



COVENTRY CITY FOOTBALL CLUB LIMITED

Safeguarding Policy

...LET'S ALL SING TOGETHER

#PUSB 

STATEMENT FROM THE BOARD

Coventry City Football Club Limited ("**the Club**") is committed to safeguarding the welfare of children, young people, and vulnerable adults. The Club will endeavour to ensure the safety of all those who engage with and come into contact with the Club. The Club expects all staff, players, volunteers, participants, contractors and guests to share this commitment and to support and develop a culture of safeguarding vigilance throughout the organisation.

Safeguarding is everybody's responsibility.

The Club makes provisions for children and young people, young players and adults at risk through adherence to and understanding of the Club's Safeguarding Policies and Procedures, and in accordance with the EFL Safeguarding Strategy and Guidelines, including a robust safer recruitment process.

The Club believe that all staff, players, volunteers, participants, contractors, and guests have a responsibility to report any concerns to the Club relating to any concern about the welfare of any child, young person, or vulnerable adult.

The Club have appointed a Senior Safeguarding Manager ("**SSM**"), a Head of Safeguarding (HOS) a Academy Safeguarding Lead (**ASL**) and a number of Designated Safeguarding Officers ("**DSOs**") who operate under the Head of Safeguarding ("**HOS**") throughout the organisation both during the week and on match days. The SSM, HOS, ASL and DSOs all undergo safeguarding training on a regular basis.

The Club is committed to ensuring that:

- The safety and welfare of children, young people, and vulnerable adults under the care of the Club is paramount.
- All children, young people and vulnerable adults that engage with the Club, regardless of age, culture, social background, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to safety and protection from abuse, harm or poor practice.
- The Club will work to empower young people, adults at risk and vulnerable groups to safeguard themselves and develop their resilience to harm or abuse.
- Staff have a responsibility to act on a suspicion or disclosure which suggests an adult at risk, or a child may be at risk of harm. Any concerns must be reported immediately on MyConcern which will automatically notify the SSM, HOS.
- All suspicions, reports and/or allegations of abuse will be taken seriously, investigated thoroughly, and responded to swiftly and appropriately, which may involve the appropriate Local Authority teams, where necessary.
- The Club has a responsibility to fully support anyone who in good faith reports their concerns that a child, young person, or adult at risk is, or may be, being abused or mistreated.

The Club's Safeguarding policies are updated and endorsed by the Board on an annual basis or where there is change of legislation, regulation or guidance.

Through this policy the Club aims to:

- Safeguard all children, young people and vulnerable adults that come into contact with the Club.
- Demonstrate best practice in the area of safeguarding children, young people and vulnerable adults.
- Increase awareness and understanding of safeguarding issues throughout the Club.
- Provide guidance for parents and carers on understanding the reporting procedures.
- Provide guidance for staff, players, volunteers, contractors, and guests on understanding the reporting procedures.
- Ensure that coaches, parents, participants, staff, players, and other adults who come into contact with children, young people and vulnerable adults provide good role models for behaviour.
- Promote high ethical standards throughout the Club.
- Reduce the stigma attached to mental health issues and promote positive wellbeing throughout the Club
- Provides a secure environment that encourages openness and trust.
- Can respond effectively to concerns about Staff, players, and Volunteers mental Health.
- Embeds the skills Staff, players and Volunteers need to make good decisions about their own mental health and wellbeing.
- Offers comprehensive pastoral and medical support that is accessible to all Staff and players.

DEFINITIONS AND TERMINOLOGY

The Club – refers to Coventry City Football Club and the Academy, its staff, and all activities it undertakes. In certain circumstances, it may also refer to such as Sky Blues in the Community and other third parties with an entrusted responsibility for delivering Club-supported activity.

Staff – refers to persons employed by and receiving payment for services from the Club. They could be full time, part time, casual or contracted. This is irrespective of their position, length of employment, or nature of their contract.

Volunteers – persons who freely offer their skills and expertise or take part in a task, event, or enterprise with the Club at their own expense in terms of time and/or resources. This also includes Interns who are carrying out volunteer activities as part of their study on a recognised course at University and match-day volunteers.

Child/ren – defined in the Children's Act (1989) as any person under the age of 18.

