



Safeguarding Children Policy

Introduction

This Policy applies to all Community Trust Staff including Volunteers and Trustees, project participants, players, and parents, who make provision for children and young people. The responsibility for ensuring the welfare of children is everybody's throughout the Trust. We are committed to working with other agencies, including our local authority, the Police and other bodies concerned with the protection of children. We will comply with safeguarding legislation including the Children Act 2004 and statutory guidance such as 'Working Together to Safeguard Children'.

The policy recognises that the welfare and interests of children are paramount in all circumstances. It aims to ensure that:

- all children have a positive and enjoyable experience of sport and any activity on offer by the Trust in a safe and child centred environment;
- all children are protected from abuse whilst participating in any activity provided by the Trust in or outside of the activity;
- all children, whatever their age, ability or disability, gender reassignment, race, religion or belief, sex or sexual orientation, socio-economic background have the right to protection from abuse;
- all suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately;
- all staff have an equal responsibility to identify children who may benefit from early help and to act on any suspicion or disclosure that may suggest a child is at risk of harm; and
- there is a culture of transparency, openness and, if needed, challenge with regards to maintaining high standards in safeguarding.

All staff (paid/unpaid), volunteers, trustees, project participants, players and parents working at the Trust in whatever capacity have a responsibility to report concerns in accordance with this policy.

Policy Statement

Rochdale AFC Community Trust (The Trust") in association with Rochdale AFC recognises our moral and statutory responsibility to safeguard and promote the welfare of all children. We aim to provide a safe and welcoming environment where children are respected and valued. We will act quickly and follow our procedures to ensure children receive early help and effective support, protection, and justice.

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Policy Aims and objectives

The Trust's aims are as follows:

- promote and prioritise the safety and wellbeing of children and young people;
- ensure everyone understands their roles and responsibilities in respect of safeguarding and is provided with appropriate education/training to recognise, identify and respond to signs of abuse and other safeguarding concerns relating to children and young people;
- ensure that all staff and volunteers are aware of their responsibility to report safeguarding concerns and how this should be done;
- ensure that all suspicions and allegations of abuse and poor practice are taken seriously and responded to swiftly and appropriately;
- ensure appropriate action is taken in the event of incidents/concerns of abuse and support provided to the individual/s who raise or disclose the concern;
- ensure that confidential, detailed, and accurate records of all safeguarding concerns are maintained and securely stored;
- prevent the employment/deployment of unsuitable individuals;
- ensure robust safeguarding arrangements and procedures are in operation; and
- will work in close partnership with child protection agencies such as the local authority.

We will achieve these objectives as follows:

- This policy will be available to and adhered to by all staff;
- Our Head of Safeguarding Nicola Toolan will lead on dealing with allegations, concerns, or child protection incidents, sharing information with partner agencies, and making referrals;
- We will ensure that appropriate training is provided;
- The policy and procedures will be widely promoted and are mandatory for everyone involved; and
- Failure to comply with the policy and procedures will be addressed without delay and may ultimately result in dismissal.

Roles and Responsibilities

Nicola Toolan is Head of Safeguarding (HOS). Nicola has responsibility for leading on safeguarding matters within the Trust which includes "Our teams". Nicola Toolan will lead on referrals of suspected abuse, support staff who make referrals, make arrangements for supporting children and work with other agencies and bodies concerned with the protection of children.

The Trust also has a Designated Safeguarding Officer (DSO) Ryan Bradley who will report directly to the Head of Safeguarding. The DSO is required to report to the Head of Safeguarding on a regular basis on all matters concerning the protection of children, Nicola Toolan will then report monthly to The Trustees.

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Promoting Good Practice

Introduction

Child abuse, particularly sexual abuse, can arouse strong emotions in those facing such a situation. It is important to understand these feelings and not allow them to interfere with your judgement about any action to take. Abuse can occur within many situations including the home and the sporting environment. Some individuals will actively seek employment or voluntary work with young people in order to harm them. A coach, instructor, teacher, official or volunteer may have regular contact with young people and be an important link in identifying cases where a young person needs protection. All suspicious cases of poor practice must be reported following the guidelines in this document. Where a child has been subjected to abuse outside of the sporting environment, sport can play a crucial role in improving a child's self-esteem. In such instances we will work with the appropriate agencies to ensure the child receives the required support.

