



## GILLINGHAM FOOTBALL CLUB LTD

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Safeguarding Children  
Safeguarding is EVERYONE'S Responsibility



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# GILLINGHAM FOOTBALL CLUB LTD

Gillingham FC is committed to the safeguarding and promoting the welfare of children, young people and adults at risk and expects all staff, volunteers and visitors to share this commitment. Safeguarding is everyone's responsibility.

## Policy Purpose

This safeguarding policy reflects the safeguarding ethos at GFC. Gillingham FC is committed to safeguarding and promoting the welfare of young people and adults at risk and expects all staff, volunteers and visitors to share this commitment.

This is the main 'GFC Safeguarding Children and Young People Policy'. This safeguarding policy is a point of reference for all policies and reference material used by GFC. Other related policies and protocols are listed below.

In addition, the safeguarding policy aims to promote the safety and wellbeing of the young and vulnerable and to provide assurance to parents, carers and other parties.

By implementing this policy across all GFC operations, all members of staff will understand that they have a responsibility to work together to safeguard children and that:

- The child's safety and welfare is the first consideration
- All children have a right to enjoy sport, and associated activities of GFC, free from abuse and all forms of bullying, harassment and discrimination
- All individuals and organisations involved with GFC have responsibilities for the welfare of children in our activities; and
- All individuals and organisations involved with GFC must act in accordance with the law in relation to such matters

For GFC operations, it also means; supporting 'safer recruitment' processes through promoting best practice for those working amongst our staff, supporting them, ensuring staff are competent, well-managed, challenged if poor practice occurs, and taking action when a concern arises.

## Who This Policy Applies to

This policy and its operating principles, apply to all staff and volunteers (including all players) of GFC, irrespective of the type of contract on which they are employed or the hours and days that they work, or the nominated location at which they work.

The policy also applies to any other individual, worker, contractor, commercial partners, licence holder, consultant who is engaged by, or does work on behalf of, or for, GFC. This policy does not form part of any employee's contract of employment.

For the avoidance of doubt this policy does not apply to the ACT, who operate in accordance with their own policies.

To illustrate the scope of this work, the below thorough list provides examples or situations across GFC where we need to consider the welfare and well-being of children and young people:





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- Players involved in Academy or associated development programmes
- U18s who are involved with senior appearances, training, or trips
- Young players living away from home in GFC provided accommodation
- Young players away from home on trips or tours, while under GFC supervision
- Children or young people visiting the stadium on matchday, events, or taking part in GFC activities.
- Disabled supporters who visit the stadium on matchdays, or other pre-arranged GFC activities. The DLO will become involved.
- Support for those who may be vulnerable to abuse outside of GFC, through engagement with GFC

### Key Safeguarding Terminology and Definitions

- GFC / the Club – Gillingham Football Club. Any property or training ground belonging to or where GFC operate, or where their activities occur.
- FA – Football Association
- EFL – English Football League
- CEO - Chief Executive Officer
- Staff – paid or unpaid workers, agency or third-party workers, volunteers, who provides a service.
- DSO – Designated Safeguarding Officer
- SSM – Senior Safeguarding Officer
- DLO – Disability Liaison Officer
- My Concern – The GFC confidential safeguarding management system
- GCSP – Gillingham Child Safeguarding Partnership (Local Authority)
- LADO – Local Authority Designated Officer
- The Academy - The standalone Academy department within GFC responsible for nurturing and developing GFCs future generations of players.
- Child or young person – Defined by the Children’s Act (1989) as any young person under the age of 18.
- Safeguarding - refers to the actions we take to ensure all children are safe from harm when involved in our clubs and activities.
- Child Protection - is a set of activities that are required for specific children who are at risk/or are suffering from significant harm.
- Abuse - refers to the acts of commission or omission that lead to a child experiencing harm.
- Harm - refers to the negative impact or consequences upon the child of those actions.





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- 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.
- Violence - refers to “all forms of physical or mental violence, injury and abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.”

### Related GFC Policies and Protocols

- Safeguarding Adults at Risk Policy
- Easy Read Safeguarding Policy
- Child friendly Safeguarding Policy
- Code of Conduct
- Self-Declaration
- Safer Recruitment Policy
- Staff Induction Policy
- Staff Handbook
- DBS Single Central Record
- ‘My Concern’ safeguarding case management system
- Social Media Policy
- Acceptable IT use policy
- Equal Opportunities policy
- Information sharing / data protection protocols
- Health and Safety Policy
- Complaints procedure
- Whistle Blowing policy
- Match Day safeguarding plan
- The Academy have a number of supporting policies.

This is not an inclusive list.

### Safeguarding Legislation and Guidance

Safeguarding at GFC is influenced by a range of legislation and guidance:

- The Children's Act 1989, 2004 and 2022
- Every Child Matters (policy) 2003





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- The Education Act 2002
- Keeping Children Safe in Education (KCSIE) 2023
- Working Together to Safeguard Children (guidance) July 2018
- Safeguarding Vulnerable Groups Act 2006 (amended 2012 to DBS)
- Counter Terrorism and Security Act (Prevent) 2015
- Listen and Involving Children and Young People
- DBS Barring Referral Guidance
- NICE Guidelines on Child Abuse and Neglect
- Information Sharing (advice for safeguarding practitioners) July 2018
- General Data Protection Regulations (GDPR) 2018
- Human Rights Act 1998
- Health and Safety at Work Act 1974
- Management of Health and Safety at Work regulations 1999
- The Sheldon Report recommendations 2021
- Modern Slavery Act 2015
- Female Genital Mutilation Act (FGM) 2003
- Anti-social Behaviour, Crime and Policing Act (Forced Marriage) 2014
- NWG Network (child exploitation) guidance 2021
- Private Fostering Regulations 2005
- SEN Code of Practice guidance 2015
- Domestic Abuse Act 2021
- Police Operation Encompass (DA) information sharing protocols
- UKCCIS guidance 2021 (sharing nude and semi-nude guidance)
- The standards for safeguarding and protecting children in sport (NSPCC CPSU) 2016
- Whistleblowing advice line NSPCC
- The FA Safeguarding Policies and Guidance
- The EFL Safeguarding Standards 2022/23





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- The EFL Managing Concerns guidance
- The EFL Eligibility Guide (DBS criteria) 2022

This is not an exhaustive list and when new law and guidance is released GFC will follow the updated information.

## Policy Statement

GFC takes its responsibilities very seriously regarding providing a safe and positive environment where children, young people and adults at risk are present at any of its GFC led activities and (under the supervision) of one or more members of our staff.

All vulnerable people, regardless of age, disability, gender, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion and/or sexual orientation (defined as Protected Characteristics within the Equality Act 2010) have the right to equal protection from all types of harm or abuse.

All participants and visitors to GFC activities have the right to feel safe and to be safe. Wherever they come into contact with us they will be treated both lawfully and fairly and with both dignity and respect. All the members of our staff have a duty to keep children safe and to help protect them from abuse or harm. All managers ensure that their staff understand and apply that duty.

Good safeguarding practice takes many forms. It is a thread that weaves throughout all GFC activities that involve children and other vulnerable people.

This policy also applies to individuals not included in this list who may be conducting related work that involves the children in our care. The policy has been written in line with all relevant Government legislation including the 'Working Together to Safeguard Children' guidance published in July 2018 and 'Keeping Children Safe in Education' updated 2023.

## Principles of safeguarding children and young people

The term safeguarding is a shortening of the phrase "safeguarding and promoting the welfare" of children and young people.

We follow the 6 principles of safeguarding:

1. Empowerment: it is important for a young person to be supported and encouraged to make their own decisions and give informed consent.
2. Prevention: it is better to take action before harm occurs.
3. Proportionality: the least intrusive response appropriate to the risk presented.
4. Protection: support and representation for those in greatest need.
5. Partnership: local solutions through services working with their communities – communities have a part to play in preventing, detecting and reporting neglect and abuse.
6. Accountability: accountability and transparency in safeguarding practice.





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## National and International Frameworks

The GFC safeguarding programme will seek to work within the guidance provided by 'International Safeguards for Children in Sport' framework and in conjunction with the local frameworks found within any country where staff are conducting GFC business.

## GFC Safeguarding Framework

This policy is the basis for a GFC safeguarding network that seeks to implement a clear and Effective programme of work that is embedded across the staff.