Vulnerable adult/s – an adult (person aged 18 and over) who is, or may be in need of, one of the following services: Health care; relevant personal care; social care work, assistance in relation to general household matters by reason of age, illness or disability; relevant assistance in the conduct of their own affairs (due to age, illness or disability in prescribed circumstances)

Safeguarding – preventative and reactional measures taken by the Club to ensure; the risk of harm or mistreatment to the welfare of vulnerable groups is minimised; the health or wellbeing of vulnerable groups is not impaired when engaging in Club related activities; an environment exists that allows vulnerable groups to be cared for safely and allows for the best possible outcomes for them and provides them with the best life chances possible.

Welfare – the health, happiness, and fortunes of an individual and the humanitarian aspects of their life including personal need and physical and mental development.

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.

Child Protection – the process of protecting individual children identified as either suffering, or likely to suffer, significant harm as a result of abuse or neglect. It involves measures and structures designed to prevent and respond to abuse and neglect.

Child Abuse – involves acts of commission and omission, which results in harm to the child.

The four types of Child Abuse are defined as follows:

- **Physical abuse** - Physical abuse is deliberately hurting a child causing injuries such as bruises, broken bones, burns or cuts.
- **Sexual abuse** - There are two different types of child sexual abuse. These are called contact abuse and non-contact abuse.
- Contact abuse involves touching activities where an abuser makes physical contact with a child, including penetration.
- Non-contact abuse involves non-touching activities, such as grooming, exploitation, persuading children to perform sexual acts over the internet and flashing.
- **Emotional abuse** - Emotional abuse is the ongoing emotional maltreatment of a child. It's sometimes called psychological abuse and can seriously damage a child's emotional health and development. Emotional abuse can involve deliberately trying to scare or humiliate a child or isolating or ignoring them.

- **Neglect** - Neglect is the ongoing failure to meet a child's basic needs and is the most common form of child abuse.

RULES, REGULATIONS AND GUIDANCE

The Club is governed by the legislation, rules and regulations set out by key governing agencies including the Government, The Football Association, The EFL and the NSPCC Child Protection in Sport Unit. This Safeguarding Policy has been developed with reference to the policies and procedures and is underpinned by the following legislation:

- Working Together to Safeguard Children (2018)
- The Children Act (1989 and 2004)
- What to do if you're worried a child is being abused Advice for Practitioners (2015)
- Safeguarding Vulnerable Groups Act (2006)
- Protection of Freedoms Act (POFA, 2012)
- Female Genital Mutilation Act (2013)
- Keeping Children Safe in Education (2023)
- Sexual Offences Act (2003)
- UN Convention on the Rights of the Child (1989)
- The Mental Capacity Act (2005)
- The Care Act (2014)
- Every Child Matters (2003)
- Human Rights Act (1998)
- No Secrets (2000)
- Standards for Safeguarding and Protecting Children in Sport (NSPCC and CPSU, 2020)
- Health & Safety at Work Act 1974
- Management of Health & Safety at Work Regulations 1999
- Modern Slavery Act 2015
- Mental Health Act 1983
- Counter Terrorism and Security Act 2015
- Private Fostering Regulations 2005
- General Data Protection Regulations 2018
- SEN Code of practice guidance 2015
- What to do if you're worried a child is being abused Advice for practitioners 2015

The Club recognises its responsibility to maintain regular communication with the LSCB, Local Authority children's services, Local Authority Designated Officer and the Police safeguarding teams.

The communication of the Club with the Local Authorities is centred upon supporting the Club with; reporting/monitoring of Safeguarding incidents, sharing of best practice, sharing information, changes in legislation, sharing of important local

area information and workforce best practice and training and development and any other relevant appropriate Safeguarding support.

The Club will ensure that any partner agencies also have robust Safeguarding policies and Procedures in place and where appropriate there will be a Service Level Agreement.

SENIOR SAFEGUARDING MANAGER

The Club's Senior Safeguarding Manager ("**SSM**") has responsibility to oversee and direct the safe provision of all activities and associated training relating to children and young people.

This is a strategic role providing leadership and guidance on all safeguarding matters and relevant legislation, along with implementing safeguarding awareness and best practice across the Club and Academy.

The SSM will lead and provide direction to the Head of Safeguarding ("**HOS**")

The SSM has delegated the day-to-day Safeguarding responsibilities to the Head of Safeguarding.

