



## Bradford City Safeguarding Children Policy

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<b>Approved by:</b>	Ryan Sparks      Signature:
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### Amendment History

<b>Date</b>	<b>Version</b>	<b>Author</b>	<b>Details of Amendment</b>
Unknown	1	James Mason	Initial Release
February 2019	2	Paula Watson	update following EFL audit visits
July 2019	3	Paula Watson	Annual Review
November 2019	3b	Paula Watson	to comply with EFL checklist
September 2020	4	Paula Watson	To update to comply with KCSIE 2020
March 2021	4b	Paula Watson	New CEO, add in whistleblowing paragraph

Bradford City Football Club are fully committed to the safeguarding and welfare of children, young people, young players, vulnerable adults, vulnerable groups and expects all staff, players and volunteers to share this commitment.

The Club makes provisions for children and young people, young players and adults at risk (Vulnerable Groups) ensuring that:

- The welfare of these groups is paramount.
- All children, whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to safety and protection from abuse and harm.
- Prevent policies and processes are in place for the protection of vulnerable groups from radicalisation.
- All suspicions and allegations of abuse will be taken seriously and responded to swiftly and appropriately.
- All staff, players and volunteers working for the club have a responsibility to report concerns to the Senior Safeguarding Manager and Designated Safeguarding Officers.
- Safeguarding is everyone's responsibility; the club aims through its policy and practises to create a culture of vigilance and ensuring all concerns are reported.

### **Legal Framework**

This policy has been drawn up on the basis of law and guidance that seeks to protect children, namely;

- Children Act 1989 & Children Act 2004
- Sexual Offences Act 2003
- Health & safety at work Act 1974
- Modern Slavery at work act 2015
- Private Fostering Regulations 2005
- Equality Act 2010
- Management of health & safety at work Regulations 1999
- Working Together 2018
- Keeping Children Safe in Education 2020
- The Counter-Terrorism and Security Act 2015
- Female Genital Mutilation Act 2003
- General Data Protection Regulations 2018
  - Protection of Freedoms Act 2012
- Education Act 2002
- General Data Protection Regulations 2018

### **Useful Contact Details**

The Senior Safeguarding Officer at the club is Paula Watson 07967 510560. The SSO is the senior manager with primary responsibility for managing and reporting safeguarding concerns and for putting into place and monitoring policies, procedures and daily practice to safeguard children and adults at risk in the organisation.

The Match day Safeguarding contact at the club is Sian Nuttall 07496 698298

The Academy Safeguarding & Club DSO contact at the club is Lee-Ann Brewer 07949 814505. The DSO is the designated person with primary responsibility for managing and reporting safeguarding concerns and to ensure there is good daily practice to safeguard children and adults at risk in the organisation.

Bradford City FC Community Foundation DSO is Lizzie Saunderson 07469 234066

If you prefer to report an incident by email please contact [safeguarding@bradfordcityfc.co.uk](mailto:safeguarding@bradfordcityfc.co.uk)

If there are any concerns about any of the above named people then any of the external agencies can be contacted or Ryan Sparks (CEO) can be contacted at [Ryansparks@bradfordcityfc.co.uk](mailto:Ryansparks@bradfordcityfc.co.uk)

**If you have serious concerns about the immediate safety of the child or young person contact the Police or Social Services. Record the name of the person you spoke to and tell your DSO what you have done.**

Bradford Council Children Safeguarding Services During Working Hours: Monday to Thursday 8:30am to 5:00pm, Friday 8:30am to 4:30pm First Contact Team:01274 437500– out of hours 01274 431010

Bradford Council Adult Safeguarding Services During Working Hours: Monday to Thursday 8:30am to 4:30pm, Friday 8:30am to 4:00pm First Contact Team:01274 431077– out of hours 01274 431010

West Riding FA: out of hours 07912 309565

FL Child Protection Advisor: 01772 325 811/07795 628 379

FA Safeguarding Team: 0800 169 1863 or via [safeguarding@thefa.com](mailto:safeguarding@thefa.com)

English Football League Trust on 07583491701

NSPCC Helpline number: 0808 800 5000/ [www.nspcc.org.uk/inform/cpsu](http://www.nspcc.org.uk/inform/cpsu)