## Our safeguarding vision:

GFC will:

- Respect and promote the rights, wishes and feelings of children.
- Recruit, train and supervise staff to adopt best practice in order to safeguard and protect from abuse and themselves from false allegations.
- Respond to complaints, concerns and allegations and implement the appropriate disciplinary and appeals procedures.
- Share information with relevant agencies and organisations in a timely manner (as far as the law permits).

## Our safeguarding aims:

- A safe and welcoming environment for children involved in any GFC led activities,

Wherever they are in the world, free from abuse and fear of abuse in all its forms.

- A culture where safeguarding practice is widely understood, openly discussed and where

staff recognise the role they play in keeping children, other vulnerable people, themselves and their colleagues, safe from harm

- A clear system which promotes and supports; constant vigilance, prevention and early intervention in safeguarding matters and where necessary prompt and thorough action in response to any reported concerns or incident
- To apply legislation, government policy & guidance, and football governing body regulations, policy and guidance where applicable; and
- To work closely together with local statutory agencies and other partners to promote and safeguard the welfare of children.

## To realise these aims we will:

- Work or liaise with relevant football governing bodies, statutory agencies and other child welfare bodies to ensure we meet all necessary regulations and standards in respect of our safeguarding practice.
- Listen to children and take them seriously, consult with them when developing processes and react appropriately to ideas, feelings and concerns, then address them in a fair, effective and timely manner.
- Develop and communicate a series of clear policies, protocols and guidance designed to help deliver sound governance and good practice across GFC's activities, including regular safeguarding meetings with representatives from all relevant areas of GFC.





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- Maintain a visible safeguarding presence across all areas of GFC including for remote communications and on social media platforms
- Monitor activities taking place at GFC facilities and those at off-site locations
- Provide training, advice and support across all areas of the GFC where children and other vulnerable people are involved in any GFC led activity.
- Support and help deliver the GFC's 'safer recruitment' philosophy in accordance with local legislative and regulatory requirements and in partnership with the human resources department and relevant managers
- Maintain confidentiality of all information and documentation relating to DBS disclosures, concerns, allegations and incidents in accordance with relevant data protection legislation
- Share sensitive information with the relevant authorities when it is appropriate to do so and in the knowledge that the information will be treated confidentially.
- Prepare annual safeguarding reviews covering each strategic element of GFC.

### Roles and Responsibilities

Shannon Galinson – Senior Safeguarding Officer and Safeguarding Champion (Board Level)

Asif Rasheed – Academy DSO

Nick Farrell – Player Care Manager

Ben Reeves – Disability Liaison Officer

Gary Newman – Stadium Security Officer

### Organisational Safeguarding Flowchart

Safeguarding children across GFC is given a very high priority. GFC have a full time SSO to promote the best practice and create a safer culture across all aspects of the club.

At GFC operational board level, Shannon Galinson is the Safeguarding Champion and endorses this policy and all other safeguarding policies on behalf of the board. Safeguarding is a standing agenda item at board meetings and the SSO/Safeguarding Champion reports regularly.

GFC have safeguarding representatives across all aspects of business to ensure the highest standards are maintained consistently.

GFC have additional safeguarding policies and protocols, which give greater detail and support this central document, which is to be used as a reference material.

The DSOs regularly meet in order to share information and promote best practice across The Club

GFC have a Disabled Liaison Officer (DLO) who is the first contact point for those who need additional considerations when attending matchday or other GFC events.

It has been recognised the safeguarding team require proper support in their role.

This is done through supervision, both within GFC and with outside organisations.



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Shannon Galinson – Safeguarding Champion Board Level

Geoff Wellard – Senior Safeguarding Officer

Asif Rasheed – Academy DSO

Nick Farrell – Player Care Manager

Gary Newman – Stadium Safety Officer

Darren Green – EFL Regional Support Officer

## GFC Academy GFC Operations GFC Matchday

### Raising a Concern

Due to their contact with children and young people, GFC staff are well placed to observe the changes in their behaviour and outward signs of abuse. Children and young people may turn to a trusted person when they are in distress or at risk. It is vital that all staff are alert to this and understand the procedures for reporting their concerns and what appropriate action to take.

Safeguarding concerns fall into one of the following types:

- The behaviour of an adult towards a child
- The behaviour of a young person towards another young person (child on child abuse)
- A risk identified through the recruitment process (DBS)
- Information about an individual provided by statutory agencies or another route
- Allegations of abuse
- Concern about harm to a child that has taken place outside of any GFC activity, but identified while at a GFC activity.

For members of staff these concerns can apply to both their professional and private lives and poor conduct in either may affect their position in the workplace.

GFC ensure that confidentiality of safeguarding cases is maintained. Everyone is told to report safeguarding concerns, however small.

The secure safeguarding reporting and case management system 'My Concern' is used by GFC for reporting all safeguarding concerns.

Only the SSO and essential people involved will be aware, on a need-to-know basis.

Statutory information sharing protocols will be followed where necessary including the FA safeguarding case management, the EFL safeguarding team, the local authority and the police.

A child centred approach to safeguarding is at the centre of the GFC ethos. Wherever possible the young or vulnerable person will be involved in every aspect of managing the concern



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If a person is at immediate risk of harm or about to become the victim of a crime, the police must be informed via 999. Referral for any issue concerning potential radicalisation to extremism should be managed as any other safeguarding referral.

Due to their contact with children, GFC staff are well placed to observe changes in a child's behaviour and outward signs of abuse or neglect.

Children or young people may turn to a trusted adult at GFC when they are in distress or at risk. It is vital that our staff are alert to the signs of abuse and what steps to take if a child or young person confides in them.

Mandatory reporting – If any member of GFC staff has a concern about a child, they have a duty to refer this to the DSO. The DSO will ensure every instance is recorded on 'My Concern'. This will ensure transparency, an audit trail, identify poor practice, lessons learned and themes.

If there is immediate risk of harm, a serious injury, or a criminal offence may have been committed, then the police or other emergency services must be involved at the earliest opportunity.

Where a very serious concern is raised that involves anyone involved in a GFC activity, the SSM, who is the board representative, will be informed.

### **Reporting**

There may be occasions when staff are concerned about a child's welfare and may suspect that a child may be at risk of harm. Staff should give the child the opportunity to talk. The signs they have noticed may be due to a variety of factors, for example, a parent has moved out, a pet has died, a grandparent is very ill or an accident has occurred.

Following an initial conversation with the child, if the member of staff remains concerned, they should discuss their concerns with their line manager, Designated Safeguarding Officer. A 'My Concern' report must be recorded.

If the child does begin to reveal that they are being harmed, staff should follow the advice below. Concerns which do not meet the threshold for child protection intervention will be monitored.

### **Taking action**

Any child or young person could become a victim of abuse. It is important to believe the young person and take the matter seriously.

### **Key points for staff to remember:**

- Discuss your concern with your line manager and report it your Dedicated Safeguarding Officer – follow the procedure for your activity.
- In an emergency take the action necessary to help the child, if necessary, call 999 or 101 for local police.
- Consider the welfare of the victim (and the reporting person if different).
- Remove the alleged perpetrator from the workplace.
- Do not start your own investigation.
- Secure evidence, especially if the allegation involves a sexual assault (clothing and hygiene items).
- Share information on a need-to-know basis only – do not discuss with colleagues, friends or family.





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- Make a record and use the Note and Record advice (annex attached) to guide you.

Make an entry on 'My Concern' or confirm one has been made.

- Seek support for yourself if you are distressed.

If the child is in need of immediate medical attention:

- Call for an ambulance.
- Inform parents you are doing this. If the parents are allegedly involved in the abuse, only inform them that you are taking the child to hospital. Do not share any other information.
- Inform doctor of your concerns in relation to child protection issues.
- The doctor will take appropriate action.
- Inform your manager and report your concerns.

### **If a child discloses to you:**

If a child discloses about any risks to their safety or well-being, the staff member will need to tell the child the information will be recorded – staff are not allowed to keep secrets.

### **How to respond:**

In the event that a child makes an allegation or disclosure of abuse, whether by an adult or another child, you can use the TED questions to gain clarity:

1. **T**ell me what happened,
  2. **E**xplain,
  3. **D**escribe.
- Listen and/or closely observe their presentation and behaviour
  - Do not interview, investigate or ask leading questions.
  - Let them know that you will need to tell someone else in order to help them.
  - Do not promise to keep what they tell you secret.
  - Do not speak with the alleged person or parents/carers of the child.
  - Respond appropriately: make notes and discuss with your line manager.
  - Report your concerns and contact the DSO.
  - Record your observations; complete a My Concern entry. This will automatically be submitted to the DSO. Keep any notes as they are vital evidence and may be required for any criminal investigation.