The SSM will support the Head of Safeguarding (HOS) who is responsible for:

- Manage the implementation of the Club's Safeguarding Strategy.
- Ensure Club compliance with statutory obligations under relevant legislation and the Affiliated Football Safeguarding Policy.
- Work closely with Heads of Department to develop and implement safer recruitment and induction practices across the organisation.
- Continuously work to maintain, embed, and improve the Club's safeguarding provision ensuring the highest standards for safeguarding vulnerable groups.
- Manage the development, implementation, promotion and review of the Club's safeguarding vulnerable groups' policies, practices, and good practice guidelines.
- Be the lead member of staff to manage safeguarding incidents, concerns, and allegations.
- Be the lead member of staff to work in partnership with statutory and football authorities, sharing information where appropriate to safeguard vulnerable groups.
- Maintain accurate, confidential, and up to date records on all safeguarding incidents, concerns, and allegations.
- Give direction and guidance to staff in respect of safeguarding incidents, concerns, and allegations.
- Support staff to respond appropriately to concerns about the welfare or safety of vulnerable groups.
- Ensure that ASL and DSOs are trained, supported, and supervised.

- Act as the Club's lead source of safeguarding support, advice, and expertise.
- Ensure staff understand their individual responsibilities to safeguard and promote the welfare of vulnerable groups.
- Develop relationships with statutory and football authorities.
- Attend regular safeguarding training and maintain an up-to-date knowledge base of relevant legislation, regulations, and best practice.
- Refer cases to the Disclosure and Barring Service (DBS), Disclosure Scotland, or Access NI, Independent Safeguarding Authority (ISA), Local Authority Designated Officer (LADO) and the FA where a member of staff has been dismissed.
- As required, liaise with the local authority designated officer (LADO) at the local authority if a concern has arisen regarding a member of staff.
- Refer any relevant information with Police, Local Authorities, and other statutory organisations, when safeguarding matters arise, in urgent situations make appropriate external referrals and record accurate details on MyConcern.
- Liaise with the HR team where the acts or omissions of a member of staff has/may impact on the safeguarding of their players.
- Contribute to the induction programme and training for new/existing staff regarding safeguarding

The HOS will lead and provide direction to the Academy Safeguarding Lead (“**ASL**”) and Designated Safeguarding Officers (“**DSOs**”).

The HOS will support the Academy Safeguarding Lead (ASL) who is responsible for:

- Be the main point of contact and deal with all Academy Safeguarding concerns.
- Maintain accurate and confidential records on MyConcern.
- Work with the Head of Safeguarding to ensure that action plans as a result of audit(s) are prioritised and that the safeguarding strategy is followed.
- Meet with the Academy DSOs to discuss ongoing cases, issues, and best practice.
- Work with Academy staff to ensure that safeguarding is a key consideration in key activities and that there is a safeguarding implementation plan in place for every activity and all staff understand their safeguarding responsibility.
- Ensure DBS checks are in place and maintain the Single Central Register.
- Work with the Head of Safeguarding to effectively conduct robust initial investigations of all safeguarding concerns raised.
- Ensure that all concerns and safeguarding information is logged and stored securely in line with GDPR.
- Liaise with the HR team where the acts or omissions of a member of staff has/may impact on the safeguarding of their players.
- Contribute to the induction programme and training for new/existing Academy staff regarding safeguarding.
- Coach, support and develop Academy staff understanding to ensure high standards of care, values, ethics, equality and diversity, policies and procedures, legislation and contractual requirements are met.

- Assess information from Academy staff regarding concerns about children and vulnerable adults and make referrals to the Head of Safeguarding.
- Work with the Head of Safeguarding to refer any relevant information with Police, Local Authorities, and other statutory organisations, when safeguarding matters arise, in urgent situations make appropriate external referrals and record accurate details on MyConcern.
- Encourage good practice by promoting and championing the safeguarding policy and procedures throughout the Club.
- Undertake announced and unannounced visits to Host Family Accommodation with Head of Academy Player Care to ensure that they comply fully with safeguarding requirements and make recommendations where appropriate.
- Understand and implement the Club's Safeguarding policy, procedures, and best practice guidelines in your role.
- Attend EFL, other external training and online training as required.
- Refer cases to the Disclosure and Barring Service (DBS), Disclosure Scotland, or Access NI, Independent Safeguarding Authority (ISA), Local Authority Designated Officer (LADO) and the FA where a member of staff has been dismissed.
- The ASL should ensure that all written records relating to the incident are kept indefinitely, in a secure location. All electronic records are stored in a restricted area and all incidents are recorded on a central record on MyConcern
- Provide ongoing safeguarding training to all Academy staff dependent on their role.
- As required, liaise with the local authority designated officer (LADO) at the local authority if a concern has arisen regarding a member of staff.
- Act as a source of support, advice, and expertise for Academy staff.
- Meet with the Clubs HOS to discuss ongoing cases, issues, and best practice.
- Support Academy staff and volunteers who are responsible for making referrals across the club.

