are deemed to be regulated and therefore activate

the required levels of Criminal Record Checks that are associated.

2 Legal Framework – Rules and Regulations

2.1 In the management of its programmes, the discharge of its functions, and in implementing this policy and procedure, The Organisation will remain mindful of its' duty of care and other legal obligations such as those set out in the Health and Safety at Work Act 1974, Data Protection Act 1998, Equality Act 2010 and Protection of Freedoms Act 2012.

2.2 In the case of children, The Organisation is also mindful of its responsibilities under the Following legislation and guidance; 1989 and 2004 Children Act, Working Together to Safeguard Children (2017), Keeping Children Safe in Education 2016, Children and Social Work Act (2017) FA Safeguarding Children Rules and English Football League Rules and guidance. The Organisation is fully committed to ensuring that the best practice recommended by these bodies is employed throughout The Organisation.

The Organisation also recognises its responsibility to work with other agencies, including Local Safeguarding Boards to protect vulnerable young people from harm and to respond to safeguarding concerns.

3 Review

3.1 This policy will be reviewed annually or if there is a statutory legislative or organisational change, or following a safeguarding incident, concern or allegation whereby the policy is found to be in need of revision to ensure the aims and key principles are met. All policy documents and reviews will be submitted to the Board for approval.

4 Aims and Key Principles

The aims of The Organisation's Safeguarding Children and Young People and vulnerable adults Policy are:

- To safeguard all Children and young people and vulnerable adults who interact with The Organisation;
- To demonstrate best practice in the area of safeguarding Children and vulnerable adults;
- To positively reflect and promote the club values in regard to safeguarding children and vulnerable adults;
- To develop a positive and pro-active welfare programme to enable all Children and young people to participate in an enjoyable and safe environment;
- To encourage parents and other members of the Child or young person's family to be involved in a relationship with The Organisation;
- To ensure that coaches, parents and other adults who come in to contact with Children and young people provide good role models of behaviour;
- To promote high ethical standards throughout The Organisation.

The key principles underpinning this policy are:

- The Child's welfare is, and must always be, the paramount consideration;
- All Children and young people and vulnerable adults have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual identity;
- All allegations of abuse or poor practice will be taken seriously and responded to efficiently and proportionately.
- Everyone, including staff, participants (including education learners), employers and other stakeholders will be made aware of and supported to understand the safeguarding policies and procedures implemented by RUCT.

5 Designated Safeguarding Lead

The Designated Safeguarding Lead (DSL) has overall responsibility for the safeguarding of children at The Organisation. The DSL will;

- Report to the Board of Trustee's on recommendations for changes to the Safeguarding Policy and Procedures taking into account legislative changes;
- Undertake regular monitoring and risk assessments of activities involving children and vulnerable adults (or will designate this task to a trained activity lead, or an external assessor as appropriate);
- Ensure they undertake regular and appropriate training for the role.

6 Designated Safeguarding Officers

6.1 The Organisation has Designated Safeguarding Officers (DSO) who have responsibility for the safeguarding of children and vulnerable adults at Rotherham United Community Trust (RUCT)

The DSO will;

- Make the decision to investigate any allegations or concerns of abuse;
- Address any immediate protection issues;
- Make the decision to refer to an appropriate statutory agency (Police or Social Services);
- Liaise with local Safeguarding Boards;
- Ensure staff are trained on Organisation safeguarding procedures;
- Ensure they undertake regular and appropriate training for the role;
- Source appropriate external training for safeguarding;
- Undertake regular monitoring and risk assessments of activities involving children and vulnerable adults (or will designate this task to a trained activity lead, the Safety Operations Manager, or an external assessor as appropriate.
- Access all incidents logged and identify and key trends and patterns to form part of an action plan to continuously improve safeguarding.

Anybody with a concern about a child or young person's welfare should contact the DSL or DSO direct, or their line manager for advice in the first instance. Contact details can be found at the end of this policy.

6.2 All employees, contractors and volunteers are expected to;

- Be alert to signs of abuse and radicalisation and take responsibility for referring concerns to the Designated Safeguarding Officer;
- Be prepared to listen to and take seriously the concerns of children and vulnerable adults;
- Abide by the codes of conduct for employees and volunteers;
- Promote the health, safety and welfare of children and vulnerable adults;
- Maintain records as necessary;
- Set a good example to children by their own behaviour..

7 Human Resources and Disclosure

7.1 Recruitment

As part of The Organisation'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.