## **Policy Statement**

Bradford City FC recognises its duty of care to safeguard all children, young people and young players, vulnerable adults/groups involved in activities organised by ourselves from harm. All children have the right to protection, and the needs of disabled children and others who may be particularly vulnerable must be taken into account. We will do their utmost to ensure the safety and protection of all children/groups involved in activities through adherence to the safeguarding guidelines adopted by the Club. All young people are informed at induction into the academy about safeguarding, our policies and how to report any concerns. Young people friendly leaflets and advice posters are available, and there is a player care officer who is based at the Academy to support all young people (Lee- Ann Brewer)

## **Definitions**

A child is defined as under the age of 18 (The Children Act 1989). However, for the purpose of the Club's Safeguarding policies and practices for home match day supporters, when referring to a child, the policies refer to a person under 14 years of age. Supporters under 14 years of age are not allowed to enter the stadium without a qualifying adult (age 18-years and over). As a result, and in line with reasonable adjustments, any supporter who is under 14 years of age must attend with their parent or guardian. Supporters over 14 years and under 18 years are allowed to enter the stadium

unaccompanied however they are not allowed to be responsible for another supporter. Only supporters aged 18 years and over can be responsible for a supporter under the age of 18 years.

Adults at Risk are defined as an adult (person aged 18 or over) who is receiving one of the following services; health care; relevant personal care; social care work; assistance in relation to general household matters by reason of age, illness or disability; relevant assistance in the conduct of their own affairs or conveying (due to age, illness or disability in prescribed circumstances). We have a separate adults at risk policy.

Staff or employees is defined as any member of the workforce either paid or unpaid.

Vulnerable Groups is defined as the collective term used when talking about or referring to children, young people and adults at risk as a whole. We recognise that children with special educational needs and disabilities can face additional safeguarding challenges, and we have a risk assessment process in place for any such circumstances.

## **Policy**

The aim of our Safeguarding Policy is to promote good practice and to enable staff to ensure that we:

- Provide children, young people, young players, adults at risk, (vulnerable groups) with appropriate safety and protection whilst in our care.
- Undertake to provide relevant safeguarding training, delivered by appropriate training providers as appropriate to their role for staff, players and volunteers.
- Allow staff/volunteers to make informed and confident responses to specific safeguarding issues.
- Provide education and awareness raising, to young players and parents to understand their role in safeguarding.

## **Scope**

This policy covers all activities within the; Stadium, Training Ground, and Academy. The community foundation operate their own Safeguarding policies and processes in line with the code of capability.

## **Promoting good practice**

Child abuse, physical, emotional, neglect and in particular sexual abuse, can result in 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, school and the footballing environment. Some individuals will actively seek employment or voluntary work with young people/young players in order to harm them. A coach, instructor, teacher, official or volunteer may have regular contact with young people/young players and be an important link in identifying situations where a young person needs protection.

Any concern regarding poor practice should be reported. There is a separate low level concern policy that should be read alongside this.

If it is brought to the attention of the Club that a child joining the activities has been subject to child abuse outside the footballing environment, we recognise that football can play a crucial role as part of a

care plan or in improving a child's self esteem. In such instances the Club will work with the referral agencies to ensure the child receives the appropriate support.

At Bradford City Football Club we recognise the need for safeguarding to be inherent and part of the culture and values demonstrated by all staff.

There is an increased Focus on mental health

- Staff are "well placed" to identify behaviour suggestive of a mental health problem or being at risk of developing one.
- All staff have an awareness of mental health problems as an indicator of abuse, neglect or exploitation.
- They should understand the lasting impact of abuse, neglect and ACEs and impact on mental health, behaviour & education
- Where there is a safeguarding concern follow the child protection procedure

### **Good practice guidelines**

All personnel are encouraged to demonstrate exemplary behaviour in order to safeguard children and vulnerable groups, to report any concerns about the welfare of a child and also to protect themselves from allegations.

