OTIUM ENTERTAINMENT GROUP LIMITED

T/A COVENTRY CITY FOOTBALL CLUB

Safeguarding Children Policy

2020/21 Season

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Registered Office: Otium Entertainment Group Ltd. trading as Coventry City Football Club, Sky Blue Lodge, Leamington Road, Ryton-on-Dunsmore, Coventry, CV8 3FL | Registered in England & Wales **No.** 7612487

OTIUM ENTERTAINMENT GROUP LIMITED T/A COVENTRY CITY FOOTBALL CLUB ("CCFC") acknowledges its responsibility to safeguard the welfare of every child and young person who has been entrusted to its care and is committed to working to provide a safe environment for all members.

A child or young person is anyone aged 18 or below engaged in any club football activity. We subscribe to the *EFL's Safeguarding Policy and Procedures* and endorse and adopt the EFL Strategy & Policy Statements.

The Club's Safeguarding Policy:

The key principles of the EFL Safeguarding Children Policy are that:

- The child's welfare is, and must always be, the paramount consideration
- All children and young people have a right to be protected from abuse regardless of their age, gender, disability, culture, language, racial origin, religious beliefs or sexual orientation
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- Working in partnership with other organisations, children and young people and their parents or carers is essential

We acknowledge that every child or young person who plays or participates in football should be able to take part in an enjoyable and safe environment and be protected from poor practice and abuse.

This is reflected in all the Club's Safeguarding Policies.

Coventry City Football Club recognises that this is the responsibility of everyone involved in our Club.

The Club has a role to play in safeguarding the welfare of all children and young people by protecting them from physical, sexual or emotional harm and from neglect or bullying. It is noted and accepted that the EFL's Safeguarding Children Regulation applies to everyone in football whether in a paid or in a voluntary capacity. This includes those who are volunteers, match officials, helpers on Club tours, football coaches, Club officials and medical staff.

A duty has been placed on all sports clubs to be a key partner in safeguarding. The Club therefore recognises the following as definitions of abuse and neglect as defined within Keeping Children Safe in Education and will work with all relevant authorities to report and prevent them.

Types of abuse

Abuse is defined as a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children.

Keeping Children Safe in Education 2020 outlines the following areas of abuse and neglect:

Abuse: *a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.*

Physical abuse: *a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.*

Emotional abuse*: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child 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 a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from 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, although it may occur alone.*

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.*

Neglect: *the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, 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.

In addition, Keeping Children Safe in Education statutory guidance identifies that there are wider safeguarding issues that we need to consider and act upon. These include:

Child Sexual Exploitation	Child Criminal Exploitation
Peer on peer abuse	Serious violence
Female Genital Mutilation (FGM)	Mental Health

Further information:

The guidance should be read alongside:

- statutory guidance Working Together to Safeguard Children;
- departmental advice What to do if you are Worried a Child is Being Abused - Advice for Practitioners; and
- departmental advice Sexual Violence and Sexual Harassment Between Children in Schools and Colleges

CCFC's Prevent Duty

The Prevent duty requires all specified authorities to work to prevent people from being drawn into terrorism. This duty is part of the Counter Terrorism and Security Act 2015, this came into effect in July 2015.

This duty will:

- respond to the ideological challenge of terrorism and the threat we face from those who promote it;
- prevent people from being drawn into terrorism and ensure that they are given appropriate advice and support; and
- work with sectors and institutions where there are risks of radicalisation that we need to address.

The Prevent duty refers to all schools and childcare provider and CCFC's Academy therefore is classed as a specified authority. The Government has defined extremism in the Prevent strategy as: "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces". The Academy is committed to all forms of safeguarding and our young players well-being. The Prevent duty will form part of this, we will work together to identify

any child or young person who is at vulnerable to radicalisation and take appropriate action to protect them and we will promote fundamental British values in our teaching and coaching activities

Signs of radicalisation include but are not limited to

- isolating themselves from family and friends
- talking as if from a scripted speech
- unwillingness or inability to discuss their views
- a sudden disrespectful attitude towards others
- increased levels of anger
- increased secretiveness, especially around internet use.

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. Extremists might target them and tell them they can be part of something special, later brainwashing them into cutting themselves off from their friends and family.