If a child starts to disclose something and then stops when they are informed you must record it, or that it cannot remain confidential, this must still be reported on 'My Concern'.





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## Reporting procedures for off-site / schools / other organisations

When delivering activities off-site, or in a school or with another organisation, or under the direction of another organisation, the policy for that establishment will apply:

- You must inform the designated person (teacher) for that establishment for them to follow local partnership procedures.
- You must then make a 'My Concern' report, or inform the DSO
- If the activity is in partnership with another organisation or school, but on GFC premises, you must follow the GFC procedure.

## Notifying parents

GFC will normally seek to discuss any concerns about a child or young person with their parents. This must be handled sensitively, and where possible the DSO will contact the parent in the event of a concern, suspicion or disclosure. However, if GFC believes that notifying the parents could increase the risk to the child, advice will be sought from the DSO in partnership with PSCP.

## Referral to children's social care

A member of the safeguarding team, or DSO can make a referral to PSCP (local authority children's social care) if it is believed that a child is suffering or is at risk of suffering significant harm.

The child (subject to their age and understanding) and the parents will be told a referral is being made, unless doing so would increase the risk to the child. A direct referral can be made by any member of staff, if they genuinely believe independent action is necessary to protect the child. The DSO must be informed of your actions as soon as practicable afterwards.

## Reporting directly to children's social care

Staff should follow the procedures outlined in this policy. However, when there is concern about the immediate safety of any child, you may share information directly with PSCP, the Police or NSPCC if:

- The situation is an emergency or out of hours
- The DSO or a supervisor are unavailable
- A direct report is the best way to ensure the child's safety at that time
- For any other reason they make a judgement that the direct referral is in the best

interest of the child. The DSO must be informed as soon as practicable and a My Concern entry made.

## Reports against staff

If a report is made against GFC staff or volunteer, the report will be taken seriously where relevant law, football protocols and policy will be adhered to and where appropriate information sharing between agencies will take place.

This will be recorded on the secure My Concern system and managed by the DSO. HR disciplinary procedure will be complied with. It is likely the staff member will be removed from the activity or suspended as a matter of course to assist an unhindered enquiry into the events.





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### Low Level Concerns

GFC complaints procedure will be followed where a member of staff, or child, or parent / carer raises a concern about poor practice towards a child that does not reach the threshold for reporting to PSCP / LADO.

GFC wish to maintain a culture of openness, trust and transparency, which all staff are confident and clear of expected behaviours of themselves and their colleagues.

Staff should feel empowered to raise any low-level concern, whether about their own or another's behaviour, which may fall short of the standards expected and set out in their code of conduct. We aim to deal in a sensitive, prompt and proportionate manner, maintaining confidentiality and protecting staff from false allegations.

Poor practice examples include unfairly singling out a child, or attempting to humiliate a child, bullying or belittling a child, or discriminating against them in some way. Poor Practice is defined in the section 'What is abuse'.

A low-level concern may be a minor concern such as a nagging doubt, or a situation that may appear compromising or misconstrued. This may include a behaviour which occurred outside of the workplace.

Low level concerns must be managed before they spiral out of control. Information sharing principles will be followed to establish any patterns or ongoing risk.

The EFL have specific guidance to ensure a co-ordinated approach to low level concerns. The FA safeguarding unit have a database covering all football concerns.

Where an individual reaches 3 low level concern reports, or they leave employ of GFC having received a low-level concern report, this information will be shared with the FA. This is not withstanding any other appropriate action that may be taken to address the low-level concern reports by GFC. This protects the integrity of the whole game.

**All staff members should feel confident to raise any concerns of poor or unsafe practices.**

### Action to be taken

Make a My Concern report / inform the DSO when there has been a nagging doubt or poor practice has been identified. The DSO will then lead the enquiries as per any other concern that has been raised.

Other options can be considered by the reporting person: The NSPCC have a helpline for advice, or consider speaking with your manager, or make a report / complaint / grievance to HR.

If a member of staff feels this route has been ineffective, GFC have a Whistleblowing policy, which can be used independently of the safeguarding team.

If the allegation is regarding the safeguarding team, the HR manager should be informed and the matter dealt with independently.

There is nothing to prevent anyone from reporting a concern direct to external agencies such as the PSCP or the police if the reporting person is doing so in the best interest of the child.

As with all disclosures and reports, the process for managing low level concerns may result in a discipline / misconduct investigation, or a child protection investigation, or a criminal investigation. All notes or information must be securely retained as they may be required for any such investigation.





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With all allegation reports, there is consideration for lessons learned. This will lead to an environment of continual improvement. We do not need to wait to the conclusion of the enquiries to make the improvements from the lessons learned.

### Confidentiality

Information can be shared lawfully where there are concerns about the safety of an individual, and where it is in the best interests of that individual. Information sharing between organisations can improve the decision-making process, assists in early intervention, prevention and in improving outcomes for the individual.

Staff must only share safeguarding information in line with ECHR, being lawful, necessary and proportionate. All staff must be held accountable for their actions when passing personal information and must comply with the framework of this policy.

All matters relating to child protection are confidential and information is disclosed on a need-to-know basis.

### Information sharing

Data protection legislation permits data information sharing:

'If a professional has concerns about a child's welfare and believes they are suffering or likely to suffer significant harm they should share the information with children's social care'. This is reflected in 'Working Together to Safeguard Children' 2018.

Information sharing is guided by the following principles: the information is necessary, proportionate, relevant, adequate, accurate, timely and secure.

Information sharing decisions will be recorded, whether or not the decision was made to share.

### Information management

Child protection information is stored and handled securely in line with the Data Protection Act 2018 and GDPR. Information will be stored separately from other records on My Concern, which is a secure place with limited access to designated people, in line with the NSPCC guidance on Child Protection Records Retention and Storage. My Concern is the secure safeguarding case management system and is approved by the EFL.

Physical or written information will be secured in a locked facility.

The DSO will normally obtain consent from the child and, or parents / carers to share sensitive information within GFC or to agencies. When there is good reason to do so, the DSO may share information without consent, and will record that reason.

Child protection records may be exempt from the provision of the Data Protection Act, which means there may not be an automatic right for parents / carers to see them. If a request is made to any member of staff the DSO must be informed.

The Data Protection Act and GFC's data protection policies do not prevent staff from sharing information with relevant agencies, where that information may help to protect a child.

GFC have a risk register, for which safeguarding is included, this will reduce or negate risk and enable an ongoing evaluation process.





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## Files on children

Concerns are recorded securely on My Concern, which is overseen by the DSO. The case management process records how concerns have been received, responded to, and dealt with.

## Whistleblowing –

GFC views the reporting of concerns by members of staff as a vital element of maintaining the core values. Individuals are strongly recommended to report incidents of malpractice, where policy, protocol or law may have been breached by another member of staff.

Failure to report such a matter may result in disciplinary or criminal action. GFC have a whistleblowing policy published on their website.

## Referral management

All concerns raised will be dealt with in a swift and confidential manner. When the concern could be of a serious nature a referral to the police or PSCP should be made at the earliest opportunity.

Where a concern is raised through My Concern, or directly with the DSO, the matter will be dealt with as a matter of urgency, usually within one working day.

## Record keeping and confidentiality

All incidents and concerns will be taken seriously, accurately recorded, acted on as appropriate, and confidentially retained. Records will be reviewed to identify patterns of behaviour that may raise a concern.

All information collected and stored, will be treated with sensitivity and handled in accordance with data protection legislation. There may be a requirement to refer matters to the governing body or PSCP.

## Consent

GFC recognise the importance of approaching the individual needs of the child in the appropriate way and according to law and statutory guidance.

Where a child is at risk of harm, consent to act on concerns is not normally required in law, although GFC recognise that consent and consultation with those with parental responsibility is considered best practice, unless this would put the child at greater risk of harm.

**Children:** We will always respect your right to have your say when a decision that affects you is being taken. We will take your views into account and always act in your best interests.