7.2 Staff Training & Awareness

This policy and procedure is issued to The Organisation's employees and casual workers who come into contact with children at induction and is also available to all employees on the website. The DSO holds a specific Safeguarding & Safer Working Practice Induction with all new fixed-term, permanent starters and volunteers during which the key elements of The Organisation's Safeguarding 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 relevant Safeguarding Course for their position, staff in direct contact with EFLT and Premier League Club programs will be required to complete the FA's 3-hour Safeguarding Children Awareness workshop and undertake a refresher course on an annual basis, as advised by the FA, at least once every 3 years. All NCS Staff will complete the full NCS safeguarding training, at least once every 3 years and all other staff including Education Tutors will complete the online EFL Safeguarding Essentials on a yearly basis. Details of training and qualifications is retained by the Human Resources Department. All staff will also complete training online safety training, which will include relationships, education and online safety

Guidance on Peer- on Peer abuse for all staff has been expanded, emphasising that all staff should understand the importance of challenging inappropriate behavior between children and young people. Staff should also recognize that downplaying certain behaviors as " just banter " or " boys being boys " can lead to a culture of unacceptable behavior, an unsafe environment for children and young people and a culture that normailses abuse. Staff should understand that even if there are no reports of peer – on peer abuse in the trust , this doesn't mean its not happening. If staff have any concerns of peer-on-peer abuse, they should speak to the designated safeguarding lead.

Safeguarding Awareness courses are also offered by The Organisation to develop knowledge which is department specific.

This information can be made available in alternative formats, such as easy read or large print, and may be available in alternative languages, upon request. Please call 01709 827767 or e-mail community@rotherhamunited.net

7.4 Contractors

All external contractors engaged by The Organisation 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 Organisation the contractor will receive a site induction from a member of the team which covers Safeguarding Children and vulnerable adults and give details of The Organisation's expected code of behaviour. 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.

7.5 Service Level Agreements / Partnership Agreements

The Organisation's commitment to Safeguarding is outlined in any partnership agreements, service level agreements or any other agreements that are in place with any facility or service provider or for commissioned services insofar as those services relate to Children and vulnerable adults.

8. Disclosure and Barring Service

The Organisation is registered with the Disclosure and Barring Service (DBS) to carry out Criminal Record Checks (CRC's) on individuals who work for The Organisation. Enhanced CRCs, plus barred list check where appropriate, enable The Organisation to undertake more thorough recruitment and selection procedures for positions involving work with Children and vulnerable adults.

8.1 New Appointments

All staff that are offered a position which involves working with Children and vulnerable adults in Regulated Activity will be required to undertake an Enhanced DBS CRC 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 CRC has been received, the member of staff will not be permitted to work with Children. All details will be entered into a Single Central Record and monitored by the Head of HR and the HOS.

Should a positive DBS CRC be received, a risk assessment will be carried out by the Safeguarding Lead or relevant Head of Department, with the HR Director to assess the information contained within the CRC. The member of staff may also be asked to attend an interview prior to a recruitment decision being made. The Rehabilitation of Offenders Act and Protection of Freedoms Act should be considered in all cases before a final decision is made.

Data is kept on individual staff members and under the GDPR legislation is securely kept both electronically and physically. RUCT has bought in an external company to manage and monitor this service and have conducted a gap analysis to enable the upmost confidential information and its correct use and storage. Data will be kept for the time of your employment and then limited via securely disposing 1 year after the end of your services.

Rotherham United Community Trust (RUCT) undertakes not to discriminate unfairly against any subject of a criminal record check on the basis of a conviction or other information revealed.

As an organisation assessing applicants' suitability for positions which are included in the Rehabilitation of Offenders Act 1974 (Exceptions) Order using criminal record checks processed through the Disclosure and Barring Service (DBS), RUCT complies fully with the code of practice and undertakes to treat all applicants for positions fairly.

RUCT recognized its legal duty to refer any staff member or volunteer who are removed from employment due to safeguarding concerns either internally or presented by the Local Authority or any other governing bodies (ie The FA). Please see section 19 making a referral.

8.2 New Appointments who already have a CRC

If a new member of staff has been subject to a CRC check by their previous employer The Organisation will still require a further check either by new application or use of the DBS Update service.

8.3 Temporary Staff, Volunteers and External Consultants

The Organisation will ensure that all temporary staff, volunteers and external consultants sign a Self-Declaration Form where appropriate and, in any case, will not have unsupervised access to Children and vulnerable adults during their time with The Organisation.

8.4 **Whilst the following list is not exhaustive, these are the key principles for a participant code of conduct that RUCT will ensure at every session**

1. Everyone has the right to feel safe and valued
2. Participants must respect the leaders and colleagues around them
3. RUCT will provide a safe and secure learning environment
4. Every session will be inclusive as everyone has the right to participation

5. Staff will ensure confidentiality and respect of participant information

9 Equal Opportunities

The Organisation is committed to providing equal opportunities for all staff, players and supporters. The Organisation's policy on equal opportunities can be found in the Employee Handbook.

Children and vulnerable adults who have disabilities are at an increased risk of being abused compared with their non-disabled peers.

They are also less likely to receive the protection and support they need when they have been abused.

Professionals sometimes have difficulty identifying safeguarding concerns when working with Deaf and disabled children. We acknowledge that it is vital that everyone who works with children and vulnerable adults understands how to safeguard those who have disabilities and protect them from harm.