It is critical that a culture of listening is created and understanding the needs of each individual child. Effective safeguarding systems must be child centred. Problems can arise in safeguarding systems when we lose sight of the needs and views of the child or place the interests of adults ahead of the needs of children. Everyone working with children and families must seek the voice of the child and reflect and respond to it in all aspects of work.

Good Practice Guidelines

To meet and maintain our responsibilities towards children, all personnel should be encouraged to demonstrate exemplary behaviour and follow the examples of good practice set out below:

Good practice means:

- Treating all children with respect;
- Being alerted to changes in behaviour and to signs of abuse and neglect;
- Recognising that challenging behaviour may be an indicator of abuse;
- Setting a good example and being an excellent role model;
- Maintain appropriate levels of discussion avoiding sexualised or derogatory language;
- Always working in an open environment (e.g., avoiding private or unobserved situations and encouraging an open environment i.e., no secrets);
- Always putting the welfare of each young person first, before winning or achieving goals;
- Maintaining a safe and appropriate distance with children avoiding any behaviour which could be construed as anything other than a professional relationship (e.g. it is not appropriate to have an intimate relationship with a child or to share a room with them);
- Building balanced relationships based on mutual trust which empowers children to share in the decision-making process;
- Making sport fun, enjoyable and promoting fair play;
- Ensuring that if any form of manual/physical support is required, it should be provided openly and according to guidelines provided by the Coach Education Programme. Care is needed, as it is difficult to maintain hand positions when the child is constantly moving. Young people should always be consulted, and their agreement gained. Some parents are becoming increasingly sensitive about manual support and their views should always be carefully considered;
- Keeping up to date with the technical skills, qualifications, and insurance in sport;

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- Involving parents/carers wherever possible (e.g. for the responsibility of their children in the changing rooms). If groups have to be supervised in the changing rooms, always ensure parents/teachers/coaches/officials work in pairs;
- Ensuring that if mixed teams are taken away, they should always be accompanied by a male and female member of staff;
- Ensuring that at tournament or residential events, adults should not enter children's rooms or invite children into their rooms;
- Giving enthusiastic and constructive feedback rather than negative criticism;
- Recognising the developmental needs and capacity of young people and disabled adults – avoiding excessive training or competition and not pushing them against their will;
- Securing parental consent in writing to *act in loco parentis*, if the need arises to give permission for the administration of emergency first aid and/or other medical treatment;
- Keeping a written record of any injury that occurs, along with the details of any treatment given;
- Requesting written parental consent if club officials are required to transport young people in their cars;
- Encouraging respectful behaviour between children and challenge inappropriate or discriminatory behaviours; and
- reporting all concerns about a child's safety and welfare to a DSO.

Practice to be avoided

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

- Avoid spending excessive amounts of time alone with children away from others;
- Avoid taking children to your home where they will be alone with you; and
- Desisting from any Social Media contact with children.

Practice never to be sanctioned

The following should never be sanctioned. You should never:

- Engage in rough, physical, or sexually provocative games, including horseplay;
- Share a room with a child;
- Allow or engage in any form of inappropriate touching;
- Allow children to use inappropriate language unchallenged;
- Allow verbal bullying or derisory comments from one child to another (Peer on Peer Bullying);
- Make sexually suggestive comments to a child, even in fun;
- Reduce a child to tears as a form of control;
- Allow allegations made by a child to go unchallenged, unrecorded or not acted upon;
- Do things of a personal nature for children, that they can do for themselves; or
- Invite or allow children to stay with you at your home unsupervised.



It may sometimes be necessary for staff or volunteers to do things of a personal nature for children, particularly if they are young or disabled. These tasks should only be carried out with the full understanding and consent of parents and the children involved. There is a need to be responsive to a person's reactions. If a person is fully dependent on you, talk with him/her about what you are doing and give choices where possible.

This is particularly so if you are involved in any dressing or undressing of outer clothing, or where there is physical contact, lifting or assisting a child to carry out particular activities. Avoid taking on the responsibility for tasks for which you are not appropriately trained.

If any of the following occur, you should report this immediately to another colleague and record the incident. You should also ensure the parents of the child are informed:

- If you accidentally hurt a player;
- If he/she seems distressed in any manner;
- If a player appears to be sexually aroused by your actions; or
- If a player misunderstands or misinterprets something, you have done.