**Parents:** We will consult with you and obtain consent as a matter of course, unless we consider that informing you will put your child at greater risk of harm. Care will be taken to obtain consent from all of those with parental consent, where a parent or legal guardian cannot give consent at that point, and where it may be required, we will always act in the best interest of the child.

## Partnerships

GFC works closely with statutory agencies, football regulators and appropriate organisations and follow the safeguarding information sharing principles. GFC work in partnership with Kent County Council and Active Kent and Medway relevant multi-agency partnerships, including the Kent and Medway Prevent team. GFC abide by safeguarding information sharing protocols with statutory agencies, including the police.



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GFC work closely with the FA and EFL safeguarding teams to ensure compliance with a football wide governance.

There are regular meetings between the safeguarding teams of GFC, to confirm strong team working and collaboration.

When a referral has been made, or The FA / EFL have been informed, or other partner agencies have been informed, the DSO will remain the GFC point of contact and work in partnership in line with relevant protocols and information sharing agreements. The DSO will remain in contact with the board as appropriate depending on circumstances.

When there is a decision not to refer there are numerous considerations to be made and a record must be made of the decision-making process and communication with the individuals involved.

When speaking with children and young people, consideration should be given to how easily the individual is influenced, whether they fully understand what has been said and may not normally have people listen to their views.

A victim centred approach to safeguarding is at the centre of the GFC ethos.

Wherever possible the individual will be involved in every aspect of managing the concern.

### Support

Child abuse is devastating for the child and can result in distress and anxiety for staff who become involved.

We will support children, their families and staff by:

- Taking all suspicions and disclosures seriously.
- Nominating a link person who will keep all parties informed and be the central point of contact.
- Where a member of staff is the subject of an allegation made by a child, separate link People will be nominated to avoid any conflict of interest.
- Responding sympathetically to any request from children or staff for time out to deal with distress or anxiety.
- Maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies.
- Storing records securely.
- Offering details of helplines or other avenues of external support.
- Following the procedures laid down in our child protection, whistleblowing, complaints and disciplinary procedures.
- Co-operating with relevant statutory agencies.

### SSO and DSO Procedures

GFC is not an expert in child protection and refers issues to the appropriate agencies and governing bodies. All information received will be dealt with confidentially and shared on a need-to-know basis.

GFC operate in an open and transparent manner. Any concerns relating to a member of staff or volunteer, should be recorded via the 'My Concern' App and the DSO informed. GFC record all allegations and follow Low Level Concerns principles.

Where necessary GFC will work in partnership with the Local Authority Designated Officer (LADO), the FA Safeguarding Case Management Team and EFL Safeguarding Team.







## GILLINGHAM FOOTBALL CLUB LTD

GFC have a whistleblowing policy. When an allegation against a member of staff is made, this procedure must be followed. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do occur.

When notified of an allegation of abuse by a staff member, the DSO will:

- Ensure the child is removed from any immediate risk of harm
- Consider the welfare of all parties involved
- Confirm the report is recorded on My Concern
- Review the information and confirm any evidence is secured
- Complete a risk assessment as necessary
- Obtain a written factual statement from the person making the report
- Any account or statement made by a child, will be written in their words.
- Any reports must contain only facts, not conjecture or opinions
- All written records are to be securely retained
- If the report involves an allegation regarding a member of staff, and where the threshold is met, it will be reported to the LADO within one working day
- The DSO will manage any referrals in accordance with legislation and information sharing protocols

Where appropriate we will co-operate with the lead investigator. Care will be taken to monitor the seriousness of the report as new information comes to light.

If information comes to light to suggest it is a false allegation, we will enquire what made a person make such a report, and if there are other sources of risk to them.

If the concern occurred outside of GFC, the DSO would inform the council, or other local authority where the child lives.

The parents/carers of the child will be informed as soon as possible following advice from the council or the police.

If the allegation relates to a member of GFC staff, the DSO and or the SSM will:

- Liaise with the Head of Media in order to liaise with the FA media team and agree a holding statement if required.
- Inform the football governing bodies; [safeguarding@thefa.com](mailto:safeguarding@thefa.com) and [safeguarding@efl.com](mailto:safeguarding@efl.com)
- If the SSM is not available an appropriate board member must be informed
- Inform the HR Manager and the appropriate head of department

Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly and consistently. They have the right to be informed of its progress.





## GILLINGHAM FOOTBALL CLUB LTD

Suspension is a neutral act and may assist the unhindered investigation of the concerns. However, this is not the default option and alternatives to suspension will be considered. In some cases, a suspension will be the best way to protect the interests of both the child and the staff member. If a member of staff is suspended, they will receive support and a named point of contact.

### Non-Recent Allegations

Allegations concerning staff who no longer work at GFC, or non-recent allegations (some refer to this as historic cases), will be reported to the LADO, the police, the FA Safeguarding Unit and the EFL Safeguarding Team, even if the alleged perpetrator of the abuse is believed to be deceased.

### Good Practice

GFC accept the moral and legal responsibility to comply with the duty of care to protect and safeguard the young and adults at risk. GFC promote an organisational culture to ensure all children and young people are respected as individuals and can raise their concerns with confidence.

To meet and maintain our responsibilities towards children we need to agree standards of good practice which form a code of conduct for all staff.

Good practice and staff conduct includes:

- Provide a safe environment for children and young people
- Treating all children with respect and in accordance with their needs
- Setting a good example by conducting ourselves appropriately
- Ensuring all children are aware of safeguarding and how to raise the alarm for themselves or another child
- Promoting an environment of preventative education
- Involving children in decisions that affect them
- Encouraging positive, respectful and safe behaviour among children
- Being a good listener
- Staff are encouraged to act responsibly and help children keep themselves safe
- Staff who come into contact with children need to be conversant with the other GFC safeguarding policies as they are key to identifying issues
- Being alerted to changes in a child's behaviour and to signs of abuse, neglect and exploitation
- Recognising that challenging behaviour may be an indicator of abuse
- Asking a child's permission before initiating physical contact, such as physical support during a sporting activity or administering first aid.





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# GILLINGHAM FOOTBALL CLUB LTD

## Activities

Safe working practices are based on GFC safeguarding policies and protocols, which safeguard children and young people from harm and potential abuse.

As well as protecting staff by providing a framework to work within, reducing allegations which can arise from vulnerable or compromising situations.

- Securing parental consent in writing for all activities (including photography and first aid)
- Following staff codes of conduct
- Accurate record keeping (including accidents, treatment, personal notes, complaints, compromising situations)
- Risk assessments completed prior to activities (including events and trips)
- Adequate supervision levels to prevent misbehaviour and or peer abuse
- Promoting and respecting the rights of children
- Promoting a child centred perspective and equality

## Inclusive good practice

GFC encourages inclusivity and provides opportunities for children and young people regardless of any additional needs or vulnerabilities, promoting equality and diversity.

## Safeguarding Staff

Safeguarding is also about ensuring that all staff, volunteers and partners understand the role that they play in protecting vulnerable people. Across GFC there will be a wide range of employment and deployment arrangements involving full-time or part-time permanent staff, consultants, matchday staff or volunteers.

Our staff is what makes this policy 'live'. This means all members of staff who are involved in training, managing, supervising or caring for children must work conscientiously to help keep those in their care safe from harm. They must also be aware of how to keep themselves and their colleagues safe from having allegations made against them by maintaining.

Professional boundaries and avoiding behaviour that may be misinterpreted by others. In turn this has direct impact on maintaining the reputation of GFC.

## Staff handbook

GFC have a staff handbook which outlines safer working practices and applies to all staff.

## Safer Recruitment

Those who apply for a role that involves working with children, young people, or adults at risk are subject to the safer recruitment principles. GFC have a safer recruitment policy. The EFL provide an eligibility guide to assess who requires a DBS certificate and what level check is required. There will be follow up checks on references and qualifications, in addition to safeguarding questions in an interview. There may be open-source online checks made.





# GILLINGHAM FOOTBALL CLUB LTD

## Safeguarding induction

Each member of staff will receive an induction by the DSO to ensure they are aware of GFC policies, expectations, behaviours at work and away from work, including their online presence.

## Safeguarding training

Each member of staff will complete the EFL online safeguarding training. This was enhanced in 2022. The training will be retaken in line with the appropriate schedule.

## My Concern

All appropriate staff and supervisors will be invited to register with My Concern, the EFL approved online safeguarding management system, which will allow easy reporting of concerns.