We endeavour to :

- Always respond to any request to complete or update your DBS Criminal Records Check
- Always inform the HR Department in respect of your behaviour with regard to any investigation, allegation or arrest which may have an impact upon the role you have in working with children or vulnerable groups.
- Always work in an open environment; for example, avoid private or unobserved situations and encourage an open environment, ie no secrets.
- Treating all young people/young players/vulnerable adults/groups equally and with respect and dignity.
- Always putting the welfare of each young person first before winning and achieving goals.
- Always maintaining a professional relationship with young people and players; for example, never have an intimate relationship with a child U18 (even if they are over 16 years old) when you are responsible for their supervision, care, support or coaching.
- Always maintaining a professional relationship with vulnerable adults; for example, never have an intimate relationship with a vulnerable person (even if they are over 16 years old) when you are responsible for their supervision, care, support or coaching.
- Building balanced relationships based on mutual trust which empowers children to share in the decision-making process.
- Recognise children with social workers may continue to be vulnerable and be educationally disadvantaged in attendance, learning, behaviour and mental health and to use this information to inform the response to further safeguarding concerns (e.g. absence, missing) and support
- Making football fun, enjoyable and promoting fair play.

## **Coaching Contact:**

- Ensure that if any form of manual/physical contact is required, it should be provided openly and according to coaching guidelines provided by the National Governing Body (NGB) of the sport and in line with The Premier League or Football League Child Protection Guidance. Care is needed as contact may be difficult to maintain when a child is constantly moving. Young people/young players should always be consulted and their agreement gained. Some parents are becoming increasingly sensitive about manual support and their views should be carefully considered.
- All caregivers must be subject to DBS checks at the highest level.
- All staff should be vigilant and ensure adults around children act in accordance with the clubs standards. Staff are also responsible for those who enter changing rooms, etc.
- Ensure that at tournaments or residential events, the accommodation guidelines are followed.
- Being an excellent role model – this includes not smoking, not drinking alcohol, not using drugs or not using bad language in the company of children/young people/young players/vulnerable groups.
- When coaching gives enthusiastic and constructive feedback recognising the development needs and capacity of young people/young players and vulnerable adults/groups – avoid excessive training or competition and not pushing them against their will.
- Secure parental consent in writing to act, if the need arises, in emergency circumstances to give permission for the administration of medication or emergency treatment in line with the information advised on the current 'Parental Consent Form' as amended from time to time.
- Keep a written record of any injury or incident that occurs, along with the details of any treatment given and/or action taken.
- Advise parents, the DSO on any issue in relation to any treatment of children or vulnerable groups and to log such details on an incident/accident report form.
- Request written parental consent if Club/Foundation Officials are required to transport children/young people/young players/vulnerable adults/vulnerable groups in their cars and ensure that coaches/staff are accompanied by another member of staff. This should be avoided unless absolutely necessary.

## **Practices to be avoided**

The following should be avoided except in emergencies. If cases arise where these situations are unavoidable they should only occur with the full knowledge and consent of someone in charge in the Club or the child's parents/guardian. 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 training session/match:

- Never taking children to your home where they will be alone.

The following should never be sanctioned. You should never:

- Share a room with any under 18's.
- Engage in rough, physical or sexual provocative games, including horseplay.
- Allow or engage in any form of inappropriate touching.

- Allow children to use Inappropriate language unchallenged.
- 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 unacknowledged, unchallenged, unrecorded or not acted upon.
- Do things of a personal nature for children or vulnerable adults that they can do for themselves

Staff should avoid taking on any caring responsibilities for which you are not appropriately trained and for which consent forms have been obtained.

## **Responding to allegations**

It is not the responsibility of anyone employed by Bradford City Football Club, in a paid or unpaid capacity to decide whether or not the alleged harm or abuse has taken place. However, it is their responsibility to act on any concerns through contact with the appropriate authorities.

We will ensure that all staff/volunteers are fully supported and protect anyone, who in good faith, reports his/her concern that a colleague is, or may be, harming or abusing a child.

Any Concern should be documented in writing on the Safeguarding Reporting Form (appendix 1) and sent to either the DSO or SSO. All verbal conversations should be documented on this form or on additional sheets if necessary.

Where there is a complaint against a member of staff there may be three types of investigation (internal and external):

- A criminal investigation.
- A safeguarding investigation.
- A disciplinary or misconduct investigation.

The results of the Police and safeguarding investigation may well influence the disciplinary investigation, and/or any future action, but not necessarily.