We're using the term 'disabled children' to refer to children and young people with a range of very different conditions and identities, some of whom may not identify as being disabled. This includes children who are Deaf, are on the autistic spectrum, have a condition such as attention deficit hyperactivity disorder (ADHD) and/or children who have a long term illness.

10 Ratios and Supervision of Children

10.1 Any activity undertaken by The Organisation will always be given 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.

10.2 Regardless of these ratios a minimum of 2 members of staff or delivery partner will always be available to supervise an activity. This ensures at least basic cover in the event of something impacting on the availability of one of the adults during the activity (e.g. in the event of a participant requiring the attention of an adult during the activity following an accident).

- For children under 5 the recommended ratio should be no more than 1:6.
- For children under 8 the recommended ratio should be no more than 1:8.
- For children over 8 the recommend ratio should be no more than 1:10, but this varies depending on the activity. Advice should be sought from the Safeguarding Lead or Officer if unsure.
- For Academy activities, the Football League's Youth Development Rules prescribe a ratio of 1 Coach to 8 Players (over 8s).
- For Trust activities, the Football Association prescribe a ratio of 1 Coach to 16 Players.
- For organised groups of children attending a match day at the New York Stadium, the minimum ratio is 2 responsible adults to 20 children.

Where the Organisation is taking responsibility for the care of the children, parents/carers should not be included in supervision calculations.
These ratios are partially based on Ofsted's guidelines which are as follows:
Child's age Ratio of adults: children

Age	Ratio
0-2	1:3
2-3	1:4
4-8	1:6

9-12	1:8
13-18	1:10

11. **Lone Working**
Working 1:1 with Children and vulnerable adults should only occur in exceptional circumstances, and if it does, the staff member must seek and follow the specific guidance from the Designated Safeguarding Officer.

12 **Gifts and Favouritism**
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. All staff are expected to adhere to the Organisation's Anti-Corruption and Bribery policies which can be found in the Employee Handbook.

12.2 The Organisation 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 and they should be dealt with appropriately.

12.3 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.

12.4 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 favouritism.

13 Use of Images

13.1 The Organisation takes its guidance on the use of images from guidelines issued by the FA, Football League and Local Safeguarding Board and follows the (UKCIS 2020) guidance. All images are taken by The Organisation's officials who have been briefed by the member of staff (and where possible the Organisation's Safeguarding Officer) responsible for the activity being photographed / filmed as follows:

- Before taking images of Children, parental consent is sought in writing at the start of each football season or prior to the event. Parents/Legal Guardians are responsible for informing The Organisation 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 Organisation will not allow an image to be used for something other than that for which it was initially agreed;
- All Children featured in The Organisation's 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/Trust photographers will, where applicable, undertake a DBS check 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 Organisation and the Local Safeguarding Board from time to time;
- 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/Trust document;
- No images of children featured in Club/Trust 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/Trust officials and are stored safely and securely at The Organisation's premises;

- Any instances of inappropriate images in football should be reported to The Organisation's Head of Media, and the Safeguarding Lead immediately;
- The Organisation does not put young player profiles with images and personal information on its website.

14 Transport

14.1 The Trust has qualified drivers who are fully DBS checked and are cleared to be in charge of transportation for the Trust

14.2 When Children and vulnerable adults are being transported on behalf of the RUCT they shall, where possible, be accompanied by their team Manager, a coach or a designated tour leader.

14.3 In some cases, where Children need to be transported unaccompanied, this will be with an approved travel company (who have signed up to relevant Policies of the Organisation), or by a member of The Organisation's staff who has a satisfactory DBS check and has been issued with (and received training on) The Organisation's 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 Organisation also provides a duty of care for young person's when travelling on behalf of The Organisation.

14.4 The Trust has a Transport Policy that should be followed when children are being transported on behalf of the Trust. Children shall be accompanied at all times by the Activity Leader. Only vehicles and drivers approved under the Trust's Transport Policy will be used to transport children. Under no circumstances will a member of staff use a private vehicle to convey children engaged in an Activity being delivered by the Trust.

15. Medical

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

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

15.3 The Medical Department has a separate Code of Conduct for use when dealing with children and young people and vulnerable adults that is issued to all staff within the Medical Department.
There may be occasions where medical treatment is necessary during an Activity or event that is run by RUCT and the Trust will ensure a level of medical cover is available at all its activities including at least one suitably trained Emergency First Aider. All relevant and necessary medical information of participants will be treated in confidence but provided to the Event Lead if necessary, e.g. asthmatic participants. Specialist medical advice and further information will be sought when working with children who have additional needs or disability.

16 Complaints

In the event that any learner, participant or parent raises a concern about poor practice in sessions or on programmes then our complaints procedure should be followed. Details of the complaints procedure and an initial enquiry form can be found on the RUCT website under 'policies & Procedures'

http://www.rucst.co.uk/policies-procedures/

Poor practice examples include unfairly singling out a learner or participant, belittling a learner or participant or discriminating against them in some way. Complaints are managed by senior staff, the Head of Community and Trustee's where necessary. An explanation of the complaints procedure is included on the website via the link provided.