The Designated Safeguarding Officer (DSO) will make a referral to the Channel programme if there is a concern about radicalisation. The Channel programme focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. The programme uses a multi-agency approach to protect vulnerable people by:

- identifying individuals at risk
- assessing the nature and extent of that risk
- developing the most appropriate support plan for the individuals concerned

The Club will then work in partnership with all those involved in the Channel programme to ensure the well-being of that child or young person - https://www.gov.uk/government/publications/channel-guidance. The Academy and other key club staff will be trained in the prevent duty via the Home Office WRAP (Workshop to Raise Awareness of Prevent) training. The Club will have an IT user policy in place that all staff and scholars will be asked to sign, which highlights the usage of the Clubs IT equipment with regard to the Prevent duty. Filtering is in place to ensure there is not access to online known radicalisation sites or searches for extremist material.

Harmful Sexual Behaviour

Harmful sexual behaviour (HSB) is defined as “Sexual behaviours expressed by children and young people under the age of 18 that are developmentally inappropriate, may be harmful towards self or others, or be abusive towards another child, young person or adult.” (Derived from Hackett, 2014).

HSB may include:

- inappropriate touching
- using sexual violence or threats

- sexual activity that involves force, coercion or persuasion
- sexual bullying (both online and offline) for example enticement to perform sexual acts, production of sexual photos, sexting

Children and young people have been found to engage in a wide range of harmful sexual behaviours including both contact (touching, masturbation, penetration) and non-contact (grooming, exhibitionism, voyeurism and sexting or taking film of sexual acts via smart phones and social media applications) behaviours.

Sexual behaviour between children is also considered harmful if one of the children is much older, particularly if there is more than two years' difference in age or if one of the children is pre-pubescent and the other isn't. However, children can be sexually abused by same aged peers, and a younger child can abuse an older child, particularly if they have power over them – for example, if the older child has a disability (Rich, 2011; Yates et al, 2012) Around a third of sexual abuse is committed by children and young people.

The key indicators of HSB are:

- Signs of bullying environments/ incidents; dominance
- Changes of behaviour in an individual
- Individuals trying to avoid another club member; absences from training or changing rooms
- Games/banter which involve sexual touching
- Pictures of body parts being taken particularly without consent
- Behaviours in changing rooms which make other people feel uncomfortable

The club acknowledges that for some people reporting sexual behaviours will be uncomfortable, but it is essential that any information about HSB is passed on to the DSO or SSM as soon as possible. If HSB is observed the following process will be followed:

- The behaviour will be stopped
- The behaviour will be defined (Describe the behaviour accurately to avoid any misunderstanding for the child or young person involved)
- The incident will be reported immediately the DSO
- The incident will be recorded as specifically as possible - what was seen and heard. Both the young person's and the victim's response will be included and passed to the DSO as soon as possible.
- The DSO will consider the level of concern and may consult statutory authorities before making a formal referral, involving parents (unless this would pose a risk to the young person), review with FA safeguarding team and take advice for the SSM
- The DSO will then work with staff who work with the young person to ensure that the individual has no opportunity for unsupervised contact with other potentially vulnerable children or young people, including the suspected victim

  Remember it is not the role of CCFC to distinguish between experimental and harmful sexual behaviours in children and young people.

Positions of Trust

The Sexual Offences Act 2003 (the Act) states that any sexual activity involving children under 16 is unlawful. The Act addresses the abuse of positions of trust is the need to protect young people aged 16 and 17 who, despite reaching the age of consent for sexual activity, are vulnerable to sexual abuse and exploitation, in defined circumstances. This includes sexual activity and relationships with adults who hold a position of trust, responsibility or authority in relation to them and, as a result, have a considerable amount of power and influence in their lives. The law defines specific roles and settings where sexual activity between 16 and 17-year olds and those in positions of trust, responsibility or authority constitutes a criminal offence.

This legislation does not include sports roles (e.g. coaches, instructors or helpers) or sports organisations and settings (e.g. clubs, leisure facilities or events) within these definitions.

CCFC defines all roles within the Academy and coaching staff that come into contact with children and young people as positions of trust and therefore ban any sexual relationships/activity between adults in those roles and 16 - 17-year olds for whom they are in a position of authority. All staff should ensure they maintain healthy, positive and professional relationships with all athletes. Coaches and others in positions of authority and trust in relation to players aged 16 and 17 years must not engage in sexual relationships with them while that unequal power relationship exists.

Any allegations regarding position of trust abuse will be dealt with by the Whistleblowing Policy (available on the Club's website), alongside the Disciplinary Policy which is in the club's Staff Handbook.

If anyone suspects that an abuse of a position of trust has occurred, is occurring or may occurring report this to the DSO or SSM. They will ask you to make a written record of your concerns and relevant details.

If you feel your concern has not been dealt with appropriately, you can consult with the Local Authority Designated Officer (LADO) whose details should be available through Coventry City Council's Children's Social Care Department Tel: **024 7683 3443** Email: lado@coventry.gov.uk and whose duties include responding to concerns about potential breaches of positions of trust. Alternatively, you can seek advice from the 24-hour NSPCC Helpline – 0808 800 5000.