## **Prevent Policy**

From 1 st July 2015, all schools and childcare providers were required, under section 26 of the Counter terrorism and Security Act 2015, to have due regard to the prevention of people from being drawn into terrorism. This legislation is primarily aimed at the education system. However, all agencies having contact with young people must adhere to the prospect of preventing radicalisation. Bradford City Football Club is responsible for the welfare of all children and young people that partake in the sport. The club adopt the policy strategy laid down by the law to ensure the safeguarding of all.

In dealing with the Prevent Duty it is important to recognise that the dealings that a club official will be different to those of a child care professional, however, there are areas that will overlap and these are reproduced here:

- The general risks affecting children and young people may vary from area to area, and according to their age.
- Schools and childcare providers are in an important position to identify risks within a given local context.

- It is important that schools and childcare providers understand these risks so that they can respond in an appropriate and proportionate way.
- There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology.
- As with managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Children at risk of radicalisation may display different signs or seek to hide their views.

The Prevent duty does not require teachers or childcare providers to carry out unnecessary intrusion into family life but as with any other safeguarding risk, they must take action when they observe behaviour of concern. There may not be any one sign which will lead you to the belief a young person is being radicalised. The general risks affecting children and young people may vary from area to area, and according to their age. There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing other safeguarding risks, club personnel should be alert to changes in children's behaviour that could indicate that they may be in need of help or protection. In these cases, the general safeguarding principles apply to the 'Keeping Safe' from radicalisation as per the general safeguarding relevant statutory guidance and Stevenage Football Club policy. Any concerns of a young person being at risk demonstrated by behaviour on or off the pitch, views posted online or concerns from family or friends should be referred to the safeguarding lead. Concern does not require any person to carry out any form of investigation but will ultimately be referred to the relevant professional body.

### **Suspected Abuse**

- Any suspicion that a child has been harmed or abused by either a member of staff or volunteer should be reported to the DSO, who will take such steps as considered necessary to ensure the safety of the child in question and any other child who may be at risk.
  - The DSO will refer the allegation to the Social Services Department who may involve the Police, or alternatively go directly to the Police if out of hours.
- Contact with the parents or carers of the child will be discussed with the appropriate authorities, and a decision will be made about which is the right organisation to make contact with the parents or carers of the child in order to inform them of any disclosure. This will be done as soon as practicable after discussion with the appropriate authorities.

### **Confidentiality**

All information imparted to a member of staff will be treated in confidence. Confidentiality is a key issue in the lives of young people and vulnerable adults/groups. They may trust a member of staff with issues of a personal nature and wherever possible their confidences should be respected. Staff must not make promises of confidentiality they may be unable to keep.

Furthermore, staff should always make any complainant fully aware of any situation where confidentiality must not be maintained as in a case of a concern for the protection of children or vulnerable adults or the welfare of either.

Young people or vulnerable adults may disclose information that is difficult for the member of staff to deal with without further advice/support, or which must be reported to statutory agencies. In this case the complainant should be told that the situation will be discussed with the DSO with a speciality in that area, or with the Line Manger, but confidentiality will be maintained if possible.

### **Training Opportunities**



All staff will receive an annual safeguarding Essentials module. The DSo and SSm will attend EFL and Local Authority training. There will be a training needs analysis and safeguarding workforce plan for all employees who directly work with children.

All staff working directly with young people should also read Keeping Children Safe in Education (2019) Guidance (Appendix 2) and should all sign and understand the Club's Staff code of conduct.

## **Information Sharing**

Bradford City FC are committed to sharing information for the purposes of safeguarding and promoting the welfare of children and young people in line with Working Together (2013) and with respect for The General Data Protection Regulations (2018). Any decision to break confidentiality should always be preceded by staff informing the complainant of what is about to happen and the reason for the decision. The staff member should also try to seek the consent of the person who makes the disclosure. There will be no breach of confidence if the person to whom a duty of confidence is owed, consents to the disclosure. Staff should, in the first instance, seek the consent from the person if considering sharing information with other agencies. It is therefore essential that members of staff understand the balance between the need for confidentiality and the need for the sharing of information. For that reason, they must not promise absolute confidentiality to the person who discloses any concern or allegation. Information which is considered important in protecting the safety and welfare of the child or vulnerable adult will be shared by the Club and Foundation with the appropriate statutory and regulatory agencies in order to seek help and keep those involved safe.