Should you feel unconfident in reporting to the organisation OR that you have not received a satisfactory response to your concern you can approach the following people/organisations:

Clare Macrory, Designated Safeguarding and Welfare Officer, Sheffield and Hallamshire County FA - 0114 261 5514 / Clare.Macrory@SheffieldFA.com

Tara Lawson, English Football League, EFL House, 10-12 West Cliff, Preston, PR1 8HU, 01772 325800 tlawson@efltrust.com

Charity Commission - Charity Commission – whistleblowing@charitycommission.gsi.gov.uk

NCS Trust - The NCS 'Speak Up' helpline and accompanying email account enables the reporting of all issues or concerns that relate to NCS and its delivery. All calls and emails will be received directly by NCS Trust and will respect the reporting party's right to anonymity. T: 0800 9806 899 E: confidential@ncstrust.co.uk

NSPCC
Contact the Advice Line
Call 0800 028 0285
Email help@nspcc.org.uk

Alternatively you can contact The FAs Safeguarding Team via 0800 169 1863 # 6300 (during office hours Mon-Fri exc bank holidays) or (including out of hours) the FA/NSPCC Child Protection Helpline on 0808 800 5000

17 Guidelines in the Event of a Concern

17.1 Highlighting Concern

Although the Organisation is committed to doing the utmost to safeguard Children and vulnerable adults from harm there may be occasions when concern is raised over the treatment of a Child.
"Child abuse" and "neglect" are generic terms encompassing all ill treatment of Children and vulnerable adults as well as cases where the standard of care does not adequately support the Child's health or development. Children 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 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.

RUCT will support learners, participants and their families, and staff by:

- Taking all suspicions and disclosures seriously
- Nominating a link person (DSL) who will keep all parties informed and be the central point of contact

- Where a member of staff is the subject of an allegation made by a learner or participant, separate link people will be nominated to avoid any conflict of interest
- Responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety
- All staff should reassure victims of abuse that they are being taken seriously and will be supported. Children and young people should never be made to feel ashamed or that they are creating a problem by reporting abuse, sexual violence or sexual harassment.
- Staff should be aware of the possible
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies
- Maintaining and storing records securely
- Offering details of helplines, counselling or other avenues of external support
- Following the procedures laid down in our whistleblowing, external whistleblowing, complaints and disciplinary procedures
- Cooperating fully with relevant statutory agencies

17.2 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 a Trust 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. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a Child. A person might do this because they enjoy or need the attention they get through having a sick Child. Physical abuse can be caused through omission or the failure to act to protect.

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

Child criminal and sexual exploitation

The vulnerability of children involved in criminal exploitation is not always recognised by adults and professionals and the indicators of exploitation are different for boys and girls. Child Exploitation is a form of sexual abuse and can be a one-off occurrence or might happen over time. All children and young people, including 16 and 17 year olds, can experience child sexual exploitation.

Neglect: Neglect is the persistent failure to meet a Child's basic physical and/or psychological needs, likely to result in the serious impairment of the Child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a Child 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 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's basic emotional needs.

Emotional Abuse: Emotional abuse is the persistent emotional maltreatment of a Child such as to cause severe and persistent adverse effects on the Child's emotional development. It may involve conveying to

Children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the Child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on Children.
These may include interactions that are beyond the Child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the Child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing Children frequently to feel frightened or in danger, or the exploitation or corruption of Children. Some level of emotional abuse is involved in all types of maltreatment of a Child, though it may occur alone.

Bullying: Bullying is not always easy to define and can take many forms. The three main types are: physical, verbal and emotional. Bullying can also take the form of online Cyber bullying where technology and The Internet is used to post or share derogatory comments and/or pictures of children which cause them alarm or distress, in applications or social media.
The Organisation has a zero-tolerance approach to bullying and any reported incidents of bullying by a staff member to a Child, Child to staff member or Child to Child will be taken seriously and investigated by the Designated Safeguarding Officer. 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 Designated Safeguarding Lead.

Child Sexual Exploitation: Child Sexual Exploitation is a form of sexual abuse where young people are exploited for money, power or status. It can occur directly or through the use of technology. Young people may be groomed online through social media sites and apps including dating apps.

Forced Marriage (Also may be referred to as 'Honour-based violence): Forced marriage is a marriage in which one or both partners do not consent to the marriage and are coerced into it. Coercion can be physical ie using violence, threats, emotional or financial. It also applies to vulnerable adults who may not have the capacity to consent to the marriage. People who are forced to marry or fear they might be forced to marry can go missing from education.