## DBS

As per the safer recruitment, all staff engaged in regulated activity, or fit the criteria for the EFL Eligibility Guide must have a valid GFC DBS and/or allow permission for regular update service checks.

## CPD

Staff are responsible for their own continued professional development, which includes certificate renewals, first aid, and updating their DBS with any change of circumstance.

## Code of conduct

Academy staff will be required to annually sign the code of conduct and a self-declaration to register any change of circumstance.

## Staff / child relationships

GFC provides advice to staff regarding their personal online activity and has strict rules regarding contact with children, whether in person or electronically. Any breach of these rules may result in disciplinary action or child protection investigation. We will work in partnership with statutory agencies and sport governing bodies.

Staff should ensure they maintain a professional relationship with all children, young people and adults at risk.

Staff working with young people up to the age of 18 in an education setting (the academy) are now encompassed in the updated KCSIE 2023 guidance and formally recognised as PIPOT (Person in a Position of Trust).

Staff must not engage with any sexual relationship with any person while an unequal power relationship occurs.

When a young person has reached the age of 18, GFC disapproves of any relationships between staff and a young person for whom they have previously been responsible for.





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## Abuse of position of trust

All staff are aware that any inappropriate behaviour towards children or young people is unacceptable and likely to be unlawful. All conduct towards children and young people must remain professional. The Sexual Offences Act 2003 states it is an offence for a person over the age of 18 to have a sexual relationship with a person under 18, where that person is in a position of trust (PIPOT), even if the relationship is consensual. The KCSIE 2023 guidance further protects the rights of under 18-year-olds in an education setting (the academy).

Staff must report any concerns they have about another staff member. If they fail to do so they may be liable to disciplinary action or a criminal investigation. A report must be made by My Concern, or alternatively contact the DSO directly.

## Codes of Conduct

All academy staff, parents and players are required to annually sign a code of conduct. This encourages a safe environment for our children and young people, where everyone behaves in a responsible manner.

GFC participates in national and local campaigns highlighting and promoting the ethos of our players to be respected and speak out if they have any worries or concerns.

## Whistleblowing

GFC views the reporting of concerns by members of staff as a vital element of maintaining the core values. Individuals are strongly recommended to report incidents of malpractice, where policy, protocol or law may have been breached by another member of staff. Failure to report such a matter may result in disciplinary or criminal action. GFC have a whistleblowing policy published on their website.

## ICT

GFC use IT in many ways, its use will continue to grow and change with new technology. GFC use IT to communicate with supporters, customers, players, the media and parents of our young players.

GFC will:

- Develop and maintain clear policies on suitable and appropriate use of internet, email, SMS, messaging groups, apps and social media
- Ensure that child related information for players will only be sent electronically to parents.
- Raise awareness amongst young participants (especially Academy players) regarding safer internet and social media use in respect of their position
- Raise awareness, through training and internal communications, with the staff regarding appropriate use of such media and the importance of both professional and personal online activity
- Have a zero-tolerance approach to online exploitation or child on child abuse
- Respond quickly and appropriately to inappropriate use of the internet and social media by players, participants and members of staff.





# GILLINGHAM FOOTBALL CLUB LTD

## Staff Training

It is important that staff throughout the organisation receive training and awareness to enable them to recognise the possible signs of abuse, neglect, and exploitation and what to do if they have a safeguarding concern.

New staff undergo a safeguarding induction as part of GFC safer recruitment, which includes an introduction on how safeguarding weaves through everyday activity in line with the GFC vision and behaviour expectations, familiarisation with the GFC.

safeguarding policies, safe working practices, reporting concerns and the details of the DSO. Any gaps will be identified and any training needs addressed.

In appropriate roles there is mandatory FA safeguarding training, which is required to be regularly taken.

The EFL provides safeguarding training for all staff, which is taken following induction and at the recommended intervals.

The Single central Record will be updated for those in regulated activity or where a DBS is also required.

The DSO and SSM have regular EFL mandatory training they attend as prescribed.

This increases their safeguarding knowledge within the football setting.

The DSO is Level 3 Safeguarding trained and this must be refreshed every 2 years.

There is also optional local safeguarding training held by the council, for which the DSO is able to attend.

The DSO has regular meetings with the board in which they cascade essential safeguarding information, legislation and training.

The Academy has twice yearly safeguarding training from the DSO. New legislation is cascaded, current issues (locally and nationally) are discussed, and training on key safeguarding elements is completed.

## What is Abuse?

Abuse is the misuse of the power and control one person has over another. Abuse is not based on whether there was an element of intent, but rather that harm was caused, or the risk of harm on the individual.

An incident may be a single occasion or multiple acts. Abuse can be an inaction or lack of action that causes harm or the risk of harm. Abuse can be intentional or unintentional, is not necessarily a criminal act and is a violation of their human and civil rights.

Abuse can occur in any context in any place, whether at home or the workplace, in a care setting or in public. Where many people consider somewhere safe, this is not necessarily the case for a child or young person. GFC must remain a safe place, where children and young people are confident to report a concern that happened outside of a GFC activity.

A child or young person may not realise they have been subject of abuse and they may not be ready to disclose abuse.

It is not the responsibility of GFC staff to decide that abuse is occurring, but it is their responsibility to act on any signs or concerns.

In respect of children, there are 5 categories of abuse, these are based on the 'Working Together' 2018 mandatory guidance published by the UK Government and endorsed by the NSPCC. Other forms of abuse are linked to these categories.

**The below list gives a definition of the type of abuse and how that may relate to an elite football environment.**



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Registered no. 39175 England





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## Neglect

The ongoing failure to meet a child's basic needs. A child may be left hungry, dirty, without proper clothing, shelter or supervision. This may form a wider neglect of: physical - where basic needs such as food, clothing or shelter are not met, or they have not been kept safe.

## Educational

The parent does not ensure the child is given an education; emotional – a child is not nurtured or given stimulation, this could be through ignoring, humiliating, intimidating or isolating them; medical – a child is not given the correct healthcare, which includes refusing dental or other appointments or recommendations.

In football this may include not having the proper supervision, clothing or encouraged to play while injured. It may occur if a young person's needs are disregarded before, during or after training or a game.

## Physical abuse

When someone hurts or harms a child or young person on purpose. This includes; hitting, slapping, kicking, shaking. Throwing, poisoning, burning or scalding, biting, scratching, breaking bones or drowning. This list is not exclusive and includes any way of causing intentionally causing physical harm and includes making up symptoms or causing a child to become unwell.

In football this may include inappropriate training methods for the age group or being allowed to play while injured. Furthermore, any physical act such as hitting, restraining or manhandling.

## Sexual abuse

When a child or young person is sexually abused, they are forced or tricked into sexual activity. They may not understand that what is happening is abuse or that it's wrong. They may be afraid to tell someone. Sexual abuse can happen anywhere, and it can be in person or online.

There are 2 types of sexual abuse;

## Contact

Where an abuser makes physical contact with a child, whether touching (clothed or not), using a body part or object to rape or penetrate, forcing a child to take part in sexual activities, or making a child touch someone else.

## Non-contact

This can be in person or online and includes, flashing, showing pornographic material, exposing a child to sexual acts, making them perform a sexual act to themselves, forcing a child to make, view or share child abuse images or videos, or forcing a child to take part in sexual activities or conversations online or through a smartphone.

In football this may include inappropriate touching, sexually explicit jokes or conversations between adults in the hearing of a child or taking of an image and altering it for a sexual nature.







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## Emotional abuse

Any type of abuse that involves the continual emotional mistreatment of a child. This can include deliberately trying to scare, humiliate, isolate or ignore a child. Further emotional abuse can include; constant criticism, threatening, shouting, calling names, making the child subject of jokes or sarcasm to hurt them, blaming or scapegoating, making a child perform degrading acts, trying to control their life, pushing a child too hard and not recognising their limitations, exposing a child to upsetting events (such as drug misuse or DA), failing to promote their development, not allowing friends, persistently ignoring them, being absent, manipulating a child, never saying kind things or praise, or never showing emotions in interactions with a child (emotional neglect). In football this may be constant criticism from parents, coaches abusing their power or imposing unrealistic pressure to perform or using derogatory language referring to a player's cultural heritage.