If a person discloses information and asks for it to be kept confidential then this person cannot be told that information (disclosure) is totally confidential since it has to be passed on or referred for help to be sought.

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

Every effort should be made to ensure that confidentiality is maintained for all concerned. Information should be handled and disseminated on a need to know basis only. This includes (but is not limited to) the following people:

- DSOs.
  - The parents/guardian of the person who is alleged to be abused (only with guidance from statutory agencies).
  - The person making the allegation.
  - Social Services/Police.
  - Chief Executive Officer
  - Department Head/Direct Line Manager.
  - The alleged abuser (and parents if the alleged abuser is a child) \*.

## **Reporting Procedures**

- The FA/EFL should be informed of any serious safeguarding concern or complaint in order that they may consider the risk posed across football.

## **Whistleblowing**

If you're worried about poor or unsafe safeguarding practices, or potential failures in the club or Academy, talk to the Designated safeguarding Lead, any senior leader, or the CEO. If you feel unable to

talk to someone in the club you can call the NSPCC whistleblowing helpline on 0800 028 0285 or email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

## **Historic Complaints**

Allegations of harm or abuse may be made some time after the event, eg 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 we will follow the procedures as detailed in this policy and report the matter directly to the Police or Social Services.

## **Bullying**

takes all complaints of bullying seriously and has a zero tolerance for bullying. Serious and prolonged bullying may lead to isolation.

The same procedure should be followed as set out in the section relating to responding to suspicions or allegations, if bullying is suspected. All settings in which children are provided with services or are living away from home should have rigorously enforced anti-bullying strategies in place.

## **Help Prevent Bullying**

- Take all signs and complaints of bullying very seriously.
- Encourage all children to speak and share their concerns. Help the victim to speak out and tell the person in charge of the activity. Create an open environment.
- Investigate all allegations and take action to ensure the victim is safe. Speak with the victim(s) and the bully(ies) separately.
- Reassure the victim(s) that you can be trusted and will help them, although you cannot promise to not tell anyone else.
- Keep records of what is said (what happened, by whom, when).
- Report any concerns to the DSO who may contact the school (or organisation where the bullying is happening).

## **Action Towards Bully**

- Talk with the bully(ies), explain the situation and try to get the bully(ies) to understand the consequences of their behaviour. If bullying is found to have occurred seek a resolution which satisfies the victim. This may include an apology to the victim(s).
  - Inform the bully(ies) parents/guardian.
  - Insist on the return of borrowed items and that the bully(ies) compensate the victim.
  - Provide support for the coach of the victim(s).
  - Impose sanctions if necessary.
  - Encourage and support the bully(ies) to change behaviour.
  - Hold meetings with the families to report on progress.
  - Inform all organisation members of action taken.
  - Keep a written record of action taken.
- Remain vigilant following the disclosure/investigation.

- Record the outcome of the complaint.
- Ensure relevant coaching staff are aware of the outcome and that they monitor the situation to reduce the chances of a re-occurrence. The full policies can be found in the Employee Handbook.

**Other policies:**

These include but are not limited to:

Equal opportunities Policy  
 Health & safety  
 Complaints & Whistleblowing Policy  
 Photography  
 Mascots  
 Social media policy  
 Transport Policy  
 Staff induction policy/process  
 Acceptable IT use Policy  
 Preventing Radicalisation  
 Safe Recruitment procedures

All policies are reviewed annually or after any incident, by the senior safeguarding officer and all safeguarding stakeholders.

**Information for staff and volunteers**

**Defining Abuse**

Child abuse is any form of physical, emotional or sexual mistreatment or lack of care that leads to injury or harm.

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.

Abuse can happen to a child regardless of their age, gender, race or ability. Abusers can be adults (male or female) and other young people and are usually known to and trusted by the child and family.