Female Genital Mutilation (FGM): Female Genital Mutilation (FGM) is illegal in the UK. Cases of where FGM is reported to have taken place or concerns that it might take place should be treated as a safeguarding issue. Although most cases of FGM are thought to take places between the ages of 5 and 8 years, it should be recognised that FGM can occur at any time, for example on reaching adulthood or before marriage.

Radicalisation: Radicalisation is the process by which individuals come to support terrorism or violent extremism. Young people may express extremist ideas, be in possession of extremist literature or express extremist views. They may associate with known extremists or seek to recruit others to an extremist ideology. Concerns that a child's behaviour indicates involvement with extremist ideas should be considered a safeguarding issue and reported as such. See also RUCT Prevent Policy in relation to radicalisation and RUCT's Prevent Agenda linked to the safeguarding of our learners, participants, volunteers and staff.

County Lines: County Lines is the criminal exploitation of children, when gangs and organized crime networks groom and exploit children to sell drugs, arms and other goods such as motor vehicles. Often these children are made to travel across counties, and they use dedicated mobile phone "lines" to supply the goods.

Serious Violence Risk Factors

- Being Male
- Having been frequently absent or permanently excluded from school

- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Online Safety

Online safety poses a serious risk as we increase our delivery methods to include online platforms and more hybrid working utilising working from home format education and programs. All staff should be fully aware of all online risks and have completed online safety training. This training should include details on the usage of mobiles and smart phones. When conducting education through online platforms we will follow the guidance of (dfE 2021b) to ensure that appropriate security procedures in place to safeguard their systems.

17.3 The concept of significant harm

Some children are in need because they are suffering, or likely to suffer, significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children, and gives local authorities a duty to make enquiries to decide whether they should take action to safeguard or promote the welfare of a child who is suffering, or likely to suffer, significant harm.

A court may make a care order (committing the child to the care of the local authority) or supervision order (putting the child under the supervision of a social worker or a probation officer) in respect of a child if it is satisfied that:

- The child is suffering, or is likely to suffer, significant harm; and
- The harm, or likelihood of harm, is attributable to a lack of adequate parental care or control.

There are no absolute criteria on which to rely when judging what constitutes significant harm. Consideration of the severity of ill-treatment may include the degree and the extent of physical harm, the duration and frequency of abuse and neglect, the extent of premeditation, and the presence or degree of threat, coercion, sadism and bizarre or unusual elements.

Each of these elements has been associated with more severe effects on the child, and/or relatively greater difficulty in helping the child overcome the adverse impact of the maltreatment. Sometimes, a single traumatic event may constitute significant harm, for example, a violent assault, suffocation or poisoning. More often, significant harm is a compilation of significant events, both acute and long-standing, which interrupt, change or damage the child's physical and psychological development. Some children live in family and social circumstances where their health and development are neglected.

For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the child's own assessment of his or her safety and welfare, the family's strengths and supports, as well as an assessment of the likelihood and capacity for change and improvements in parenting and the care of children and young people.

18 Responding to a Report or Submission

18.1 A Designated Safeguarding Officer or the Lead Designated Safeguarding Officer should be contacted as early as possible and within 24 hours in any circumstance, however it is recognised that an individual may need to respond to a situation immediately. With this in mind the following guidelines offer help and support in responding to abuse or a suspicion of abuse or poor practice.

Do:

- Ensure the child, young person or adult's safety;
- Treat any allegations extremely seriously and act at all times towards the person as if you believe what they are saying, although do not directly say the words "I believe you";
- Tell them they are right to tell you;

- Reassure them that they are not to blame;
- Be aware of the possible health needs that might arise following sexual assault, such as physical mental and sexual health problems and unwanted pregnancy
- Staff should recognise that children and young people might not find it easy to talk about their abuse verbally. Staff should be aware of signs and behaviours that might indicate abuse.
- Be honest about your own position, who you have to tell and why;
- Tell them what you are doing and when, and keep them up to date with what is happening;
- Take further action – you may be the only person in a position to prevent future abuse;
- Write down everything said and what was done (handwritten is preferable) and sign and date the notes. An Incident Report Form should be used where possible and, in any case, a referral must be made to the Organisation within 24 hours of the incident taking place;
- Seek medical advice if necessary.

Don't:

- Make promises you cannot keep or to keep secrets;
- Interrogate the person or child – it is not your job to carry out an investigation – this will be up to the Police and/or Children's Services who have experience in this;
- Cast doubt on what they have told you, don't interrupt or change the subject;
- Say anything that makes the person feel responsible for the abuse;
- Inform parents/carers – the Designated Safeguarding Lead or Officer will make this decision based on whether there is suspicion of their involvement.
- In the event of suspicion of sexual abuse do not let the person bathe or shower until given permission to do so. Washing can destroy valuable evidence
- DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.
- Make sure you tell a Designated Safeguarding Officer immediately, they will know how to follow this up and where to go for further advice.

19 Recording Allegations or Submissions

19.1 The Designated Safeguarding Officer will immediately report any allegation to the Designated Safeguarding Lead, who will ask for a written factual statement from the person making the report. An Incident Report Form must be completed and submitted within 24 hours to the Designated Safeguarding Officer and Designated Safeguarding Lead.