## Bullying

Behaviour that hurts someone else. It includes name calling, hitting, pushing, spreading rumours, threatening or undermining someone. It also includes nonverbal abuse, emotional abuse, exclusion, constant criticism, hiding or damaging belongings, controlling or manipulating someone, making silent or abusive calls. If the type of bullying discriminates due to a person's race, sexuality or because they have a disability it can be a hate crime.

If a person is perceived to be 'different' from others, they could be at greater risk. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

In football this may be a parent who pushes too hard, a coach who treats some players less favourably, or wants to win at all costs, or a player who intimidates or excludes another. Football has a competitive nature and create or support an environment for a bully if other individual or the club are unaware. The victim is often weaker and less powerful and the outcome painful and distressing.

## Cyber bullying

Takes place online, and be done remotely via phone, Apps, social media as well as online. This can include; sending threatening or abusive texts, creating and sharing embarrassing images or videos, trolling, exclusion from online games or friendship groups, online shaming, setting up hate sites, encouraging hate crime, taking part in an abusive poll, creating fake accounts, creating or sending sexual images, (also known as nude and semi-nude photos).

## Additional Child Protection Considerations

Online abuse – this any type of abuse that occurs on the internet, mobile phones, social media, emails, online chats, gaming and live stream sites. Children are at risk from strangers purporting to be another person (usually an adult pretending to be a peer), or child on child abuse. Preventing online abuse is the responsibility of everyone.

## Child Sexual Exploitation

Where a child or young person is given gifts, money, drugs, status, or affection, in exchange for sexual activities. This often involves the child being tricked, (by untrue friendships or romance where they believe the relationship is consensual), and then encouraged or blackmailed to continue their activity. These children then may be used to coerce others to participate.

## Criminal Exploitation

Children and young people can be manipulated or coerced to become involved with gangs and criminal activities. This is often caused by exploitation and after being pressured or abused, they are then put into dangerous situations. This can involve the trafficking of young for criminal gain and be involved in 'County Lines', drug and criminality across different areas of the country.





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## County Lines

A term used to describe organised criminal networks involved in moving drugs from one area of the country to another. They are likely to exploit vulnerable people including children and the young to move and store money. Coercion, intimidation, violence, sexual violence and weapons will be used to force the young person to act for them. The young person may believe they are consensual to the exploitation. The exploitation and coercion may not have been in person but through the use of technology.

## Child trafficking

Where a child or young person is tricked, forced or persuaded to leave their homes and are moved or transported, where they are forced to work, commit crime, or be 'sold' on. It is a form of modern-day slavery for commercial gain. Children can be trafficked into the UK from abroad, or within the UK.

## Domestic Abuse

A child witnessing DA is a form of abuse and can have a serious impact on their mental and physical wellbeing, as well as their behaviour, which can have a long-term impact and can last into adulthood. DA can occur in young people, where both people are over 16 who either; are or have been in an intimate relationship, or if they are from the same family. DA is any incident or pattern of incidents of; controlling, coercive behaviour, threatening behaviour, violence, psychological abuse, physical abuse, sexual abuse, financial control, emotional abuse, or 'honour' based violence.

## FGM

Where a female's genitals are deliberately altered or removed for a nonmedical reason. There are no health benefits for girls or women. It can happen at several stages of a female's life, including at birth, during childhood, as a teenager, before marriage, or during pregnancy. It is illegal in the UK, whether committed here or abroad.

## Forced Marriage

Where the marriage is not consented by one or both spouses. Duress can include physical, psychological, financial and sexual pressure. A forced marriage must not be mistaken with an arranged marriage, where the marriage is entered freely by both parties, although the families take a leading role in the choice of partner.

Honour based violence are crimes or incidents which are, or may have been, committed to protect or defend the reputation or honour of the family and / or the community. They can include physical assaults, abduction, or even murder.

## Grooming

Where someone builds a relationship, trust and an emotional connection with a child or young person so they can manipulate, exploit and abuse them. Any person at any age can groom another and this can be over a very short time, or indeed over a period of years. Grooming activity may include; offering advice or understanding, buying gift, giving the child attention, using their professional position or reputation, taking the child or young person on trips, or using secrets and intimidation to control children.

Once the trust is established, the relationship will be exploited and may include isolating the child from friends and family. The Groomer may also build relationships with family and friends of the victim to make them seem trustworthy, while making it harder for the victim to come forward.





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## Child on Child abuse

Children and young people can be harmed or taken advantage of by other children. This can involve any type of abuse or coercion between children, whether in person or online, including those in a relationship. This was previously known as 'peer on peer' abuse but has been amended as there may be an age difference between children or young people.

## Hazing

Any ritual, initiation activities or situation, with or without the consent, which recklessly, intentionally or unintentionally endangers the physical or emotional wellbeing of vulnerable groups.

## Fabricated or induced illness

A situation is fabricated by the parent / carer whereby the child is presented for medical assessment or care, often persistently and often resulting in medical procedures that are unnecessary. These symptoms and signs will cease when the child is separated from the perpetrator.

## Financial abuse

GFC considers that financial abuse and fraud is a further risk that may apply to young professional footballers. With the increased public attention, our young professional players may be more vulnerable as a result. If any case is identified, the DSO should be informed at the earliest opportunity.

## Radicalisation and Extremism

Radicalisation and exposing vulnerable and young people to extreme behaviours is a form of emotional abuse and is a safeguarding risk. GFC will monitor and manage these in accordance with its established processes in the event a concern is raised.

Radicalisation can take place through direct personal contact, or indirectly either online or through social media. Extremism is defined 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.

GFC work in partnership with the police and local partnerships and support the government Prevent Strategy, in order to support the most vulnerable in our community who are at risk of radicalisation. GFC have a Prevent policy which is published on the website.

## Children with harmful sexual behaviour

Children may be harmed by other children. Up to 30% of child sexual abuse is committed by another person under 18.

Many adult sex offenders committed their first offence as a child or young person. Sometimes children can develop sexual behaviour inappropriate for their age. Some children may make clumsy attempts at sexual behaviour that are upsetting for others and they may not understand what is and is not appropriate. It may be that a child has been sexually abused and believes that is normal behaviour when they are in a relationship with another young person. The behaviours are harmful to both children.

Without appropriate intervention young people may continue their behaviours into adulthood.

Harmful Sexual Behaviour can be either; contact, such as touching, masturbation, or penetration, or non-contact, such as voyeurism, obscene communication, or exhibitionism.





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As soon as an incident is reported to a member of staff the matter must be reported on My Concern and the DSO will take the lead on any investigations.

## Sharing of nudes and semi-nudes

This was previously known as and commonly referred to as 'Sexting'. Modern use of mobile devices, the internet, social media, private messaging, and on-line game chats are a concerning area for safeguarding, as when a photo or message is posted, the child or young person loses control or ownership of any content image they have shared. They may have shared the image with a friend (or someone purporting to be a friend, such as an adult abuser), the child will become vulnerable to bullying, blackmail, grooming or abuse.

It is a criminal offence to create, share, copy, or alter any explicit image of a child. While the UKCIS guidance is not to criminalise victims, the matter must be recorded and the DSO informed. No staff member is to look at, delete or copy any image. The device must be kept safe. GFC policy 'Nudes and semi-nudes images' must be adhered to.

GFC work in partnership with the council, the police, statutory agencies, the football regulators and will act in the best interest of our young people to support them through distressing times.

If a child is in immediate risk of harm call the police 999 and they will be able to assist that young person and where appropriate view the image.

## Sexual violence and sexual harassment between children

Any unwanted act of a sexual nature is unacceptable. Factors outside of GFC may affect the young people in our care. All victims are to be reassured and treated seriously. GFC work in partnership with schools, statutory agencies, and the police to ensure safeguarding information protocols are followed. A perpetrator may in fact be a victim of abuse themselves and there may be wider issues involved. Sexual harassment is 'unwanted conduct of a sexual nature', which can occur online or in person.

This may link into other abuse, such as; sharing of nude and semi-nude images, sharing unwanted explicit content, 'upskirting', or harmful sexual behaviour. Sexual violence is an unwanted sexual act, which can include a single act of kissing without consent and more serious non-consensual or coercive acts.

## Teenage relationship abuse

A recent NSPCC survey showed 25% of girls and 18% of boys have experienced physical violence in a relationship. Teen relationship abuse covers more than violence and other types of abuse include; pressuring a partner to have sex, controlling behaviour, or unnecessary jealousy or anger.