The role of the Designated Safeguarding Officer (DSO)

The Club has appointed a number of Designated Safeguarding Officers (DSO) in line with the EFL's role profile and required completion of the Safeguarding Children Workshop The DSOs operate under the guidance of the Senior Safeguarding Manager (SSM). The post holder will be involved with designated person's training provided by the EFL. The DSO is the first point of contact for all club members and parents or guardians regarding concerns

for the welfare of any child or young person. They will also play a proactive role in increasing an awareness of poor practice and abuse amongst club members.

The DSO's role includes but is not limited to the following

- The DSO may take advice form the EFL CPA if required before a decision is made.
- If the DSO decides that they must report the allegation, the DSO should contact Social Services or the LADO by telephone and send relevant written back up within 24 hours of the initial disclosure/allegation, if requested.
- The DSO will ensure details of all referrals or allegations are passed on to EFL DSO and the Football League case management team within 72 hours
- The young person and referring staff member should be informed of the action being taken and the reasons for this decision. This should happen before Social Care Services are informed, unless doing so would place the young person at greater risk. In this case, both staff and player should be contacted as soon as safety considerations of the young person permit.
- Refer cases to the Disclosure and Barring Service (DBS), Disclosure Scotland, or Access NI, Independent Safeguarding Authority (ISA), Local Authority Designated Officer and the FA where a member of staff has been dismissed following concerns they posed a risk to a child
- The DSO 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.
- Provide ongoing safeguarding training to all staff dependant in their role.

The role of the Senior Safeguarding Manager

The Club has a Senior Safeguarding Manager (SSM) who handles the Club's Safeguarding, HR, Legal & Compliance, this role includes but is not limited to:

- Operational leadership responsibilities for safeguarding across the Club
- Work with the Board to ensure safeguarding is at the heart of the Club's ethos and that all staff are supported in knowing how to recognise, respond and report potential concerns
- Liaise with the Chief Executive Officer and the Chairman to keep them informed of any safeguarding issues especially ongoing enquiries and police investigations
- 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 staff.
- Meet with the Clubs DSOs to discuss ongoing cases, issues and best practice.
- Support Club staff and volunteers who are responsible for making referrals across the club
- Update the Board with safeguarding issues and development

The Club's DSO's are detailed on the Club's website or by writing to Coventry City Football Club, Sky Blue Lodge, Leamington Road, Ryton on Dunsmore, CV8 3FL

The Club's Senior Safeguarding Manager is Sandra Garlick who can be contacted on safeguarding@ccfc.co.uk or by post at Coventry City Football Club.

Any allegation, disclosure or suspicion of abuse needs will be taken seriously and handled in a sensitive manner. Individual members of staff should wherever possible deal with safeguarding disclosures with the help of a DSO or SSM and should always refer to the DSO if available, who will undertake the interview. Information should be strictly limited to those who need to know.

Process

As outlined in Part One of Keeping Children Safe in Education 'if, at any point, *there is a risk of immediate serious harm* to a child a referral should be made to children or adult Social Care immediately. Anybody can make a referral'. If this ever happens, staff must inform one of the DSO's or SSM at the first possible moment and log the incident on MyConcern.

Staff should **ALWAYS** make it clear to a young person that they cannot make guarantees of confidentiality.

The following forms a checklist for those dealing with a disclosure

- Listen carefully to what is being said
- Keep questions to a minimum, just to clarify what is being said
- Avoid leading questions, prompting or making comments
- Suspend your own judgement – remember that you are not investigating the matter
- Inform the young person of the actions that will follow your conversation and assure them that they will be kept informed of all developments.
- Staff should support the student and give reassurances whilst explaining which other people will need to know about the allegations.
- Staff should make notes of the conversations which may be shared by the investigating agency (e.g. Social Services) including the below.

During or immediately after the disclosure record the following:

- Names of those present during the disclosure/allegation
- Address and contact of young person
- Date of birth
- Ethnic origin
- Other agencies already involved
- Date and time of the conversation
- Place where the alleged abuse happened
- Brief description of the allegation
- Any visible injuries
- Any alleged injuries
- The young person's preferred action
- Means of contacting the young person

- Next steps and follow up agreed

We acknowledge and endorse the EFL's identification of bullying as a category of abuse. Bullying of any kind is not acceptable at our club. We have a separate Anti- bullying process in place which outlines in detail how the Club deals with bullying. This is set out in the the Club's ANIT BULLYING POLICY. Incidents need to be reported to the DSO and in cases of serious bullying, the County FA's Welfare Officer will be contacted.