Throughout the Club there are named and appointed DSOs. These can be seen in the Club's Safeguarding Team Organisation Chart. Their details are also available on the Company website. The team is comprised of key staff that support the SSM, HOS and ASL in their duties in raising awareness of safeguarding and assisting with responding appropriately to safeguarding concerns and allegations.

SAFEGUARDING TRAINING

The Club will ensure that there are qualified and designated individuals within the organisation that will take the lead on ensuring that the Club does all it can to meet its statutory and moral obligations.

A Safeguarding induction is provided for all new starters, including full time, part time and casual members of staff. This induction is provided by the HOS or ASL who will

ensure that staff understand how to use and report safeguarding issues on MyConcern. All staff are provided with a copy of the *EFL's Guide to Safer Working Practice for EFL Member Clubs* upon commencement of their employment.

More specific training is given to people based on their job role and the need of the person. DSOs and staff who are in direct contact with children will receive access to online training provided by [EduCare \(TES\)](#).

All staff working in direct contact with children are required to complete the FA's three-hour Safeguarding Children Awareness Workshop and undertake a refresher course at least once every three years. Details of satisfactory completion are held on the SCR (held on Sentry) which is updated by HR.

Training is provided to all relevant staff as part of their own CPD. Following the release of new legislation that will have an impact on any work being carried out by the Club, the HOS will ensure that all personnel are made aware of this and that it is incorporated into ways of working.

Head of Safeguarding, Academy Safeguarding Lead, Player Liaison, Head of Academy Player Care will work closely together to identify opportunities for staff training, (MHFA Adult or Youth) so that all members of staff feel confident in supporting any Mental Health concerns and reporting appropriately.

MENTAL HEALTH AND EMOTIONAL WELLBEING

The Club has a MENTAL HEALTH & EMOTIONAL WELLBEING Policy in place.

Mental Health is defined by the World Health Organisation as 'a state of (complete) physical, mental and social wellbeing, and not merely the absence of disease or infirmity'. Mental health "influences how we think and feel about ourselves and others and how we interpret events. It affects our capacity to learn, to communicate and to form, sustain and end relationships. It also influences our ability to cope with change, transition and life events: having a baby, moving house, experiencing bereavement" (Friedli, 2004).

Anna Freud website: Mental Health describes our emotional, psychological and social wellbeing. It affects our thinking, moods, and behaviours. Everyone has mental health, and it is normal for mental health to change during times of stress. Positive mental health does not mean always being happy, but feeling empowered to talk about, cope with and overcome the things we might encounter in life. That way, we recover from our downturns and learn to take care of our minds in the same way we do our bodies.

The Club is committed to:

- Operating a psychologically informed environment that promotes an openness to mental health and well-being across its players and staff.
- Responding to any concerns surrounding mental health in its players or staff.
- Ensuring that sufficient staff are suitably trained to recognise and support with mental health concerns. (Mental Health First Aid training)
- Ensuring that all players and staff understand the process to follow if there is a concern about their own or someone else's mental health.
- Having a clear referral process with suitable external providers (e.g. clinical psychology) to ensure that is adhered to by staff across the Club.
- Providing educational material to staff, Players parents and carers on the subject of mental health.

RECRUITMENT

The Club has a specific SAFER RECRUITMENT POLICY which sets out in detail the process the Club will undertake in ensuring staff are suitable to work with children and adults at risk. A copy of the Safer Recruitment Policy is available on the Club's website on the Safeguarding and Vacancies pages.

All staff will be shown the Club's safeguarding policies and processes along with being discussed in their induction meeting upon employment at the Club. These are also available on the Club's SharePoint. A briefing document and guidance for safer working practices will be provided and will also be available on the network. Key elements of the Club's SAFEGUARDING CHILDREN POLICY are discussed in more detail if the role requires it.

DISCLOSURE AND BARRING SERVICE ("DBS")

All Staff, including volunteers, in roles in regulated activity, with young people and vulnerable adults will undergo enhanced DBS disclosure, which is an on-going procedure throughout the association with the Club. Enhanced DBS checks will enable the Club to undertake more thorough recruitment and selection procedures for positions which involve working with children. Staff working in other roles within the Club may be subject to Criminal Record Checks dependent upon the role being undertaken and in line with guidance produced by the FA.

All staff are required to complete a Self-Declaration annually in July and upon application for any new role.