## Poor Practice

A 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 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. Poor practice occurs when the needs of the child is not afforded the necessary priority compromising their welfare. GFC use the 'My Concern' safeguarding case management system and expect all staff to report incidents of poor practice as they fall within the description as outlined in the section 'Low Level Concerns'. Examples of poor practice would include; concerning practices, uncomfortable situations, safety concerns, language used, unnecessary singling out of a child, or indeed any 'nagging doubt'.





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## Infatuations

A vulnerable person may develop an infatuation with a member of staff who works with them. Such situations should be handled sensitively. Staff must beware that in such circumstances, there is a high risk that words or actions can be misinterpreted and allegations can be easily made. As soon as a situation is identified by the staff member or a colleague the DSO must be informed as the earliest opportunity.

## Non-Recent abuse

When a young person, or an adult comes forward as being abused when they were younger. This may have occurred a year ago or many years ago and has been referred to as 'historical abuse'. GFC acknowledge there have been cases occur within football and have adopted the 'Sheldon Report' 2021 recommendations. If a report is made to GFC, the DSO will record the matter and liaise with the police, PSCP, EFL and The FA, to ensure the matter is investigated in a transparent and thorough matter and the victim is appropriately supported through local and national agencies who are expert in these cases.

## Mental Health

Promoting children and young people's wellbeing is a key part of keeping them safe, helping them develop and ensuring they have positive outcomes in adulthood (Public Health England, 2021).

Mental health plays a key role in a child's overall wellbeing and can be affected by various factors, including; environment, stress, family circumstances, or abuse and neglect. Negative experiences can adversely affect a child's mental health, just as positive experiences can help improve it.

GFC take the mental health of its young people very seriously. Any concerns should be raised by My Concern or reporting it directly the DSO. Remember if any person is at immediate risk of harm: Call 999. We will be able to assist the young person, by sign posting to relevant agencies, both statutory and voluntary and offer ongoing support to our academy players with the Education and Welfare Officer.

The mental health of children and young people is the responsibility of everyone. We must all promote their wellbeing and recognise any concerns. Staff will be able to recognise any concerns and know what action to take.

GFC create an open environment where children and young people can talk about how they feel without judgement. While we are not experts in the field of mental health, we utilise the help of professionals and other resources, such as the NSPCC.

## Further Vulnerabilities to Consider

GFC understand that all children and young people must receive the highest standards of protection. We understand that some of our young have additional vulnerabilities and our safeguarding team must be informed if any of our young players, or members of the public engaging with us have additional needs that we could consider placing additional assistance to them.

## Young people with disabilities

Many children and young people have special educational needs and disabilities (SEND), these may be visible or hidden. SEND children may require additional support and assistance in understanding. When a young person with SEND is engaging with GFC in an activity and may require additional support, the activity manager and DSO must be made aware in order that individual support can be considered as people with disabilities are more vulnerable to abuse.





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## LGBTQ+

As children and young people mature, their decisions about sexuality are being developed and explored. This may cause anxiety and the person could become more vulnerable to abuse. Many are bullied or consider self-harm. GFC will manage all concerns in a confidential and sensitive manner in order to support our young. GFC is considered a safe and supportive place and as such a young person may disclose sensitive information to a trusted individual. As with all safeguarding disclosures, the DSO must be informed and will manage the information and make a plan moving forward to support the individual. LGBTQ+ children are at greater risk of abuse and extra care must be taken to stay vigilant and maintain confidentiality.

## Looked after children (LAC)

The most common reason for children to be looked after is as a result of abuse. Staff should be extra vigilant to keep LAC safe. The activity manager and the DSO should have social worker and additional contact details, should there be any concerns. This information will include; social worker name, care arrangements, and authorities in place.

## Cultural sensitivity

Our increasingly diverse community means we will have more children and young people with different cultural needs playing football in our academy. This will require staff to be sensitive to the vulnerabilities and must refrain from stereotypical beliefs. The young person will be more vulnerable to discrimination or abuse. Each person must be treated in accordance with their needs, but care must be taken as not to further isolate the individual when dealing with a concern due to the extra attention.

Some young people speak English as a second language; therefore, care must be taken to confirm any training or task is understood correctly.

## Age sensitivity

Care must be taken in order to communicate with and train children and young people giving consideration of their age, maturity, physicality, and understanding. As a young person matures, their understanding of the world, expectations, influence and peer pressure changes. While they remain classed as a child under the law until they reach the age of 18, their responsibilities and independence will develop allowing them to develop into well rounded and healthy adults.

## Under 18 supporters

GFC have published on their website the terms and conditions for ticket sales for those supporters under 18. This reflects the vulnerabilities, behaviour expectations and parental responsibilities for home matches and away travel (that is organised through GFC ticket office). GFC have matchday safeguarding protocols in place, staff are EFL safeguarding trained, or awareness trained and where appropriate under the EFL Eligibility Guide, have a DBS certificate.

## Work experience

The DSO must be informed if there is a planned placement for work experience where any person under the age of 18. This is not a process which is taken as a matter of course and will be structured in advance. GFC will act in accordance with 'Work Experience: a guide for employers' 2002, DFES.

Those over 18 partaking in work experience, will be treated as volunteers and will be subject to the process for safer recruitment.





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## Travel, trips and tours

It is a regular feature of the academy season to have a trip or tournament away. This aids the development of our young players and gives them the opportunity to play other academy age group teams they may not otherwise have the occasion to play. There are specific guidelines and policies relating to our young people travelling to play football, whether training, tournaments or matches.

GFC have a Travel, Trips and Tournaments policy.

Permissions, safeguarding risk assessments, health and safety provision, individual needs and vulnerabilities, accommodation, appropriate staff supervision, records, minibus use and constant evaluation will be adhered to ensuring the young and vulnerable are kept safe.

## Senior appearances

On occasions GFC have under 18 players making first team appearances. They will train, travel away and play in the adult game. We understand the different aspects of safeguarding for the senior game that is relevant to the under

18s. To maintain the safe environment, we have in place key staff, who are DBS checked and liaises with the Player Care Manager/Senior Safeguarding Officer

## Academy transport plan

In order that GFC ensure their staff and players are transported safely to and from training or matches, there is an 'Academy Transport Plan' which covers all aspects of conveying young people and includes minibus guidance.

## Academy accommodation plan

GFC may be required to provide accommodation for our 16–18-year-old scholars, for which daily travel is not viable. This may be long term for the period of time of their apprenticeship, or shorter term for triallists, or if there is a short-term need.

GFC use the Host Family scheme who are subject to a rigorous selection process, have DBS checks for all adults at the accommodation and the premises is subject to safety checks. Host Families take part in ongoing safeguarding, care, nutrition and first aid training.

GFC will conduct checks, both arranged and unannounced to check the ongoing wellbeing of our players. GFC understand the care required for young people living away from their home. GFC have a comprehensive accommodation plan considering all these aspects.

As GFC do not accommodate those under 16, we are not covered by the private fostering regulations. We do however follow the ethos, work in partnership with the council and the LADO is aware of our arrangements.

Accommodation for trips, tours and tournaments, is covered in that section.

## Contextual Safeguarding

As young people grow and develop, they are influenced by a range of environments and people outside of their family. For example; in school, in the community, their peer groups, or online. Children and young people encounter risk in any of these environments. Sometimes the different contexts are inter-related and can mean that children and young people may encounter multiple risks.





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Contextual safeguarding looks at how we can best understand these risks, engage with our young people and help keep them safe. GFC can be a constant and trusted place for our young players and supporters and it may be here they feel able to disclose a risk which occurred outside of GFC, for which we must act to keep them safe, which may mean involving other statutory agencies and the police.

We must also ensure that GFC remains a safe place and mitigate safeguarding risks wherever possible.

When a safeguarding concern is raised, we must also consider the wider community factors for the young person and where the threats or risks may occur. We must also consider the welfare of other children or young people and if they are at risk.

Assessments should consider all the individual needs of the child, including parental support and their understanding of other potential environmental risks. GFC work in partnership with the council, other statutory agencies, football governing bodies and voluntary sector in order to protect our young and promote their wellbeing.

### Consultation

Where appropriate we will consult with children and young people, their parents / carers to understand their needs, concerns and wishes in order that these may help shape GFC policy, procedure and practice. GFC have both a players' voice and a parents' forum for the academy and we listen to our supporters. We record all concerns that are raised and we have a lesson learned philosophy to continually improve our standards.