Abuse of Position of Trust

All staff are aware that inappropriate behaviour towards children is unacceptable and that their conduct towards children must be beyond reproach. Inappropriate behaviour and abuse of your position will be dealt with under this, and other relevant, Trust policies.

Children who may be particularly vulnerable

Some children may have an increased risk of abuse. It is important to understand that this increase in risk is due more to societal attitudes and assumptions, and child protection procedures that fail to acknowledge children's diverse circumstances, rather than the individual child's personality, impairment or circumstances.

Many factors can contribute to an increase in risk, including prejudice and discrimination, isolation, social exclusion, communication issues and reluctance on the part of some adults to accept that abuse can occur.

To ensure that all our children receive equal protection, we will give special consideration to children who are:

- Disabled;
- affected by domestic abuse ;
- affected by substance misuse/drug use;
- affected by mental health issues including self-harm ;
- affected by poor parenting;
- living away from home;
- vulnerable to being bullied;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality ;
- do not have English as a first language.

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This list provides examples of additional vulnerable groups and is not exhaustive and all children should be considered on an individual basis to assess if additional support and protection is required.

Bullying and Preventing Radicalisation

The Trust recognises that bullying is a serious issue and will not be tolerated. Bullying can cause significant harm to a child's well-being. All forms of bullying, which includes cyber bullying, must be recorded and reported in accordance with internal procedures. The Trust recognises that bullying can cause safeguarding concerns, depending on the specific circumstances, may need to be dealt with under this policy (Peer on Peer bullying).

The following matters of good practice should be followed:

- Take all signs of bullying very seriously;
- Encourage all children to speak and share their concerns (At its most serious level, bullying can lead to suicide and should not be underestimated). Our culture of listening is of paramount importance ;
- Help the child to speak out;
- Create an open environment;
- Investigate all allegations and take action to ensure that the child is safe. Speak with the child and the perpetrator separately;
- Seek professional advice and assistance when appropriate to do so;
- Reassure the child that you can be trusted and will help them, although you cannot promise not to tell anybody else;
- Keep records of what is said (what happened, by whom, when and where); and
- Report any concerns to the DSO or the HOS.

Action towards the perpetrator(s) of Bullying:

- Talk to them. Explain the situation and try to get them to understand the consequences of their behaviour;
- Inform the parents;
- If the bullying consists of for example, taking personal items, insist on the return of the borrowed items;
- Impose sanctions as necessary;
- Encourage and support the perpetrator to change behaviour;
- Hold meetings with the families to report on progress; or
- Keep a written record of action taken;

The Trust recognises that as part of its wider safeguarding duty, that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. Trust staff are expected to identify children at risk and act proportionately. Where Radicalisation is suspected, this should be reported to the DSO or the HOS.



Raising a Concern

What to do if there are concerns

If you suspect possible child abuse, you must report this to the DSO immediately. If the DSO is not available, you must escalate your concern to the HOS. In the absence of the HOS, you must raise your concern with Senior Safeguarding Manager or the Chief Operating Officer. Contact details are included at the end of this policy. It is not the responsibility of anyone working at the Trust, in a paid or unpaid capacity to take responsibility to decide whether child abuse has taken place.

However, there is a responsibility to act on any concerns which are raised in accordance with set procedures. The Trust will fully support and protect anyone, who in good faith, reports his or her concern that a colleague is, or may be, abusing a child.

What information you should record

You must ensure that you accurately record information as this will need to be reported to Children Services or the Police. You should record the following information to support further investigation:

- Name of child;
- Age of child and date of birth;
- Home address and telephone number;
- If the person making the report expressing their own concerns or those of someone else;
- What is the nature of the allegation? Include dates, times, any special factors and other relevant information;
- A description of any visible bruising or other injuries, include behavioural signs indirect signs;
- Witnesses to the incidents;
- The child's account, if it can be given, of what has happened;
- If the parents/carers been contacted;
- If so, what has been said;
- If anyone else been consulted? If so record details.;
- If it is not the child making the report has the child concerned been spoken to? If so what was said; and
- If anyone has been alleged to be the abuser. Record details.

What we will do next

The HOS will make a referral to Rochdale Council's Children Services Team who may also share information about the allegation with other agencies if appropriate, including the Police. The parents or carers of the child will be contacted as soon as possible following advice from the social services department. If the allegation is about a parent/carer then the child must not go back to that environment and the police must be contacted.