19.2 Any statement made by the child should be reported in their own words. These reports should be confined to facts. Any opinion, interpretation or judgement should be clearly stated as this, questions kept to a minimum, and where used, they should be of an open format. No suggestion of who the perpetrator was or how any concern or incident happened should be suggested.

19.3 The Organisation will ensure that any child concerned is not Interrogated – it is not your job to carry out an investigation – this will be up to the Police and Children's Services who have experience in this;

- Cast doubt on what the child has told you, don't interrupt or change the subject;
- Say anything that makes the child feel responsible for the abuse;
- Inform parents/carers – the Designated Safeguarding Lead or Officer will make this decision based on whether there is suspicion of their involvement.

DOING NOTHING IS NOT AN OPTION; IT IS YOUR RESPONSIBILITY TO ACT.

Make sure you tell a Designated Safeguarding Officer immediately, they will know how to follow this up and where to go for further advice.

20 Specific information regarding allegations against members of staff

20.1 If the report involves an allegation about any member of the Organisation's staff (whether full time, part time, paid, unpaid, contracted, engaged, voluntary etc.) and the Organisation believes that the report could demonstrate that the member of staff in question has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or

behaved towards a child or children in a way that indicates he or she is unsuitable to work with children, then the Designated Safeguarding Lead or Designated Safeguarding Officer shall immediately inform the Local Authority Designated Officer (LADO) where the alleged incident took place so that he or she can consult with the Police and Local Authority Children's Social Care colleagues as appropriate. Where the Designated Safeguarding Lead or Safeguarding Officers are unsure as to whether the report meets the criteria stated above, the advice of the LADO shall still be sought.

20.2 The member of staff in question may be asked to write a brief report, as may any other person that is deemed to have an involvement in the allegation. The member of staff in question will be asked to stay away from activities pending the conclusion of any investigation. This process would only be carried out once the advice of the above mentioned external bodies had been sought and only then in consultation with the Designated Safeguarding Lead or Designated Safeguarding Officer. Providing it does not contradict with any advice received from the LADO, any internal investigation will be carried out in line with the Organisation's Management and Human Resource Policies and either general or department-specific Grievance Procedures as they are applicable.

21 Confidentiality

21.1 There is always tension and caution around issues of confidentiality. The advice for all staff at the Organisation is that no guarantee of confidentiality can be given to a child (although this does not necessarily mean that the parents/carers have to be told).

21.2 A child should never be pressured to give information or show physical marks unless they do so willingly. If they choose to show markings, two members of staff should be present and any marks raising concern should be recorded on the incident and report form.

21.3 There are actions which staff have to, and are obliged to take, once they are aware of a problem. Undertakings of confidentiality should not be given either to the person making the allegations or to the person being interviewed. A matter is confidential on a need to know basis and nobody should have any reservations about referring any issue to the Designated Safeguarding Lead or any Designated Safeguarding Officer. The key issue is that the welfare of the child is protected.

22 Unsubstantiated, unfounded, false or malicious reports

A new section has been added on responding to allegations which are found to be unsubstantiated, unfounded, false or malicious. In these cases, the DSL should consider whether the child or person who has made the allegation is in need of support or may have been abused by someone else.

23 Key Safeguarding contacts and further information sources Internal Safeguarding Contacts

RUCT Senior Safeguarding Manager – Paul Douglas – 01709 827767
RUFC Safeguarding Lead – Julie Shore - 07921472271
RUCT Designated Lead Officer – Jamie Noble – 07943611112
RUCT Designated Safeguarding Officer (Community) – Kirsty Maxey – 01709827767

External Safeguarding Contacts

Rotherham Local Safeguarding Children Board 01709 336080

The FA/NSPCC Helpline 0808 800 5000; Textphone 0800 056 0566
NSPCC SMS 88858

The English Football League
Alex Richards EFL: Safeguarding Manager
Debbie Lyons-Treadell: EFL Safeguarding Advisor Support
Tel: 01772 325811

Mental Health Links and resources to support young people and staff (DfE 2018)
Department for Education (DfE) (2018) Mental Health and behavior in schools .[accessed 27.10.21]
https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2

24 Complaints

Policy Statement

We hope you will be satisfied with the service you receive from Rotherham United Community Sport Trust. However, we do acknowledge that you may sometimes feel that you want to complain about something we have or have not done. It is important that you tell us when you are not pleased as we can use your feedback to correct mistakes where they have been made. We can also use this information to develop policies and procedures to improve the service given

A complaint is any expression of dissatisfaction by any Rotherham United Community Sport Trust service user or stakeholder, whether justified or not. Complaints should be seen as an opportunity for Rotherham United Community Sport Trust to improve the quality of its services, and to improve relations with its stakeholders and service users.