### Standards of behaviour

We want to create a safe environment, where children and young people can enjoy themselves and we ensure their wellbeing is nurtured. GFC expect that all people behave in a way that upholds the standards expected.

GFC does not condone behaviour that falls short of our vision and expectations and that includes young people and children. We take a positive approach to behaviour management for our young people and children and recognise the following:

- Every child is different and has individual needs
- All children are expected to take responsibility for their actions
- Behaviour can be a reflection on how a person is feeling
- Staff are trained to recognise a change in behaviour, which may indicate an underlying issue
- All responses to challenging, aggressive, or violent behaviour must be considered to protect the welfare of others, and any physical intervention must only be as a last resort. Any responses must be reasonable and proportionate.
- Diffusion and de-escalation techniques may be used by our staff, but any physical punishment is not permitted.
- All incidents must be recorded on My Concern and the DSO will make follow up enquiries

The academy encapsulates this ethos and all staff, parents and players agree a code of conduct at the start of each season as part of their annual registration process. This clearly states our behaviour expectations and if required the consequences of not meeting the high standards set. This encourages all our staff, parents and players to become role models to others.

### Safer Recruitment

GFC have a set of practices and a policy to help make sure that our staff and volunteers who come into contact with children and young people are suitable to do so. It is vital part of creating a safe and positive environment and making a commitment to keep children safe from harm.



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Our commitment to safeguarding and protecting all children and young people is demonstrated by:

- Implementing robust safer recruitment practices
- Identifying and rejecting people who are unsuitable to work with children and young people
- Responding to concerns about the suitability of applicants both during the recruitment process and once they have begun their role
- An application form must be completed and a CV on it's own is not suitable.
- Ensuring all new staff and volunteers participate in a safeguarding induction
- HR and safeguarding policies supporting safer recruitment
- Ensuring all staff complete the EFL safeguarding training
- Ensuring all relevant staff complete The FA safeguarding training

Pre-selection – When recruiting for a position that involves contact with children or young people, GFC operate a comprehensive recruitment procedure that includes:

- Self-Disclosure form requiring the applicant to declare unspent convictions
- Verification of ID and right to work in the UK
- Verification of professional qualifications
- Screening by DBS and Barring service (DBS check)
- Two references, both from professional people (and not friends or family),

including the applicants most recent post working with children

This structured approach will; minimise the risk of appointing someone unsuitable, ensure you select the right person for the role, make a fair process, and records will be maintained for future reference. Our protocols will ensure we adhere to legislation and guidance during this process.

### Interview

Applicants will undergo an interview that includes questions relevant to safeguarding vulnerable people and any areas of concern regarding their CV / application / previous employment gaps / safeguarding experience is discussed.

### Post interview

In the event of a positive DBS disclosure, the DSO will work with the Barring Service, FA safeguarding unit and any relevant agencies to ascertain the circumstances. A risk assessment will be conducted and a decision will be made whether to continue with the employment, or whether the offer is withdrawn, based on transferable risk and reputational risk.

An applicant must not commence work until the DBS certificate for GFC has been returned. In the rare case, where the applicant commences work prior to this DBS process being completed, this must be sanctioned only by the DSO, who will conduct a risk assessment and action plan based on supporting evidence (such as existing DBS from another organisation).

An applicant who has signed up to 'The DBS Update service' must allow for the DSO to make regular checks on their DBS status prior to being offered the post.



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## Induction

All new members of staff will have a face-to-face safeguarding induction with the DSO. During this induction, the DSO will assess their level of knowledge, confirm they have seen and understand the published GFC safeguarding policies, understand the concern reporting process, and confirm expectations of safeguarding standards and responsibilities are understood. Any gaps will be discussed and addressed.

## Training

All new staff are required to complete the EFL safeguarding training. Some relevant staff are also required to complete The FA safeguarding training. There are refresher dates on all training and the DSO will manage the databases.

People involved in the recruitment process will be able to receive the relevant NSPCC safer recruitment training and be supported by HR and the DSO in this process.

There will be ongoing safeguarding training and updates presented by the DSO to the board, management, staff and players. This may be done through the GFC Teams.

The Academy is involved more closely and regularly with children and young people and will receive training at least twice yearly including the coaches, talent scouts, house parents, players and parents.

The Academy Secretary and Senior Safeguarding Officer, who form part of the Academy Safeguarding Team, will receive enhanced safeguarding training, including Level 3 Safeguarding (provided by The FA).

## Photography and Image Capture

GFC acknowledge that celebrating success is a key part of football and many activities are held in the public arena. We welcome photographs and images that celebrate the sport, the values and the vision of GFC.

We understand that image capture can present difficulties, risk and sensitivity in a range of circumstances. During the course of our activities, it is foreseeable that a child's image may be captured by appointed photographers. These images may then be used by GFC staff and contractors in both internal and external news and marketing publications and online via websites and social media.

We believe that children and young people should not be subject of abuse of any kind.

We have a responsibility to promote the welfare of all children and young people and to take, share and use images safely. Parents / carers have the right to decide whether their images are taken and how they may be used.

## Incidental image capture on matchdays and at events

Large crowds may create further questions with regard to consent. As such on matchdays and at special events there is a reasonable expectation that any person may have their image captured or broadcast, and as such explicit consent is not required. In any situation where children may be subject to incidental image capture, i.e., in the background of a main shot, where practical they should be informed, they may be on camera and have an opportunity to opt out.

Where a person finds their image or that of a child is has been used in these circumstances, we will endeavour to remove it from circulation where it is practical to do so, and there are reasonable grounds. We acknowledged that once published, trying to control an image in the public arena is particularly difficult.

GFC will not be able to control the photos taken by members of the public which are taken in public spaces, such as on pitch activity on matchdays at Priestfield Stadium.





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Where GFC conduct an activity that may allow for the image capture of a participant, the appropriate consent must be in place prior to the event. Those individual and parents / carers must understand what they are consenting to and why.

This consent must provide a genuine choice in order to be valid. Activities arranged in the public arena will mean that non authorised GFC staff, such as passing members of the public, would be able to take photos which would be outside of GFC control.

### Social media

GFC have a published policy on how it uses social media and the importance of engaging with fans. The policy outlines the GFC vision and values and how it will deal with abusive online activity. Any social media concerns involving any vulnerable person, the DSO will be informed and the matter recorded and managed through My Concern.

### Parents, other children and other photographers

We acknowledge that in some circumstances; parents, family, friends, or other children may wish to take photos. Each GFC event will have clear rules set prior as to what is acceptable; by default, photographs are not permitted at private or invitation events. Where a member of staff, parent or child has a concern, the event manager must be informed immediately.

The use of smart phones and live broadcasting to the internet, the scope for image sharing has increased dramatically and will continue to do so with advances in technology. Extra vigilance must be taken and applying the policy fairly and firmly.

### GFC Academy

The academy uses recordings, images and live streaming as a legitimate coaching aid and for parents to watch their children. Similarly, images are captured for management purposes, such as ID photos. The academy has a separate image capture policy, which maintains the ethos of this policy and where consent of the parent / carer is essential and is agreed on the signing of a new player and at the commencement of every season.

### Further image capture considerations

In general, all people should take these considerations into account:

- Staff should not use their own equipment to take photos
- It is not permitted to take photos of children partially dressed or in changing rooms
- Staff should not take the image of a child should be taken unless the correct permissions are in place beforehand
- Children who are more vulnerable, such as being upset, injury, or ill, must not have their photo taken
- Unless permission is in place beforehand, the full name of the child must not be in any captions, kit or reports, as this may leave the child more vulnerable.
- No images should be taken that are sexually suggestive or provocative
- With advancing technology, it is becoming easier to digitally alter photos, and this must be considered with all photos taken.





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Any reports or concerns of inappropriate image capture must be reported on My Concern and the DSO informed as soon as practicable. GFC will work in partnership with other agencies, including the PSCP, LADO, police, football regulators, and voluntary support agencies to keep our children and young people safe and investigate any accusations.

### Image storage

All images, whilst held by GFC, will be securely stored on GFC's IT system, complying with the Data Protection act 2018, and always remains the property of GFC. When footage is passed to parents / carers for training or development, it must not be further distributed, without the express prior consent of the academy manager. Families are made fully aware of this restriction at the point of distribution.



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