MATCH DAYS AND UNACCOMPANIED CHILDREN

The Club wants all junior supporters to enjoy the day when attending matches at the Club and the Academy, regardless of the result. Dedicated DBS checked Staff and Volunteers are specifically employed to enhance the experience of all young

supporters within the Family Zone on Club match days and through our partners Sky Blues in the Community.

All Junior supporters and JSBs ("**Junior Sky Blues**") are welcome to join in with activities, but adult/parental supervision is required for all junior supporters under the age of 14, which is felt to be the maximum age for the activities on offer.

The minimum age for a junior supporter to attend without supervision is 14 years old, except for hospitality areas, where the age is 16, providing when challenged that a parent/guardian can be contacted to verify permission has been given for them to attend the match. In the event verification cannot be made or should a junior supporter appear to be younger than 14, then the Club will refuse entry to the match and a member of the Match Day Safeguarding Team will supervise the junior supporter until such time that verification can be attained, or arrangements made for an approved adult to collect the junior supporter from the ground.

POLICIES

This policy should be read in conjunction with the following Club policies and the Club's Safeguarding Strategy Plan:

- Academy Players Selected for First Team Policy
- Acceptable Use of IT Policy
- Accident Reporting Policy
- Adults at Risk Policy
- Anti-Bullying Policy
- Ball Collector Policy
- Changing Facility Policy
- Complaints Policy
- Guidance for Bringing Children to Football Matches
- Health and Safety Policy
- Host Family Accommodation Policy
- Keeping Children Safe in Education Policy
- Late Collection of Children Policy
- Managing Allegations Policy
- Match Day Code of Conduct
- Match Day Safeguarding Plan.
- Mental Health, Emotional Wellbeing & Welfare
- Online Guide for Hosts, Parents & Carers
- Photography & Digital Images Policy
- Prevent, Radicalisation & Extremism Policy
- Risk Management
- Safeguarding Policy
- Safeguarding Children Policy
- Safeguarding & Covid-19 Amendment.
- Safer Recruitment Policy

- Scouts Policy & Code of Conduct
- Speak Up Policy
- Mascot Policy
- Social Media Policy
- Stress Management Policy
- Transport Policy
- Trips, Tours, & Tournaments Policy
- Whistleblowing Policy
- Youth Produced Sexual Imagery Policy

DEFINITIONS OF POOR PRACTICE AND ABUSE

Poor Practice is unacceptable and will be treated seriously with appropriate action. Any behaviour that contravenes existing Codes of Conduct, Club policies, infringes an individual's rights and/or reflects a failure to fulfil the highest standards of care is an indication of poor practice. A child or young person may not be aware that poor practice or abuse is taking place, as they may deem the behaviour as acceptable.

What is abuse?

Abuse is any form of physical, emotional, or sexual mistreatment or lack of care that leads to injury or harm. It commonly occurs within a relationship of trust or responsibility and represents an abuse of power or a breach of trust. Abuse can happen to a child or a vulnerable adult regardless of their age, gender, race, ability, culture or sexual orientation.

Abuse of Positions of Trust (Sexual Offences Act, 2003).

As set out by the Sexual Offences Act (2003), abuse of position of trust covers the following situations: sexual activity with a child; causing or inciting a child to engage in sexual activity; sexual activity in the presence of a child; causing a child to watch a sexual act. These situations relate to offences being committed online, via social media or text messages.

When engaging with children and young people on behalf of the Club, staff and volunteers are considered to be acting in a position of trust. Broadly speaking, a relationship of trust can be described as one in which one party is in a position of power or influence over the other by virtue of their work or the nature of their activity. It is vital for all those in positions of trust to understand the power this can give them over those they care for and the responsibility they must exercise as a consequence of this relationship.

Young people aged 16 years can legally consent to sexual activity, but they may still be relatively immature emotionally. It is essential that those who may be in a position of trust recognise this vulnerability and ensure it is not exploited.

Where a person aged 18 or over is in a specified position of trust with a young person under 18, it is an offence in certain circumstances for that person to engage in sexual activity with or in the presence of that young person, or to cause or incite that young person to engage in or watch sexual activity even if the young person appears to consent.

Therefore, given this principle, the Club expects that:

- Any behaviour, which might allow a sexual relationship to develop between the person in a position of trust and the child or young people in their care, must be avoided;
- Any sexual relationship within a position of trust relationship is not allowed so long as the relationship of trust continues.