We aim to ensure that:

- Making a complaint is as easy as possible;
- We treat a complaint as a clear expression of dissatisfaction with our service which calls for an immediate response;
- We deal with it promptly, politely and, when appropriate, confidentially;
- We respond in the right way - for example, with an explanation, or an apology where We have got things wrong, or information on any action taken etc;
- We learn from complaints, use them to improve our service, and review annually our complaints policy and procedures.

Reasons for complaining:

A complaint can arise if an individual perceives that we have:

- Done something wrong
- Failed to do something we should have done

- Acted unfairly and discourteously
- Failure to provide a service at the right time or to meet service expectations

Before you make a complaint, it is important to think about what you want to happen as a result of your complaint, and to make this clear at the beginning. You may want:

- An apology
- Someone to explain what has happened
- Some changes or improvements to be made to make sure people recognise their mistake
- To make sure the same thing does not happen again.

Serious complaints

Complaints of a serious nature e.g. fraud or sexual harassment will follow Rotherham United Community Sport Trust discipline or grievance procedure. Any complaint thought to be of a serious nature should be passed immediately to the Chair of the Board of Trustees.

Other complaints

All other complaints should follow the procedure below.

Stage 1

When a verbal complaint is made, staff should:

- Be courteous.
- Minimise the need for the complaint to be made, if possible
- Record the complaint
- The name and address of the complainant
- Detail of the complaint ensuring that a clear and comprehensive summary on concern is taken
- What redress the complainant wants
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome recorded
- Read back the complaint for verification

If you have a complaint about the service you have received from Rotherham United Community Sport Trust you can speak to the person who has been dealing with you.

Ask to speak to the Line Manager in the first instance to see if it can be resolved informally

Stage 2

- The complaint if it cannot be resolved informally then a written letter should be sent to the Community Manager (Jamie Noble) of the organisation.
- If the complaint is about the Community Manager, then the complaint should be sent to the Chair of the Board of Trustees (Paul Douglas)
- A letter should be sent acknowledging the complaint within 5 working days, explaining the complaint procedure and timescales.

- The complaint should be investigated and recommendations made within 15 days after the letter of acknowledgement being sent to you.

Stage 3

If you are not satisfied with the response from the Community Manager you can write to the Chair of the Board Trustees and ask your complaint to be reviewed who will acknowledge your request within 5 working days and will response in writing within 15 days from letter of acknowledgement after reviewing the complaint and making his recommendations. The Chair of the Board of Trustees will either support the recommendations of the Community Manager or instigate a further investigation

However some issues will be more complex and may require longer to fully investigate. If the matter requires more detailed investigation, you will receive an interim response describing what is being done to deal with the matter and when a full reply can be expected and from whom.

Our Undertaking;

If a complaint is justified Rotherham United Community Sport Trust will put right what went wrong and if possible adjust service delivery to prevent a similar problem arising in the future.

25 What happens next: Investigations

Police investigations If the allegation or concern, or any evidence seen at any stage in the process, indicates that the law in relation to safeguarding has (or may have been) broken, RUCT will report it to the police without delay. For concerns relating to employees or volunteers within the CYPD, the safeguarding team will provide guidance to the manager responsible, and liaison with the police will be conducted by an area manager or above. For teams outside of the CYPD, liaison with the police will be conducted by the safeguarding team.

RUCT will fully cooperate with the police in any investigation. Requests for access to data will be coordinated through the offices of the records/archive and data protection manager.

If a police investigation is to proceed, other processes such as disciplinary investigations are usually suspended pending the outcome of the police investigation. This is important to make sure that evidence for the police investigation is not contaminated.

Designated Officer, Children's Services or Adult Social Care inquiries Whilst it is rare for the Designated Officer, Children's Services or Adult Social Care to carry out an inquiry into concerns or allegations, they can choose to do this. Should an inquiry occur, RUCT will fully cooperate.

Access to data will be coordinated through the offices of the records/archive and data protection manager.

Social Care investigations If the allegation or concern, or any evidence seen at any stage in the process, indicates that Social Care need to be involved , RUCT will report it to the MASH Team without delay. For concerns relating to employees or volunteers within the CYPD, the safeguarding team will provide guidance to the manager responsible, and liaison with social care and as appropriate through the Designated Safeguarding Lead.

RUCT will fully cooperate with the local authority safeguarding team and police in any investigation. Requests for access to data will be coordinated through the offices of the records/archive and data protection manager to ensure all GDPR requirements are met.

If a police / social care investigation is to proceed, other processes such as disciplinary investigations are usually suspended pending the outcome of the police investigation. This is important to make sure that evidence for the police / social care investigation is not contaminated.

Designated Officer, Children's Services or Adult Social Care inquiries Whilst it is rare for the Designated Officer, Children's Services or Adult Social Care to carry out an inquiry into concerns or allegations, they can choose to do this. Should an inquiry occur, RUCT will fully cooperate.