The HOS will inform the Football Association Child Protection Officer who will deal with any media enquiries.

If the DSO or HOS is the subject of the allegation, the report must be made to the Senior Safeguarding Manager or the Chief Operating Officer or in his/her absence the Football Association Child Protection Officer.

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Allegations about staff and volunteers

Where there is a complaint against a member of staff there may be three types of investigation

- A criminal investigation;
- A child protection investigation;
- A disciplinary or misconduct investigation;

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

Action if there are concerns

The following action should be taken if there are concerns.

Poor Practice

If following consideration, the allegation is clearly about poor practice; the HOS will deal with it as a Conduct issue.

If the allegation is about poor practice by the HOS, or if the matter has been handled inadequately and concerns remain, it should be reported to the Chief Operating Officer who will decide how to deal with the allegation and whether or not to initiate disciplinary proceedings.

Allegations of Abuse

Allegations of abuse may be made some time after the event (e.g. by an adult who was abused as a child or by a member of staff who is still currently working with children). Where such an allegation is made, the club should follow the procedures as detailed above and report the matter to Social Services or the Police. This is because other children, either within or outside of the Trust, may be at risk from this person.

For flow chart and contacts in the organisation, please see pages 3 & 4 in Rochdale AFC Safeguarding Policy, which you can access on the company server.

Training

It is important that all staff have regular training to enable them to recognise the possible signs of abuse and neglect and to know what to do if they have a concern. All staff, including site staff will be regularly trained in safeguarding and given at least annual updates.

The HOS will receive training updated at least every two years. The DSO will be supported and encouraged to attend additional training to keep up to date.



CATEGORIES OF ABUSE – CHILDREN

‘Child abuse and neglect’ are generic terms encompassing all ill treatment of children 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.

Recognition – Signs of Abuse

Should you have any concern that abuse is occurring you must contact a DSO immediately.

Physical Abuse - Physical abuse may involve hitting, shaking, throwing, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer feigns the symptoms of, or deliberately causes ill health to a child whom they are looking after. 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. An example of this could be where training is inappropriate for the age group, players are expected to play with an injury or where drugs or alcohol are offered or accepted.

Sexual Abuse - Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, whether or not the child is aware of, or consents to, what is happening. The activities may involve inappropriate touching or physical contact. Sexual abuse may also include non-contact activities, such as involving children in looking at, or in the production of, pornographic material or grooming a child in preparation for abuse (including via the internet). Boys and girls can be sexually abused by males and/or females, by adults and by other children. An example in football is sexual abuse through inappropriate touching, or sexually explicit jokes between adults and children.

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 because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, shelter, and clothing;
- failing to protect a child from physical 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. An example of this could be if a child or young person does not have proper supervision, clothing or are allowed/encouraged to play whilst injured.



Emotional Abuse - Emotional abuse is the persistent emotional ill treatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve making a child feel or believe that they are worthless or unloved, inadequate, or valued only in so far as they meet the needs of another person.

In addition, it includes racist or sexist behaviour and demeaning initiation ceremonies. 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, over protection and limitation of exploration and learning or preventing the child participation in normal social interaction.

It can be inflicted by other children and as well as adults and can include serious bullying or cyberbullying causing children to feel frightened or in danger. An example of this could be, coaches or parents emotionally abuse children if they constantly criticise, abuse their power, or impose unrealistic pressure to perform.

Bullying & Hazing - anyone can be the target of bullying, but children who are perceived as different may be at greater risk; this may include children from minority groups, or children with a disability. Bullying can include:

- Physical – hitting, kicking, theft;
- Verbal – name calling, teasing, sarcasm, racist or homophobic taunts, threats;
- Emotional – tormenting, text messaging, ridiculing, humiliating and ignoring; and
- Sexual – unwanted physical contact or sexually abusive comments.

Although bullying can take place anywhere it is more likely to take place in an unsupervised area. This would include changing rooms, or on the way to the pitch or training sessions

Hazing - is the practice of rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group. Hazing is seen in many different types of social groups, including gangs, sports teams and schools.

Grooming - is when someone builds an emotional connection with an individual to gain their trust for the purposes of abuse or exploitation.

Many children or other vulnerable people don't understand that they have been groomed, or that what has happened is abuse. Grooming happens both on line and in person. Groomers will hide their true intentions and may spend a long time (this could be years) gaining an individuals' trust. They may also try to gain the trust of the whole family so they can be alone with the person.