SIGNS OF ABUSE

The main forms of abuse identified are as follows. Should you have any concern that abuse is occurring you should report the matter on MyConcern and speak to the Clubs HOS or ASL.

DEFINITIONS OF ABUSE

Physical abuse: Any deliberate act causing injury or trauma to another person, for example, hitting, slapping, pushing, kicking, burning, giving a person medicine that they do not need and/or that may harm them or application of inappropriate restraint measures.

Emotional abuse: Any act or other treatment which may cause emotional damage and undermine a person's sense of well-being, including persistent criticism, denigration or putting unrealistic expectations on vulnerable groups, isolation, verbal assault, humiliation, blaming, controlling, intimidation or use of threats.

Sexual abuse: Any act which results in the exploitation of children and adults at risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This may be by an adult or by a young person who is intellectually, emotionally, physically or sexually more mature than the victim. This includes non-contact activities, such as indecent exposure, involving children or adults at risk in witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of staff to abuse their relationship of trust for sexual gratification.

Child sexual exploitation: A form of child sexual abuse. It occurs where an individual or groups of people take advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may be sexually exploited even if the sexual activity appears consensual. Child sexual exploitation can also take place through the use of technology.

Peer-on-peer abuse: Children and young people can be taken advantage of or harmed by adults and by other children. Peer-on-peer abuse is any form of physical, sexual, emotional or financial abuse, and coercive control, exercised between children and within children's relationships (both intimate and non-intimate).

Neglect: Ongoing failure to meet the basic needs of children and/or adults at risk. Neglect may involve; failing to provide adequate food, shelter including exclusion from home or abandonment, failing to protect them from physical and emotional harm or danger, or the failing to ensure access to appropriate medical care or treatment. It may also include neglect of or unresponsiveness to, basic emotional needs.

In an activity setting, it may involve failing to ensure that children and/or adults at risk are safe and adequately supervised or exposing them to unnecessary risks.

Grooming: Grooming is defined as developing the trust of an individual and/or their family for the purposes of sexual abuse, sexual exploitation or trafficking. Grooming can happen both online and in person.

Radicalisation: The process by which a person comes to support terrorism and forms of extremism leading to terrorism. Anybody from any background can become radicalised. The grooming of children and/or adults at risk for the purposes of involvement in extremist activity is a serious safeguarding issue.

Female genital mutilation ("FGM"): Involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The procedure has no health benefits for girls and women. The Female Genital Mutilation Act makes it illegal to practise FGM in the UK or to take girls who are British nationals or permanent residents of the UK abroad for FGM whether or not it is lawful in another country.

Bullying: Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours, embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

Cyberbullying: The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among children. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking.

Bullying as a result of any form of discrimination: Bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

Poor practice: This is behaviour that falls short of abuse but is nevertheless unacceptable. It is essential that poor practice is challenged and reported even where there is a belief that the motives of an individual are well meaning. Failure to challenge poor practice can lead to an environment where abuse is more likely to remain unnoticed. Incidents of poor practice occur when the needs of the child and/or adult at risk are not afforded the necessary priority compromising their welfare, for example, allowing abusive or concerning practices to go unreported, placing them in potentially compromising and uncomfortable situations, failing to ensure their safety, ignoring health and safety guidelines, giving continued and unnecessary preferential treatment to individuals.

Hazing: Any rituals, initiation activities, action or situation, with or without consent, which recklessly, intentionally or unintentionally endangers the physical or emotional well-being of Vulnerable Groups.

Infatuations: Vulnerable Groups may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively to maintain the dignity and safety of all concerned. Staff should be aware, that in such circumstances, there is a high risk that words or actions may be misinterpreted and that allegations could be made against Staff. Staff should therefore ensure that their own behaviour is above reproach. A member of staff who becomes aware that a Child or Adult at Risk may be infatuated with him/ her, or with a colleague, should discuss this at the earliest opportunity with the Club Designated Safeguarding Officer (or the Club Senior Safeguarding Manager in his/her absence).

Domestic violence: Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence.

Fabricate or induced illness: Fabricated or induced illness is easiest understood as illness in a child which is fabricated by a parent or person in loco parentis. The child is often presented for medical assessment and care, usually persistently, often resulting

in multiple medical procedures. Acute symptoms and signs of illness cease when the child is separated from the perpetrator.

Forced Marriage: A marriage in which one or both spouses do not (or in the case of some adults with learning or physical disabilities or children, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial and sexual pressure. A Forced Marriage is different from an arranged marriage, which is a marriage entered into freely by both parties, although their families take a leading role in the choice of partner. The Anti-social Behaviour, Crime and Policing Act 2014 made it a criminal offence (which can result in a sentence of up to 7 years in prison) to force someone to marry.