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

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

**Sexual abuse:** Any act which results in the exploitation of children and adults at risk, whether with their consent or not, for the purpose of sexual or erotic gratification. This may be by an adult or by a young person who is intellectually, emotionally, physically or sexually more mature than the victim. This includes non-contact activities, such as indecent exposure, involving children or adults at risk in

witnessing sexual acts, looking at sexual images/pornography or grooming them in preparation for abuse (including via the internet). Whilst legally Children aged sixteen have reached the age of consent for sexual activity, it is unacceptable for any member of Staff to abuse their relationship of trust for sexual gratification.

**Child exploitation & Child sexual exploitation:**

All staff to be aware safeguarding incidents/ behaviours can occur outside school or college or be associated with outside factors. CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Missing education can also be a sign of CCE, including involvement in County Lines

**Peer-on-peer abuse:** Children and young people can be taken advantage of or harmed by adults and by other Children. Peer-on-peer abuse is any form of physical, sexual, emotional and financial abuse, and coercive control, exercised between Children and within Children's relationships (both intimate and non- intimate). All incidents of this and Sexting will be followed up. there is an inappropriate images policy in place at the club. Definition now widened to include Bullying (including cyberbullying), Upskirting and abuse within intimate partner relationships

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

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

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

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

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

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

**Bullying:** Repeated behaviour intended to intimidate or upset someone and/or make them feel uncomfortable or unsafe, for example, name calling, exclusion or isolation, spreading rumours,

embarrassing someone in public or in front of their peers, threatening to cause harm, physically hurting someone or damaging their possessions.

**Cyberbullying:** The use of technology to harass, threaten, embarrass, humiliate, spread rumours or target another person. By definition, it occurs among Children. When an adult is the victim, it may meet the definition of cyber harassment or cyberstalking. Bullying as a result of any form of discrimination: Bullying because of discrimination occurs when motivated by a prejudice against certain people or groups of people. This may be because of an individual's ethnic origin, colour, nationality, race, religion or belief, gender, gender reassignment, sexual orientation or disability. Actions may include unfair or less favourable treatment, culturally insensitive comments, insults and 'banter'.

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

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

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

**'honour-based' abuse:** Shift from so-called 'honour-based' violence to include incidents or crimes committed to protect or defend the honour of the family and/or the community. Incorporates FGM, forced marriage, breast ironing and similar. Wider definition than the previous violence based model similar to the shift in perception of domestic abuse rather than just domestic violence

**Domestic violence:** Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged sixteen or over, who are or have been intimate with partners or family members regardless of gender or sexuality. This can encompass but is not limited to psychological, physical, sexual, financial, emotional abuse and so called 'honour' based violence. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result"

**Fabricate or induced illness:** Fabricated or Induced Illness is easiest understood as illness in a child which is fabricated by a parent or person in loco parentis. The child is often presented for medical assessment and care, usually persistently, often resulting in multiple medical procedures. Acute symptoms and signs of illness cease when the child is separated from the perpetrator.

**Forced Marriage:** A marriage in which one or both spouses do not (or in the case of some adults with learning or physical disabilities or children, cannot) consent to the marriage and duress is involved. Duress can include physical, psychological, financial and sexual pressure. A Forced Marriage is different

from an arranged marriage, which is a marriage entered into freely by both parties, although their families take a leading role in the choice of partner. The Anti-social Behaviour, Crime and Policing Act 2014 made it a criminal offence (which can result in a sentence of up to 7 years in prison) to force someone to marry.

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

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

### **Policy Update**

This policy will be updated in September 2021, unless following any safeguarding incident and subsequent review, then the policy may be updated earlier.

### **Version Control**

This policy will be reviewed and updated at least every year by the owner, and more frequently if necessary.

The Senior Safeguarding Lead will ensure this document is available on the Club website, and at the club reception, including any interim updates.

**Bradford City Football Club Safeguarding Policy Amendment- Covid 19**  
**(March 2020)**

This amendment should be read in conjunction with the Club Safeguarding Policy and Staff Codes of Conduct.