Grooming activity may include:

- Offering advice or understanding;
- Buying gifts;
- Giving the child attention;
- Using their professional position or reputation;
- Taking them on trips, outings or holidays;
- Using secrets and intimidation to control children.

Once they have established trust, groomers will exploit the relationship by isolating the individual from friends or family and creating a dependent relationship.

They will use any means of power or control to make the individual believe they have no choice but to do what they want.



Groomers may introduce “secrets” as a way to control or frighten the individual. Sometimes they will blackmail them or make them feel ashamed or guilty to stop them telling anyone about the abuse. Children are reluctant to tell someone when they are being abused so it is essential that every member of the workforce is aware of the possible signs, and that there may be many pieces of information that piece together and alert you that something is not right. It is not the individual’s responsibility to decide if a child or young person is being abused, however, it is essential that all concerns are escalated to a member of the safeguarding team.

There is no clear dividing line between one type of abuse and another. The following section is divided into four areas to help categorize what may be seen or heard. Children/may show signs or symptoms from one or all of the categories. This should not be used as check list. All staff should be aware of anything unusual displayed by the child.

Remember – signs and symptoms often appear in a cluster, but also many of the indicators above may be caused by other factors – if in doubt report your concerns. The most important factor is a report by the child.

SIGNS AND INDICATORS

Physical signs of abuse

Bruise marks consistent with either straps or slaps.

Undue fear of adults – fear of going home to parents or carers.

Aggression towards others.

Unexplained injuries or burns-particularly if they are recurrent and especially in non-mobile babies.

Any injuries not consistent with the explanation given for them.

Injuries that occur to the body in places which are not normally exposed to falls, rough games etc.

Reluctance to change for, or participate in games or swimming.

Bruises, bites burn, fractures etc. which do not have an accidental/satisfactory explanation.

Cuts/scratches/substance abuse.

Hitting (with the hand or implement) smacking, punching, kicking, slapping, twisting/pulling ear, hair, or fingers, holding/squeezing with tight grip, biting, and burning.

Fabricated illnesses.

Neglect Signs of Abuse

Exposure to danger/lack of supervision.

Neglects – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care etc.

Injuries that have not received medical attention.

Constant hunger.

Poor standards of hygiene.

Untreated illnesses.

Persistent lack of attention, warmth, or praise.

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Emotional Signs of Abuse

Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clingy.

Depression/aggression/extreme anxiety.

Nervousness, frozen watchfulness.

Obsessions or phobias.

Sudden under achievement or lack of concentration.

Attention seeking behaviour..

Persistent tiredness

Running away/stealing/lying.

Humiliating taunting or threatening a child whether in form of others or alone.

Persistent lack of attention warmth or praise.

Shouting/yelling at a child.

Radicalization- use of inappropriate language, possession of violent extremist views, advocating violent actions and means.

Association with known extremists, seeking to recruit others.

Indicators of Possible Sexual Abuse

Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour.

Regularly engages in inappropriate sexual play.

Sexual knowledge inappropriate for their age.

Wariness of being approached.

Bruises on inner thigh/buttock.

Any allegation made by a child concerning sexual abuse.

Sexual activity through words/play or drawing.

Child who is sexually provocative or seductive with adults.

Unaccounted sources of money.

Telling you about being asked to "keep a secret" or dropping hints or clues about abuse.

Child Sexual Exploitation (CSE)

A type of abuse in which children in exploitative situations and relationships receive something such as gifts, money or affection as a result of performing sexual activities or others performing sexual activities on them.

Children or young people may be tricked into believing they are in a loving, consensual relationship.

They might be invited to parties and given drugs and alcohol.

They may also be groomed online.

Some children and young people are trafficked into or within the UK for the purpose of sexual exploitation.

Sexual exploitation can also happen to young people in gangs.

Female Genital Mutilation (FGM)

FGM involves procedures that intentionally alter or injure female genital organs for non-medical reasons. The Female Genital Mutilation Act 2003 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. It also makes it illegal to aid, abet, counsel, or procure the carrying out of FGM abroad



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There are no health benefits to FGM and it is likely to cause severe immediate medical effects (such as bleeding, shock, wound infections, severe pain) as well as longer term medical consequences (such as abnormal periods, damage to the reproductive system including infertility, complications in pregnancy and new born deaths. Longer term consequences also include psychological damage such as low libido depression and anxiety. FGM is a very complex issue and should be dealt with sensitively. Issues will likely involve several agencies working together including specialist police officers, health and social care and education.