Private fostering: A privately fostered child is a child under 16 (or 18 if disabled) who is cared for by an adult who is not a parent or close relative where the child is to be cared for in that home for 28 days or more. Close relative is defined as "a grandparent, brother, sister, uncle or aunt (whether of the full blood or half blood or by marriage or civil partnership) or step-parent". A child who is 'Looked After' by a local authority or placed in a children's home, hospital or school is excluded from the definition. In a private fostering arrangement, the parent still holds Parental Responsibility and agrees the arrangement with the private foster carer. A child (as per definition above) placed with a host family for 28 days or more is in a private fostering arrangement and therefore Clubs with host families should inform and work with their local authority ensuring that they meet legislative and local procedural requirements.

County Lines: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of "deal line". They are likely to exploit children and adults at risk to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons. Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Criminal exploitation of children is broader than just county lines and includes, for instance, children forced to work on cannabis farms or to commit theft.

Concerns around radicalisation and extremism: The Counter Terrorism and Security Act places a duty on specified authorities, including sport in the exercise of their functions, to have due regard to the need to prevent people from being drawn into terrorism (the Prevent Duty). There is also a duty on local authorities to ensure there is a Channel Panel in place. This must include the local authority and senior police officers. The panel will assess to what extent identified individuals are vulnerable to being drawn into terrorism. The Act requires partners of the Channel Panel to

cooperate with the panel in the carrying out of its functions and the police in undertaking the initial assessment as to whether a referral is appropriate. Any concerns or queries regarding this should be discussed with the Academy DSO as the designated lead for PREVENT.

Signs and Symptoms: The list below is not exhaustive and the presence of one or more of these indicators is not proof that abuse is taking place though they are indicators that abuse may have taken place:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if on a part of the body not normally prone to such injuries.
- An injury for which the explanation seems inconsistent.
- Disclosure of what appears to be an abusive act.
- Disclosure of unsatisfactory home circumstances i.e. domestic abuse, drugs and alcohol misuse, mental health concerns of a parent or other person within the home.
- Someone expresses concern about the welfare of the child.
- Unexplained changes in behaviour (e.g. becoming quiet, withdrawn or sudden outbursts).
- Oversexualised behaviour.
- Displays variations in eating patterns including overeating or loss of appetite.
- Weight loss for no apparent reason.
- Becomes increasingly dirty or unkempt.
- Evasive parents/care.

Remember: It is not the responsibility of staff (permanent or casual) or volunteers to decide if abuse has taken place, but it is their responsibility to act on any concerns, in accordance with this procedure. All concerns, no matter how trivial they may appear, should be logged recorded on [MyConcern](#).

RESPONDING TO ALLEGATIONS OR SUSPICIONS

All staff, volunteers and players have a responsibility to ensure the safety and welfare of children and to take appropriate steps to ensure that suspicions and allegations of abuse are taken seriously and responded to quickly and appropriately. It is not the responsibility of anyone within the Club to decide whether or not child abuse has taken place. If you have a concern about the behaviour of someone involved in football towards a child, contact the HOS, ASL or one of the Club DSOs.

Where there is a complaint against a member of Club staff then one of the following may occur:

- A criminal investigation led by the Police.
- A child protection investigation led in a multi-agency approach between the Club and the Local Authority.

- A disciplinary or misconduct investigation led by the Club, which may also involve The Football Association or Premier League.
- The Club will delay an internal disciplinary or misconduct investigation while a criminal or Local Authority investigation takes place.
- If a member of staff suspects abuse is taking place, or a report/allegation of abuse has been disclosed to them, where possible the HOS or ASL should be contacted as early as possible. However, it is recognised that an individual may need to respond to a situation immediately and prior to such contact if the nature of the suspicion or report is putting the child concerned in immediate danger. The HOS will notify the LADO and consult with the Police and Local Authority children's social care as appropriate. Useful contact details are shown below and in the Club's Safeguarding Organisational Chart.

CONFIDENTIALITY

There is always tension and caution around issues of confidentiality. The advice for all at the Club is that no guarantee of confidentiality can be given to a child or young person (although this does not necessarily mean that the parents of the young person have to be told). You cannot promise to keep their disclosure a secret, or that you will not have to speak to someone else about the issue – reassure them that it will be a 'need to know' basis and that their dignity and privacy will be respected at all times.