**Club statement:**

The way in which our football Club is currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, a number of our important safeguarding principles remain the same:

- with regard to safeguarding, the best interests of children will always continue to come first
- if anyone has a safeguarding concern about any child connected to the Club they should continue to act and act immediately
- a Designated Safeguarding Officer or Deputy will always be available
- unsuitable people are not allowed to enter the Club workforce and/or gain access to children
- children continue to be protected when they are online

**Club Safeguarding Contacts:**

During the Covid-19 lockdown period the Safeguarding contacts for the Club are as follows:

**Lee-ann Brewer**  
**Academy Safeguarding Officer**  
**07949 814505 | [lee-ann.brewer@bradfordcityfc.co.uk](mailto:lee-ann.brewer@bradfordcityfc.co.uk)**

**Paula Watson**  
**Club Senior Safeguarding Manager**  
**07967510560 | [paulawatson@bradfordcityfc.co.uk](mailto:paulawatson@bradfordcityfc.co.uk)**

**Neil Matthews**  
**Academy Manager**  
**07555284391 | [neil.matthews@bradfordcityfc.co.uk](mailto:neil.matthews@bradfordcityfc.co.uk)**

Remember that in an emergency or where there is risk to life you should contact the police immediately.

### **Other Safeguarding contacts in football:**

Whilst any safeguarding concern should be raised with the Club Safeguarding contacts in the first instance we recognise that this may not always be possible or appropriate. Below are the contact details for footballing partners with whom safeguarding concerns in relation to the Club can be discussed:

The English Football League Safeguarding Team

Tel: 01772 325940

Email: [safeguarding@efl.com](mailto:safeguarding@efl.com)

If they concern regards a person in employed in footballs conduct towards a child:

The FA Safeguarding Team

Tel: 0800 169 1863

Email: [Safeguarding@TheFA.com](mailto:Safeguarding@TheFA.com)

### **Procedures and Safety Measures for online learning:**

The Club expects all staff and players to adhere to the relevant policy boundaries must be maintained at all times. We have put extra measures in place to reduce the risks in relation to online learning which include:

- All contact online being observable and interruptible
- Staff and children must wear suitable clothing as should anyone else in the household
- Any computers being used should be in appropriate areas, for example not in bedrooms and the background should not be blurred
- Online teaching will not be carried out on a one to one basis and will be done in a group setting with several players present,
- Another adult will be invited to be present in the room
- All communication provided will have an educational purpose
- Language must be professional and appropriate, including any family members in the background
- The Club will record online teaching/instruction sessions. Players and parents will be informed that sessions are being recorded in advance of doing so.
- All sessions provided will be via the Clubs I.T platform (for example remote desktop) or Wi-Fi (where possible)



**Mental health:**

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of us all. Players who are struggling under the current circumstances should contact the Club safeguarding staff as outlined above. Support can also be accessed through a number of national organisations including:

The Samaritans	Tel: 116 123	<a href="https://www.samaritans.org">https://www.samaritans.org</a>
ChildLine:	Tel: 0800 1111	<a href="https://www.childline.org.uk">https://www.childline.org.uk</a>
NSPCC:	Tel: 0808 800 5000	<a href="https://www.nspcc.org.uk">https://www.nspcc.org.uk</a>
Mind:	Tel: 0300 123 3393	<a href="https://www.mind.org.uk">https://www.mind.org.uk</a>
PFA:	Tel: 07500 000 777	<a href="https://www.thepfa.com/wellbeing">https://www.thepfa.com/wellbeing</a>
Club Chaplain: Ollie Evans	Tel: 07596 694758	

**Online safety:**

It is important that internet safety and security messages are re-enforced during this time when we are expecting young people to be online more often. They may also be increasing their usage on devices during their own free time during this lockdown period. It is important that both players and parents are aware of the help and support available should they be concerned about something they have seen or experienced online. These include:

UK Safer Internet Centre	<a href="https://reportharmfulcontent.com/">https://reportharmfulcontent.com/</a>
CEOP	<a href="https://www.ceop.police.uk/safety-centre/">https://www.ceop.police.uk/safety-centre/</a>
Internet Matters	<a href="https://www.internetmatters.org/">https://www.internetmatters.org/</a>
NetAware	<a href="https://www.net-aware.org.uk/">https://www.net-aware.org.uk/</a>
ParentInfo	<a href="https://parentinfo.org/">https://parentinfo.org/</a>
ThinkuKnow	<a href="https://www.thinkuknow.co.uk/">https://www.thinkuknow.co.uk/</a>