Child Trafficking and Modern Slavery

Child trafficking is the movement of a young person for the purpose of exploitation. This includes:

- A young person being bought or sold for money;
- A young person being tricked into leaving home;
- A young person who is given away by their family because the family need money;
- A young person who is made to leave their home because of war;
- A young person who chooses to leave home, thinking they are going to a better life;

The move of the young person can be international or within the same country. There could be lots of reasons the person has moved including;

- Sexual exploitation;
- Forced labour;
- Domestic servitude;
- Organ harvesting;
- Child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc;
- Forced marriage and illegal adoption (if other constituent elements are present).

The reasons for the move generally benefit the people who take the young person and the people who exploit or abuse them. The young person does not benefit from the move. In fact, in most cases the young person suffers because they have been forced or tricked into moving.

What are the signs of someone being trafficked?

One or two of these signs might not necessarily mean a person has been trafficked, but if you have any concerns about a vulnerable person, please contact a safeguarding officer.

- Physical signs that someone has tried to hurt them (bruises/cuts);
- Does not come into school all the time;
- Has different adults around them quite a lot;
- Often seems tired or worn out;
- Does not often speak to other people or seems withdrawn;
- Seems to be afraid of people in authority (teachers/adults);
- Gets angry easily or can be violent;
- Looks like they find it difficult to concentrate or focus on something;
- Have moved to the UK a while ago, but still don't really know the language;
- Have suggested they don't live with family or have a bad time at home.

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Child exploiters and traffickers are targeting both boys and girls.

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking. These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. Although human trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country. It is possible to be a victim even if consent has been given to be moved.

Children cannot give consent to being exploited therefore the element of coercion or deception does not need to be present to prove an offence.

Peer-on-Peer Abuse

Peer-on Peer abuse is any form of physical, sexual, emotional, and financial abuse, and coercive control exercised between and within children's relationships (both intimate and non-intimate). It can take many various forms including serious bullying (including cyber bullying), physical abuse, teenage relationship abuse, domestic violence, sexting, child sexual exploitation, youth and serious youth violence, harmful sexual behaviour and/or gender-based violence.

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Safer Recruitment

The Trust endeavours to ensure that we do our utmost to employ 'safe' staff through our internal recruitment processes and in accordance with the law. We will achieve this in the following way: -

- At least one member of each recruitment panel will have attended safer recruitment training.

When undertaking pre-selection checks the following must be included:

- All volunteers/staff should complete an application form. The application form will request information about an applicant's past and self-disclosure about any criminal record.
- A DBS check will be undertaken:-
- Two confidential references, including one regarding previous work with children. These references must be taken up and confirmed through telephone contact; and
- Evidence of identity (passport or driving licence with photo).

Should the Trust buy in services it will ensure that the organisation and/or individual has the appropriate clearances in place prior to working with the children and young people in the group.

Recruitment of ex-Offenders

As a user of the Disclosure and Barring Service (DBS) checking service to assess applicants' suitability for positions of trust, we will fully comply with the DBS Code of Practice and the Rehabilitation of Offenders Act. We will treat all applicants for positions fairly.

We will not discriminate unfairly against any subject of a Criminal Records Check (CRC) or self-disclosure on the basis of a conviction or other information revealed. We ensure the fair treatment of staff, potential staff, volunteers and potential volunteers and users of our services, regardless of race, gender, religion, sexual orientation, responsibilities for dependants, age, physical/mental disability, or offending background.

Unless the nature of the position allows, we will only carry out searches of 'unspent' convictions as defined in the Rehabilitation of Offenders Act 1974. Where an Enhanced check is sought, we may ask about spent and unspent offences but will do so in the spirit of the Rehabilitation of Offenders Act, 1974 and the relevant law.

Guidelines for Use of Photographic Filming Equipment at Sporting Events

Whilst photographs taken of children during sporting events is positive, especially for parents and carers who want to create memories, unfortunately, some people have used sporting events as an opportunity to take inappropriate photographs or film footage of children. However, we must ensure that we comply with the General Data Protection Regulation and related data protection laws e.g., the Data Protection Act 2018.