A child or young person 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.

There are actions which staff have to and are obliged to take once we 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 a safeguarding children issue to the HOS or ASL. The key issue is that the welfare of the child is protected.

The following guidelines offer help and support in responding to abuse or a suspicion of abuse: Staff should:

- Listen carefully rather than question the child directly.
- Stay calm and not offer their personal opinions/thoughts.
- Be aware that medical or criminal evidence may be relevant.
- Tell the child that you are listening and taking what they say extremely seriously.
- Seek medical attention if necessary.
- Take further action – they may be the only person in a position to prevent future abuse.

- Inform the Designated Safeguarding Lead/Senior Safeguarding Manager of the information or another senior member of staff if these are not available.
- Write down everything said (in their words as far as possible) and what was done – accuracy and detail is important. Keep this information stored in a secure place. Concerns can be recorded on the Safeguarding reporting form.
- Report everything onto [MyConcern](#) software.

CRISIS RESPONSE

If there is immediate danger and/or potential imminent harm to an individual's safety please contact:

- NHS: 999 emergency or nearest A&E department.
- 111 for professional health advice 24/7.
- Samaritans: 116 123 (24/7 Freephone).
- When practicable to do so ensure you make the Head of Safeguarding aware of your action

EMERGENCY CONTACT DETAILS

In all cases if you are not sure what to do you can gain help from NSPCC 24-hour help line Tel No: 0800 800 500

Other contact numbers:

Mind Infoline: The Mind Infoline can help you to find out what services are available in your area. You can call them on 0300 123 3393 email info@mind.org.uk or text 86463. They are open 9am-6pm, Monday to Friday

Rethink Mental Illness: Founded 40 years ago through voluntary groups for people affected by mental illness, Rethink Mental Illness have over 100 groups in England. Call them on 0300 5000 927

Samaritans: Call free on 116 123

Childline: 0800 1111

Local Authority Designated Officer (LADO): Francesca Hamilton

- 024 7697 5483

lado@coventry.gov.uk

Coventry City Council

Local Authority Local Safeguarding Children Partnership (CSCP): 024 7697 5477

CoventryCSCP@coventry.gov.uk

Non-emergency: 101

Emergency Duty Social Worker: 024 7683 2222

Local Authority Local Safeguarding Adults Board (LSAB): 024 7683 3003

Multi Agency Safeguarding Hub (MASH) 0300 126 1000 / Emergency Duty Team 024 7678 8555 mash@coventry.gov.uk

Coventry Police 0845 113 5000/101 mail@coventry.police.uk

NSPCC/FA DEDICATED HELPLINE FOR VICTIMS OF ABUSE IN FOOTBALL – 0800 0232642

FA Safeguarding Duty Manager – 0800 169 1863 Safeguarding.Children@thefa.com

EFL Safeguarding Manager – Alexandra Richards - 01772 325940/M: 07792284740
arichards@efl.com

Birmingham County FA Designated Safeguarding Lead – 0121 357 4278
Support@BirminghamFA.com

Coventry City Football Club:

General: Safeguarding@ccfc.co.uk

Senior Safeguarding Manager – David Boddy David.boddy@ccfc.co.uk

Head of Safeguarding - Kirstie.Patrick@ccfc.co.uk

Academy Safeguarding Lead – TBC

Match Day HOS – Kirstie Patrick- Kirstie.patrick@ccfc.co.uk

Match Day DSOs – Bryn Meredith, Emily Kelly, Jessica Owen and Alice Kennell

Mental Health First Aiders

Adult

Kirstie Patrick
Dale Gregory
Adam Hearn
Rose Oxley
Alistair Whelan
Jon McKendry

Youth

Kirstie Patrick
Ben King
Sophie Reynolds
Kat Watkin
Niall Geraghty
Adam Batstone

This Safeguarding Policy has been approved and authorised by:

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Review History

Number	Date	Review details	Authorised by:	Endorsed by Board
1	Nov 2020	Review and update	Sandra Garlick (HR)	Tim Fisher, Director
2	Jan 2022	Review and update	Sandra Garlick (HR)	Tim Fisher, Director
3	Jul 2022	Review and update	Sandra Garlick (HR)	Tim Fisher, Director
4	Feb 23	Review and update	Sandra Garlick (HR)	Doug King, Director
5	Aug 23	Review and update	Kirstie Patrick (HOS)	Doug King, Director
6	Jan 24	Review and update	Sandra Garlick (HR)	Doug King, Director