Access to data will be coordinated through the offices of the records/archive and data protection manager

If an inquiry by the Designated Officer or Local Authority is to proceed, other processes such as disciplinary investigations are usually suspended pending the outcome of the investigation. This is important to make sure that the evidence for the police investigation is not contaminated.

OFSTED Investigations RUCT has only one OFSTED registered service, the Post Adoption and Care Team. Should a concern arise in that service, OFSTED can choose to carry out its own investigation into the concerns.

OFSTED must be notified by the Responsible Individual (this is usually the director of CYP) when allegations of concerns about employees or volunteers arise.

Internal investigations Where there is no police investigation, or investigation by the Designated Officer or Children's Services, there may be a need for an internal investigation led by RUCT. This must be agreed in consultation with the Designated Officer and confirmed in writing. If new information comes to light of additional safeguarding concerns, the Designated Officer must be informed. They must also be informed of the final outcome.

The investigation will be conducted following Terms of Reference that have been agreed by HR, the safeguarding team and the senior manager responsible within the directorate concerned. Terms of Reference should detail who is conducting the investigation and who they are reporting to, the reasons for the investigation including the details of the concerns, the remit (or scope) including actions to be taken if new safeguarding or other concerns materialise, what may be looked in the way of evidence including interviews, who the report will be issued to and how else it may be used. Within the Terms of Reference, realistic timescales for completing the investigation should be outlined.

Internal investigations into allegations require the safeguarding team to have 'full oversight'. This means oversight of all key documents that are linked to safeguarding evidence, and regular liaison with those leading the investigation to provide advice, guidance and instruction. As allegations are also a potential disciplinary matter, the HR business partner will also have full oversight.

The safeguarding investigation will be conducted by individuals who are independent of the service or team. The investigators will need to be senior to the individual concerned and have sufficient experience of investigating disciplinary matters, or safeguarding concerns or complaints. If the allegations or concerns are about a person who is a director or above, this may mean that the investigation is conducted by someone who is independent of RUCT.

The safeguarding investigation will gather facts by looking at data and records. Interviews with employees and volunteers facing allegations will be conducted following the procedure set out in the Disciplinary Process.

Very careful consideration will need to be given regarding the need to interview a child or young person. If it is felt to be essential for the investigation, parental involvement and/or the support of an advocate must be considered.

The investigators will produce a written report and, using the evidence found, draw conclusions and make recommendations to address outstanding safeguarding concerns. In relation to any potential disciplinary process, the report will only make a recommendation based on their findings and confirm whether there is a case to answer in a disciplinary process.

If at any stage in the process information is seen that the law may have been broken, this must be reported to the police and the Designated Officer. The safeguarding team must also be consulted by those carrying out the investigation.

If the investigation recommends that a disciplinary hearing is required, the Disciplinary Process will be followed.

The outcome of the internal investigation, including any disciplinary outcome, must be shared with the Designated Officer. Any advised follow-up actions from the Designated Officer must then be prioritised. The reports and outcomes of these processes must also be shared with the safeguarding team.

Where an employee or volunteer resigns prior to the conclusion of a safeguarding investigation or disciplinary action relating to a safeguarding issue, or is dismissed as a result of a safeguarding concern, the investigation must be completed and the findings recorded on their personnel file and referred to the DBS. In such cases a compromise agreement will not be offered.

In the event of a referral to the DBS service, please visit https://www.gov.uk/guidance/making-barring-referrals-to-the-dbs#what-is-a-referral following the process found at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/502089/DBS_referral_flowchart.pdf

What happens next: Outcomes

Types of outcome Outcomes following a safeguarding investigation regarding employees and volunteers can be:

 Substantiated allegations: This is when there is sufficient evidence to prove the allegation or concern that a child has been harmed, or there was a risk of harm from the actions of an employee or volunteer. In such cases, it is likely that the police will need to be notified. The Designated Officer should be informed what actions have been taken. Investigating officers should make any organisational learning recommendations.

Malicious allegations: This is when there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive. In these circumstances, the police should be asked to consider what action may be appropriate.

False allegations: This is when there is sufficient evidence to disprove the allegation, however there is no evidence to suggest there was a deliberate intention to deceive. The Designated Officer should be advised of the outcome and if necessary, the investigating officers may make organisational learning recommendations.

Unsubstantiated allegations: This is when there is insufficient evidence to either prove or disprove the allegation, therefore the term does not imply guilt or innocence. The Designated Officer should be advised of

the outcome, with such cases investigating officers may highlight other matters that need consideration as well as any organisational learning recommendations.

Unfounded allegations: This is an additional definition used where there is no evidence or proper basis to support the allegation being made. It may indicate that the person making the allegation misinterpreted the incident, was mistaken about what they saw, or may not have been aware of all the circumstances.

Cases where an allegation was proven to be false, unsubstantiated, or malicious should not be included in employer references. This includes a history of repeated concerns of allegations that have all been found to be false, unsubstantiated or malicious.