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Photographs / filming as learning aid

There is no intention to prevent club coaches and teachers using video equipment as a legitimate coaching aid. However, performers and their parents/carers should be aware that this is part of the coaching programme and care should be taken in the storing of such films in accordance with data protection laws. Any data protection queries should be raised with the Data Protection Officer (DPO). You should also be familiar with our data protection policy found on the company server.

If it is suspected that photographs or videos have been taken or used for inappropriate purposes, then this must be reported to the DSO immediately.

Photographs / film for promotional purposes

In this instance, we must obtain the consent of parents / carers. Examples may include putting photographs / videos on social media, the website, on displays, in publications such as the newspaper. You should refer to our data protection policy for more information. However, you must obtain prior written consent, and this should be recorded in our consents register as evidence held by Nicola Toolan. If we do not obtain consents, this could lead to a safeguarding risk. For example, if photographs of a Looked After Child are published in a newspaper, this may lead to them being identified by other individuals who they need protecting from.

This policy does not prevent parents or carers from taking photographs during sporting events as long as this is done so for personal use only.

Confidentiality

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

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

- The Head of Safeguarding or Senior Safeguarding Manager/Chief Operating Officer in their absence;
- The parents of the person who is alleged to have been abused;
- The person making the allegation;
- Social Services/Police;
- The alleged abuser (and parents if the alleged abuser is a child).
-

Seek Social Services advice on who should approach alleged abuser.

Information should be stored in a secure place with limited access to designated people, in line with data protection laws (e.g., that information is accurate, regularly updated, relevant and secure).

As a Trust, we are required to work in partnership with other agencies and bodies to promote the welfare of children. These duties, and multi-agency approach, as set out in statutory guidance, means that we will need to disclose information in the interests of protecting children.

It will never be appropriate to withhold information which is relevant and necessary in protecting children.

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Sources of support

Consideration should be given about what support may be appropriate to children, parents, and members of staff. Use of Helplines, support groups and open meetings will maintain an open culture. The British Association of Counselling Directory may be a useful resource. This is Available from The British Association for Counselling, 1 Regent Place, Rugby CV21 2PJ, Tel: 01788 550899, Fax: 01788 562189, E-mail: bac@bac.co.uk, Internet: www.bac.co.uk)

Consideration should be given about what support may be appropriate to the alleged perpetrator of the abuse.

Monitoring

The policy will be reviewed annually or in the following circumstances:

- changes in legislation and/or government guidance
- as required by the Local Safeguarding Children Board, UK Sport and/or The FA or EFL: or
- as a result of any other significant change or event.

Reporting a safeguarding concern

Report Safeguarding concern to: Rochdale AFC Community Trust DSO – Ryan Bradley – Ryan.bradley@rochdaleafc.co.uk

In the absence of DSO, report to Head of Safeguarding: Nicola Toolan – Nicola.toolan@rochdaleafc.co.uk.

In the absence of Head of Safeguarding, report to Rochdale AFC Senior Safeguarding Manager – Simon Gauge – Simon.gauge@rochdaleafc.co.uk

or Chief Operating Officer – George Delves – George.delves@rochdaleafc.co.uk

In the case of an emergency, contact the Police (999)
Always report to Rochdale Council Social Services
Tel: 0300 303 0440

Rochdale MBC LADO – www.rochdalesafeguarding.com
Tel: 01706 647474

Other useful contacts

Child Protection Officer - Lancashire County FA
Email: CountyWO@LancashireFA.com Tel: 01772 624000

NSPCC Helpline
Email: www.nspcc.org.uk Tel: 0808 800 5000

Childline
Tel: 0800 11 11

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**Rochdale AFC
Community Trust**