Safer recruitment

We endorse and adopt the *EFL's Safeguarding Children Guidelines for Safe Recruitment* and will:

- Develop a role profile
- Require applicants to complete a Club Application Form and Self Declaration
- Request and validate identification documents
- As a minimum, meet and chat with the applicant(s) and where possible conduct interviews before appointing with specific questions around safeguarding included in this process relevant to the role
- Request and follow up with two written references before appointing
- Require an FA DBS Enhanced Disclosure where appropriate in line with EFL guidelines as a condition of employment

All current Club employees, contractors and volunteers with direct access to children and young people will be required to complete a DBS Enhanced Disclosure. The Club reserves the right to undertake risk assessments of any individuals whose DBS Enhanced Disclosure confirms content that is considered to be relevant. If there are concerns regarding the appropriateness of an individual who is already involved or who has approached us to become part of the Club, guidance will be sought from the EFL.

It is noted and accepted that the EFL will consider the relevance and significance of the information obtained via The FA DBS Enhanced Disclosure and that all decisions will be made in the best interests of children and young people.

It is accepted that the EFL aims to prevent people with a history of relevant and significant offending from having contact with children or young people and the opportunity to influence policies or practice with children or young people. This is to prevent direct sexual or physical harm to children and to minimise the risk of 'grooming' within football. The Club commits to ensure that it will do all it can to ensure that children and young people are fully protected. A separate SAFER RECRUITMENT POLICY is to be used in conjunction with this policy. A copy is available on the Club's website.

The Club supports the EFL's Whistleblowing Policy. A copy of Club's WHISTLEBLOWING POLICY can be found on the Club's website. Any adult or young person with concerns about a colleague can 'whistle blow' by contacting the DSO and/or the Child Protection Advisor at the EFL on 01772 325811, or by writing to them at the EFL, EFL House, 10-12 West Cliff,

Preston, Lancashire, PR1 8HU or by going directly to the Police, Social Services or the NSPCC. –

Coventry City Football Club encourages everyone to know about Whistleblowing and utilise it if necessary.

Codes of Conduct for players, parents or spectators, adults working with children and volunteers have been implemented by the Club. In order to validate these Codes of Conduct, the Club has clear sanctions to deal with any misconduct at Club level and acknowledges the possibility of potential sanctions which may be implemented by leagues or the County FA in more serious circumstances.

This policy is the main guidance for safeguarding children at the Club. The following policies are available for specific areas, and are located on the Club website and internally on the Club's Intranet for access by all staff:

- Academy Players Selected for First Team
- Accident Reporting
- Accommodation
- Acceptable Use of IT policy
- Adults at Risk
- Anti-Bullying
- Board Safeguarding Statement
- Club Risk Register and Crisis Management Plan
- Complaints
- Equality policy
- Health and Safety
- Information Sharing/Data Protection Safeguarding children policy
- Late Collection of Children
- Managing Allegations
- Match Day Safeguarding Plan
- Modern Slavery & Human Trafficking
- Parent Handbooks
- Photography & Digital Images Policy
- Player Handbook/Code of Conduct
- Prevent Risk Assessment
- Risk Assessment Template and Procedure
- Safer Recruitment
- Safeguarding Children
- Safeguarding & Covid-19 Amendment
- Safeguarding Strategy and Implementation Plan
- Social Media
- Transport
- Trips, Tours, & Tournaments
- Whistleblowing
- Youth Produced Sexual Imagery

Safeguarding Useful Information

Each QR Code will lead you to the website of the organisation for further Information, Help and Guidance!

SCAN ME

Coventry MASH
Safeguarding Issues

SCAN ME

West Midlands Police
Youth Violence

SCAN ME

Coventry Prevent
Radicalisation

SCAN ME

MIND
Mental Health

SCAN ME

Bullying UK
Sexting

SCAN ME

NSPCC
Child Exploitation

SCAN ME

Warwickshire Council
Children Missing Education

SCAN ME

Gangsline
Gang Crime

SCAN ME

Hello Cov
Violent Crime

Update Responsibility: SSM	Revision version: 3
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Review History

Number	Date	Review details	Authorised by:	Endorsed by Board
1	Feb 2019	Development and creation of document.	Sandra Garlick (SSM)	Tim Fisher, Director
2	Aug 19	Review and update	Sandra Garlick (SSM)	Tim Fisher, Director
3	Nov 2020	Review and update	Sandra Garlick (SSM)	Tim Fisher, Director