Charity number 1121850
Company number 6394327

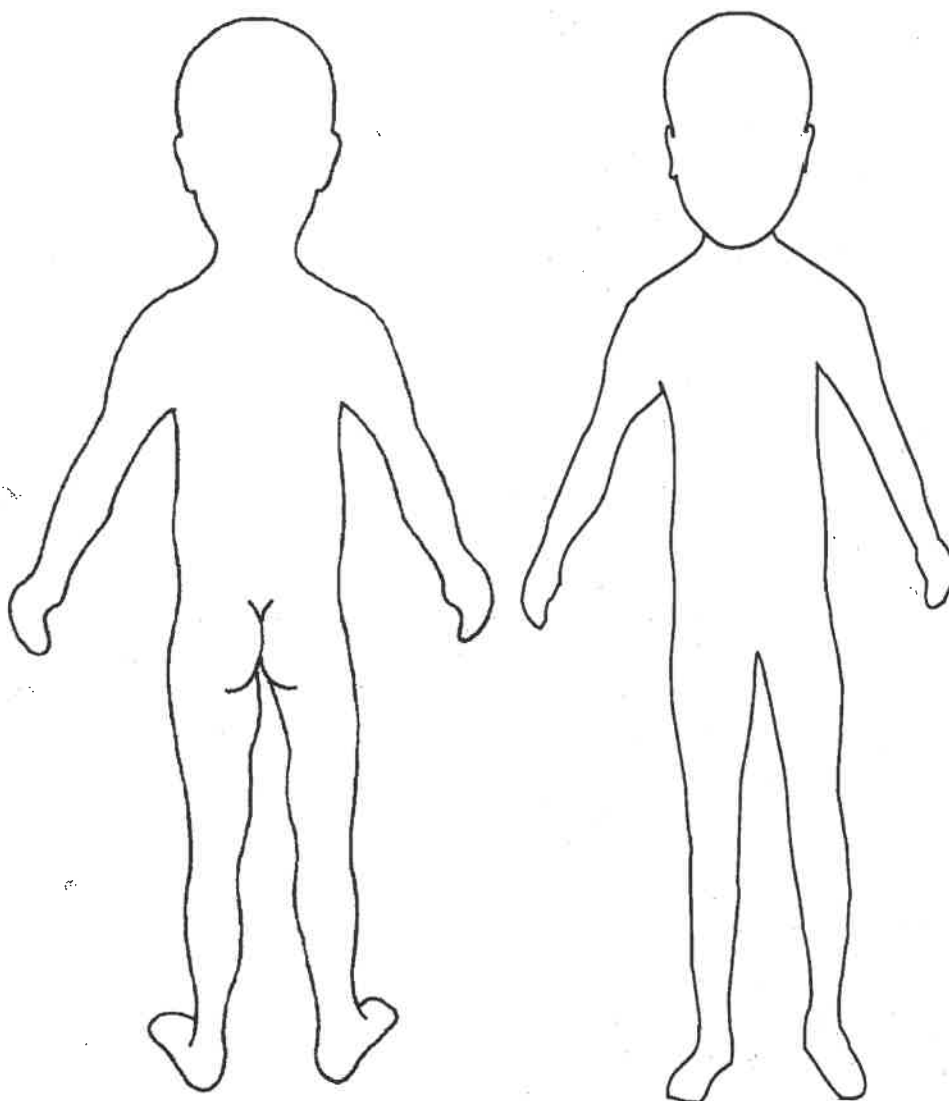
BODY MAP

(This must be completed at time of observation)

Name of Child: _____ Date of Birth: _____

Name of Staff: _____ Job title: _____

Date and time of observation: _____



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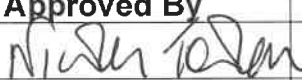
Anyone who has a concern about the welfare of a child or the behaviour of an adult towards a child or young person under 18 years of age in football, and cannot contact a DSO or the Head of Safeguarding is required to refer it to the FA Safeguarding team or in our case also the English Football League Trust. The team is staffed by professionals who are experienced in dealing with these concerns.

Referring a concern can be done via your club, league or County FA – all will have a designated safeguarding officer (DSO). Alternatively, you can email directly via safeguarding@thefa.com.

If the matter is urgent and you cannot contact your club or County FA designated safeguarding officer, you can call The NSPCC 24-hour helpline on 0808 800 5000 – or if it is an emergency because a child or children are at immediate risk, then call the police or children's social care in your area.

If you are concerned that someone may be behaving inappropriately or seeking to groom a child in an online environment, then please use the CEOP reporting button that will take you directly to the team at the National Crime Agency, as well as informing your County FA or The FA via safeguarding@thefa.com.

AUTHOR & APPROVAL

Version One	Approved By	Date	Review Date
Nicola Toolan-HOS		19/05/2022	19/05/2023
Ryan Bradley Community Director		19/05/2022	19/05/2023
Trustee		27/5/22	27/5/22
Trustee			